



**Havering**  
LONDON BOROUGH

**Strategic Planning  
Committee – Developer  
Presentation**

**26 February 2026**

<b>Pre-Application Reference:</b>	<b>W0198.25</b>
<b>Location:</b>	<b>Land North of Benets Road, Hornchurch</b>
<b>Ward:</b>	<b>Cranham / Emerson Park</b>
<b>Description:</b>	<b>Residential-led development of up to 570 dwellings.</b>
<b>Case Officer:</b>	<b>Andrew Thornley</b>

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## **1. Background**

1.1 This proposed development is being presented to enable Members of the committee to view it before a planning application is submitted and to comment upon it. The development does not constitute an application for planning permission and any comments made upon it are provisional and subject to full consideration of any subsequent application and the comments received because of consultation, publicity and notification.

## **2. Proposal**

2.1 The proposal relates to the development of the site, comprising approximately 570 homes and some ancillary non-residential floorspace. The developable areas would be concentrated across the central and western parts of the site, whilst the eastern half of the site would be used as areas of open space. This results in a scheme where approximately 12 of the 24.5 hectare site would be built on.

2.2 The scale of the proposed development includes buildings of heights increasing from two and a half storeys around the periphery of the site, up to four storeys in the centre, with intervening heights of three storeys, to gradually step up away from the site boundaries.

2.3 Access to the site is proposed from the north-west, via an extension to Rayburn Road and utilising part of the existing farm track which connects to it, and which would have to be widened and formally laid out to provide a usable access for the

proposed development. A secondary access is proposed in the south-east corner, from Benets Road.

2.4 The proposal is likely to come forward as an outline consent with all matters reserved.

### **3. Site and Surroundings**

3.1 The approximately 24.5 hectare site comprises four fields in agricultural use to the north of Benets Road, to the east of Wingletye Road, to the south of Emerson Park Academy (a school) and to the west of Upminster Golf Club. The boundaries of the site are characterised by a single row of established deciduous trees, with more extensive copses in the north-west (within the application site) and south-east (mostly outside the application site), which are both protected by Tree Preservation Orders (TPOs).

3.2 There is an existing vehicular access to the site in the north-west corner from Rayburn Road, via a small track which runs through the woodland area, and three public footpaths (Footpaths 273, 284 and 285) which run along the boundaries of the site, with pedestrian accesses in all four corners.

3.3 The surrounding area (particularly to the south and west of the site) is of a suburban character, like most residential parts of the borough, and is characterised by rows of two-storey detached, semi-detached, and terraced houses with sloping roofs and relatively large rear gardens. There are some examples of bungalows, such as on Wingletye Lane, and flat-roofed houses, such as on the corner of Benets Road and Frimley Avenue. The areas to the north and east of the site are open and less developed, with a school and its playing fields and a golf course forming these respective boundaries, but overall the wider area appears as the edge of a traditional suburban town on the outskirts of London.

### **4. Relevant Planning History**

4.1 Z0004.25 - Request for Screening Opinion under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in relation to an outline planning application for a residential-led development of up to 570 dwellings. EIA Not Required. Issued on the 11<sup>th</sup> September 2025.

4.2 This Screening Opinion was referred to the National Planning Casework Unit, working on behalf of the Secretary of State for the Ministry of Housing, Communities and Local Government, on the 22<sup>nd</sup> September 2025 by a third party, so that the council's decision could be reviewed, and for the SoS to issue their own Screening Direction.

4.3 The Planning Casework Unit issued their Screening Direction on the 16<sup>th</sup> January 2026, confirming that they agree with the LPA's position, and have concluded that the development is not EIA development.

## 5. Planning Policy Designations

- 5.1 The application site is subject to several planning designations, as set out in the Havering Local Plan.
- 5.2 Chief amongst these is the Green Belt, which the application site falls wholly within, which is a highly restrictive planning designation which seeks to protect the openness of the land around the edge of London, as set out by Policy G2 of the London Plan (London's Green Belt). The site is further classified as Grade 2 under the Agricultural Land Classification system, where Grade 1 (excellent) is the best and Grade 5 (very poor) is the worst.
- 5.3 In addition, the site falls within the Minerals Safeguarding Area, which seeks to protect the future supply of aggregates and prevent forms of development which would sterilise or prejudice future mineral extraction, in accordance with Policy 37 of the Havering Local Plan (Minerals Safeguarding).
- 5.4 The site is also designated as an Archaeological Priority Area (APA), with prehistoric potential, as set out in Policy 28 of the Havering Local Plan (Heritage Assets).
- 5.5 There are two small patches of land designated as being 'suitable for small wind energy developments' in the east of the site, as set out by Policy 36 of the Havering Local Plan (Low carbon design and renewable energy).
- 5.6 The Thames Chase Community Forest also covers the site, and largely overlays the Green Belt designation in this part of the borough. This is an aspirational designation which seeks to develop strategic woodland, habitats and access on a forest-wide scale.
- 5.7 Tree Preservation Orders (TPOs) cover the areas of woodland in the north-west and south-east corners, which are inside and (mostly) outside the site respectively. TPOs are used to designate trees of high amenity value to the public. These areas of woodland comprise a good mix of hawthorn (*Crataegus monogyna*), elder (*Sambucus nigra*), bramble (*Rubus fruticosus* agg.), holly (*Ilex aquifolium*), and holm oak (*Quercus ilex*), with a smaller number of other native species.
- 5.8 Ingrebourne River runs in a broad north/south direction to the west of the site, lying within the adjacent Upminster Golf Course, and subsequently some parts of the site, mostly in the south-east corner, are designated as Flood Zones 2 and 3. In addition, the Ingrebourne Valley Site of Importance for Nature Conservation (SINC) is also approximately 40-100 metres east of the site, which broadly follows the course of the Ingrebourne River but also extends to include some land adjacent to the river, largely on the eastern bank but also including a small section on the western bank approximately 90 metres south of the south-east corner.
- 5.9 The Hornchurch Cutting SSSI is located approximately 300 metres south-west of the site. This SSSI is an important Ice Age geological site, marking the maximum southerly extent of the northern ice sheet during the whole of the Ice Age in Britain. This railway cutting is also designated as the Railside Land SINC and wildlife

corridor, which is a linear feature which connects area of wildlife habitat acting to mitigate some of the adverse ecological effects of habitat fragmentation.

## 6. Quality Review Panel

6.1 The pre-application scheme was presented to Havering's Quality Review Panel on the 13<sup>th</sup> January 2026. The feedback from the QRP, and the applicant team responses, are summarised in the table below:

QRP Comments	Applicant Team Response
<b>Masterplan Principles</b>	
<p>The character of the site should be informed by a detailed analysis of the local context (both the suburban morphology and landscape) - recognising how the surrounding area varies from street to street.</p>	<p>The character work to date will be expanded and developed further and will form part of the contextual analysis with the DAS.</p> <p>The DAS will also cover design principles and how the character analysis has influenced the proposed masterplan.</p>
<p>The relationship of the site within the wider setting of Hornchurch and Upminster should also be considered. This analysis should be used to inform the placemaking narrative that underpins the design approach.</p>	
<p>The panel does not expect the design team to replicate the surrounding streetscape which is characterised by granular layouts, deep setbacks and large gardens, and would significantly reduce densities.</p>	
<p>However, the team should seek to draw on the qualities of this context to establish a placemaking approach that informs the appropriate density and quantity of development for the site.</p>	
<p>The outline application should be supported by a more developed illustrative masterplan and a design code, which set clear parameters and guidance that should include, but not be limited to, character areas, street hierarchy, block typologies, servicing and parking.</p>	
<p>Defining the design code at this stage will provide a framework for the future developer to take forward and give council officers confidence that a high-quality scheme can be delivered.</p>	<p>The design code will seek to strike a balance between ensuring the delivery of a high quality scheme, without inhibiting innovation for future housebuilders.</p>

	Street hierarchy, as well as pedestrian and cycle movement will be covered by the design code.
Given the minimal variation in building heights, the distribution of density is likely to be less impactful than establishing a clear parking strategy and well designed street scene that will appropriately frame the buildings at any height.	The masterplan and code will align with policy in regard to parking provision. A variety of parking solutions will be implemented across the scheme to ensure this is sensitively delivered. Street design will be guided by landscape principles to create an attractive street scene which creates a setting to the built form.
The applicant is encouraged to look at Barking Riverside, Pudding Mill Lane and Old Ford masterplans, which are good precedents of high-quality design coded developments that have been delivered.	The suggested precedents will be studied by the project to team and we will look to draw from best practice.
Precedents such as LLDC Olympic Park developments, Northwest Cambridge and Accordia should also be considered. These schemes successfully deliver a suburban character with higher densities.	The outline code will feature illustrative visuals and sketches to summarise the proposed character and placemaking strategy.
<b>Access and Servicing</b>	
The applicant should demonstrate that the wider area can accommodate both the size of vehicles and uplift in trip generation associated with this development.	The accesses will be designed in accordance with the relevant design guidance and swept paths will be provided within the application to demonstrate that appropriate access can be provided. The access road is 6m wide and in excess of what need to be provided.  Construction traffic would be subject to a construction traffic management plan and the size and timings of these movements can be managed.
There are concerns that local roads leading to the site - specifically the primary access on Rayburn Road - may struggle to adequately accommodate heavy goods vehicles (HGVs) and larger service vehicles, due to constrained mini-roundabouts and restricted turning radii.	This will be included within the Transport Assessment including capacity analysis of the junctions agreed with the Highway Authority during scoping.
The capacity of Rayburn Road, including the junction with Wingletye Lane,	

<p>should be considered in more detail. The introduction of approximately 570 homes would also have a major impact on the local road infrastructure which is already congested.</p>	
<p>The panel is concerned that the primary access road is too narrow for construction traffic and service vehicles to access the site and therefore questions whether the development is viable.</p>	<p>The existing width of Rayburn Road is 6m wide and therefore exceeds the 5.5m width required for two HGVs to pass. The width of this road has not been raised as a concern by the Highway Authority during our scoping discussions to date.</p>
<p>The secondary route is also restricted, which could cause significant issues with access to the site should the primary road be closed for any reason.</p>	<p>Notwithstanding the above, within the site the cross sections will be provided and a carriageway width of 6.2m could be secured in parameter form along the main travel corridor including a loop such that a bus service could be provided by TfL at a later date. There is a balance to be struck between placemaking and providing wider carriageways to accommodate a bus service/ vehicular movement.</p>
<p>Vehicle access may therefore need to be restricted by weight or axle width, and future bus access limited to a small hopper service, should TFL choose to introduce a route.</p>	<p>It is agreed that the closure of any primary access for a development would result in an undesirable access arrangement, however this is expected to be an incredibly rare occurrence, nor is it a reasonable design criteria.</p>
<p>As this is a new development it should be fully compliant with 'Manual for Streets' guidance.</p>	<p>Agreed, the scheme is being developed in accordance with relevant guidance including Manual for Streets.</p>
<p>A clear road hierarchy should be developed to define road widths, parking arrangements, swales and suds, and demonstrate how pedestrians, cyclists and vehicles will move around the site.</p>	<p>Agreed, a road hierarchy will be identified within the DAS and parameter plans which will demonstrate the movement strategy. This will focus on promoting active and sustainable travel in accordance with policy and best practice.</p>
<p>Segregated pedestrian and cycle routes, particularly on primary and secondary streets, should be defined within the design code.</p>	<p>The existing Public Rights of Way within the site will be retained and upgraded with new surfacing where appropriate.</p>
<p>The development should be planned within its wider context ensuring that existing footpaths linking to and crossing the site are retained and pedestrian</p>	

connectivity is supported.	
Road widths should be addressed as part of the parameter plans, as this will have an impact on the plot sizes and could result in taller buildings to deliver a viable scheme.	A carriageway width of 6.2m could be secured in parameter form along the main travel corridor.
The road layout has numerous dead ends and turning heads which could be designed out to create a more efficient, coherent and safer street network. Access and turning for refuse vehicles should also be reviewed, as the current road layout limits their ability to manoeuvre.	The internal arrangement is a reserved matter, however the indicative masterplan will be updated to minimise the turning heads within the site.
The panel recommends mapping pedestrian and cycle routes through the site to understand desire lines and connectivity.	The existing Public Rights of Way within the site will be retained and upgraded with new surfacing where appropriate.
Eliminating single-sided pavements is recommended, to reduce the need to cross multiple roads. This would improve child independence and safety.	The internal arrangement is a reserved matter, however the indicative masterplan will be updated to minimise the areas where footways are provided on one side of the carriageway.
The use of shared surfaces should be carefully considered, as these can be misused by parked vehicles and be difficult to manage.	The internal arrangement is a reserved matter, however the indicative masterplan will be updated to remove shared surfaces.
The parking strategy should be reconsidered, with a variety of typologies and provision. Including on-street spaces should be considered alongside on-plot, to provide a better quality of suburban street scene.	The internal arrangement is a reserved matter, however the DAS will provide details on parking provision and anticipated typologies. The level of parking provision is controlled through the minimum standard provided by the London Borough of Havering and the maximum standard set out within the London Plan, both of which need to be adhered to. On-street parking is likely to be utilised for visitor parking and to address potential overspill concerns.
<b>Ecology</b>	
The panel is concerned that ecological surveys will be undertaken after the outline application is submitted, meaning the scheme will not reflect their findings. The surveys should be used to inform and determine the design approach.	Further protected species surveys ( <i>i.e.</i> Breeding bird surveys and ground level tree assessments) are recommended. Given the location of the site and habitats present, it is thought that any protected species, if present on site, can be easily mitigated for and certainly would not form a core population for any

	species in particular. The main concern would be the loss of arable land for nesting skylark, however this can be mitigated for with off-site plots, if required, as it would not be feasible to mitigate for them within the scheme.
A badger scoping survey should be completed before the application is submitted as it could have a significant impact on the masterplan. If a sett is identified, the scheme must be designed to accommodate it, to avoid applying for a licence for closure.	All areas of the site were accessed as part of the initial preliminary ecological appraisal and no badger signs or setts were observed. The site is disturbed through dog walkers and public utilising the site for walking and a commuting route. There are also well-established residential developments within the immediate vicinity causing a disturbance. A pre-commencement walkover for badgers will be undertaken prior to works, but a full suite of surveys are deemed disproportionate.
Other surveys, including a ground level tree assessment, breeding bird studies and a roosting bat survey should be carried out to assess the impact of construction and street lighting on wildlife.	Further breeding bird surveys are scheduled for 2026. Ground level tree assessments will be undertaken on any trees to be impacted. However if trees are to be retained, can be protected following the use of root protection areas and sensitive lighting this will mitigate impacts to bats.
The use of the existing vehicular access point as the primary access helps minimise the number of trees affected. However, the panel is concerned the carriageway width, pavements and lighting required will have a significant impact on natural assets within and outside the site boundary.	Agreed, further survey work will be required in relation to impacts on trees and bats once road width is confirmed.
More detailed work is required to demonstrate the width of road required and the impact on the existing woodland.	
There are also concerns about the isolation of the triangle of woodland to southeast of the site, and the disruption to existing wildlife corridors due to the new road.	Assuming this is meant to be the woodland to the north west where the new access road is coming in, there is already a gap between the woodland edges that forms a footpath, the addition of a road would not cause major fragmentation for wildlife and can be mitigated for. The existing trees are to be retained with new tree planting and greenspace also proposed to limit isolation. If it is in fact the south eastern

	woodland, there is connection to the east away from site that connects to the east to the golf course, with the line of trees to the east of the development site been retained with greenspace also proposed in this area to maintain wildlife corridors.
The panel requests further evidence to demonstrate the proposed flood remediation measures are adequate as the information provided does not offer sufficient reassurance.	The River is c.50m from the development site, and located within an existing golf course that is subject to disturbance. Furthermore there is an existing public footpath along the east of the site, between the development site and the River. Furthermore, the east of the site is to be used for public open space and not for residential development parcels, therefore not restricting wildlife access.
The existing network of ditches, swales and scrub provides ecological connectivity to the River Ingrebourne. However, the scheme will narrow the river corridor and restrict wildlife access to it. The applicant should therefore assess the impact of the development on wildlife movement across the site.	
The panel welcomes the retention of undeveloped land to the east of the hedgerow and acknowledges the potential of the landscape strategy. However, there are concerns that increased traffic and street lighting will negatively impact the site, and that the proposed open space does not sufficiently mitigate these effects.	A sensitive lighting strategy would be used throughout the site to mitigate any impacts on retained habitats.
<b>Public Realm and Landscape Design</b>	
The design appears to prioritise plot layout over landscape and ecology considerations; the panel would have expected a greater level of landscape detail at this stage if the scheme is intended to be landscape-led.	Additional plans will be included in the DAS to show how the scheme has been shaped by its landscape.
The panel welcomes the principle of a landscape-led approach but would like the applicant to demonstrate how the existing landscape, ecology and biodiversity character informs the design approach.	
More information is required on how urban greening and net biodiversity targets will be achieved as this is not clear.	This will form part of future pre-application discussions, and form part of the submission.
Each site edge condition requires further consideration to ensure a safe and secure environment is created. Single sided streets should be replaced	Due to the existing landscape structure of the Site (incl. PRow), it is not possible to arrange plots back to back

with gardens backing on to existing gardens where possible.	onto existing gardens. Edges will be illustrated in the Design Code.
Character zones should include differing garden sizes to provide variety and choice. This could also create a variety of plot dimensions.	This can be incorporated at the Design Core stage.  It should be noted that the proposals presented to DRP were at the early stage of design and are subsequently being progressed in more detail to further consider character, density, patterning and street design.
New trees are welcomed but the proposal lacks granularity. Bushes, shrubs and other forms of planting should be indicated in the illustrative masterplan.	This will be illustratively shown on the Landscape Strategy plan, and developed further at the detailed design stage.  The design code will also cover landscape design, street trees and open space types.
More evidence should be provided to support the number and size of play areas, as there are concerns that these seem insufficient for the number of family-sized homes.	The play standards will be reviewed again, and at the detailed design stage, the equipment would be chosen to accommodate a range of ages and abilities.
Provision for adult and older children's recreation should also be included in the landscape strategy to demonstrate the scheme has been thoughtfully designed for all age groups.	
'Day in the life' studies would help understand how different user groups will engage with the spaces.	

## 7. Key Planning Considerations

### 7.1 Principle of Development

7.2 The application site is designated as Green Belt, and put simply, the Green Belt is a very restrictive planning designation which seeks to protect land from development with its core principle related to the permanent protection of openness. Any harm to the Green Belt's openness should be given significant weight in the planning balance, with nearly all forms of development considered inappropriate. The applicant has brought forward these proposals on the basis that they consider the site to be grey belt.

7.3 In accordance with footnote 55 of the NPPF, if a site is designated as being 'Grey Belt', development of the land is not considered inappropriate by definition, and in such instances, very special circumstance are not required to justify development.

It should be noted, however, that to be considered as not inappropriate where a site is considered to be Grey Belt, in accordance with Para. 155 of the NPPF, the development must also not fundamentally undermine all five purposes (taken together) of the remaining areas of Green Belt within the borough, must demonstrate that there is an unmet need for the type of development proposed (for housing, this is a lack of a five year housing land supply), and must be in a sustainable location (through limiting the need to travel and offering a genuine choice of transport modes). The proposal must also meet the 'Golden Rules', as set out in the NPPF, which require that the policy target of affordable housing is provided on-site (in this case 50% by habitable room), necessary improvements to the local infrastructure are made, and new, publicly accessible green spaces are provided.

7.4 The proposal as stated above has been brought forward by the applicant on the basis that the site constitutes 'Grey Belt', which is defined in the NPPF as "*land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143*".

7.5 Para. 143 of the NPPF explains that the Green Belt serves five key purposes, namely:

- a) **to check the unrestricted sprawl of large built-up areas;**
- b) **to prevent neighbouring towns merging into one another;**
- c) to assist in safeguarding the countryside from encroachment;
- d) **to preserve the setting and special character of historic towns;** and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

7.6 Green Belt guidance has been provided in the form of the National Planning Policy Guidance (NPPG), which sets out how Grey Belt land should be identified, and this guidance requires a site to be assessed against each relevant purpose (a, b, and d as set out above) and to be assigned as a 'Strong', 'Moderate', or 'Weak' contributor against that purpose. Any assessment area that is judged to not strongly contribute to any one of purposes a, b, or d can be identified as grey belt land, and subject to also satisfying Para. 155 of the NPPF, can be considered an appropriate form of development.

7.7 With regards to the above, the Council along with other Councils, has been required to undertake its own Grey Belt Assessment, through LUC (a third party), which it is currently doing and this formal assessment will inform the council's long-term position on Green Belt and Grey Belt. Until this Green Belt / Grey Belt assessment has been published, each site must be assessed on its own merits on an individual site by site basis where a planning application has been received.

7.8 Havering's most recent Green Belt Study was carried out in 2016, and this study divided the borough's Green Belt into 24 parcels. The application site falls at the southern end of Parcel 13, which is described as making a "Paramount" contribution under purpose (a), a 'Major' contribution under purpose (b), and a "Fundamental" overall contribution to the Green Belt. The rationale being that

Parcel 13 provides separation between the northern part of Upminster at Cranham, and the eastern edge of Romford, at Emerson Park.

7.9 At this stage in the pre-application process, no formal determination as to the site's Green or Grey Belt status has been made by officers, however it has not been demonstrated to the council's satisfaction thus far that the site does not strongly contribute to both purposes (a) and (b) of the Green Belt's five purposes (with purpose (d) not being relevant to the site).

7.10 Moreover, the site has a PTAL of between 0 and 1b, indicative of very poor access to public transport, where there would be very heavy reliance on private vehicle trips for the day-to-day lives of future residents, and as such, the site cannot really be described as being in a sustainable location, taking into account paras. 110 and 115 of the NPPF, and relevant London Plan and Havering Local Plan policies relating to sustainable transport.

7.11 In terms of the Para. 155 assessment, it is agreed that there is an unmet need for new housing within the borough, with the lack of a demonstrable five-year housing supply, and on the basis of the information provided, it is likely that the proposal could satisfy the "Golden Rules", as set out under paras. 156 and 157 of the NPPF, if the site was to be assessed to constitute Grey Belt Land.

7.12 The application site is further designated as part of the Minerals Safeguarding Area, as described by Policy 37 of the Havering Local Plan (Mineral Reserves). This designation seeks to safeguard mineral reserves in Havering from other forms of development that would sterilise the resource and/or prejudice future mineral extraction.

#### 7.13 Affordable Housing

7.14 The proposal is set to include 50% affordable housing (by habitable room), to meet the "golden rules" as set out in the NPPF. To meet this, the tenure of the affordable provision must be 70% social/affordable rent, 30% intermediate, in accordance with Local Plan policy.

#### 7.15 Layout, Scale and Massing

7.16 The proposed layout, whilst shown indicatively (noting that the proposal would come forward as an outline consent), seeks to introduce development to the western parts of the site, safeguarding the eastern parts of the site as public open space. This is considered to be a sensible layout, which avoids developing the areas most at risk of flooding, and which is likely to better integrate with the surrounding built form.

7.17 Some concerns are raised with the proposed scale of the four-storey buildings within the centre of the development. Whilst it is recognised that there would be a need to optimise the site's potential, if the principle of development was supported, low-rise apartment blocks would not be particularly in keeping with the more suburban appearance of Emerson Park and Cranham, which are both characterised by one and two-storey houses. Having said that, given the size of

the application site, there may be scope to create a new neighbourhood with its own defining characteristics, which may allow for buildings up to four storeys, provided they relate well to other parts of the development.

7.18 As part of any future outline application, it would be expected that a detailed design code is submitted, which sets out the design principles to be adopted under the later reserved matters applications.

#### 7.19 Access, Transport and Parking

7.20 The application site has a PTAL of between 0 and 1b, indicative of very poor access to public transport, where there would be very heavy reliance on private vehicle trips for future residents.

7.21 On this basis, it is expected that Havering Local Plan's minimum standards are met, and based on the results of a comprehensive Transport Assessment, a level of provision above the minimum standards may be necessary to serve future occupiers.

7.22 Vehicular access into the site would be from the north-west and south-east, utilising an existing farm track into the fields from Rayburn Road and a small unmade track between houses on Benets Roads.

7.23 Owing to the number of additional vehicles which would likely serve a development of this size, there is the potential for a significant increase in vehicle movements and potentially severe impacts on the local highway network. In this respect, Wingletye Lane already appears to experience relatively high levels of traffic at present and is single-carriageway in both directions, with limited scope to increase its capacity.

#### 7.24 Ecology and Trees

7.25 The deciduous woodland within the site has the potential to provide high levels of biodiversity, and hence would be largely retained under the proposals, although it is noted that some tree loss would be required to facilitate the widening and laying of hardstanding across the farm track in the north-west corner to make it suitable for use by general vehicle traffic into the site. This could be offset by replacement tree planting, either around the existing areas of woodland or in other parts of the site (or both), and in any event, the mandatory Biodiversity Net Gain requirement would be applied to any future development which would, as a requirement, ensure that the proposal delivers improvements to existing biodiverse features and/or would involve the creation of new habitats.

7.26 The Ingrebourne Valley SINC is also approximately 40-100 metres east of the site, which broadly follows the course of the Ingrebourne River but also extends to include some land adjacent to the river, largely on the eastern bank but also including a small section on the western bank approximately 90 metres south of the south-east corner.

7.27 Owing to the proximity of the SINC, the priority habitat woodland and the greenfield nature of the site, it is considered that an Ecological Impact Assessment (EclA) would also be required at application stage, in addition to a PEA (Preliminary Ecological Appraisal).

7.28 The boundaries of the site are characterised by a single row of established deciduous trees, with more extensive copses in the north-west (within the application site) and south-east (mostly outside the application site) corners, which are both protected by Tree Preservation Orders (TPOs).

7.29 Any loss of trees protected by a TPO would have to be robustly justified, and it would be expected that any subsequent application is accompanied by an Arboricultural Impact Assessment.

### 7.30 Flood Risk

7.31 Ingrebourne River runs in a broad north/south direction to the west of the site, lying within the adjacent Upminster Golf Course, and subsequently some parts of the site, mostly in the south-east corner, are designated as Flood Zones 2 and 3. In this respect, it is recognised that approximately half of the overall site would remain undeveloped, with approximately 12 hectares reserved for green infrastructure, whilst also stating that the areas of the site in Flood Zones 2 and 3 would not be developed.

7.32 Nonetheless, noting that the application site includes flood zones 2 and 3, and would be significantly above the size threshold, a Flood Risk Assessment (FRA) would be required alongside any future application, and the Environment Agency would be consulted to review this FRA.

7.33 A SUDs Strategy would also be required, and should be designed and implemented in a manner which promotes multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation, which should further support enhancements, where possible, to the Ingrebourne River.

## **8. Conclusions**

8.1 The main consideration of this application will be whether the site constitutes 'Grey Belt', in accordance with the latest planning guidance. At this stage in the pre-application process, the local planning authority is considering the details of the submission and will formally set out a recommended position if an application is subsequently submitted for this site.

8.2 Notwithstanding the Grey Belt considerations, some concerns are raised in respect of the proposed accesses into the site, and the potential transport impacts this may have on the local highway network, which would need to be robustly justified as part of any future planning application.

8.3 The proposed development is still at pre-application stage. The scheme will be further progressed through a design led approach. At this stage we would welcome

Members thoughts and comments on the proposals to be incorporated in the scheme ahead of a potential future submission.