



Application Reference: P0421.25

Location: Farnham and Hilldene Estate, Romford

Ward Heaton

Description: Hybrid Planning Application for the comprehensive redevelopment of the Site and demolition of existing buildings and structures (excluding the Harold Hill Library) including:

- i) Full planning permission for the erection of one building (Block A) comprising residential use, retail/commercial (Use Class E) use, community use, hot food takeaway (sui generis) and public house (sui generis), landscaping, car and cycle parking, highway works including alteration to the existing vehicular access on East Dene Drive, Hilldene Avenue, and other associated works.
- ii) Outline planning permission with all matters reserved (except for access) for the erection of buildings comprising residential use, retail/commercial space, sui generis and community use, enhancements to the external elevations of Harold Hill Library, open space and landscaping, car and cycle parking, highway works, and other associated works.

Case Officer: Richard Byrne

Reason for Report to Committee: The application is referable to the Mayor of London under the Town and Country Planning (Mayor of London) Order 2008.

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

1.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- 1.1 This report sets out the detailed considerations for the hybrid planning application for the Harold Hill District Centre. The application is for the comprehensive redevelopment of the site which forms part of the Havering's '12 Estates' regeneration strategy. This application follows the recent approvals for the Family Welcome Centre on the northern side of Hilldene Avenue and the affordable led residential scheme on the southern side of Chippenham Road.
- 1.2 The scheme proposes the demolition of the existing centre where the Harold Hill Library will be retained and for the redevelopment to deliver up to 481 homes, between 6,204 sqm and 6,504 sqm maximum (GEA) of flexible commercial and community floorspace, public and private open space, highways improvements, landscaping and other benefits.

- 1.3 The approach to site layout, height and massing represents an acceptable approach given the location of the site. This initial scale and design was also reviewed by Members of the Strategic Planning Committee and the Council's Quality Review Panel.
- 1.4 The proposed development would uplift the number of homes within the reimagined centre securing the provision of onsite affordable housing. Overall, the number of units proposed would positively add to the Council's housing delivery targets and would include those existing residents who have a 'right to return'.
- 1.5 Officers consider that the proposal would protect the natural and built environment in accordance with the principles of sustainable development and meet an identified housing need including a significant proportion of affordable housing. The proposal is sustainable in terms of transportation and would not have undue impact on the visual character of the area.
- 1.6 The proposed development of the site would result in a modern, contemporary design that responds positively to the local context, and would provide appropriate living conditions which would be accessible for all future occupiers of the development.
- 1.7 The recommended conditions and Heads of Terms would secure future policy compliance by the applicant on the site and ensure any adverse development impacts are mitigated.
- 1.8 Officers consider the proposal to be acceptable, subject to no contrary direction from the Mayor for London, the prior completion of a Section 106 legal agreement pursuant to the Town and Country Planning Act 1990 (as amended) and all other enabling powers and the planning conditions listed below.

2.0 RECOMMENDATION

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

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

Affordable Housing

- The two components (full and outline) to provide 53% affordable housing (57% by habitable room)
- A tenure mix comprising 60% Social Rent/London Affordable Rent and 40% intermediate.
- Early, Mid and Late Stage Viability Review Mechanisms to be applied.
- Phasing of Affordable housing delivery
- Affordable housing rent levels secured
- Shared ownership units maximum combined income £90,000
- Shared ownership annual housing cost no more than 40% of value
- Affordable housing breakdown and unit location
- Limitation on service charges for social rented units

Biodiversity

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

Carbon offset

- Submit an updated energy statement for the full component (£115,563 – indicative sum)
- Submit an energy statement upon submission of each phase and/or reserved matters;
- To pay the carbon offset contribution for the full component and then each subsequent phase / reserved matters

Community Use and Commercial/ Retail Strategy

- Submission of an overarching Community Use and Commercial/ Retail Strategy which would inform how the strategy would be set out for Phase 1 / Block 1 and for the approach for each phase/reserved matters;
- Before the submission of each Reserved Matters / Phase a Community Use and Commercial/ Retail Strategy is submitted which links to the approach (as above) and how the objectives are achieved for the particular Phase/Reserved Matters.
- Operators to comply with the Healthier Catering Commitment standards.

Education provision

- To make a contribution of up to £2,472,368 for primary and secondary school places

Employment

- Submission and approval by the council of a training and recruitment plan with target/s for the recruitment of local residents
- Submission and approval by the council of an education commitments Plan with for skills training roles for local residents
- Provide Skills Training Roles for construction apprenticeships
- Secure that at least 20% for local suppliers during the construction.
- In the event that the skills training roles have not been achieved in relation to a phase and/or the target for employment to local residents (local labour target of 20%) are not achieved and/or 20% of local suppliers 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

Health Contribution

- A contribution of up to £209,568 would be required to mitigate the impact of the residential development on health infrastructure.

Highways

- The provision of 2 car club space on the site and 2 years free membership for future residents to the Car Club;
- Submission of Travel Plan. The full travel plan should include car and cycle parking monitoring;
- Payment of a Travel Plan Monitoring Fee of £5,000 for the purposes of monitoring the operation and effectiveness of the travel plan;

Legal Costs, Administration and Monitoring

- A financial contribution (to be agreed) to be paid by the developer to the Council to reimburse the Council's legal costs associated with the preparation of the planning obligation (irrespective of whether the agreement is completed) and a further financial obligation (to be agreed) to be paid to reimburse the Council's administrative costs associated with monitoring compliance with the obligations.
- 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.

Management and maintenance of Public Open Space and Play Space

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

Offsite Play Space

- Details to show play location, area and types of equipment to suit identified age groups

- b) That the Director Planning is delegated authority to issue the planning permission subject a legal agreement or unilateral undertaking whichever is the appropriate legal mechanism and the imposition of the conditions [and informative notes] below to secure the following matters:

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. Phasing Plan
7. Design Code
8. Site and Floor levels
9. Maximum number of residential units (481)
10. Minimum non-residential floorspace
11. Partial Discharge – Allows for Phasing of development
12. Approval of Materials
13. Wayfinding Strategy
14. Access to Phases
15. Accessibility and Management Plan
16. Car parking design and management plan
17. Occupier and Visitor Cycle Parking
18. Boundary treatments
19. Secure by Design
20. Accessibility and Adaptability – M4(2) and M4(3) housing
21. Refuse Storage and Segregation for Recycling/Refuse Collection Strategy
22. Energy strategy
23. Energy compliance
24. Future District Heating Network (DHN) Connection
25. Overheating modelling
26. Urban Greening Factor
27. Accordance With Ecological Appraisal Recommendations
28. Construction Environmental Management Plan for biodiversity
29. Biodiversity Enhancement Strategy
30. Concurrent With Reserved Matters: Biodiversity Net Gain Plan
31. Landscape And Ecological Management Plan (prior to works and with REM)
32. Habitat Management and Monitoring Plan (HMMP)
33. Nesting Birds and Bat Roosts
34. Bird Hazard Management Plan
35. Protection of Trees
36. Vegetation Clearance
37. Air Quality Assessment
38. Ventilation Equipment
39. Noise levels from plant and machinery
40. Noise from mechanical ventilation
41. Road Noise

42. Hours of Operation- Non-Residential – 0700 to 2300 (Deliveries 0700 to 2100)
43. Lighting Strategy
44. Flood Risk
45. Drainage Strategy based on SuDs Principles
46. Drainage Maintenance
47. Piling (including vibration) Method Statement
48. Non-Road Mobile Plant and Machinery (“NRMM”)
49. Oil Interceptors
50. Contamination Remediation Scheme
51. Unexpected Contamination
52. Construction Environmental and Site Waste Management Plan
53. Recycling and Waste Reporting
54. Whole Life Cycle Carbon assessment
55. GLA 'Be Seen' energy monitoring requirements
56. Demolition and Construction Hours (8am to 6pm Mon-Fri, 8am to 1pm Sat, none Sunday and Bank Holidays)
57. Foundation Design
58. Circular Economy Statement, monitoring report and completion report
59. Satellite Dishes
60. Fire Safety
61. Concurrent With Reserved Matters: Daylight\sunlight
62. Cranes
63. Delivery and servicing plan for residential uses
64. Delivery and servicing plan for non-residential uses
65. Archaeology (Written Scheme of Investigation)
66. Water efficiency
67. Updated commercial strategy

Informatives

1. *Advice for Written schemes of investigation*
2. *Guidelines for Archaeological Projects in Greater London*
3. *advice of the Metropolitan Police Service Designing out Crime Officers*
4. *Thames Water advice*
5. *Carry out a condition survey of the carriageway and footways*

- 2.2 That the Director of Planning is delegated authority to negotiate the legal agreement or unilateral undertaking whichever is the appropriate legal mechanism indicated above and that if not completed by the 31st May 2026 the Director of Planning is delegated authority to refuse planning permission or extend the timeframe to grant approval.

3.0 SITE AND SURROUNDINGS

- 3.1 The application site comprises the Farnham and Hildene shopping centre, situated within the heart of Harold Hill. The shopping centre represents a 'District Centre' serving the wider Harold Hill estate and is identified within the Havering's '12 Estates' regeneration strategy as a key component of the Harold Hill masterplan, alongside Chippenham Road (Phase II) and the under-construction family welcome centre (Phase I).
- 3.2 The shopping centre is arranged along Farnham Road, Chippenham Road and Hildene Avenue in the form of linear parades. The parades are generally four storeys in height, with retail and service uses accommodated at ground floor level and residential flats above. The retail mix is primarily convenience-based, focused on meeting day-to-day shopping needs. A small number of national multiple operators, such as Sainsbury's Local, Iceland and Coop, anchor the centre. These are supported by a broad range of

independent and community-focused traders including convenience stores, bakeries, cafés and takeaways, hair and beauty salons, charity shops and small specialist retailers.

- 3.3 The modest scale and uniform building line maintain a human scale and ensure the centre sits comfortably alongside surrounding housing. Public realm consists of wide pedestrian footways and street trees in places with the Harold Hill Library sitting centrally within the site facing Farnham Road. Customer car parking areas are positioned directly in front of the retail units with areas for servicing and deliveries to the rear with further areas of parking for the apartments above the commercial ground floor.

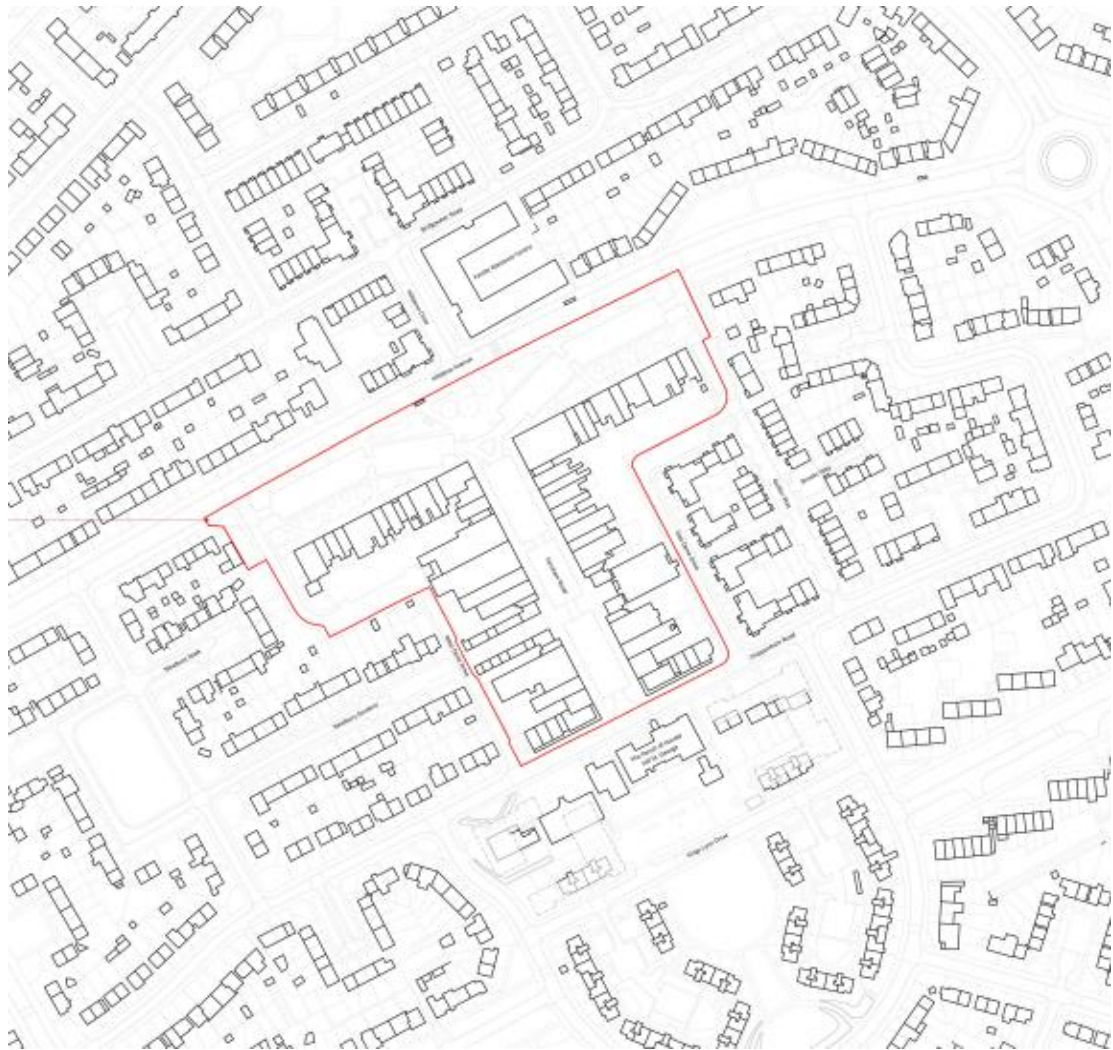


Figure 1: Site Location

- 3.4 The PTAL (Public Transport Accessibility Level) rating of the application site is 2, however, the district centre is served by local bus routes circulating Harold Hill and connecting to Harold Wood Station and Romford town centre.
- 3.5 The centre is surrounded predominantly by residential neighbourhoods which characterise the Harold Hill estate. To the north, east and west the site adjoins established residential streets of two-storey housing interspersed by pockets of open space. To the south is characterised by a mixture of two storey houses and four storey apartment blocks which are due to be demolished to facilitate the recently approved Chippenham Road development for 138 new affordable apartments (Ref: P1150.24).

4.0 DESCRIPTION OF PROPOSAL

4.1 The proposal involves a full redevelopment of the Local Centre where all buildings with the exception of the Harold Hill Library will be demolished to facilitate the following:

- Up to 481 homes
- Between 6,204 minimum and 6,504 sqm maximum (GEA) of flexible commercial and community floorspace
- The commercial and community floorspace is further divided into:
 - Up to 500 sqm of floorspace for Hot Food Takeaway
 - Up to 500 sqm of floorspace for uses involving nail bars, beauticians, launderettes, tanning salons betting shops and taxi hires.
- A minimum of 407 sqm for community uses (excluding the retention of the existing library of 540 sqm)

4.2 This is a hybrid planning application where permission is sought in full for part of the site (shown as Plot A in fig 2) and in outline (Plots B to F in fig 2) with only access to be considered for the remainder (outline element) of the site.

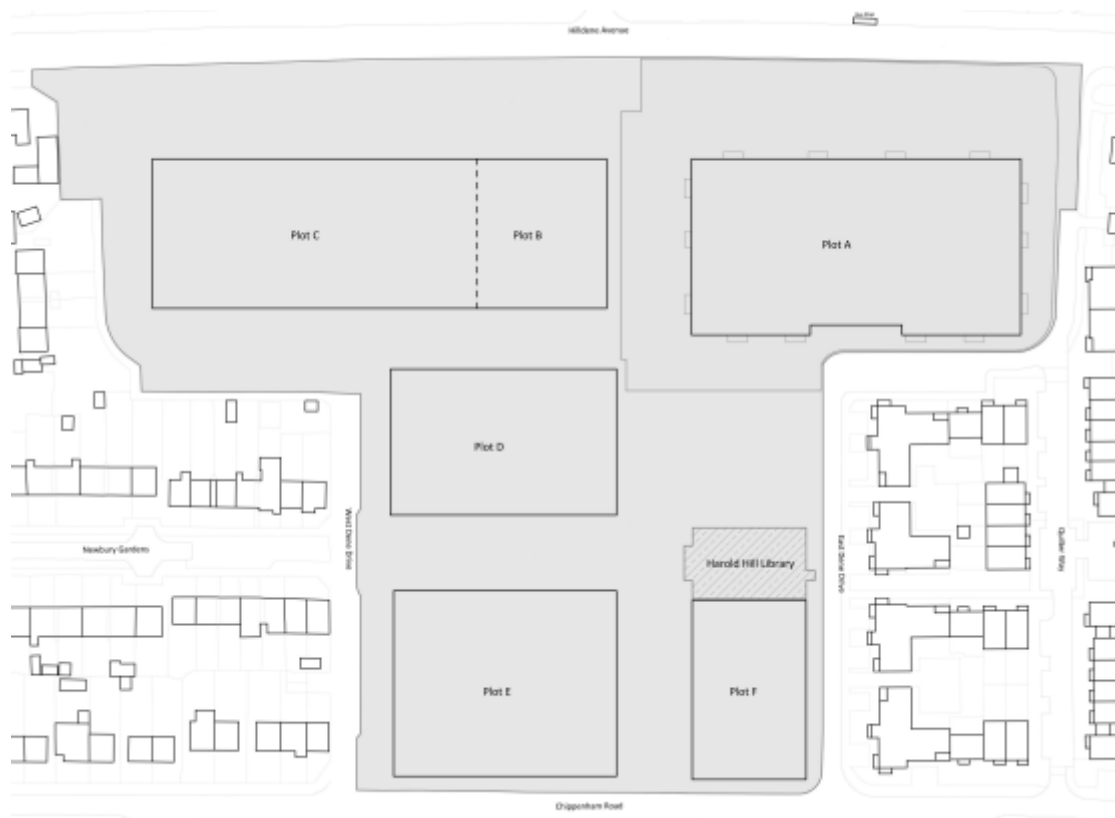


Figure 2: Areas covering the different components of the application

4.3 The quantum of the Full application comprises:

Table 1: Quantum of the Full application	
Component	Total unit/sqm
Social Rent Housing	104
Commercial floorspace (Use Class E); Including a Public House	1,634 sq.m. (GIA) / 1704 sq.m. (GEA) 281 sqm (GIA)
Community use	204 sqm (GIA) / 207 sqm (GEA)

4.4 The quantum of the Outline application comprises:

Table 2: Quantum of the Outline application					
Component	Private	London Affordable Rent	Social Rent	Shared Ownership	Total unit/sqm
Housing	225	17	18	117	377
Non-residential floorspace					Between 4,500 sqm. and 4,800 sqm (GEA)
Enhancements to the external elevations of Harold Hill Library					

4.5 The proposed scheme has adopted a masterplan approach. 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

4.6 The redevelopment of the district centre is proposed to be phased to allow demolition and subsequent construction to take place over key milestones to enable the centre to function while relocating existing commercial tenants and to bring forward the housing in a timely manner. Figure 3 below shows an indicative approach and is shaded to reflect the different phases.

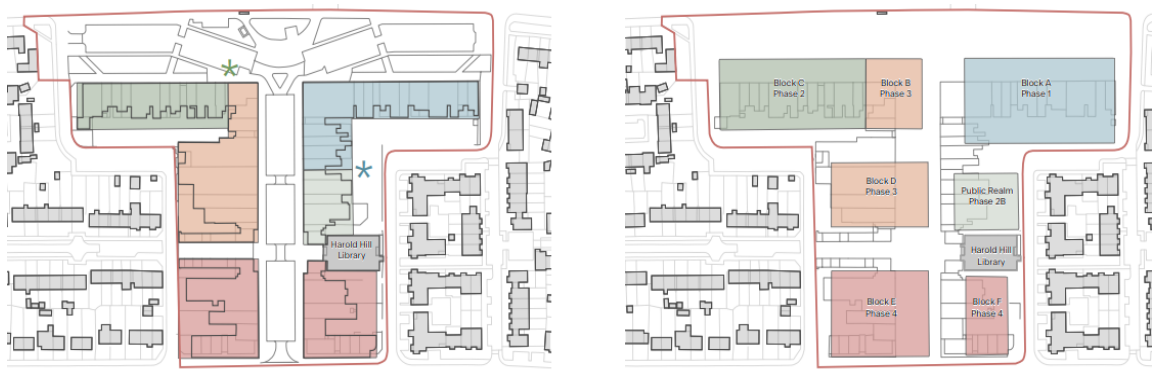


Figure 3: Proposed Phasing Left: Demolition

Right: Construction

Phase I (top right – Block A)

- Demolition of part of the existing northeastern block adjacent Hildene Avenue to create space for the construction of Phase 1.
- Following demolition Phase 1 can be constructed whilst maintaining access and visibility to the stores on the Western side of Farnham Road. Phase 1 provides commercial and community spaces on the ground floor and provides affordable housing on the site (right to return and new tenants).
- Part of the central square provides open space for visitors and residents.

Phase II (Top left – Block C and public realm)

- The north-western part of the existing block is proposed to be demolished whilst not impacting the anchor and independent stores on Farnham Road.
- Phase 2 provides space for the anchor and independent stores on Farnham Road to be relocated onto Hilldene Avenue.
- The central square is completed (between Block A and the north side of Harold Hill Library)

Phase III (Central – Blocks B and D)

- With Phase 1 and 2 complete and accommodating the affordable housing need and key retail frontages, the remaining central parts of the site can be demolished to allow for Phase 3.
- Phase 3 can then be constructed completing the frontage along Hilldene Avenue.

Phase IV (Bottom of site – Blocks E and F)

- The southern part of the site can then be demolished to create the final construction site.
- Phase 4 completes the scheme and redevelopment of the centre

Proposal for Phase I (full application)

- 4.7 The breakdown of unit sizes across Block's A is 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'.

Table 3: Residential Composition of Block A			
Unit Type	Proposed Social Rent	Unit %'age	Right to Return
1B2P	20	19.2	7
2B3P	6	5.8	---
2B4P	27	26	22
3B5P	21	20.2	---
3B6P	25	24	18
4B6P	5	4.8	---
Total	104	100	47

- 4.8 Within Phase 1, permission is sought for 1,634 sqm (GIA) / 1,704 sqm (GEA) of commercial floorspace (Class E use), 207 sqm (GEA) of community floorspace and 281 (GIA) of public house floorspace. 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 north, west and partially along the southern side of the ground floor. The proposed retail, community and food and drink uses have active frontages and public realm access to animate the building and immediate external spaces.

Architecture and materiality

- 4.9 The proposed building steps up in height to a maximum of 6 storeys on the western side of the block and when read in conjunction with the wider masterplan creates height in the central part of the district centre. Block A steps down to a maximum of 5 storeys to the east and to four storeys along the southern side. The massing has been broken up by

building inserts at the corners with a recessed section along the Hilldene Avenue frontage. To the south the height steps down to four storeys to allow light into the central podium garden.

- 4.10 The appearance of the development has been designed to respond to the commercial and community ground floor uses along Hilldene Avenue and Farnham Road (northern end) where the emphasis is placed on creating clear entrance points and proportional frontages with display windows. Above the ground floor the built form includes brick detailing, balconies and rhythmical fenestration which is enhanced by brickwork that has taken design cues from the Chippenham Road development to the south and the Family Welcome Centre to the north.

External areas

- 4.11 Phase I delivers parts of the overall landscape and public realm within the wider site, integrating with the principles of the masterplan for the redevelopment proposal.
- 4.12 The open space has been placed into four-character areas to respond to specific locations, depending on purpose, type of movement and rest places, parking and type of ground floor frontage. A functional street area characterises the relationship between the site edge and Hilldene Avenue. A retail street character area comprising the frontage parking (Hilldene Parade) and retail street (northern end of Farnham Road). A residential garden character area comprises the podium private space for residents with finally a residential street character area which includes part of the central square (northerly area) and remaining of the block A perimeter which faces East Dene Drive.
- 4.13 The character areas will be discussed in more detail later in this report. However, the scheme overall provides private terraces, pockets of lawn areas, a podium garden, children playspace, defensible planting with wayfinding trees, different surface treatments, refuse points, integrated SuDS and seating opportunities.

Access

- 4.14 Vehicular access to Block A is taken from the existing point from East Dene Drive to continue through the parallel parking bays (Hilldene Parade) to then lead west (into the outline component) and south along the re-configured Farnham Road. Alterations are proposed to East Dene Drive; however, the road remains a key route to the south.
- 4.15 Cycle access would follow the vehicular routes with a secondary route created adjacent to the southern edge of the building.
- 4.16 Residential entrances are located on the eastern and western edges of the building for the above first floor apartments onto the northern end of Farnham Road and East Dene Drive leading to lobbies and core lifts/staircases. Individual entrances are positioned along the south serving the terraced houses.

Parking

- 4.17 A total of 61 car parking spaces are proposed, which includes 29 for resident permit holders, 23 for pay by phone and 9 would have a dual use. The parking is located along Hilldene Parade and six bays along East Dene Drive.
- 4.18 All long stay cycle parking bays will be provided within secure locations within the building, whilst short stay spaces will be provided within eyesight of building entrances. 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 4: Full Component Quantum of Cycle Parking				
Use	Long Stay			Short Stay
	Two Tier	Sheffield	Accessible	Sheffield
Residential	158	30	10	---
Retail/Community	18			36
Total	216			36

Delivery & Servicing

- 4.19 The delivery and servicing strategy for the proposed development uses Hilddene Parade (out of hours), a half layby on the northern section of Farnham Road and on East Dene Drive. Routes have been created between Hilddene Parade service road and the footway adjacent to Block A for delivery and refuse routes. The proposed half layby can accommodate a vehicle serving the URS (Underground Refuse Storage) and will ensure that such vehicles do not interrupt the flow of traffic within the site.

Proposal for the Development in Outline

- 4.20 Outline permission is sought for up to 377 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 5: Illustrative Tenure Mix of the Outline					
Unit Type	Social Rent	London Affordable Rent	Shared Ownership	Private	Unit %'age
1B2P	---	---	52	87	38.67
2B3P	4	5	31	58	25.77
2B4P	3	7	21	70	31.11
3B5P		5	7	6	2.67
3B6P	11		3	2	0.89
4B6P			3	2	0.89
Total	18	17	117	225	100

- 4.21 All homes would achieve the minimum space standards and 89% would be designed to meet Building Regulations for accessible and adaptable homes, 11% to be wheelchair adaptable. It is anticipated the outline component would have an average of 74% of homes being dual or triple aspect.
- 4.22 The two components (full and outline) would provide 53% affordable housing (57% by habitable room) with a tenure mix comprising 60% London Affordable/Social Rent and 40% intermediate.
- 4.23 Across the outline component the proposed non-residential offer (a maximum of 4,058 sqm) will comprise floorspace primarily focused on retail and commercial spaces with food and beverage. The outline part of the proposal will also provide community uses comprising a minimum of 407 sqm with the existing library retained (540sqm). The outline development anticipates that non-residential uses, including retail, community facilities, food and beverage functions, will be strategically positioned to maximise accessibility and activity. These uses are likely to be concentrated along key edges and around the central public square to encourage footfall and foster vibrant activity hubs throughout the site.

Retail and commercial units will typically be located at ground level, near main access points, while community facilities are planned adjacent to residential clusters or within the central public realm for ease of access. Uses including nail bars, beauticians, launderettes, tanning salons, betting shops, hot food takeaways and taxi hire (Sui generis uses) are intended to benefit from good visibility and accessibility, supporting social interaction and local needs. Specific locations will be detailed in future reserved matters applications, but the overall design aims to create a lively, integrated environment that maximizes the site's mixed-use potential in a re-shaped District Centres integral within the community.

Parameters

4.24 Five blocks are proposed across the outline component ranging between 6 – 8 storey. The proposed heights are noted below:

- Plot B and C face Hilldene Avenue and bound by West Dene Drive and Farnham Road. The block would have a maximum height of 8 storey
- Plot D is centrally placed between West Dene Drive and the civic square projecting up to 6 storeys
- Plot E is in the southern part of the site bound by West Dene Drive and Chippenham Road with a height of 6 storeys; and,
- Plot F bound by Chippenham Road and East Dene Drive is up to 6 storeys.

4.25 Buildings are arranged which increase in height towards the centre creating a marker on Hilldene Avenue and step down towards the edges (East and West Dene Drive).

Access (indicative)

4.26 The access for the outline component of the application is taken from the existing surrounding roads namely Hilldene Avenue, Chippenham Road, East Dene Drive and West Dene Drive shown on the parameter plan (figure 5) which incorporates the full component of the application.

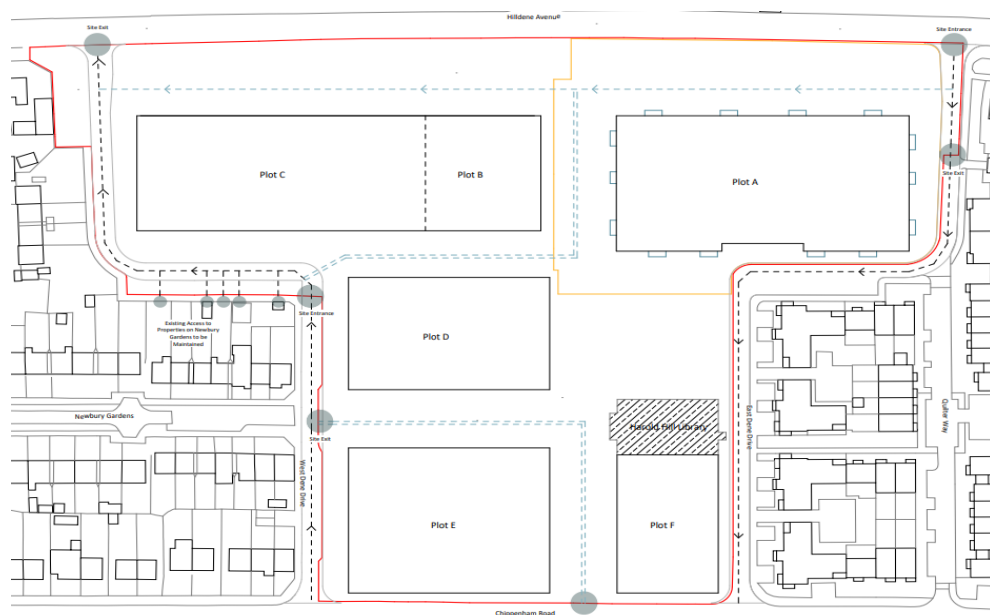


Figure 4: Access points and routes through the proposed development

Parking (indicative)

4.27 The quantum of car parking covering the outline component is set out below:

Table 6: Illustrative quantum of car parking		
Type of Parking	Number of spaces	%'age of Accessible Bays
Pay-by-Phone spaces	A minimum of 79 and a maximum of 86 spaces (excluding dual use spaces)	6%
Permit holder spaces	A minimum of 0.35 spaces per unit (including dual use spaces)	3% – 7%
Dual use spaces	A minimum of 36 and a maximum of 51 spaces	6%
Car Club	2 spaces	---

4.28 The pay-by phone spaces will be used by visitors to the District Centre mostly be located at the north end of the Site, fronting Hilldene Avenue. The permit holder spaces would be available to residents, businesses, domestic carers and health and homecare professionals spread across the District Centre. The proposals include 'dual use' parking spaces on-site, which could be used by both visitors to the Centre, wishing to pay-by-phone, and by permit holders.

4.29 Parking spaces are primarily located close to building entrances and where distances exceed this threshold, resting places have been incorporated into the layout. The current proposals for pay-by-phone spaces and dual use spaces are 20% active EV charging provision and the remaining spaces will be passive provision.

5.0 PLANNING HISTORY

5.1 Given the application seeks the complete re-development of the whole site, the existing planning history for the district centre is not considered relevant to the proposals.

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 2024. The applicant 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.

6.2 Officers agree that the site comprises previously developed land and the principle of the redevelopment of the District Centre with uplift in residential homes is acceptable subject to the application submission demonstrating that the vitality and viability of the centre would be maintained, the 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.

6.3 The proposal was presented to the Havering Quality Review Panel on two occasions with the most recent one being on 14 October 2024. A number of 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 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.

Table 7: Summary of QRP Comments and Applicants Responses (14 October 2024)	
QRP Comments	Applicant Response
Masterplan vision	
Commends the project team for taking a step back to analyse the existing demographics and uses in the Harold Hill District Centre and the wider area that it serves. This has informed a deeper understanding of the role that it plays as a town centre for approximately 20,000 people.	We welcome the updated comments from the QRP, demonstrating the engagement during the pre-application process to address the matters raised at the first QRP meeting.
The development of a masterplan vision is welcome, as a basis for continuing work to establish clear, place-specific aspirations. Although Harold Hill District Centre needs investment, it has been an important hub for the community for many years and remains attractive to major retailers. Protecting this sense of authenticity and providing a meaningful new town centre, will ensure that local people recognise it as their own.	
Building on what works well already will ensure that the centre retains a sense of its identity and purpose throughout the phased transformation. There is an opportunity to translate the learnings from the contextual analysis and community engagement into a unique proposal.	
Sustainability	
Limited information on sustainability was presented at the review, and the panel asks that more detail is provided at a future review. This should include analysis of the feasibility of retaining existing structures.	The Proposed Development is being brought forward to achieve BREEAM principles, maximising energy efficiency and reducing overheating by prioritising passive measures.
While some parts of the Harold Hill District Centre are failing, other parts are successful and could be retained. The panel asks for further exploration of a refurbishment approach. This would reduce embodied carbon, contributing to meeting Havering Council's net zero target.	Heat pumps are proposed as the main heat source for the development it is proposed to install a total of 67 No. photovoltaic panels on the roof of the Block A with a total peak output of 25.5 kW. Although the exact numbers cannot be determined at this stage, it is expected that a minimum of 210 No. photovoltaic panels will be installed across the remainder of the development, providing a total peak output of 79.7 kW.

The panel encourages more ambitious sustainability targets. These should be set at an early stage to become anchors for developing all other aspects of the design.	This approach achieves significant benefits in terms of energy savings for new residents, and carbon savings for the development as a whole, and has been integrated as a fundamental component of the design. The Proposed Development targets a minimum BREEAM rating of 'Excellent', with an overall score of 73.7% currently being targeted.
For example, during the next stage of development, the project team should consider how the window sizes, external shading and balcony designs can contribute to operational performance and internal comfort.	As part of the Detailed Component, the development achieves an on-site carbon reduction of 64% in regulated carbon dioxide emissions over Part L 2021. The Outline Component as a whole is expected to achieve an on-site carbon reduction of 66% in regulated carbon dioxide emissions over Part L 2021.
The project team is also encouraged to develop the proposals for biodiversity net gain and urban greening, retaining as many existing trees as possible.	The Proposed Development creates new public and private environments with a significant uplift in public realm space at ground floor level, including places to play and dwell. The incorporation of landscaping within the public realm, including retention of a large number of existing trees and proposed new trees, rain gardens, amenity grassland and flower-rich perennial planting, results in a net gain of biodiversity of +35% on Phase 1 and an estimated net gain of +95% for the Outline Component. The Urban Greening Factor (UGF) score for Block A is 0.34, and masterplan score is 0.36 following the re-alignment of the road layout fronting Hilddene Avenue to increase the pedestrian footways along Hilddene Avenue to a maximum of 5.5m towards the centre of the scheme to create a safe and accessible environment for pedestrians.
Masterplan layout	
It is positive that the central spine has been retained in the masterplan. The symmetry of this layout has a distinctly 1950s feel, maintaining an echo of the existing layout, which will contribute to the place making character.	The feedback from the QRP is welcome.
The panel also supports the breaking of this symmetry to provide a new public open space on the central axis, next to Harold Hill Library.	The Proposed Development also provides an improved layout to open up the Site and provide additional pedestrian connectivity to the surrounding areas, including East Dene Drive, West Dene Drive, Newbury Gardens, Quilter Way and Chippenham Road.
Harold Hill District Centre currently suffers from anti-social behaviour	

problems along the eastern and western edges where the rear of the housing is not well overlooked. It is important that the masterplan provides clarity around fronts and backs for the housing. The panel recommends further thought about the edges of the scheme to achieve this, especially to the west, where the boundary is adjacent to private gardens and garages. The scheme should establish positive relationships with houses beyond the site boundary.	Vehicular access is submitted in detail for all phases of the development (i.e. it is not a reserved matter). The Proposed Development also results in a good performance of daylight/sunlight on neighbouring properties against the parameter plans, with all windows retaining VSC values that have been outlined as being 'reasonably good' and 'acceptable'. In many cases, the future phases of the scheme will result in smaller massing and further articulation which will likely leave the neighbouring properties with greater levels of daylight amenity.
Masterplan drawings should include the phase 1 and 2 developments to the north and south. This will clarify onwards connections beyond the site boundary that have shaped the layout.	Additional landscaping and tree planting has been proposed around the Site edges, including to the west along West Dene Drive to improve the condition and enhance the relationship with the houses beyond the boundary. The carriageway on West Dene Drive cannot be rerouted as the neighbouring properties have access rights to the gates and garages in this location which need to be maintained. West Dene Drive is also outside the Council's ownership.
The challenge of achieving as many dual aspect homes as possible is acknowledged. While the panel understands the negative community feedback around deck access due to residents' current experience, it thinks that this could still be explored as a potential solution.	The layout has been optimised to maximise the provision of dual aspect dwellings through the use of gallery access and through-homes. The Proposed Development provides 70% dual and triple aspect homes and avoids single aspect north facing homes in order to provide high quality places to live.
The potential for deck access housing to be a good place to live could be illustrated with reference to contemporary precedents. If deck access is not a viable option, the panel asks that any necessary single aspect homes are carefully located to consider orientation and liveability.	There are no north facing single aspect homes within the scheme.
Streets	
The design of streets should reinforce their hierarchy in the masterplan, with primary, secondary or tertiary streets having different characters and widths. The panel would support flexibility on 18m street widths in relation to building heights, if this can be shown to benefit place making. For example, some of the side streets could be narrower to	The proposed layout supports a range of street hierarchies and a well-defined central public space to provide different retail conditions to support the District Centre. This is achieved through the delivery of a courtyard typology configuration that maximises the provision of primary frontages and ground floor active frontages, including commercial/retail and community uses,

create a more domestic sense of containment.	provides high quality residential homes and includes significant provision of public realm through the incorporation of play space, planting and street furniture.
The panel also recommends making the public open space more enclosed through a tighter surrounding street structure, to create the feeling of a civic square. The street to the north of the open space could be downgraded or removed. These spatial gains could also improve the deliverability of the scheme if they can be added to the internal footprints.	The alignment of the road layout fronting Hildene Avenue has been reviewed and the pedestrian footways along Hildene Avenue have been increased to a maximum of 5.5m towards the centre of the scheme to create a safe and accessible environment for pedestrians.
The panel recognises the challenge of providing the necessary parking provision while creating a high-quality public realm. However, the streets are overly dominated by parking and vehicular movement at present.	The Proposed Development encourages and facilitates active travel with convenient and inclusive pedestrian routes, cycle parking and legible entrances to the buildings, which have been aligned with people's anticipated movement patterns within and through the Site. This includes the removal of the existing impermeable layout and opening up the Site to improve connectivity throughout the Site.
The panel recommends removing as much parking as possible from the central spine. It is important that this space functions as effective public realm for the locals who will arrive on foot, rather than prioritising space for those arriving by car to use the shops.	The proposed car parking provision is based on the need for parking to ensure the vitality and viability of the District Centre, and to ensure appropriate provision for new residents that reduces the potential for overspill onto surrounding streets. This will prevent cars parking on surrounding streets, to the detriment of the wider local character. A balanced approach is required within the Site itself, especially given the town centre location and inclusion of significant landscaping.
The panel is concerned about the quality offered by side streets with parking and dead frontages. Further exploration to show the ground floor uses together with the public realm would test the success of the proposals.	The proposed layout supports a range of street hierarchies to provide different retail conditions to support the District Centre. This is achieved through the delivery of a courtyard typology configuration that maximises the provision of primary frontages and maximises ground floor active frontages on side streets, including commercial/retail and community uses, provides high quality residential homes and includes significant provision of public realm through the incorporation of play space, planting and street furniture.
The east-west streets with cars parked on both sides are not an ideal environment for children, and could be worsened by delivery vehicles loading and unloading. The panel encourages the project team to prioritise child	The Proposed Development defines public and private environments as the wider Site provides a significant uplift in public realm space at ground floor level, including places to play and dwell. The incorporation of landscaping within the public realm, including

friendly design, as streets that work for children are likely to work for all. The panel suggests making the two 'L'-shaped routes around the blocks on the western side of the masterplan pedestrian only, or if that is not feasible, making them accessible by car to residents only.	existing and proposed trees, rain gardens, amenity grassland and flower-rich perennial planting, will help to soften the proposed townscape and contribute to a more integrated appearance. The proposed courtyard typology allows a large quantum of private amenity space/environment to come forward as part of the masterplan, acting as a safe space for residents. Private environments include the courtyard gardens and roof terraces which are separate from the wider Town Centre and are only accessible for residents which creates safety and privacy benefits across each of the proposed buildings. This space allows the provision of secure play space and additional planting and landscaping to improve the environment for future residents. The massing has been reviewed to change the hierarchy of streets and increase podium play.
Sections through each street would help to determine the appropriate amount of space for walking, playing, retail spill-out, greening and servicing. These decisions, plus the microclimate conditions and the street width will help to create the character of each street.	As the proposal evolves further thought is needed on the fronts and backs of the retail units facing Hildene Road to find the best locations for entrances and servicing.
The Proposed Development facilitates efficient servicing, maintenance and deliveries as the residential waste will be dealt with via the Underground Refuse System (URS) containers and internal waste stores. This ensures that active frontages can be maximised around the Site. Delivery and servicing activity for the residential, retail / commercial and community uses in Block A will be undertaken on-street via two half lay-bys at the east and west edge of the Phase 1 site. The proposed layout includes half lay-bys which would be used by delivery vehicles and waste collection vehicles accessing the residential units and retail / commercial units. The design of the half lay-bys, approximately 1m in width and 15m in length, would ensure vehicles stopped in these lay-bys would not block general traffic using the 6m wide carriageways, and would not impede access to adjacent car parking bays. Further details of the servicing arrangements are set out in the Delivery and Servicing Management Plan (contained within the Transport Assessment), prepared by WSP.	
Landscape and play	
As design work continues, the landscape proposals should be	The proposed architecture is of a high quality and has been designed to pay attention to

developed to define the various character areas and what type of spaces they offer. The architecture can then be developed in response to the unique conditions of each street or space.	detail. A materials palette has been developed that responds to the local character and comprises complementary materials selected across each of the three buildings. The material palette has been chosen using complementary tones, materials that define uses, robust high-quality materials, and tactile materials and details at locations with human interaction. All buildings are proposed to comprise primarily of brick with shades of brick defining the base and creating variation at the upper levels. This is further reinforced by the delivery of a landscape-led masterplan, which adds significant new hard and soft landscaping suitable for a town centre location, tree and shrub planting, amenity grassland and play space to embed the Proposed Development into its immediate context.
The panel welcomes the addition of a public open space to the north of Harold Hill Library off the central axis. There is a significant amount of green space in the wider area, but not of this type, and it will complement the surrounding community and commercial uses.	We welcome the feedback from the QRP on this and agree that the central public open space will be a high-quality space.
The play strategy diagram appears to be counting every available space, including some narrow slithers. The panel questions how usable some of these smaller spaces will be.	The detailed Phase 1 application proposes to deliver 1,293 sqm of play space, against a policy target of 1,332 sqm. In total, combined with the outline scheme the development proposes a total of 2,373 sqm of play on site (including all doorstep play for under 5-year-olds) against a requirement of 2,825sqm. While this is an under provision against policy targets, the remaining provision for age groups 5-11 and 12+ (c.479 sqm) is proposed to be provided within Newbury Gardens which is a green space within a 250m walk.
It suggests developing a play strategy with a clearer sense of scale, as well as an understanding of how the different spaces connect and what they offer for various age ranges.	
Height and massing	
The eight-storey block will cross the height threshold requiring a second stair core to meet current fire safety building regulations. The project team could consider increasing the height slightly further if it would make the scheme more affordable. However, any increase would need to be balanced with the impact of parking ratios and overshadowing on the public realm.	Phase 1 of the Proposed Development will comprise the erection of one building (Plot A) up to 6 storeys in height (proposed height of 17.75m to finished floor level of sixth storey and maximum overall height of 23m). The indicative scheme (Phases 2-4) proposes five further buildings (Plot BF) up to 6-8 storeys in height, with the tallest elements located at the centre of the Site, stepping down towards the Site's edges.

	Each block has been designed to accommodate a second stair core. A Fire Statement has been prepared and submitted to support the application. The proposals provide a design which is suitable meets Policy D12, and Policy D5 of the London Plan 2021 as well as meeting the functional requirements of Schedule 1, Part B of the Building Regulations as required.
Architecture	
The panel recommends that the masterplan vision and key moves, such as the street hierarchy, are settled before further exploration of architectural character.	The proposed layout supports a range of street hierarchies to provide different retail conditions to support the District Centre. This is achieved through the delivery of a courtyard typology configuration that maximises the provision of primary frontages and ground floor active frontages, including commercial/retail and community uses, provides high quality residential homes and includes significant provision of public realm through the incorporation of play space, planting and street furniture.

- 6.4 The scheme was subsequently presented to SPC Members on Thursday 14 November where the comments are noted below.

Table 8: SPC Developer Presentation Comments and Applicant response 14 November 2024	
SPC Comment	Applicant Response
Images used in the presentation show a number of units with roller shutters drawn, which appears to present a rather negative impression of the 'health' of the district centre whilst it is accepted that there is an issue of anti-social behaviour and overprovision of parking.	This is noted. The images included in the Masterplan Design and Access Statement show a variety of photos of shops taken during the day, with the majority of the shops shown as open. The proposed shopfronts will create a high quality and legible high street along Hilldene Avenue and both sides of Farnham Road which supports the appearance and viability of the Town Centre. The approach to shopfront design is set out in further detail within the Site-Wide Design and Access Statement.
Encouraging that the post office is retained and would like the banks to be retained and the library to be more prominent	The existing tenants will be offered space within the Proposed Development. It is a matter for each business whether they choose to take up this offer as commercial businesses, and it is not within the Applicant's control to require any business to stay on the Site.

	The library is proposed to be retained and will benefit from new central public space located adjacent to the existing library.
Reassurance with what is happening around the War Memorial	The War Memorial is retained within Hilldene Landing to the northern end of the Site. This space is intended to provide a physical place for remembrance, allowing people to honour and reflect on the lives of those lost. The redesign of the War Memorial area will bring more attention and prominence to the area. One of the key ways this will be achieved is by relocating the memorial stone to a central position within the historic garden.
What would the access be to the playspace for all abilities	As set out within the Landscaping Strategy, the detailed Phase 1 application proposes to deliver 1,293 sqm of play space, against a policy target of 1,332 sqm. In total, combined with the outline scheme the development proposes a total of 2,373 sqm of play on site (including all doorstep play for under 5-year-olds) against a requirement of 2,825sqm. While this is an under provision against policy targets, the remaining provision for age groups 5-11 and 12+ (c.479 sqm) is proposed to be provided within Newbury Gardens which is a green space within a 250m walk.
Opportunities to address anti-social behaviour with the current poor layout	The Proposed Development has been designed to provide additional active retail frontages along Hilldene Avenue, in addition to West and East Dene Drive. Landscaping and improved site connections also provide additional pedestrian activity, resulting in an enhanced natural surveillance to deter anti-social behaviour. The proposed public realm also improves site permeability and connecting into the surrounding network of footways and cycleways to deter anti-social behaviour.
Members would like to clarify if the parking spaces are going to be allocated to an individual or on a first come first serve basis	The parking spaces will be available to existing residents, businesses domestic carers and health and homecare professionals permit holders, who would be able to park in any space. This is the same as the existing arrangement on the Site.
What provision are going to be put in place for rubbish collections	The proposed layout includes half lay-bys across the Site which would be used by delivery vehicles and waste collection vehicles accessing the residential homes and retail units. The design of the half lay-bys, approximately 1m in width and 15m in length, would ensure vehicles stopped in

	these lay-bys would not block general traffic using the 6m wide carriageways, and would not impede access to adjacent car parking bays. In accordance with the LBH guidance on waste collection, the distance between the bin stores and the residential units should target 30m, and the distance between the bin stores and the waste collection vehicle should be no more than 25m. The Underground Refuse System (URS) bins for the residential homes are located next to each residential lobby for easy access for residents, and a half lay-by is provided next to each set of bins for the waste collection vehicle to use. The waste collection strategy has also been discussed with LBH. The waste collection vehicle will use stabilisers when collecting waste. The stabilisers will protrude approximately 1.5m from either side of the vehicle, therefore a half lay-by has been proposed to ensure a clear width of 3m is retained for general traffic to pass. Therefore, the half-laybys are required to ensure the waste collection vehicle is able to stop next to the URS bins and not block general traffic passing in the 6m wide carriageways.
Accessibility for those with mobility issues for waste collection especially for bringing waste to the ground floor. Whether there is an opportunity to consider this into a management scheme	Waste storage in Plot A (Phase 1) is offered as an additional ground floor use, alongside cycle parking, plant rooms and residential cores. This space will be accessible to all residents.
Members sought confidence of how trade waste is managed including details around storage	Commercial waste for Block A will be accommodated within each premises as part of their fit outs and collected at designated external locations on the agreed collection days. It will be written into the commercial tenant's standard lease that all waste will have to be stored within the tenant's demise and only put out on-street during scheduled waste collection periods. With regard to commercial waste for the retail units, this will be stored within each retail unit and collected by a private contractor who would also use the half lay-bys. The waste collection vehicle will stop in the carriageway when collecting waste from units on the north and south sides of Block A, on Hildene Parade and East Dene Drive respectively, and will use the half-laybys next to the east and west sides of Block A when collecting waste for commercial units on these sides.

	A Commercial Waste Management Strategy will be provided with each future Reserved Matters application for each of the future phases to set out the waste strategy for these phases.
Observations on loss of retail floorspace and whether that works commercially and wanting to understand as part of the submission. Furthermore, is there sufficient capacity for on-street parking spaces and for the increase in visitors to the District Centre.	The Retail Strategy, prepared by Savills and MAPP, identifies a vacancy at risk rate of 36%, and justifies that a reduction in floorspace is broadly in line with the demand for UK retail floorspace, which is set to reduce by an average of 25% over the next decade. The general trend for a reduction in floorspace need is broadly based upon the rise of e-commerce, a significant reduction in retailer margins due to cost inflation meaning more spend is required to support profitability, local convenience retail only accounting for a 'top up' component of in-store spend (typically in the region of 20-25% spend), and reductions in footfall since the COVID-19 pandemic, averaging 30% in town centres and 10-15% in local centres. The footfall data at Harold Hill (2018-2023) has been reviewed and has registered a reduction of 15%. The reduction in floorspace would be in line with this, at a 26-30% reduction overall, or 31% for the illustrative masterplan. 130 car parking spaces are proposed in total for retail parking, split by 32 for Building A and 98 for Buildings B-F.
Members would like to see the amount of social rent units being increased at the expense of Shared Ownership units for which there is much less demand. In addition, would like to see the number of three-bedroom units increased.	The Detailed Application (Phase 1) comprises of 100% social rent units, and the Illustrative Scheme comprises 25% social rent units. The London Borough of Havering considers family housing as units with 3 bedrooms or more. 49% of units (51no.) in Phase 1 comprise of family-sized housing and in the illustrative scheme, 18.7% (90no.) of units have 3 or more bedrooms. The majority of the 3-bedroom homes are proposed to be affordable (90%) and therefore, seek to meet the high level of demand for affordable 3-bed properties as indicated by the key findings of the Outer North East London SHMA.
Reassurance wanted that there is sufficient bus capacity as it is observed that uses are currently running full at times and what	The Transport Assessment confirms that although there would be an increase in trips on public transport, this would only lead to a negligible increase in additional trips in the peak

measures will be taken to increase capacity.	hour. There is therefore sufficient capacity on buses.
Invitation to consider how would the fronts and back of retail units be treated that face Hilldene Avenue and picks up on the observations from the QRP report.	Active frontages have been maximised within the Proposed Development. These active frontages will be further enhanced through the approach to shopfront design is set out in further detail within the Site-Wide Design and Access Statement. In addition to this, it should be noted that most of the back-of-house areas would be contained under the podiums of the proposed buildings, thereby reducing the extent of inactive frontage associated with servicing the commercial spaces. The Proposed Development facilitates efficient servicing, maintenance and deliveries as the residential waste will be dealt with via the Underground Refuse System (URS) containers and internal waste stores. This ensures that active frontages can be maximised around the Site. Delivery and servicing activity for the residential, retail / commercial and community uses in Block A will be undertaken on-street via two half lay-bys at the east and west edge of the Phase 1 site. The proposed layout includes half lay-bys which would be used by delivery vehicles and waste collection vehicles accessing the residential units and retail / commercial units. The design of the half lay-bys, approximately 1m in width and 15m in length, would ensure vehicles stopped in these lay-bys would not block general traffic using the 6m wide carriageways, and would not impede access to adjacent car parking bays. Further details of the servicing arrangements are set out in the Delivery and Servicing Management Plan (contained within the Transport Assessment), prepared by WSP.
What provisions would be in place to deal with food waste.	Appropriate storage space for the separation of dry recyclables and food waste is provided in homes.
Clarification for on site management of the District Centre, would there be an office for the centre manager and also one for the police on site and if the centre would be covered by CCTV.	The design and layout of the masterplan has been carefully developed in line with Secured by Design principles and Metropolitan Police to provide a safe, well-managed environment. The existing town centre is not a shopping centre and so does not have a centre manager. The Proposed Development will replicate this arrangement. It is expected that crime and anti-

	social behaviour will mostly be deterred by the greater provision of active frontages and passive surveillance, and through Secured by Design measures. CCTV will be addressed through detailed design in liaison with the Secured by Design officer.
More details required on EV charging	The proposed EV parking provision is 20% active charging spaces with passive provision for all remaining spaces.
More details required on wayfinding across the District Centre	The proposed development and the new public realm will create high value community spaces and add architectural quality to the streetscape. In its immediate surroundings, the proposed development will act as a wayfinding marker signalling the new, revived, vibrant district centre. aiding with the wayfinding of the Site with the surrounding street network. Trees will also act as a wayfinding device and define the character across the different areas of the site.
Members would like the community to be involved with the installation of public art	The Applicant has developed a Community Uses Evidence Base and Principles document which sets out how the community will be engaged on the provision and design of community spaces.
Understanding and inviting consideration of infrastructure upfront so it is incorporated into the public realm including electric supply for any events held in the public spaces	The Applicant has developed a Community Uses Evidence Base and Principles document which includes consideration of the design of the public realm. It is expected that any external events will be powered by external generators.
Are there sufficient school place available to accompany the level of development	The Applicant considers that there would be a shortfall of 8 secondary school places in Year 7 and of 2 SEND spaces. This provision can be accommodated in the Council's £66 million investment in school expansion. Any funding for expansion of school places should be addressed through CIL – of which the development is providing an estimated £2.8 million – noting that the Proposed Development is reliant entirely upon grant funding to be delivered, which must be used to maximise affordable housing provision.
What considerations have been made for fire safety and emergency service provision	With regards to Phase 1, the building has been designed to minimise the risk of fire and includes fire detection systems, fire suppression systems, smoke ventilation systems and other emergency measures. Similar fire safety systems are

	detailed for Buildings B-F and are outlined in the Fire Statement.
How are the parking spaces treated to enhance the quality of these spaces and how they manage surface water	A tanked permeable paving (system C) is proposed to be used in all car parking areas and most pedestrian areas. 30% void volume in subbase is to be used as part of the attenuation.
Members seek further information for rainwater harvesting	A Drainage Strategy has been prepared by Evolve which confirms that rainwater is being collected and re-used for irrigation within the proposed green roof systems, which are included on all new buildings. Each green roof includes an egg-crate type storage layer which captures and permanently stores rainwater for passive irrigation of the soil layers above. No further rainwater harvesting is proposed given the significant challenges of incorporating this on site and the very limited benefit this would provide.
Members would like the opportunity for residents to become more involved to create the character and sense of place	Several public and retailer consultation events have been undertaken in June and November 2024. In addition to extensive retailer and shopkeeper consultation, Publica engaged with local stakeholder and community groups to understand the site's context and how local groups may be able to operate as part of the Proposed Development. This is further detailed in the Community Uses Evidence Base and Principles, prepared by Publica.
Would need consideration if there are intended to be ground floor residential units in respect to how they can be adequately ventilated and that they have sufficient defensible space where doors / windows opening on to public space.	All residential dwellings tested have been modelled with natural ventilation via fully open windows/doors and increased mechanical ventilation to demonstrate that passive measures have been maximised and the façade design has been optimised. All homes have sufficient defensible space to ensure privacy.

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 proposal is a Schedule 2 development (10b) of the EIA Regulations.
- 6.7 The proposed development has been screened in accordance with the EIA Regulations and considered in cumulation with existing development and the proposed development in the vicinity. The assessment concludes that the proposal, whether alone or in cumulation with the existing and proposed development, would be unlikely to give rise to effects on the environment that cannot be adequately assessed through the normal planning application process.
- 6.8 In light of the above considerations and the relatively low impacts which the development would have on environmental resources in the locality and on a wider scale, the proposed development would not constitute Environmental Impact Assessment (EIA) Development and an Environmental Statement (ES) would not therefore be required.

7.0 CONSULTATION RESPONSE

- 7.1 A summary of the consultation responses follows with the Officer comments (where relevant).

Table 9: Summary of Statutory and Non-Statutory Consultees	
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	Summary of response: Land use principles: Comprehensive redevelopment of the estate and Harold Hill Town Centre is proposed. Full redevelopment could be supported, subject to full demonstration of suitable measures to manage the social and environmental impacts. Reduction and consolidation of town centre floorspace must also be appropriate locally with suitable measures identified and secured to manage impacts. An update on the matter will be provided at Stage 2. Affordable housing: 57% affordable housing by habitable room (53% by unit) is proposed overall, at a tenure split of 53% Social Rent, 7% London Affordable Rent, and 40% Shared Ownership. This comprises 104 social rent units within the detailed phase and up to 256 affordable housing units overall. A viability assessment is being robustly interrogated by GLA officers, early, mid and late-stage reviews are required. Urban design: Whilst not in an identified tall building location, the approach to massing and building heights is broadly supported at this stage, along with the development and building layout. Concerns with extensive surface parking and its impact on the public realm proposals remain unresolved, however with the

	quality of the public realm considered an important contributor to long-term town centre health and vitality. Further improvement is sought with suitable measures secured in the Design Code. Other issues on equalities, transport, sustainable infrastructure and environmental matters also require resolution prior to the Mayor's decision making stage.
Historic England (Archaeology)	No objection Two-stage archaeological condition is advised: Stage 1: Submit and approve a Written Scheme of Investigation (WSI) before any development. Stage 2: If archaeological interest is found, a second WSI must be submitted and approved,
HSE - Gateway 1 (Fire Statement)	No objection in principle <u>Full Planning Application</u> Block A is not a relevant building, however, HSE are content with the fire safety design as set out in the project description, to the extent it affects land use planning conditions. <u>Outline Application</u> HSE is unable to comment in full on the outline application, however, it is recommended a condition to secure the submission of a fire statement with any reserve matters and is consulted in conjunction with the LPA.
LBH Education	No objection, subject to a contribution towards education The proposed development will generate an additional 30 Primary aged children, 57 secondary aged children and 2 SEND children in an area where we are projecting a deficit of places.
LBH Environmental Health	No Objection Phase I Risk assessment conditioned acceptable; Ari Quality Assessment is satisfactory Noted proposals have been made for dust mitigation, however, dust management plan is required. Required Conditions: • Submission of Phase II and III Investigation • Unexpected contamination • Accordance with air quality assessment • Approval of dust management plan • NRMM
LBH Waste & Recycling	No objection
Lead Local Flood Authority	No comment
LFEPA - Water Office	No objection No additional hydrants are required

	Conditions to ensure development does not affect hydrants
London Fire Brigade (Fire Statement)	No further observations to make
NHS	No objection subject to a contribution for the primary care cost associated with the development, as calculated by the HUDU model.
Place Services - Ecology	No objection Sufficient ecological information is available to support determination. Mitigation measures must be secured by condition to protect designated sites, Priority species, and habitats. • Implementation of mitigation measures from ecological reports. • Construction Environmental Management Plan (CEMP) for biodiversity. • Biodiversity Enhancement Strategy (e.g., bird/bat boxes, bee bricks). • Landscape and Ecological Management Plan (LEMP) for long-term habitat management. • Optional: Habitat Management and Monitoring Plan (HMMP) for 30-year monitoring
Place Services – Landscape	No objection in principle Overall, it is welcomed the re-development of the site and consider the proposals generally acceptable. It is encouraged the scheme to provide a stronger central spine, responding more closely to the Design Code prior to approval. While the Full aspect of the site (Block A) is generally acceptable, it is encouraged an integrated approach to the public realm interface between Farnham Square and Phase 1 and improvements towards the hybrid landscape strategy to achieve the 0.4 UGF score required by Policy G5. There are concerns regarding the parameters of the outline aspect (Block B-F) and recommend a reduction in heights or alternative roof aspects to reduce the impact on visual amenity from long distance views.
Sport England	No objection • Understood that Havering is a CiL charging Authority and as such any contributions must be in accordance with the CiL Charging Schedule
Thames Water Dev. Control	Comments provided requiring the submission of foul water capacity, establishing surface water capacity in the area and general advice
Transport for London	No objection Recommends conditions for: • Parking Design and Management Plan

	• Cycle parking details • Further work is required on the trip generation • A full Travel Plan should be secured, enforced, monitored • A Delivery and Servicing Management Plan should be secured by condition. • A detailed CTMP should be secured by condition
UK Power Network	Provides general advice as the proposed development is in close proximity to a substation.

8.0 LOCAL REPRESENTATION

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

8.2 16 comments, two objection and 1 in support being have been received via the Council's publicity process.

Table 10: Summary of Representations
Seek clarification on relocation plans and if sufficient in size
Wish for a smooth transition from the current unit to new location
Fantastic opportunity to bring life and a future to the area
The proposal would represent a significant loss in floorspace for primary and secondary frontages. This would be contrary to paragraph 90 of the NPPF as it would harm the vitality and viability of the centre
The reduction in floorspace will limit future potential of the District centre and not allow it to grow and diversify in a way to respond to rapid changes in retail and leisure industries
The reduction in scale would inhibit how the centre serves the community and this is not justified in the submission.
There is no detail in the submission (as part is in outline) how the retail units would be suitable with how servicing and loading areas would work for retailers.
There is no commitment as to the size and type of retail units and whether they would meet the needs of a convenience retailer
The introduction of further residents in the new apartments would exacerbate the issue
The proposal would have a damaging effect on the District Centre as a retail location threatening the Centre's convenience offer.

9.0 RELEVANT POLICIES

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

National Planning Policy Framework (2024)

The National Planning Policy Framework (NPPF) sets out Government planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced. Themes relevant to this proposal are:

Chapter 2 - Achieving sustainable development
Chapter 5 - Delivering a sufficient supply of homes
Chapter 6 - Building a strong, competitive economy
Chapter 7 - Ensuring the vitality of town centres
Chapter 8 - Promoting healthy and safe communities
Chapter 9 - Promoting sustainable transport
Chapter 11 - Making effective use of land
Chapter 12 - Achieving well-designed places
Chapter 14 - Meeting the challenge of climate change, flooding and coastal change
Chapter 15 - Conserving and enhancing the natural environment
Chapter 16 - Conserving and enhancing the historic environment

London Plan 2021

GG1 Building strong and inclusive communities
GG2 Making the best use of land
GG3 Creating a healthy city
GG4 Delivering the homes Londoners need
GG5 Growing a good economy
GG6 Increasing efficiency and resilience
SD1 Opportunity Areas
SD6 Town centres and high streets
SD7 Town centres: development principles and Development Plan Document
SD8 Town centre network
SD9 Town centres: Local partnerships and implementation
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
H2 Small sites
H4 Delivering affordable housing
H5 Threshold approach to applications
H6 Affordable housing tenure
H7 Monitoring of affordable housing
H8 Loss of existing housing and estate redevelopment
H9 Ensuring the best use of stock

H10 Housing size mix
 S1 Developing London's social infrastructure
 S2 Health and social care facilities
 S3 Education and childcare facilities
 S4 Play and recreation facilities
 E1 Offices
 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
 HC3 Strategic and Local Views
 HC5 Supporting London's culture and creative industries
 HC6 Supporting the night-time economy
 HC7 Protecting public houses
 G1 Green infrastructure
 G4 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

- Accelerating Housing Delivery: Planning and Housing Practice Note (2024)
- Affordable Housing and Viability Supplementary Planning Guidance (SPG) (2017)
- Air Quality Neutral (2023)
- Air Quality Positive (2023)
- 'Be Seen' energy monitoring guidance (2021)
- Energy Assessment (2022)
- Housing Design Standards LPG (2023)

- Optimising Site Capacity: A Design-led Approach (2023)
- Play and Informal Recreation SPG (2012)
- Sustainable Transport, Walking and Cycling (2022)
- Urban Greening Factor (2023)

Havering Local Plan (2021)

The following policies are considered relevant for the proposed development:

- 3 - Housing supply
- 4 - Affordable Housing
- 5 - Housing mix
- 7 - Residential design and amenity
- 12 - Healthy communities
- 13 - Town centre development
- 14 - Eating and drinking
- 15 - Culture and creativity
- 16 - Social Infrastructure
- 18 - Open space, sports and recreation
- 19 - Business Growth
- 22 - Skills and training
- 23 - Transport connections
- 24 - Parking provision and design
- 26 - Urban design
- 27 - Landscaping
- 29 - Green infrastructure
- 30 - Nature conservation
- 32 - Flood management
- 33 - Air quality
- 34 - Managing pollution
- 35 - Waste management
- 36 - Low carbon design, decentralised energy and renewable energy

- Havering Character Study – August 2024

10.0 MATERIAL PLANNING CONSIDERATIONS

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

- Principle of 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

- 10.2 The scheme proposes comprehensive redevelopment of the Harold Hill District Centre; it seeks to restore and ensure the long-term viability and vitality of Harold Hill District Town Centre. Although the scheme takes a design led approach which will be considered later in this report the principle of demolition, reduction in non-residential spaces and loss of homes will first be considered. This will then be followed by consideration of the principle of the new proposals.

Acceptability for demolition and rebuild approach.

- 10.3 Consideration has been given to refurbishment versus full redevelopment of the estate. The applicant assessment of the existing physical environment, town centre context, and quality of accommodation identifies design limitations and structural constraints that restrict further development or refurbishment, supporting the case for redevelopment rather than refurbishment. The proposals aim to optimise the underutilised site, making efficient use of land in line with housing and spatial development policies that direct mixed-use and intensified development to brownfield and town centre locations.
- 10.4 A Resident's Ballot conducted in 2024 recorded 96.3% support for redevelopment, with a 49.8% turnout. Full estate redevelopment is therefore supported in principle, subject to appropriate measures to manage social and environmental impacts in accordance with London Plan Policy H8, including impacts on the town centre as detailed in the following section.
- 10.5 It is noted positively that the first phase of the proposals prioritises the delivery of replacement social housing, providing an early opportunity to rehouse existing or returning residents. The submission confirms that no existing leaseholders are affected by the scheme. Additionally, the application includes details of resident and community engagement undertaken to date.
- 10.6 As such the principle of demolition and new build is accepted.

Reduction in District Centre Commercial Floor Space

- 10.7 The application site falls within the Harold Hill District Centre which is allocated as a district centre in the Local Plan. Figure 6 below is an extract from the Proposal Map showing the extent of the district centre. Within the District Centre there are further two further

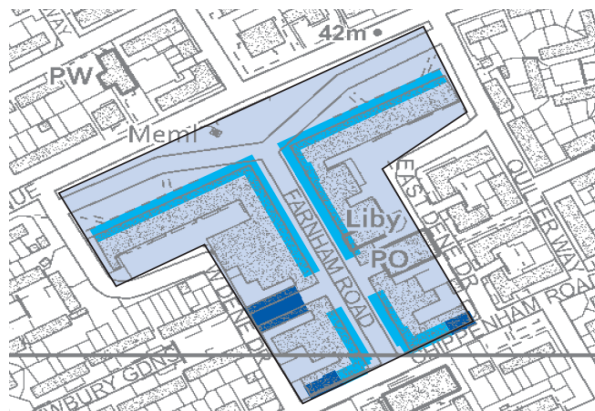


Figure 5: Extract of Harold Hill District Centre from Local Plan Proposal Map

allocations which is a primary frontage fronting Hildene Avenue and Farnham Road and a second frontage between Farnham Road and West Dene Drive and the ends of commercial blocks facing Chippenham Road.

- 10.8 In respect of the existing district centre a town centre health check has been undertaken by the applicant which has informed the approach of its redevelopment. The health check identifies that there are a number of positive aspects to the centre however, there remain areas that require improvement to fully support its success and long-term sustainability. The diversity of uses within the site is good, offering a mix that supports a range of activities throughout the day. Pedestrian flow is concentrated in the centre of the site, which provides a clear focal point but may limit activity in surrounding areas. Accessibility is generally strong, with good connections to the neighbouring area, however, the perception of safety and recorded levels of crime are poor, which may deter use, particularly in the evening. The environmental quality of the town centre is mixed, with some areas in need of attention to improve public realm and appearance.
- 10.9 The balance between independent and multiple retailers is positive, supporting local business while maintaining commercial viability. Opening hours and the availability of services are also strong. Areas for improvement include reducing the proportion of vacant street-level properties, which currently undermines the vitality of the centre. In addition, commercial rent levels suggest that parts of the site are struggling economically and may benefit from targeted intervention or support.
- 10.10 Within Harold Hill's catchment area, the presence of three national grocery retailers—Sainsbury's, Iceland, and Co-op—alongside independent grocers, highlights the town centre's important role in providing convenience retail. Given the relatively modest size of these foodstores, their offer is likely geared towards top-up or frequent basket shopping, rather than large-format, main food shopping trips. This retail pattern is typical for a centre of Harold Hill's scale and position within the retail hierarchy.
- 10.11 This role is supported by findings from the *Haverling Retail and Town Centres Study 2023*, which identified distinct shopping patterns across the borough. The household survey underpinning the study revealed that the majority of convenience expenditure is allocated to main food shopping trips, with residents in Zone 6, including Farnham, Hildene Estate, and surrounding areas, most commonly travelling to larger foodstores in Romford for these purposes.
- 10.12 Nonetheless, Harold Hill maintains a strong function as a destination for top-up shopping. This is further evidenced by the confirmed interest from all three national grocers currently operating within the centre which are offered floorspace in the redevelopment proposals. Their commitment underscores the centre's continued relevance and attractiveness for day-to-day convenience retailing.
- 10.13 A comprehensive Retail Strategy accompanies the application, providing a detailed assessment of Harold Hill District Centre's current performance. This analysis has directly informed the proposed and illustrative design of the redevelopment, including the scale and location of new commercial units.
- 10.14 The Retail Strategy identifies that approximately 36% of existing commercial floorspace (GIA) is either vacant or considered at risk, highlighting a significant oversupply of retail space within the District Centre. In response, the strategy recommends a reduction in the overall quantum of retail floorspace, alongside modernisation and repurposing of existing units to better align with contemporary retail needs.

- 10.15 The conclusions of the Retail Strategy are consistent with broader macroeconomic trends observed across the UK. These trends, widely recognised by industry experts and acknowledged by Government, indicate that many town centres are experiencing structural oversupply in retail provision. This position has underpinned recent national planning reforms, including changes to Permitted Development Rights (PDR) and the introduction of the more flexible Class E use category.
- 10.16 London Plan Policy SD6 recognises both the challenges and opportunities facing town centres and supports their adaptation and diversification in response to changing circumstances. To this end and in light of the trends and the specific challenges identified in Harold Hill, the proposed reduction and consolidation of retail and commercial floorspace is considered appropriate.
- 10.17 While the retained retail floorspace would place Harold Hill at the lower threshold of the London Plan's definition for a District Centre, the long-term success of the centre will depend not solely on its size, but on effective mechanisms for managing this transition and ensuring the town centre evolves in a sustainable, responsive manner.
- 10.18 As such to maintain the vitality of the District Centre and to bolster support for the consolidation of space an overarching Community Use and Commercial/ Retail Strategy can be secured by Legal Agreement. This would inform how a strategy for transition would be set out for the development. The strategy would include Phase 1 / Block 1 as it comprises the full component but continues to set out the broad principles for the outline component. Subsequently each reserved matters would be accompanied by a Community Use and Commercial/ Retail Strategy. The overall strategy would set out the principles and framework while giving flexibility for each reserved matters as they come forward to reflect any minor differences in characteristics and floorspaces between each phase.
- 10.19 The strategy would secure commitments and a mechanism for the relocation of existing tenants (anchor stores and independent) and to develop a robust phasing and business continuity plan. This would ensure the development over the phased period of time would not undermine the placemaking and community objectives it seeks to achieve.
- 10.20 Accordingly, it is considered the reduction and consolidation of commercial floorspace is acceptable and would generally accord with Local Plan Policy 13. This is subject to the imposition of planning conditions to set a minimum floorspace threshold and for submission of a Community Use and Commercial/ Retail Strategy to capture the mechanisms to ensure the vitality of the District Centre is maintained.

Loss of existing homes

- 10.21 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.
- 10.22 There are currently 117 social rent homes on the estate, with an estimated gross internal area (GIA) of approximately 11,130 sqm. Table three in this report sets out the proposed number of homes to be provided in the full component (Block A) which includes a total of 47 Right to Return residents who expressed a wish to return. Table five sets out the indicative mix for the outline component.

- 10.23 Taking into account the proposed housing mix in Block A is skewed in the favour of two bed units it is acknowledged this is to ensure the development meets the aims of London Plan Policy H8 to facilitate a Right to Return. With this in mind it is considered that the proposed scheme would deliver an equivalent, if not increased amount of low-cost affordable housing floorspace, in line with the requirements of Policy H8. Nevertheless, it is recommended that appropriate mechanisms, such as occupation or phasing controls, are secured to ensure that the outline phases are delivered in a manner that achieves the intended uplift in affordable housing provision.
- 10.24 It is considered the loss of the existing housing is acceptable due to the significantly greater on-site provision and density proposed.

Proposed residential

- 10.25 The National Planning Policy Framework 2024 states that housing applications should be considered in the context of the presumption in favour of sustainable development. The London Plan notes the pressing need for housing and the general requirement to improve housing choice, affordability and quality accommodation. The London Plan (Policy D3) also states that development should optimise housing output subject to local context and character.
- 10.26 The Local Plan in its strategic approach provides comprehensive overarching key features to follow for the Borough. In respect of housing growth, a key feature looks to delivery at least 18,930 high quality homes over the plan period. A further keystone is to intensify and renew existing Council housing estates to provide an improved housing stock and an uplift of 700 additional homes. These principles are brought through in Policy H1 of the London Plan which sets a 10-year target for 12,850 homes to be delivered within the Borough.
- 10.27 This is carried forward at local level through Local Plan Policy 3 which seeks to maximise opportunities for delivering high-quality, sustainable and affordable homes within a variety of types and tenures.
- 10.28 On the 12th of December 2024, the Government published the Housing Delivery Test result for 2023. The Housing Delivery Test Result for Havering for 2023 is 61%. In accordance with the NPPF the "Presumption" due to housing delivery therefore applies.
- 10.29 In terms of housing supply, based on the latest 2024 Housing Trajectory, Havering is able to demonstrate 3.4 years supply of deliverable housing sites. The Havering Local Plan was found sound and adopted in 2021 in the absence of a five-year land supply. The Inspector's report concluded:

"85. Ordinarily, the demonstration of a 5-year supply of deliverable housing land is a prerequisite of a sound plan in terms of the need to deliver a wide choice of homes. However, in the circumstances of this Plan, where the housing requirement has increased at a late stage in the examination, I ultimately conclude that the Plan, as proposed to be modified, is sound in this regard subject to an immediate review.

86. This is a pragmatic approach which is consistent with the findings of the Dacorum judgement. It aims to ensure that an adopted plan is put in place in the interim period before the update is adopted and the 5-year housing land supply situation is established."

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

The Presumption refers to the tilted balance set out in Paragraph 11(d) of the NPPF as if the presumption in favour of sustainable development outlined in paragraph 11(d) of the National Planning Policy Framework (NPPF) has been engaged.

- 10.30 Para 11(d) states that where the policies which are most important for determining the proposal are out of date, permission should be granted unless:
(i) the application of policies in the Framework that protect areas or assets of particular importance provide a strong reason for refusing the development, or
(ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole.
- 10.31 Fundamentally this means that planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole.
- 10.32 Thus, the proposal for much needed 481 homes where 53% would be for the affordable market would significantly assist in helping Havering achieve its housing target and is therefore supported.
- 10.33 In light of the above policy considerations, officers are of the view that there are no in principle objections to a mixed-use development with a significant level of new homes including affordable homes. The proposal would intensify the housing on the site and would uplift the number of homes for the area and the Borough. Full consideration of the specific issues raised by the development are undertaken below.

Connectivity with the wider area

- 10.34 The Site is within a sustainable location and is well connected by the adjacent bus stops, accessibility from the existing street network and primarily being designated as a District Centre within the Council's Town Centre hierarchy (Policy 13).
- 10.35 As such it is considered the proposal would result in no change to how the centre would connect with the community and the wider area. The scheme would broadly align with the connectivity section of Local Plan Policy 1.

Proposed Community spaces

- 10.36 Harold Hill Library will be retained within the District Centre and to accompany the proposed commercial floorspace a minimum of 407 sqm will be allocated for community use across the development.
- 10.37 The application has been supported with a community strategy which is informed by an analysis of the socio-economic factors within the Harold Hill area. The strategy sets out key principles to lead to integration and connection through the site, celebrating existing and future community hubs, even distribution through the centre of community uses and clear sightlines and routes linking the community anchors. Specifically, the strategy identifies within Block A (full component) 204 sqm will be dedicated to space for youth services with the flexibility to share the space with a council services hub, possibly a food hub, which is currently located on the first floor of the library. Further community spaces are highlighted in the outline component notably in Block D which would have a presence on the fringe of the civic square with two further dual frontage corner positions (in Blocks E and F) to the south where South Farnham Road would join with Chippenham Road.

- 10.38 The inclusion of community space within Block A is welcomed and would bring a valuable use forward in the development of the District Centre. The position of the community use within Block A would encourage sightlines from Hildene Avenue and in conjunction with the Civic square in the heart of the District Centre would naturally draw visitors through the northern section between the two principal blocks (A and B).
- 10.39 Although indicatively shown, the position of the community uses further into the centre would complement the central axis and assist in linking Block A with the existing community uses to the north (Family Welcome Centre), Harold Hill Library and uses to the south (including St George's Church on Chippenham Road) facilitating natural movement within the spine of the District Centre.
- 10.40 It is unknown at this stage of the occupier(s) of the community spaces; however, the strategy suggests the use within Block C could be a community café with an apron leading onto the Civic Square which is framed on the southern side by the library. Further spaces in the southern blocks could be suited for a nursery or council information hub.
- 10.41 The principles set out in the strategy are considered acceptable and would foster an enhanced community offering within the District Centre and enhance its vitality which is supported by Local Plan Policy 13 and 16. Further exploration of how the strategy would detail the laying of the foundations for the uses can be secured by Legal agreement for the full component. This can also then be linked with the phases as they come forward under the submission of the reserved matters.

Proposed Retail Shop Space

- 10.42 The retail floorspace and its configuration provides a choice in variation in space and shape for existing and new tenants. Although the proposal would present a strong commercial frontage along Hildene Avenue and scheme has been interspersed with commercial units through the site with a presence maintained along Chippenham Road to the south. The commercial units present an active frontage to the street and when viewed in conjunction with the community uses and the landscaping the scheme is designed to draw visitors through the centre. The width of streets, presence of parking and pockets of landscaping further encourages movement and ultimately footfall for the commercial units. Furthermore, the presence of anchor stores within the scheme can act as focal points for increased footfall creating the critical mass for the independent traders.
- 10.43 The commercial success of the centre is driven by visitor and resident footfall. With the exception of Block A the centre is at this stage based on the parameters and the intentions set out in the Design and Access Statement guided by the Design Code. To ensure synergy between the built form, landscape and open spaces, especially as the scheme is a phased development, it is considered appropriate to secure a comprehensive wayfinding strategy and details by the imposition of planning condition.
- 10.44 It is considered the flexibility given in the use class order in combination with the disposal of commercial and community uses over the site and the different size and shapes of units presents a scheme which is acceptable. Therefore, it is considered the scheme would maintain the vitality and viability of the current district centre, albeit in a re-developed form which is consistent with Chapter 7 of the NPPF, the relevant London Plan Policies in respect of the town centre and Local Plan Policy 19.

Food and Beverage uses

- 10.45 London Plan Policy E9 states where proposals that contain hot food takeaway uses, they should not be permitted within 400 metres walking distance from the entrances and exits

of an existing or proposed primary or secondary school. The Policy requires Boroughs to carefully manage the over-concentration of hot food takeaway uses within town centres and other areas through the use of locally-defined thresholds in Development Plans. Where development proposals involving hot food takeaway uses are permitted, it should be encouraged that operators comply with the Healthier Catering Commitment standards. Where justified, boroughs should ensure compliance with the Healthier Catering Commitment through use of a condition.

- 10.46 Local Plan Policy 13 against maintaining the vitality and viability of the district centre places emphasis on achieving a balanced mix of uses and in particular a criterion for non-A1/A2 uses (now Class E) in avoiding over concentration within shopping parades.
- 10.47 There is no hot food takeaway floorspace within Block A. However, within the outline component of the total 4,800 sqm floor area, up to 500 sqm would be for hot food takeaways. Evidence has been provided by the applicant to show that this would be similar to the current floorspace occupied by existing tenants where they would be offered to remain within the district centre. It is therefore considered there to be no further proliferation of hot food takeaways.
- 10.48 Although there would be no net increase given the reduced floorspace within the district centre the percentage of a hot food takeaway would increase. However, there would also be an increase in footfall as a result of the uplift in the number of homes within the proposal. The increase in homes could warrant the proposed quantum by giving more choice proportional to the increase or if those residents are on shift work for example. Indeed, while a takeaway could increase the attraction to children of the food outlets, it is noted that there are no units in Block A and remaining frontage along Hilldene Avenue falls into the outline component. It is unknown of the locations of a takeaway within the outline component which includes Hilldene Avenue and the majority of the District Centre. However, each reserved matters submission would be considered taking into account Policy E9 and LP Policy 13, particularly the criteria relating to overconcentrating of takeaway units and proximity to school entrances.
- 10.49 To comply with London Plan Policy E9 it is considered expedient in requiring operators to comply with the Healthier Catering Commitment standards. This is secured under the Legal Agreement as this can be incorporated into the Commercial and Community strategy linking all non-residential uses across the whole of the district centre.

Public house

- 10.50 The redevelopment proposal (P1150.23) for 138 affordable homes on Chippenham Road which entails the demolition of The Alderman Public House, required a replacement facility in the redevelopment of the District Centre. The public house was held to hold a value (under London Plan Policy HC7) and to make the loss acceptable a mechanism under a Legal Agreement was secured where the applicant would identify a temporary space and a permanent space for a public house re-provision within this District Centre.
- 10.51 The full application component has identified 281 sqm (GIA) within Block A for the permanent re-provision of a public house use. Notwithstanding this is a requirement of a different consent the provision of a public house use within the District Centre would support the aims of diversification and recognises the importance of eating and drinking establishments in creating attractive places where people enjoy spending their leisure time in accordance with Policy 14 of the Local Plan.

Conclusion

- 10.52 In light of the above policy considerations, officers are of the view that there are no in principle objections to a mixed-use development coming forward on this site, and that the proposals will ensure the continued vitality and viability of this District centre.

Housing Provision / Mix and Affordable Housing

- 10.53 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 50% affordable housing where the residential development is on public sector land and there is no portfolio agreement with the Mayor. Proposals which do not meet the 50% threshold or require public subsidy to do so, will be required to submit a detailed viability assessment. Development proposals will be required to deliver a tenure mix of 70% social/affordable rent and 30% intermediate provision. Policy H6 of the London Plan has at least 30% Social Rent (social rent or London affordable rent), at least 30% intermediate (London Living Rent or London shared ownership) and the remaining 40% as determined by the Local Planning Authority.
- 10.54 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.
- 10.55 The proposals will provide 53% affordable housing by unit (57% by habitable room) across the development; the tenure mix of the affordable housing will be 60% Social Rent / London Affordable Rent and 40% intermediate 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 there is a slight difference to policy with regard to the tenure mix, given that the scheme is now shown to be unviable even without providing any affordable units, it would be difficult to justify refusal on these grounds alone.
- 10.56 Given the size and timescales of the development in delivering up to 481 residential units over 4 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.
- 10.57 Importantly, 104 of the 122 social rent units are proposed in block A in the first phase, the form of units most critical to meeting the Council's identified need. 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

- 10.58 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.
- 10.59 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.

- 10.60 Over the duration of the application to optimise the unit mix within Phase 1, four 4-bedroom, 6-person (4B6P) homes have been reconfigured to 3-bedroom, 6-person (3B6P) homes. This adjustment aims to increase the overall number of three-bedroom units delivered in Block A. The affected homes are centrally located within the block, overlooking Hilledene Avenue, and are situated first through fourth floors. Table 3 and 5 under section 3 of this report provides the breakdown of unit sizes in Block A (full component) and over Blocks B – F (outline component).
- 10.61 The proposal prioritises the delivery of family-sized homes, particularly within the affordable housing offer. The approach reflects a considered balance between several key factors. These are namely the objective to maximise the number of larger, family-sized units; the design challenges associated with incorporating such units within an apartment typology and the need to ensure overall scheme viability by delivering a significant proportion of affordable housing, supported through cross-subsidy from private housing in later phases.
- 10.62 A core objective of the scheme is to maximise affordable housing delivery. Phase 1 is dedicated entirely to providing affordable housing, all of which is provided as social rent tenure. The unit mix within this phase has been designed to be both efficient and responsive to housing need, enabling the delivery of the maximum number of homes while meeting the requirements of existing residents eligible for the Right to Return.
- 10.63 It is acknowledged that the proportion of home sizes do not fully align with Policy 5, however, given the reasons set out above this is acceptable given the proposal is part of a wider regeneration scheme for Harold Hill and the redevelopment of the District Centre that would bring significant benefits to complement the housing mix.

Standard of Design, Layout, and Impact on Views

- 10.64 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.
- 10.65 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.
- 10.66 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.
- 10.67 In Havering, tall buildings are defined in line with the London Plan Policy D9, which identifies buildings of 6 storeys or 18 metres and above as tall. This definition is appropriate for the borough, as it reflects the existing tallest buildings, typically located in

town centres or mixed-use areas such as the new Beam Park neighbourhood. Tall buildings are considered highly unlikely to be appropriate in low-scale, residential areas due to their impact on character and context.

- 10.68 Mid-rise buildings, defined as developments ranging from 3 to 5 storeys, are generally more flexible in terms of location. They are considered suitable across the borough, including areas identified along the repair-reimagine spectrum. While applications for mid-rise buildings will be assessed on a case-by-case basis, they will not be subject to the same level of design scrutiny as tall buildings.
- 10.69 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.

Appraisal of design approach

- 10.70 The proposal represents a step up in density and massing in relation to the existing context. 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 Harold Hill. The proposal responds successfully to creating a clearly defined street network and a clear sense of place, with a layout that creates high quality streets and public spaces. The proposed massing has been carefully sculpted to minimise impacts, and careful attention to materials and detailing has been demonstrated.
- 10.71 The LB Havering Character Study (2024) identifies Harold Hill District Centre as a key area for regeneration. A character-led strategy has been developed to guide future change in the area. Harold Hill District Centre and Gallows Corner are highlighted as locations with potential for significant transformation, where existing character can be reimaged to support regeneration.
- 10.72 The design approach has embraced reimagining the Harold Hill District Centre. To achieve a quantum that would represent an uplift in housing and to optimise the site, the heights of buildings have inevitably increased. However, the proposed building heights have been carefully designed to respond to the surrounding context. Towards the residential edges of the site, building heights step down to a maximum of five storeys, helping to ensure a sensitive transition in scale and minimise the impact on neighbouring properties. In contrast, additional height is proposed adjacent to Farnham Road and Hildene Avenue marking the primary entrance, which will serve as a visual focal point and aid in wayfinding, helping to define the site's identity and improve legibility within the wider area.
- 10.73 Taking into account the proposed mid-rise buildings within the context of a suburban area and that densities should be optimised to help deliver on housing targets it is considered the approach is design led which would satisfy London Plan Policy D3 and Part B of London Plan Policy D9.

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

- 10.74 The existing townscape character of the site and its surroundings predominantly comprises low- to mid-rise post-war residential development. Building height is generally centralised around the site, with development typically rising to four storeys along Farnham Road. The prevailing-built form within the site consists of long, rectangular

blocks, with ground floors occupied by commercial units. This linear arrangement channels views through and along the site, creating a strong sense of enclosure. However, this effect is softened to some extent by the presence of tree planting and grass verges. The predominant material is brick, with flat roofs to buildings fronting Farnham Road and hipped roofs to developments elsewhere.

- 10.75 To the south of the site, mid-rise flatted developments of a more traditional post-war design continue, featuring hipped roofs and landscaped green lawns. In contrast, the areas to the east, west, and north are characterised by more conventional semi-detached housing. The result is a patchwork of differing building forms and styles—comprising the flatted developments along Farnham Road, the post-war blocks to the south, and the surrounding suburban housing.

Full component

- 10.76 The proposed development would introduce a noticeable uplift in height and massing within views from Hilldene Avenue. However, the articulated form and varied roofline of Block A ensure that the scheme remains predominantly mid-rise in character. Building height would generally be up to six storeys, stepping down towards the site's edges to provide an appropriate transition to the lower-rise residential context to the east, such as along Quilter Way.
- 10.77 The architectural approach adopts a contemporary yet contextual design language. The façade treatment and fenestration patterns draw inspiration from the materiality and rhythm of the Family Welcome Centre and Chippenham Road development while paying heed to the surrounding housing. Block A would introduce a more modern aesthetic that reflects its role as a new residential landmark within the District Centre.
- 10.78 Although the proposal would result in a marked change to the current scale along Hilldene Avenue, Block A would serve as a clear town centre marker when approached from the east. In doing so, it would signify a new phase of regeneration for the area, supported by enhanced public realm, improved landscaping, new housing, and upgraded community facilities.
- 10.79 Block A would redefine East Dene Drive and Quilter Way, transforming them from primarily suburban streets into a more active and vibrant edge to the district centre. The increased building scale would create a stronger sense of enclosure, consistent with an urban residential setting. The articulation of the building's core and stepped terraces would help to break down the overall massing and reduce any potential perception of overbearing impact on the adjacent residential properties.
- 10.80 Block A would be framed by a continuous perimeter footway, facilitating pedestrian movement and integrating seamlessly with existing routes beyond the site. The widened footpath along Hilldene Avenue would further improve connectivity and enhance the public realm. Parking would be accommodated to the front and sides of the building, with safe and legible routes maintained around the building.
- 10.81 The positioning of Block A respects the established building line along Hilldene Avenue and provides a distinctive 'bookend' feature to the central route through the wider site which is discussed below.

Outline component

- 10.82 It should be noted that the design under the outline component would follow under the reserved matters adhering to the parameter plans and would need to reflect the Design

Code submitted for this application. The Design Code is underpinned by the principles of movement and connections. This is linked by good quality public realm where building blocks and heights have been used to navigate visitors through the proposed district centre for all parts to have equal access to commercial, community and residential uses. The parameter plans indicate massing, heights and separation with the Design and Access Statement in conjunction with the Design Code articulating the language of how marker buildings aid wayfinding with how buildings are carefully designed with the general block formation to provide prominent, legible and active frontages.

Cumulative effect (full and outline) and links to adjacent developments

- 10.83 The existing built form along Farnham Road, which includes buildings of up to four storeys, establishes a context in which modest height increases can be appropriately accommodated. The proposed development introduces heights of up to eight storeys, representing a proportionate and contextually sensitive response. The arrangement and massing of blocks have been carefully designed to reflect the site's topography, which rises on both sides, thereby reducing long range visual impact and ensuring a comfortable relationship with the surrounding built form. The variation in height is intended to create visual interest and harmony with the existing suburban environment while optimising site capacity by the block formation. The massing arrangement also ensures that building volumes reduce at higher levels, allowing for external amenity terraces and play spaces. This design approach emphasises contextual responses, aiming to balance building density with maintaining daylight, sunlight, privacy, and a visually appealing streetscape, all within a high-density, sustainable urban form.
- 10.84 The proposal also supports wider townscape improvements along Hilldene Avenue and Farnham Road. In line with Policy D3 and Policy D4, the scheme strengthens the transition from predominantly residential to more commercial frontages. The taller elements are concentrated along the widest and most active parts of the route, particularly Hilldene Avenue where they contribute to legibility and support a more coherent urban structure.
- 10.85 Furthermore, the scheme aligns with Policy SD6 by reinforcing the character and vibrancy of the 'high street', enhancing the public realm, and promoting active frontages. The development enhances both the visual quality and functional connectivity of the area, supporting sustainable intensification in a manner consistent with strategic and local planning objectives.
- 10.86 The high standard of design helps to integrate the larger blocks into the surrounding context in a positive way. Careful attention to detail has been paid to elements such as brickwork, balcony/decks and metalwork. The effect of the brick, with different colours and textures adds to the quality to the scheme and when considered alongside the Family Welcome Centre and the Chippenham Road scheme the proposed development will positively reinforce ongoing regeneration efforts in Harold Hill. Together, these schemes will contribute to the delivery of a high-quality, well-designed transformation of the area, supporting the creation of a more vibrant, attractive, and sustainable neighbourhood.

Quality of public realm

- 10.87 Notwithstanding the overall quantum the scheme has taken significant strides in developing the public realm which caters for residents and visitors. While these spaces can sometimes have differing priorities the scheme has successfully balanced the demands for daytime and night-time uses taking into account how the spaces would be used.

- 10.88 The north of the site along Hildene Avenue is retail driven with parallel parking, interspersed with soft landscaping and buffer planting. Intrinsically linked to the axis from the north to the south of the District Centre is a civic square which is car free lying at the heart of the district centre adjacent to the library to provide a focal point for residents and visitors. The space has been designed to provide areas for diverse play and recreation, community events as well as social space for gathering. The combination of the active frontage of the surrounding blocks, community uses and alterations to the library will open up the space for multiple uses of all abilities and ages.
- 10.89 The interconnecting routes linking the central axis to East and West Dene Drive have areas of greening, pockets of play space and resting areas which all contribute to encouraging movement in a safe and pleasant manner.
- 10.90 Tree planting is proposed to be as markers and when combined with high quality street furniture will enhance the streetscape contributing to a welcoming space and encouraging natural movement.

Quality of residential accommodation

- 10.91 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 and as such it is considered that all units are of an acceptable quality.

Architectural expression

- 10.92 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.

Design conclusion

- 10.93 The outline component, through the Design Codes, will have guiding principles in place to ensure the design and appearance appropriately addresses the height and massing along Hildene Avenue, Farnham Road (as reconfigured) and Chippenham 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

- 10.94 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.

- 10.95 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.
- 10.96 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.
- 10.97 In terms of the full component (Block A a minimum target illuminance (ET) has been applied which looks at achievement across 50% of a room set at 850mm above the floor. These values, 100 lux for bedrooms, 150 lux for living rooms and 200 lx for kitchens mimic the traditionally applied ADF targets. A daylight and sunlight assessment has been undertaken by the applicant using the BRE Guidance which covers future occupiers 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 – full component

- 10.98 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 taking into account the northerly facing facade. The apartments have also been provided with relatively shallow floorplans and staggered/projecting elevations. 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. As part of the design evolution of the scheme the window openings to Block A have been revised to increase the width of the full height balcony doors, also revised the window openings to the bedrooms to increase the opening and also reduce slightly the depth of the balconies (which are still GLA compliant), measures to maximise the potential light to these habitable rooms.
- 10.99 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 component

- 10.100 The submitted Parameter Plans are to be assessed with reference to the accompanying Design Code, which sets out the framework for any future development. While an illustrative scheme has been provided, it represents only one potential approach within the boundaries of the submitted parameters. A detailed Daylight and Sunlight Assessment will accompany any future Reserved Matters application, assessing the proposed design at that stage.
- 10.101 The submitted Internal Daylight and Sunlight Assessment indicates that the least-performing facades are those with a northerly and easterly orientation. The areas experiencing the lowest levels of daylight and sunlight are located in the internal corners of courtyards, which in the illustrative scheme correspond to building cores and are therefore not habitable spaces. It is important to note that the current façade assessments

do not account for potential design features such as balconies or recessed windows, given the outline nature of the application.

10.102 Future Reserved Matters submissions will include detailed articulation of the building blocks, which is expected to enhance overall access to daylight and sunlight. In response to this, the Design Code has been updated to acknowledge that, where a courtyard arrangement is proposed, consideration of massing and plan layout may result in a reduced number of dwellings within a given plot to ensure acceptable environmental quality.

10.103 With regard to sunlight at ground level, the illustrative scheme demonstrates that a good level of sun is maintained, taking into account the proposed block typologies.

Surrounding buildings / land uses to the site

10.104 The following sections will consider the impact on light and outlook on the surrounding buildings from the full and outline component. Although the effect to light for the outline component has been based on the parameter plans submitted, the assessment also considers an illustrative scheme and is informed by a daylight and sunlight impact assessment. 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.

Full component

10.105 All the properties which face the application site have been carefully assessed. While there are impacts it is considered the reductions to light and retained levels to properties on Hildene Avenue are within BRE tolerances taking into account the separation space and heights of buildings. As such, Officers are of the view that the impact on these neighbouring properties would not result in a significant adverse impact on the amenity of the occupiers. The following section will consider the properties on East Dene Drive and Quilter Way.

10.106 The properties on East Dene Drive comprise two bungalows and three mews properties which would face Block A. It is noted that the facing windows in the bungalows serve a kitchen and shower room. The mews properties have a WC to the front with bedrooms windows at first and second floor facing Block A. The neighbouring properties would see reductions in their VSC in windows that face Block A to retained levels between 19% to 23% which would be greater than 0.8 times their former value.

10.107 Hungerdown Court would see reductions in VSC to the low twenties which would be greater than 0.8 times their former value. Although 24 Quilter Way is within proximity to Block A it is slightly offset and positioned south to Block A and as such would not be significantly affected.

10.108 The reduction in VSC on East Dene Drive and in Hungerdown Court would result in the properties experiencing a noticeable loss of light to the affected rooms which face the site making them gloomier and increasing the need for the use of electric lighting. However, it is acknowledged that the main living spaces are to the rear of the properties with rooms benefitting from being dual aspect.

10.109 It is considered the combination of the overall height of Block A opposite the properties on East Dene Drive would loom large and have an adverse impact in particular on the outlook

of the occupiers. However, the layout of the existing properties lessen the overall effect to the enjoyment of the habitable rooms in the properties.

Outline component

- 10.110 There would be noticeable reduction in VSC to windows in Lockhart Court and windows in 7 and 8 West Dene Drive which would exceed 0.8 times their former value. The retained levels would range between 21%-25% and while marginal improvements could be gained at the reserved matters stage it can be concluded that properties would still feel gloomier and in need of the use of lighting.

Conclusion

- 10.111 Officers as set out above consider there to be an adverse impact in terms of light to the front habitable rooms and outlook from these rooms of the properties that immediately face the application site in respect of the full and outline component. It is recognised that these are houses with rear facing rooms unaffected by the proposed development and some impacts are a result of existing obstructive architectural detailing. However, the losses to what are likely to be main living areas and bedrooms is significant and would have an adverse impact upon those occupiers. This adverse impact on residential amenity from the proposed development will be considered towards the end of this report in the planning balance.

Fire Safety

- 10.112 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 escape. 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.
- 10.113 Further to the above, Policy D5 within the London Plan seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the buildings.
- 10.114 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 and HSE have reviewed the application and have raised no objection (LFB to both components, HSE to the full component).
- 10.115 HSE is unable to comment in full on the outline component however the recommendation is to impose a suitable planning condition requiring the submission of a further satisfactory fire statement with any reserved matters application.
- 10.116 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 to make the full component acceptable.

Highway Matters

- 10.117 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 Policy T7 and Transport for London guidance. Plan Policies T2 and T5 relate to healthy streets, the provision of cycle and pedestrian friendly environments, whilst Policy T6 relates to parking standards.
- 10.118 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.

Trip generation and traffic

- 10.119 It is not anticipated that the retail and community uses would attract an increase in the number of trips compared to the existing centre, taking into account the reduction in overall floorspace, decrease in onsite parking, and that new residents would access units within the site. It has been demonstrated that the surrounding pedestrian network, accessibility to local amenities and public transport is considered sufficient to accommodate this increase in pedestrian movements.

Access and Layout

- 10.120 The proposal utilises the existing points of vehicular access taken either side from East and West Dene Drive (linking with Hildene Avenue) and Chippenham Road to the south. Vehicular movement would use East Dene Drive southbound only and West Dene Drive would become northbound only; Chippenham Road would remain two way. Farnham Road would not be continuous for vehicles but instead be in two sections to join north and southbound vehicles to West Dene Drive (see figure 5 for access and movement).
- 10.121 Amendments to the full component during the course of this application has increased the width of the Hildene Avenue footway and the footways adjacent to the building perimeter. Pedestrians and cyclists can still move through the central area of the site in all directions around the perimeter blocks, to then link with existing footways surrounding the site.
- 10.122 It is considered the access and layout in respect of permeability for pedestrians and vehicles is acceptable.

Active Travel

- 10.123 The assessments of the Active Travel Zone (ATZ) routes indicate that most corridors are generally of a good quality for walking and cycling, with several positive features supporting active travel. For example, Route 1 (Harold Wood Station) benefits from good street connectivity, green surroundings, and high-quality pedestrian amenities, contributing to a relaxed and safe environment during both day and night. The route's wide footways, presence of greenery, and good signage make it welcoming for pedestrians and cyclists. Similarly, Route 4 (Broadford Primary School) also displays a

well-connected, permeable street network with adequate signage and shaded areas that enhance comfort for active users.

- 10.124 Overall, it is considered the existing routes provide a solid foundation for active travel with good connectivity and pleasant environments in many sections.

Parking

- 10.125 Podium, basement, and multistorey car parking were discounted primarily due to their negative impact on ground floor layouts, which would lead to reduced commercial space and affordable housing. Each option also raised significant security concerns and fire risks, particularly with the rise of electric vehicles. Additionally, the high construction costs and the need for extensive ventilation and access arrangements further complicated their feasibility within the project.
- 10.126 The existing parking demand was established through daytime parking surveys conducted on January 31, 2024, and February 3, 2024, which showed a peak parking demand of 128 cars on February 3, 2024, equating to a parking occupancy of 52%. This data indicates that the current parking provision is significantly underutilised compared to the total available spaces. This has informed the level of parking proposed for the development set out under the description of the proposal section of this report taking into account the context of planning policy which aims to encourage travel by active travel and sustainable travel modes.
- 10.127 With respect to retail parking, there are currently 248 such spaces provided on the Site. These are all located within the northern parking area of the Site, fronting Hilldene Avenue and along Farnham Road. It is noted that both the pay-by-phone and dual-use parking spaces will be available for retail visitors. As such, the proposals will provide a minimum of 115 and up to 137 spaces for retail use. Based on the Illustrative Masterplan layout, it is estimated that approximately 132 spaces will be available for retail visitors, which aligns closely with the existing surveyed peak demand of 128 spaces.

Table 11: London Plan Parking Standards (maximum) – PTAL 2/3	
Building type	Maximum parking provision
Residential – 1-2 Bedroomed	Up to 0.75 spaces per dwelling
Residential – 3 bedroomed and greater	Up to 1 space per dwelling
Retail	Up to 1 space per 50 sq.m. (GIA)
Leisure	Case by case basis

- 10.128 The residential parking bays are proposed to be a minimum of 0.35 spaces per unit, with the total number of permit holder spaces needing to increase from 104 to accommodate the new residential units. The exact number of residential parking bays will depend on the final count of residential units, but they will be located within the development site designated for permit holders.
- 10.129 The proposed provision of between 3%-7% disabled parking is acceptable. 20% of the parking bays will have active provision for electric charging including the retail spaces. Passive provision will be available for the remaining spaces.
- 10.130 The proposed parking provision, which includes a mix of pay-by-phone, permit holder, and dual-use spaces, aligns with the existing peak demand and is crucial for maintaining the vibrancy of the town centre. Reducing parking further could lead to overspill into residential areas, negatively impacting local communities and undermining the overall success of the development.

Servicing and Deliveries

- 10.131 The delivery and servicing requirements for the residential, retail/commercial, and community uses within Block A are proposed to be accommodated on-street via two half lay-bys located at the eastern and western boundaries of the Phase 1 site. These half lay-bys, shared with URS collections each measuring approximately 1 metre in width and 15 metres in length, are designed to facilitate the use by delivery and waste collection vehicles serving both residential and non-residential units. The proposed arrangement ensures that stationary service vehicles will be sufficiently offset from the main carriageway—measuring 6 metres in width—so as not to obstruct general traffic flow. Furthermore, the positioning and dimensions of the lay-bys are such that they will not compromise access to, or egress from, adjacent car parking bays.
- 10.132 The proposed on-street delivery and servicing solution is considered to be appropriately designed and operationally acceptable. It achieves a balance between functionality and minimising disruption to the surrounding transport network, and as such, is supported in planning terms.
- 10.133 A similar approach is applied over the outline component with the use of half laybys. Servicing for the larger retail units located within Buildings B/C are proposed to be carried out via the northern parking area. This area is accessible to delivery vehicles, including articulated Heavy Goods Vehicles (HGVs) up to 16.5 metres in length, which would enter via the junction of East Dene Drive and Hildene Avenue. During deliveries, these vehicles would momentarily stop within the 6-metre-wide carriageway.
- 10.134 To minimise potential conflict with customer activity and parking demand, deliveries to the national retailers are proposed to take place outside of store opening hours. Upon completion of deliveries, vehicles would exit the site via the junction at West Dene Drive and Hildene Avenue, ensuring a logical and efficient circulation route through the site. While it is understood that many retailers operating within the Greater London area typically rely on rigid HGVs of up to 10 metres in length, the proposed layout can accommodate articulated HGVs where necessary, thereby offering flexibility to meet retailer operational requirements. The proposed delivery and servicing strategy for Buildings B/C is considered acceptable in principle. It provides adequate access for a range of delivery vehicle types, minimises disruption through out-of-hours operations, and makes effective use of existing access points. The arrangement is operationally feasible and compatible with the wider site layout and is therefore supported from a planning perspective.
- 10.135 The imposition of a planning condition would secure when the bays would be available to use in conjunction with URS collections and how the wider arrangements would ensure minimal disruption.

Travel Plan

- 10.136 A Framework Travel Plan (TP) has been submitted and is broadly acceptable for the purposes of this application. 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

- 10.137 An Outline Construction Logistics Plan (CLP) has been submitted. Mitigating measures for construction are included to manage traffic and minimise disruption. The measures include construction vehicles using pre-approved routes to minimise disruption to local traffic and communities, scheduling deliveries during off-peak hours and implementing a system for managing delivery times, regular monitoring of construction activities which include reporting any issues allows for timely interventions to address problems and coordinating logistics with other construction sites in the area. The measures would aim to decrease the number of vehicles on the road during busy periods thus alleviating traffic congestion, minimise negative impacts on the surrounding area and reducing traffic to enhance overall efficiency in construction activities.
- 10.138 Given the nature of the phased development and that the centre would still operate, it is considered that the updated Outline Construction Logistics Plan (CLP) is sought via a pre-commencement condition which will require further assessment from the TfL and Havering Highway Authority.
- 10.139 In conclusion, the proposal is acceptable subject to conditions for car and cycle parking, a Parking Design and Management Plan, a Delivery and Servicing Management Plan, a Travel Plan and a detailed Construction Logistics Plan.

Heritage

- 10.140 The Site is not within a conservation area and is not occupied by any statutorily listed or locally listed buildings. However, following consultation with Historic England it has been identified there is a potential of unknown archaeological remains which could be affected by the proposal due to the lack of borehole data of the site and substantial car parking. It is noted by Historic England that excavations adjacent revealed subsoil surviving and that Iron Age and Saxon remains were found on clay during the M25 J28 improvement works.
- 10.141 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.
- 10.142 An Archaeological Based Assessment has been submitted which satisfies NPPF Paragraph 207. The assessment draws a similar conclusion to Greater London Archaeology Advisory Service (GLAAS) in noting an adjacent excavation found the geology is shallow and that modern developments have truncated the historic land surface. Although the Assessment considers the potential to be low, it is considered appropriate to request a two-stage archaeological condition to provide acceptable safeguards to any remains.
- 10.143 The imposition of condition would ensure the development compliant with London Plan HC1 and Local Plan Policy 28.

Sustainability and Energy Efficiency

- 10.144 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*

- 10.145 The applicant has submitted an Energy Statement, which details the likely energy demands of the proposed development and proposed energy supply measures. A Sustainability Statement has also been submitted, which appraises policy and reviews project specific targets in relation to matters such as energy, water, resource conservation, waste management, biodiversity and pollution control.
- 10.146 The energy report sets out that a 71% (full component) and 71% (outline component) reductions in regulated CO₂ emissions over Building Regulations Part L 2021 (Part L 2021), exceeding the GLA minimum target of 35% and the benchmark target of 50% would be achieved. In terms of non-residential emissions, the full and outline component would experience a 39% reduction.
- 10.147 The Energy Strategy sets out the following approaches to be taken to achieve the London Plan CO₂ target reduction:

Table 12: Showing the proposal against London Plan's Energy Hierarchy	
"Be Lean" – The applicant is committed to reducing energy demand and CO₂ emissions related to the development.	
• Significantly improved fabric 'U' values • Minimised thermal bridging • Improved air tightness • Optimised g-value of the glazing – to provide a balance between minimising heat gain in summer (to reduce overheating), maximising useful heat gain in winter (to reduce heating energy) and maximising • natural daylight (to reduce lighting energy) • Site-wide heating system • High efficiency ventilation systems • Minimised heat loss from hot water systems • Low energy lighting and smart meters. • Controls systems to monitor and operate the plant and equipment as efficiently as possible.	
"Be Clean" – typically be associated with Combined Heat and Power (CHP). The following measures are proposed to that effect:	
• There are no existing or proposed heat networks in the vicinity of the site, however the site is within a GLA designated Heat Network Priority Area so it is proposed to provide a communal heating system serving the whole site with the capability to connect to a future district heat network should one become available. • It is proposed to serve the residential site heat network from an on-site energy centre which uses air-to-water heat pumps as the primary energy source which provides a future extension to include the development under the outline component. • Residential blocks will be provided with their own water-to-water heat pumps and thermal storage for distribution to the residential dwellings. A dual plate heat interface unit will be installed in each residential dwelling, providing instantaneous heating and hot water.	

- The water-to-water heat pump circuit will also provide heat for space heating and hot water to non-residential spaces within the blocks (where they do not require space cooling).
- The site heat network will be designed to minimise heat losses including measures such as minimising pipework lengths and installing high level of insulation (in excess of British Standards).
- A water-to-refrigerant heat pump (VRF) system will be installed in each block for the commercial units to provide space heating and cooling. These units will be connected to the Site heat network to provide heat in winter and allow rejected heat from the space cooling in summer to be recovered and utilised by the water-to-water heat pumps to help meet the residential water heating demand.

“Be Green” – An appraisal of available renewable energy solutions has been carried out, which has identified the following technologies as the most appropriate for the Development.

- Heat pumps are proposed as the main heat source for the development (detailed above)
- Proposed to install a total of 67 No. photovoltaic panels on the roof of the Plot A with a total peak output of 25.5 kW (based on 380W, 1.72m², 22% efficient panels)
- For the outline component the exact detail cannot be determined at this stage, however, it is expected that a minimum of 210 No. photovoltaic panels will be installed, based on a pro-rata increase from Plot A. The panels will have a total peak output of 79.7 kW (based on 380W, 1.72m², 22% efficient panels).

10.148 Whilst a detailed design will be necessary to demonstrate that the proposed development will achieve the overall CO² reduction, it is anticipated that through the above measures the proposal will achieve an overall reduction. In terms of carbon offset, the following tables sets out the full and outline component with the corresponding requirement to offset CO².

Table 13: Result of carbon offset for full and outline component				
Component Type	Shortfall (tonnes per annum)		Shortfall (£)	
	Residential	Non-Residential	Residential	Non-Residential
Full	23.9	16.6	£68,253	£47,310
Outline	76.3	33.0	£217,455	£94,050

10.149 The carbon offset contribution can be secured through the section 106 Agreement. Capture of the offset required under the outline component will be secured at each reserved matters application stage which will be based upon the final design.

10.150 The GLA has considered the submission documents and further information provided by the applicant at their request. Overall, no fundamental concerns have been raised subject to demonstrating the proposed solar array is maximised in quantum and output on the roof tops of the development. The imposition of planning condition with details submitted of the solar array and how the scheme can connect into a future district heating network can address the outstanding matters.

10.151 It is considered the full and outline component, subject to planning condition and an appropriately worded Legal Agreement, is acceptable in respect of London Plan Policy SI2 and Local Plan Policy 36.

Ecology and Biodiversity

- 10.152 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.
- 10.153 Havering Local Plan Policy 30 states that the Council will protect and enhance the Borough's natural environment and seek to increase the quantity and quality of biodiversity by ensuring developers demonstrate that the impact of proposals on protected sites and species have been fully assessed when development has the potential to impact on such sites or species. It is important that proposed enhancements for the site are maximised in terms of their benefit for biodiversity, and consideration should be given to wildlife friendly landscaping including green roofs and green walls to help enhance the ecological biodiversity of the site. Consideration should also be given to the incorporation of bat boxes and species-specific bird boxes on or built into the fabric of new buildings.

Effect of Demolition / construction

- 10.154 Currently, the site comprises various habitats that support local wildlife. Buildings on the site feature crevices and other features that could provide suitable roosting sites for bats, which forage nearby. These structures are also beneficial for nesting birds, offering shelter and breeding sites.
- 10.155 The vegetation present offers additional habitat for foraging and nesting, contributing to the overall biodiversity of the area. However, there are also invasive non-native species present, which may compete with native wildlife for resources and impact habitat quality.
- 10.156 The buildings across the site were surveyed at two separate intervals and are considered to hold low potential to support roosting bats. However, it is recommended a pre-demolition inspection is undertaken to determine no new potential roosting features have formed since the survey.
- 10.157 In respect of nesting birds, the mitigation measures align with best practice principles which recommends demolition / clearance to occur outside of nesting bird season,
- 10.158 It is considered expedient to secure the mitigation measures identified in the Ecological Appraisal by condition and that they implemented in full. This is necessary to conserve and enhance protected and Priority species particularly bats and nesting birds and 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.

Biodiversity Net Gain

- 10.159 The relevant primary legislation for the statutory framework for biodiversity net gain is principally set out under Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act 1990. This legislation was inserted into the 1990 Act by Schedule 14 of the Environment Act 2021 and was amended by the Levelling Up and Regeneration Act 2023. The Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations 2024 made consequential amendments to other parts of the

1990 Act. London Plan Policy G6 and Local Plan Policy 30 seek to enhance biodiversity within the site.

- 10.160 The Legislation introduced a mandatory 10% Biodiversity Net Gain requirement for most new developments in England. Developers must demonstrate a measurable increase in biodiversity using the Defra Biodiversity Metric. BNG must be maintained for at least 30 years through on-site or off-site habitat creation or enhancement.
- 10.161 Although the mandatory BNG will not be achieved in the full component due to the net loss of urban trees, the shortfall would be able to be achieved across the wider outline component. Place Services have confirmed that the post-intervention values are realistic and deliverable. As such, aligning with Government's advice for phased development an overall biodiversity Gain Plan can be secured by planning condition with subsequent stages of the reserved matters submission accompanied by a BNG Plan for that phase.
- 10.162 A further Habitat Management and Monitoring Plan can be secured to ensure the onsite enhancements are appropriately managed over the set period of time. Again, this would align with the initial submission and subsequent phases.

Conclusion

- 10.163 With the measures secured by planning condition and Legal Agreement or unilateral undertaking whichever is the appropriate legal mechanism will enable the LPA to demonstrate its compliance with its statutory duties, London Plan and Local Plan policies including its biodiversity duty under s40 NERC Act 2006 (as amended) and delivery of mandatory Biodiversity Net Gain.

Flood Risk and Drainage

- 10.164 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.
- 10.165 The application site is located within Flood Zone 1 in an area benefitting from river flood defences. The Risk of Flooding from Surface Water (RoFSW) map has identified that areas of the site are at medium (1%-3.3% PA) to high (over 3.3% PA) risk from surface water flooding in the north-west and south-east corners.
- 10.166 The retail to the north carries lower risk and flood resistance measures (including waterproof upstands within the external walls) including the ground floor resident units are satisfactory.
- 10.167 Sustainable urban drainage systems have been incorporated into the proposal in the form of permeable paving, rain gardens, geocellular storage and green roof systems at the top roof level. The use of soakaways, wetlands, ponds, and swales are not viable at this site due to soil conditions, available space, and levels constraints.
- 10.168 Overall, the integrated approach mitigates flood risks effectively and adaptively manage flood hazards throughout the lifetime of the development with appropriate means of drainage incorporated into the design of the scheme. These measures collectively aim to

manage surface water and flood risks effectively, ensuring the safety and resilience of the development during flood events. 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

- 10.169 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 identify a need for 1 play area catering for under-11s and 1 for children between 12-16, to meet an existing shortfall in the local area.
- 10.170 The quantum of play space for the full and outline (based on the indicative housing mix) components are summarised below. The play spaces are located on podium gardens and roof terraces where the majority is within the civic square and street play pockets. The spaces are situated where they benefit from a high degree of surveillance in public accessible areas and security within private spaces.

Table 14: 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	1128 sqm	1330 sqm
5 – 11 years	888 sqm	691 sqm
12 plus years	669 sqm	352 sqm
Total	2686 sqm	2373 sqm

- 10.171 Although the outline element and final residential mix is unknown, it can be seen that there would be shortfall within the site. However, the applicant has identified a parcel of open space on Newbury Close which could provide the 313 sqm of play space to meet the on-site shortfall (see figure 6). The existing open space is considered to be a reasonable distance and safe route which is accessible by new occupiers that can be used additionally by existing residents. It is proposed the open space can provide an opportunity for a play area which would focus on children in the age groups 5-11 and 12+. It is anticipated the design of the play space would focus on motor and social skills for the younger age group (active play to include climbing, swinging, balancing, hiding and passive play (such as communal flexible seating areas for social activities). Play elements addressing age group

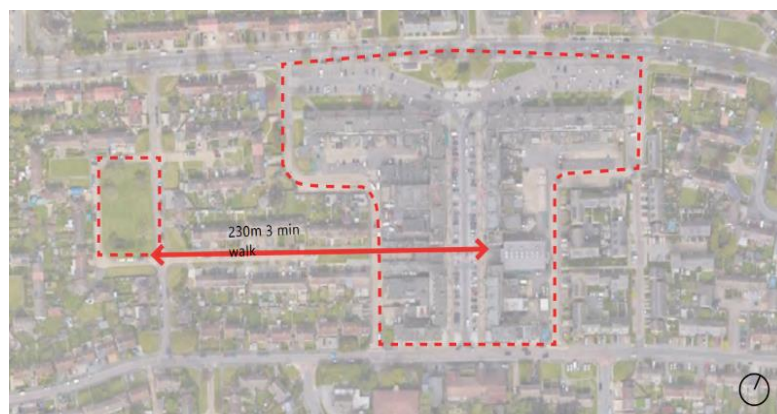


Figure 6: Location of proposed offsite play space

12+, would focus on creating open flexible spaces for various sports, fitness spaces and social spaces. Should Newbury Close not be feasible there are other open spaces in the locality which could provide the space for the offsite play space provision.

- 10.172 It is considered the combination of on-site provision and the land identified on Newbury Close would satisfy London Plan Policy S4 and Policy 18 of the Local Plan in terms of the quantum requirements for play space. The Section 106 is considered the appropriate mechanism to secure the off-site play space and the management of the space in perpetuity.

Urban Greening Factor

- 10.173 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 0.36. This would be achieved through a range of urban greening measures such as high-quality landscaping, trees, rain gardens, green roofs and nature-based sustainable drainage.
- 10.174 There is a shortfall when using the residential score target, however, the scheme is mixed use as it is a redevelopment of a District Centre. For such environments, the landscaping has to be more durable and accessible, with lower maintenance that can support a busy urban environment. Whilst this has to be high quality it needs to be balanced against other contributing factors to the scheme which may inevitably result in the lowering of the greening score.
- 10.175 The applicant has tested a scenario where to increase the score to 0.38 an additional 17 car park bays would have to be removed from the proposal. Reducing onsite parking to facilitate a greater score would potentially affect the parking on the surrounding streets. As such it is considered the proposed UGF score strikes an appropriate balance between the competing factors.
- 10.176 Further improvements could be made through the reserved matters as they come forward with the Design Code bolstering the opportunities to explore as it aims to prioritise green infrastructure as a core design objective. The imposition of planning condition to set the UGF score as a minimum target would help achieve an uplift at the later stages.

Environmental Issues

- 10.177 The Council's Environmental Health Officer has raised no objections in relation to any historical contaminated land issues, air quality impacts or dust mitigation.

Land Contamination

- 10.178 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 on-site contamination (primarily made ground, dry cleaners, tanning and nail salon, cleaning business and substation) by direct contact with impacted soils/liquids, inhalation of soil vapour, dust fibres, generation/migration/accumulation of ground gases and vapours.
- 10.179 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.

Air Quality

- 10.180 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). However, the submitted air quality assessment sets out design measures and best practice measures which demonstrates the development would not adversely affect air quality. To safeguard against additional unnecessary impacts to air quality, conditions are recommended to mitigate future impacts during the construction phases of the development, including requirements for All Non-Road Mobile Machinery and measures to control emissions during the construction phase into a Construction Management Plan.

Noise

- 10.181 The acoustic assessment submitted states that given the location of the site there is unlikely to be significant noise generated that may represent greater harm to neighbouring residents given the existing degree of exposure from current operations.
- 10.182 In respect of future occupiers through careful site management and appropriate design measures internal noise and music can be appropriately controlled to within an acceptable tolerance with measures to minimise street activity associated with the commercial use(s).
- 10.183 Noise and activity associated with deliveries and waste refuse collections can be carefully managed through a delivery and waste management strategy for the future commercial uses to ensure activities respect tenants who live in close proximity to the activity.
- 10.184 Therefore, subject to conditions governing future machinery use and delivery/refuse collections the proposed development would be acceptable on noise grounds.

Sustainable Waste Management

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

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

Circular Economy

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

Waste Management

- 10.187 The application submission is accompanied by a Waste Management Strategy (WMS) which has been subsequently revised during the course of the application.

Full component

- 10.188 Each residential property will be provided with a segregated waste bin where residents can take food waste / bulky waste to stores within the building (adjacent to the lobby area) and other refuse to URS containers located close to the building's entrance doors. The URS locations are on the outer edge of the footway allowing for pedestrian movement, adjacent to half laybys on East Dene Drive and Farnham Road. A swept path analysis demonstrates that collection vehicles can satisfactorily arrive, travel through and exit the site.
- 10.189 In respect of commercial waste individual units will have sufficient capacity internally to allow refuse, recycling and food to be segregated. On agreed collection days and agreed times, each tenant will leave waste bags in designated areas, where collection operatives will collect directly. The location of the collection areas is on the outer edge of the footway adjacent to the parking bays on Hildene Parade to the north and close to the road edge on the west and southern side of Block A. Routes have been provided between the parking bays for collection travel where vehicles would wait on Hildene Avenue outside of normal trading hours to minimise disruption to visitor vehicular traffic. The half layby on Farham Road would share the space with URS collections.
- 10.190 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.
- 10.191 It is considered to be satisfactory subject to imposition of relevant conditions in the case of an approval to ensure collections are appropriately coordinated and that refuse is managed in an acceptable manner. It is considered that the proposed development will provides a suitable waste strategy that meets the policy requirements of the London and Local Plan.

Outline Component

- 10.192 It should be noted that the exact layout of the remaining blocks and arrangement of routes and spaces would be considered under the subsequent reserved matters application. However, the revised WMS has been based on the indicative quantum of the development in how waste is to be managed.
- 10.193 In terms of residential waste, the revised WMS sets out the guiding criteria to inform the future layout and the required quantum. Again, it is proposed that residential waste would use URS where locations would be sited close to building entrances along key routes shown on the parameter. Plans. Resident provision, food and bulky waste would be within the building envelope mirroring the arrangement of Block A.

- 10.194 Non-residential waste follows the principles of Block A where it will be required to store waste within the premises as part of future fit outs and taken to designated locations on collection days within a set time window.
- 10.195 The principles of waste storage and collection, reaffirmed by the Design Code in respect of waste is considered acceptable. The details and management for waste and refuse (covering residential and non-residential uses) would be controlled by planning condition upon submission of each reserved matters application.
- 10.196 Overall, it is considered the waste and storage strategy is acceptable and would satisfy London Plan and Local Plan policies.

Accessibility and Inclusivity

- 10.197 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.
- 10.198 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. However, it is anticipated that the residents' units would still achieve Building Regulation compliance.
- 10.199 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

- 10.200 Detailed drawings of Block A are before the council, however, the building design and layout for the outline component are reserved for a subsequent submission. However, it is necessary to consider the extent to which the submitted Parameter Plans and Design Code have considered secured by design matters.

Full component

- 10.201 The design strategy emphasises active frontages with clear legible entrances, which takes into account visibility and safety. The lobbies are compartmentalised with intervening access doors to the core and stairs allowing for an access control strategy to be implemented. Ground floor cycle parking is arranged into smaller clusters of parking, separate to lobby access, with the potential for these to be separately secured and fob accessed. Footways are an appropriate width allowing movement of pedestrians with car and short stay cycle parking naturally overlooked by future occupiers.
- 10.202 The associated landscaping and public realm to have tree canopies at 2m or higher to maintain good sight lines at ground level. Bollards are between the edge of Farnham Road and the northern most area of the Civic Square.

Outline component

- 10.203 The majority of the site would be brought forward in a block formation, which is typical of a land optimising regeneration scheme. In terms of the outline component the Design Code sets out the principles in how to bring forward the scheme by ensuring there are clear lines of sight with clear defensible space and delineation between public and private areas. Routes and areas should have a good level of natural surveillance, with no dead ends and have active building frontages.
- 10.204 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.

Consideration and Conclusion

- 10.205 The Metropolitan Police's Designing Out Crime team have been consulted and have had subsequent meetings with the applicant team. It is reported 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.
- 10.206 A request for detailed information relating to Secured by Design measures is to be secured by condition. The condition would be phased to account for the submission of the subsequent reserved matters and measures required to make it acceptable.

Financial and Other Mitigation

- 10.207 The heads of terms of the Section 106 agreement have been set out above. These are considered necessary to make the application acceptable, in accordance with policy DF1 of The London Plan 2021 and Policy 16 of the Havering Local Plan 2021.
- 10.208 The proposal would attract the following Community Infrastructure Levy contributions to mitigate the impact of the development:
- 10.209 The Mayor's Community Infrastructure Levy (MCIL1) was introduced in 2012 to help finance Crossrail and on 1 April 2019 the new, replacement charging schedule (MCIL2) came into effect in order to fund Crossrail 1 (the Elizabeth Line) and Crossrail 2. If approved, the proposed development would be subject to (CIL) applied at a rate of £25 per square metre of additional gross floor area.
- 10.210 The London Borough of Havering's CIL was adopted in September 2019. Open market residential development will attract a levy of £125 per sqm of net additional floor space. If approved, the proposed development would be subject to (CIL) applied at a rate of £125 per square metre of additional gross floor area.
- 10.211 The applicant has provided a breakdown of the proposed buildings, which could result in the following CIL payments:

Table 15: Indicative CiL calculations		
Planning obligation	Monetary contribution	
	Full	Outline
Mayoral CIL	£273,625	TBC – reserved matters stage

Borough CIL	£1,368,125	TBC – reserved matters stage
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Equalities

- 10.212 The Equality Act 2010 provides that in exercising its functions (which includes its role as Local Planning Authority), the Council as a public authority shall amongst other duties have regard to the need to:
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act;
 - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
 - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 10.213 For the purposes of this obligation the term “protected characteristic” includes:- age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.
- 10.214 Policy CG1 of the London Plan also seeks to support and promote the creation of an inclusive city to address inequality.
- 10.215 Therefore, in recommending the application for approval, officers have had regard to the requirements of the aforementioned section and Act and have concluded that a decision to grant planning permission for this proposed development would comply with the Council’s statutory duty under this important legislation.
- 10.216 In light of the above, the proposals are considered to be in accordance with national regional and local policy by establishing an inclusive design and providing an environment which is accessible to all. In addition, that the proposal will provide much needed affordable housing.

11.0 PLANNING BALANCE AND CONCLUSION

- 11.1 Section 38(6) of the Planning and Compulsory Purchase Act, 2004 requires the determination of this application to be made in accordance with the development plan, unless material considerations indicate otherwise. In coming to a balanced view, careful consideration must be given to the weight to be afforded to any conflict with the Local Plan, taking into account all material considerations in the overall planning balance, with particular reference and weight afforded to the council’s housing land supply position and the weight to be afforded to development plan and its relevant policies.
- 11.2 Although the National Planning Policy Framework (NPPF) does not change the statutory status of the development plan it constitutes an important material consideration in the determination of planning applications.
- 11.3 When applying the relevant Local Plan policies in the overall planning balance the weight to be afforded to the relevant policies, and any conflict with these needs to be clearly understood. NPPF Paragraph 61 sets out that to support the government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed. The Council’s most recent Housing Land Supply Statement (October 2023) identifies a housing land supply of 2.4 years, which

is a significant shortfall against the required 5-year supply set out in paragraph 74 of the NPPF. This means applying a tilted balance towards the delivery of residential development.

11.4 The presumption in favour of sustainable development identified by the NPPF means that it is necessary to consider whether the proposed development represents 'sustainable development'. NPPF paragraph 7 sets out the three dimensions to sustainable development as being:

- Economic
- Social
- Environmental

11.5 The presumption in favour of sustainable development means that it is necessary to consider whether the proposed development represents 'sustainable development'. NPPF paragraph 8 identifies that there are three dimensions to sustainable development; namely economic, social and environmental. The NPPF advises that these roles should not be undertaken in isolation, because they are mutually dependent. Furthermore, to achieve sustainable development, economic, social; and environmental gains should be sought jointly and simultaneously.

An economic role

11.6 The economic role is defined as "contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation: and by identifying and coordinating development requirements, including the provision of infrastructure.

11.7 The government has identified the delivery of housing as a key driver of future economic growth and stimulation of the economy. It is accepted that there will be economic benefits with the development through both direct and indirect employment opportunities. Following completion of the development there will be spending in the reimagined District Centre, Harold Hill and the wider area.

11.8 The consolidated retail space still constitutes a District Centre and provides choice of commercial spaces for existing / returning tenants and new tenants to the centre. The proposal would build and enhance the success the District Centre has contributed to the local economy. As such the proposal is considered to maintain and enhance the vitality and viability of the district centre, thereby attracting significant weight in favour of the application.

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

A social role

11.10 The scheme would significantly uplift new housing where 53% will provide affordable housing with a significant proportion upfront in the initial phase of the scheme. The scheme has provided a number of family-sized units given the typology of building blocks and its district centre location. It is considered that the delivery of affordable housing at a higher level than normally received should be afforded significant weight in favour of the application. In conjunction with the market housing will make a positive significant

contribution towards meeting the housing needs of the borough. This is afforded significant weight in favour of the application.

- 11.11 The proposal builds on the strengths of the existing District Centre and incorporates more community uses to complement the existing retained library on site.
- 11.12 It is considered that this scheme would deliver a mix of onsite open space, off site provision and public spaces, which will all contribute towards the creation of sustainable communities. The social benefits of the development are therefore considered to be significant and are afforded significant weight in the overall planning balance.

An environmental role

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

Conclusion

- 11.16 The role of the Local Planning Authority is to objectively determine a planning application in accordance with the Development Plan unless material consideration suggest otherwise and with what is before them.
- 11.17 The scheme demonstrates strong alignment with the three dimensions of sustainable development outlined in the NPPF, namely, economic, social, and environmental. 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) the proposals are nevertheless considered to represent a viable, and on balance acceptable form of development.
- 11.18 Given the above with regard to the outline application, a condition is recommended restricting the maximum number of dwellings to 481. The maximum number achievable may be less subject to detailed consideration of the reserved matters. This will involve the consideration of the 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.

- 11.19 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.