

 Havering LONDON BOROUGH	Strategic Planning Committee 26 March 2026
---	--

Application Reference	P0754.25
Location	Angel Way Multi-Storey Car Park, Romford
Ward	St Edwards
Description	Demolition of the Angel Way multi-storey car park, commercial units and all structures and redevelopment of the site for residential led, mixed-use scheme, alongside a Flexible Class E / F1 (commercial / community use) unit, with car parking, landscaping and related infrastructure including a new sub-station.
Case Officer	Andrew Thornley
Reason for Committee	The application is by or on behalf of the Council and is a significant development.

1. Background

- 1.1 The application site comprises a five-level multi-storey car park located in the north-east part of Romford Town Centre, on Angel Way, which has been deemed surplus to requirements because of its low level of use.
- 1.2 The applicant is Mercury Land Holdings Ltd, a wholly owned Council company. The application seeks the complete demolition of the existing structure followed by comprehensive redevelopment to provide 106 flats split across two buildings.
- 1.3 The application follows pre-application discussions with Council officers and design review by the Havering Quality Review Panel during 2025.

2. Summary of Key Reasons for Recommendation

- 2.1 The proposed development would make a valuable contribution to meeting the Borough's housing need by delivering 106 new dwellings, utilising previously developed land in a highly sustainable urban location. The loss of the existing car park is justified by both strategic asset management priorities and evidence confirming surplus capacity in alternative off-street and on-street provision. The proposals provide much needed housing and are considered to have an acceptable impact on the amenity of neighbouring occupiers, provide adequate

parking and sustainable transport measures, and comply with relevant local and regional planning policy objectives, including the recently adopted Romford Masterplan Supplementary Planning Document. Subject to prior completion of a Section 106 agreement pursuant to Section 106 of the Town and Country Planning Act (as amended) and all other enabling powers securing the obligations listed below, and the conditions as set out in **Appendix 1**, the application is recommended for approval.

3. Recommendation

- 3.1 That the Committee resolve to GRANT planning permission subject to:
- 3.2 The prior completion of a legal agreement pursuant to Section 106 of the Town and Country Planning Act 1990 (as amended), Section 16 of the Greater London Council (General Powers) Act 1974 and all other enabling powers to secure the following planning obligations.
- Submission of a Travel Plan
 - Residents and other occupiers of the development (except Blue Badge holders) to be restricted from acquiring CPZ permits, including amendments to Traffic Orders as required.
 - Early and Late Stage Viability Reviews in accordance with Mayor's Viability SPG.
 - An off-site financial contribution of £407,225 towards the provision of additional school places.
 - An off-site contribution of £123,096 towards the provision of health services in the local area.
 - An off-site contribution of £106,000 towards improvements to the public realm and environment of Angel Way, the land around Trinity Methodist Church and the Romford Ring Road in accordance with the Romford Masterplan SPD.
 - Carbon offset contribution of £87,820.
 - Scheme for Employment, Skills and Training.
 - Mandatory BNG Requirements, including Monitoring
 - Payment of a financial contribution toward s106 monitoring costs.
- 3.3 Agreement that the Director for Planning has delegated authority to negotiate the detailed wording of the legal obligation to secure the obligations set out above.
- 3.4 Agreement that the Director for Planning has delegated authority to issue the planning permission and impose the conditions in this report, or to alter the wording of planning conditions as necessary.

4. Site Description

- 4.1 The application site comprises a five-level multi-storey car park located in the north-east part of Romford Town Centre, on Angel Way. The car park has an open roof and is built of predominantly concrete with metal guardrails across the ground floor apertures.

- 4.2 The surrounding area has a mixed character, typical of a town centre setting, with prevailing heights of three to four storeys to the south and west, but with taller buildings emerging to the north as the area goes through a transitional stage of development, with the scheme immediately to the north at nine storeys, and further north on the roundabout where St Edwards Way meets North Street at sixteen storeys (both under construction).
- 4.3 The wider area also includes a mix of styles and appearances, with the areas within the town centre to the south-east typically having ground floor commercial uses, with residential uses above, with buildings of all ages visible, reflecting the constantly evolving patterns of development which have historically occurred within Romford.

5. Planning Policy Designations

- 5.1 The application site falls within the Romford Strategic Development Area, which is designated as an area where the council will support the delivery of over 6000 new homes, and also falls within the Romford Metropolitan Town Centre, where the council will seek to strengthen Romford's role as a metropolitan centre through new or enhanced developments, often as part of mixed-use schemes to better optimise the use of brownfield sites.
- 5.2 The site also falls within the setting of Romford Conservation Area, at its north-western edge, which derives its special interest from its crossroads (between North Street, Market Place, South Street and High Street), and the historic buildings associated with its history as a commercial trading post. Some of these historic buildings are in close proximity to the application site, and consequently the proposal also affects the setting of the Golden Lion Public House (Grade II Listed), a 17th Century Pub, with later 18th and 19th Century additions and a detailed façade with original, well-preserved features, and the setting of The Lamb Public House (Grade II Listed), a 19th Century Pub. Slightly further afield to the west, and somewhat visually separated from the site, is the St Edward the Confessor Church (Grade II* Listed), which features a prominent 162 foot spire, a patterned red tile roof, with 16th and 17th century monuments in excellent condition within its grounds. The Trinity Methodist Church, to the north of the site, is also locally listed.
- 5.3 The site is also in Flood Zone 2 and within the Romford and Roman Settlement Archaeological Priority Area.

6. Relevant Planning History

- 6.1 P0733.10 - Change of use office space in the ground floor of the multi storey car park in Angel Way into a youth centre. Change of use of car park (part) to provide extension of office space. Approved on the 19th November 2010.

7. Proposal

- 7.1 The proposal seeks the complete demolition of the existing multi-storey car park, followed by the erection of two standalone residential buildings providing a combined total of 106 new homes, alongside 93 sqm of flexible Class F1 or E floorspace.
- 7.2 The western building (Block A) would be broadly 'L' shaped, and would comprise 61 units within a part six, part eight-storey building. The eastern building (Block B) would have a linear footprint, and would comprise 45 units, within a six-storey building.
- 7.3 The scheme as a whole would comprise of 39 x one-bedroom flats, 56 x two-bedroom flats, and 11 x three-bedroom flats, with 11 of the two-bedroom flats provided as M4(3) wheelchair adaptable units.
- 7.4 The proposal would be car-free, except for the provision of four wheelchair accessible spaces, which would also be provided with active electric vehicle charging points. In addition, 193 long-stay cycle spaces would be provided for future residents and 14 short-stay cycle spaces would be provided for visitors.
- 7.5 A 93 sqm unit is proposed for the south-west ground floor of Block A, to provide a retail use as Class E or a community use falling within Use Class F1.

8. Planning Policies

- 8.1 The Development Plan for the London Borough of Havering consists of The Havering Local Plan (2021) and The London Plan (2021). The Romford Masterplan SPD is also of relevance.
- 8.2 The National Planning Policy Framework (NPPF) (2024), Planning Practice Guidance, as well as relevant supplementary planning documents and guidance are all material consideration in planning decisions.
- 8.3 The proposed development has been assessed against development plan policies and relevant material considerations, as set out in the report below.

9. Consultation Responses

- 9.1 Letters notifying nearby occupiers of the surrounding properties were sent out on the 27th June 2025, a site notice was displayed on the 4th July 2025, and a press notice was displayed in a local newspaper on the 4th July 2025.
- 9.2 The council has received representations from 34 addresses in relation to this planning application, with 32 objecting, 1 in support, and 1 neither objecting nor in support.
- 9.3 The following matters have been raised within these public representations:

- Insufficient parking provision
- Parking for existing residents will get worse
- Loss of parking spaces
- Proposed flats are too small
- Housing is not a good use of this site
- Increase in disruption
- Increase in noise
- Increase in dust
- High-rise blocks are not appropriate for Romford
- Lack of supporting infrastructure
- Density of development is too high
- Existing retail unit should remain in the development
- Increase in crime
- Increase in litter
- Application site includes land owned by the adjacent church
- Loss of maintenance and servicing access to the adjacent church
- Loss of outlook
- Loss of natural light
- Existing building is unattractive monstrosity
- Proposal provides much needed housing on an under used site
- Proposal would make a positive contribution to the area

9.4 **External Consultee Comments:**

Arquiva: Recommend a planning condition requiring the developer to mitigate the impact of any degradation of television and radio reception caused by tall buildings & wind turbines, similar to many other wind turbine and wind farm schemes.

Designing out Crime Officer: An SBD Condition should be applied to the development. The site should be treated as a higher risk urban location.

This context materially informs the proportionality of the security recommendations. The updated drawings demonstrate improved clarity in terms of entrance positioning, internal block separation and natural surveillance across the central courtyard. The layout benefits from active frontage and overlooking of public spaces, which is supported.

The layout demonstrates positive design features including natural surveillance and legible movement.

There are no fundamental design objections from a crime prevention perspective.

Environment Agency: We would have no objection to the proposals if the condition relating to a Culvert Post-Development Condition Survey is attached to any grant of planning permission. Without this condition we feel that the development would pose an unacceptable risk to the culverted main river, the River Rom running underneath the site.

We are satisfied that the applicant has considered deculverting and this has been found not possible or feasible. We acknowledge that an 8m buffer has been provided on either side of the culvert.

Please note that the proposed development is within Flood Zone 2 and the flood risk associated with this site will fall under our Flood Risk Standing Advice (FRSA). Please see our comments below.

We wish to bring the decision makers attention to the council's strategic vision for the river Rom as outlined in the Romford Masterplan, adopted in March 2025. This strategic vision states that the river Rom should be de-culverted and re-naturalised as much as possible to improve biodiversity and access to the river. This is further supported by Policy 27 (landscaping), Policy 30 (biodiversity and geodiversity) and Policy 31 (rivers and river corridors) of the Havering Local Plan (2016-2031).

We note that the developer of this site has provided modelling that demonstrates a risk to offsite flooding is likely from re-naturalising the river, and we have to accept this. However, to fulfil the aims and objectives of this adopted strategic document, the council may wish to pursue alternative solutions in this case to maximise the re-naturalisation potential of this site. This could include requesting that solutions for flood risk mitigation/compensation post re-naturalisation are explored more fully.

GLAAS: I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

HSE: Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations. However, HSE has identified matters that the applicant should try to address in advance of the later regulatory phases.

London Fire Brigade: I can confirm no additional hydrants are required and no further action is required by our office.

NATS: No objection.

NHS North East London: In line with the recommendations set out in the London Plan, NHS NEL would be seeking a s106 capital contribution of £123,096. This has been calculated using the Health Urban Development Units planning contribution model, which is the accepted method of calculating

required contributions for health in London. The model reflects the housing mix of the scheme.

The HUDU Planning Contributions Model calculates the cost of mitigating the impacts of proposed development across different types of health infrastructure. This includes acute, mental health, intermediate and primary care services. We are only requesting the primary care capital calculation cost, excluding mental health, acute, and intermediate care.

Capital from this scheme and other schemes in Romford Town Centre area will be used to bring forward NHS NELs health infrastructure strategy for the town centre which is partly set out in the Romford Town Centre Supplementary Planning Document and also being developed separately.

Romford Civic Society: The society recognises that much work and thought has gone into the application, however we feel strongly that further work is required to ensure that the scheme meets the requirements set out in the Romford Masterplan and Romford Conservation Area Appraisal.

We feel that the application's weakness lies in the quality of the north-south links which it creates within the centre of town and views created within this. We are also currently unconvinced by the approach taken to the boundaries of the site and the boundary treatments.

For this reason, our view is that the application does not yet meet the requirements of the Romford Masterplan, that the vision for the St. Edwards Way area is for "a collection of urban mixed use areas that knit the town centre into the existing grain".

Furthermore, we argue that the application does not yet achieve Policy SL6 of the Masterplan, to "improve town centre wayfinding through routes and spaces with clear hierarchies, including across the Ring Road".

Neither do we think that the application currently makes the best use contribution it could to Policy CT1 (develop a greater sense of character, consistency and quality in Romford's built environment and public realm) or the strategy outlines at 6.6.2 ("developing a finer urban grain, based on streets and blocks, that create positive street edges").

The site sits at a key "bridging" location between central Romford and the areas beyond it to the east which was profoundly disrupted by the construction of the Ring Road.

The disruptive impact of the ring road in the coherence of the urban fabric of Romford is well accepted in policy documents, including in the Masterplan and Conservation Area appraisal, and the Society believes the analysis to be correct.

The High Street and, beyond it, London Road, are the key artery of this disrupted link.

As a site adjacent to this key London Road/High Street route, one of the key tasks of development on the Angel Way site must be to help provide structures which by virtue of their spacing, volume and massing as well as the views they provide, help to begin to repair that divide.

We are not persuaded that the current application does this.

It is telling, we feel, that no visualisations are provided of longer east-west views of the proposal in its setting to assist discussion and debate on this important town planning consideration.

Further to that, we concur with observations in the application that the positioning of some of the buildings seems to create largely accidental spaces around them, which will result in a streetscene of poor legibility and resultant poor quality as it will be difficult to maintain.

Through appreciating that key historic buildings in the area – most notably Trinity Methodist Church and the late Victorian shops in the High Street – are all red brick, we are cautious of the excessive use of red brick in the application, which taken together with other contemporary red brick developments in the area, could create a garish effect. In any event, care would need to be taken over the quality of brick façades used. The contrasts between interesting brick types and much flatter, unvariegated, ones in the new development at Romeo Corner, for example, serves as a warning about the effect which poor quality materials can have on the attractiveness of a development.

In addition to this, we fully support the idea that every effort should be made to open up the River Rom through this site which was made by the QRP.

That being said, we can see much merit in the north/south aspects of the scheme.

We welcome the proposal to open up a view of the side of the Methodist Church along Angel Way from the south, though we concur with those who urge further work to include an opened-up River Rom within this.

Insofar as the Angel Way frontage of Block A is concerned, we note that late nineteenth century development of the site had narrow plots here and feel strongly that it would be beneficial to reference this in the new development.

This would also sit well within the new Romford Conservation Area appraisal, which makes specific note of the detrimental effect on the quality of the Romford environment of this historic character being lost and replaced with lengthy unmodulated façades.

Further information is also required on street furniture and lighting in this scheme. As the Conservation Area Appraisal notes, currently this becomes utilitarian immediately upon leaving the conservation area. This application is, therefore, an opportunity to begin remedying this fault in a coherent way.

The Conservation Area Appraisal also observes that there is a paucity of interpretation of the historic environment in the centre of town and it is to be hoped that, again, this application could begin to correct that.

Thames Water: Proposal is in close proximity to public sewers and waste water assets. Water and waste capacity would allow for the development to proceed.

UK Power Networks: The proposed development is in close proximity to our substations. No objection.

9.5 Internal Consultee Comments:

Conservation Officer: Angel Way multistorey car park lies immediately outside the northern boundary of the Romford Conservation Area and forms part of the immediate setting of the locally listed Trinity Methodist Church. The existing building does not make a positive contribution to the setting of either of these heritage assets. The proposal to demolish the structure therefore raises no heritage concerns and represents an opportunity for redevelopment that could potentially enhance the setting of both the Conservation Area and the locally listed church.

The setting of the Romford Conservation Area is predominantly urban, characterised by the presence of tall and large modern buildings within its surroundings.

The proposed redevelopment would unfortunately intensify the existing issue by introducing two substantial blocks of flats rising up to nine storeys. These buildings would be visible from within the Conservation Area and would further erode the ability to appreciate its historic character. It is likely that the taller western block would be visible from the High Street, the main crossroads, and potentially from Market Place. As a result, the setting of the Conservation Area would be subject to additional harm.

In relation to the locally listed Trinity Methodist Church, the proposed development is considered to have both positive and negative impacts. On the positive side, the scheme would create greater clearance to the south elevation of the church and open up improved views from both the south and east. However, these benefits are outweighed by the overbearing impact of the proposed buildings, arising from their substantial scale and massing.

Overall, the proposed development would result in a low level of harm to the setting and significance of both the Romford Conservation Area and the adjoining locally listed church. The harm to the Conservation Area would be at the lower end of the scale of less than substantial

Environmental Health – Air Quality: No objections, subject to a condition managing dust.

Environmental Health – Contamination: Commercial use will be retained on the ground floor so there will be no land contamination issues.

Due to the current use and demolition of previous buildings a land contamination assessment must be done.

No objection, subject to conditions relating to multi-phase contamination assessment and unexpected contamination.

Environmental Health – Noise: No objection, subject to a condition requiring the submission of a comprehensive noise strategy and a post-completion acoustic verification.

Ecology Officer: No objection, subject to conditions.

Education Officer: The proposed housing will generate an additional, 13 primary aged children, and 3 secondary aged children in an area where we are projecting a deficit of places.

Therefore, we are seeking a financial contribution towards the cost of creating additional primary and secondary places required to meet expected demand from this new housing.

A contribution of £407, 225 is requested to mitigate this increase in demand.

Energy Consultant: No objections.

LLFA: No objections.

Tree Consultant: No objection, subject to a condition requiring the protection of trees.

Waste and Recycling Officer: I have concerns that the capacity for waste storage will be exceeded and believe a site visit by our waste contractors and Havering waste team will be needed.

10. Principle of Development

10.1 Loss of a Car Park

10.2 The proposed development would result in the complete demolition of the existing multi-storey car park, which contains 487 spaces.

10.3 Policy 24 of the Havering Local Plan (Parking Provision and Design) sets out that proposals which would result in the net loss of car parking spaces will be required to demonstrate that there is no need for these spaces.

10.4 In support of the application, the Planning Statement and Transport Assessment set out that surveys were carried out to determine how well used the car park is, and determined average occupancy levels were 24%. Moreover,

previous studies identified that there is surplus capacity within other car parks in Romford Town Centre (including at Cottons Park, Market Place, the Brewery, and the Liberty), including for wheelchair accessible bays.

- 10.5 On this basis, it is considered that the loss of the car park would not have significant adverse impacts on the town centre's vitality and the loss of these spaces could be accommodated by existing provision within and around Romford Town Centre.
- 10.6 Loss of Retail
- 10.7 Policy 13 of the Havering Local Plan (Town Centre Development) seeks to enhance the vitality and vibrancy of Havering's town centres, maintaining their important role for local communities.
- 10.8 The existing building, whilst predominantly a car park, includes a retail unit at ground floor level on its western side, with a floorspace of 506 sqm. This unit would be lost as a result of the demolition of the car park, and would not be replaced in a like-for-like manner. Instead, the proposal includes a smaller commercial unit in the south-west corner of Block A (in a similar location to the unit which would be lost), intended to operate under a flexible F1 or E class.
- 10.9 The proposal would therefore lead to the loss of 415 sqm of Class E floorspace within Romford Town Centre, and the supporting text to Policy 13 outlines that the Council will generally seek to increase the amount of retail floorspace whilst resisting the loss of shops, where this would harm the town centre's primary shopping function, character and appearance.
- 10.10 The proposed replacement unit would be located in a similar position in the streetscene, and as such, despite its smaller size, has the potential to provide a similar level of interest and activity. Moreover, the site's specific location, set away from the main active frontages of the High Street, North Street, South Street and Market Place (which are the main external thoroughfares within Romford), means that a large unit may struggle to operate successfully within this scheme, as there will be less transient and incidental footfall passing the unit when compared to the main shopping areas to the south-east.
- 10.11 This further needs to be considered in the context of Policy SD6 of the London Plan (Town Centres and High Streets), which sets out that mixed-use or housing-led intensification should be supported in town centre locations, to optimise residential growth potential, capitalising on the availability of services within walking and cycling distance, and current and future accessibility by public transport.
- 10.12 As such, it is considered that the existing unit is unlikely to represent an attractive opportunity for retail companies in its existing format and location, and does not make a significantly meaningful contribution to the vitality or viability of Romford Town Centre. A smaller unit, with a range of lawful town centre uses (including the potential for community uses), would provide greater flexibility and would likely provide a more appealing offer for potential end users.

- 10.13 It is therefore considered that the proposal, with a smaller flexible Class E/F unit could make a similar level of contribution to the town centre, despite the loss of approximately 400 sqm of retail floorspace.
- 10.14 On this basis, whilst there is some conflict with the intentions of Policy 13 of the Havering Local Plan, it is considered that the proposal would be unlikely to have a significant adverse impact on the long-term viability of Romford Town Centre, and further that the reprovision of a shopping frontage in the south-west corner would maintain a similar level of street activity.
- 10.15 Provision of Housing
- 10.16 In accordance with paragraph 124 of the NPPF and Policy GG2 of the London Plan, which both require proposals to make the best use of land, it is recognised that the redevelopment of brownfield sites, such as the application site, should be prioritised to ensure that proposals limit their harm to the natural environment and to ensure that new developments are located within existing built-up areas, which tend to have better supporting infrastructure. This is supported by paragraph 125 of the NPPF which states that substantial weight should be given to the value of using suitable brownfield land whilst promoting and supporting the development of under-utilised land.
- 10.17 Moreover, Policy GG4 (Delivering the homes Londoners need) sets out that to create a housing market that works better for all Londoners, those involved in planning and development must ensure that more homes are delivered, must support the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable and must create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.
- 10.18 Policy H1 of the London Plan (Increasing housing supply) sets out that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, especially for sites with existing or planned public transport access levels (PTALs) 3-6, or sites which are located within 800m of a station or town centre boundary. PTALs are determined by a range of factors affecting accessibility to public transport, and are scored from 0-6b, where 0 is the worst and 6b is the best.
- 10.19 The site, in its current form, is an underutilised brownfield site in an area of excellent access to public transport, which has the potential to be optimised through a comprehensive redevelopment, which could deliver a significant quantum of new homes. Owing to the excellent PTAL and its location at the edge of Romford Town Centre, doorstep amenities would be available for future residents with a plethora of shops and services within walking distance, which in turn mean that relying solely on active and sustainable modes of travel would be a realistic option for any future occupiers.
- 10.20 The proposal further complies with the intentions of Policy SD6 of the London Plan (Town centres and high streets), which encourages mixed-use or housing-

led intensification to optimise residential growth potential within and on the edge of town centres, and Policy SD7 of the London Plan (Town centres: Development Principles and Development Plan Documents), which encourages comprehensive redevelopment of redundant car-parks, surplus shopping frontages or other low-density town centre buildings that are not of heritage value.

- 10.21 The proposal would further contribute to the objectives of Policy 1 of the Havering Local Plan, in that it would bring forward housing in an area which has been earmarked for over 6000 new homes through residential-led schemes which are well integrated with the existing community.

11. Design

- 11.1 The existing building is of little architectural merit, with a very functional overall appearance, which is considered to detract from the character and appearance of the local area and the setting of Romford Conservation Area. Moreover, the widespread use of concrete with metal rails and guards, in combination with its location to the rear of the shops facing the High Street to the south, results in a building which feels oppressive and dominates this part of the town centre, creating a somewhat hostile pedestrian environment. As such, the loss of this building raises no concerns from a design standpoint, and its loss is considered necessary if the site is to be properly optimised through a residential-led redevelopment.
- 11.2 The surrounding area has a mixed character, typical of a town centre setting, with prevailing heights of three to four storeys to the south and west, but with taller buildings emerging to the north as the area goes through a transitional stage of development, with the scheme immediately to the north at nine storeys, and further north on the roundabout where St Edwards Way meets North Street at sixteen storeys (both under construction), with an eight storey building to the west.
- 11.3 The proposal seeks the complete demolition of the building on site, and the subsequent erection of two buildings, positioned around a central landscaped area. The western building (Block A), would be part six, and part eight storeys high, whilst the eastern building (Block B) would be six storeys in height.
- 11.4 As such, the proposal would increase the height of buildings within the plot, noting that the existing building is four to five storeys high, albeit the proposal would significantly decrease the building footprint through the introduction of a central landscaped area whereas the existing building covers nearly the entire site.
- 11.5 Regard should also be had to the Romford Masterplan SPD, which provides guidance on the type, form and quantum of development which should come forward in Romford. The site falls within the St Edwards Way Character Area, which sets out that the key objectives for the application site are the deculverting of the River Rom, an increase in permeability with a particular emphasis on creating a direct link between the eastern parts of Angel Way and

Trinity Methodist Church, and the creation of a north-south route connecting with the development to the north. The Masterplan SPD further discusses the potential for ground floor spaces to accommodate small scale retail or community uses and the general improvement of the pedestrian environment of Angel Way.

- 11.6 In addition, the height strategy set out in the Masterplan SPD suggests appropriate heights of four to six storeys as being most appropriate.
- 11.7 It is also important to be mindful of Policy D3 of the London Plan (Optimising site capacity through the design led approach), which requires all developments to make the most effective use of land to help improve housing delivery, and further sets out that higher density developments should be encouraged in areas which are well-connected to jobs, amenities, and infrastructure using active or public transport, which this site is.
- 11.8 This increase in height and scale is considered to be acceptable, and would appear broadly contextual with the scale of surrounding built form, being mindful of the taller consented schemes (all of which have commenced) to the north. In this respect, the site represents a somewhat transitional area on the edge of the main town centre areas, where low to mid rise buildings meet tall buildings, and the height of the two blocks within this scheme is representative of that emerging context.
- 11.9 The proposed buildings would be more visible than the existing building from medium distances, as a result of the increase in height, however despite this, the proposal would not have a noticeable impact on the skyline because of existing and consented developments of similar or greater heights (including developments which have commenced) in the vicinity. Views from within the Romford Conservation Area would be very limited in scope, with the proposed buildings appearing occasionally in some views above existing buildings, but as one of several mid-rise to tall buildings in a small cluster to the north-west of the main town centre area. Similarly, the proposal would be more visible than the existing car park when looking from the west, but again the proposed scheme would not appear in isolation but instead would be read in the context of buildings of a similar scale. Whilst the Masterplan SPD discusses heights of four to six storeys as being most appropriate, in this instance, a maximum height of eight storeys is considered acceptable in the context of the surrounding buildings and would not be harmful to the character or appearance of the wider area.
- 11.10 In addition, whilst the scheme fails to meet some of the objectives of the Masterplan SPD, in that the River Rom would remain culverted and the direct route from the east of Angel Way to Trinity Methodist Church would be not be delivered, the proposal does achieve some of the objectives of the Masterplan SPD, through the creation of a north-south route following the course of the underground river, improvements to the public realm and pedestrian environment around Angel Way, and the inclusion of commercial unit at ground floor level to be used under Use Class F1 (community uses) or Use Class E (retail uses).

- 11.11 Moreover, the Masterplan SPD envisioned the application site coming forward as part of a larger development parcel, possibly including the row of shops with flats above facing the High Street to the south, however complex land ownership issues mean that the delivery of a single larger parcel is very unlikely, and it would not be reasonable to oppose the development on this basis alone. Further, it has been robustly demonstrated to the satisfaction of both the Environment Agency and the Local Planning Authority that the specific site circumstances of this application site mean that it is not possible to naturalise the River Rom as part of the wider application aims without increasing flood risk elsewhere, and that if the proposal included plans to naturalise the river, the proposal would then have to be refused on flood risk grounds.
- 11.12 The proposed external materials are considered to be acceptable, in keeping with the prevailing materials in the area and complementing the style of nearby buildings, in particular the adjacent Trinity Methodist Church. The use of predominantly red brick is welcomed, and would provide a much more pleasing environment than the current concrete car park. Moreover, the proposal has sought to provide a level of articulation to the facades through the use of vertical soldier courses and friezes to create horizontal banding between each floor. This helps to break up the perceived massing of the proposed blocks and provides an element of human scale, whilst also unifying the two blocks through a coherent design strategy, creating a commonality which assists in positive place making.
- 11.13 On this basis, the proposal is considered acceptable from a design perspective, appearing broadly contextual with the existing and emerging developments in the area in terms of height, scale, and massing. In addition, the overall appearance, aesthetic and design quality of the proposed buildings would be a marked improvement compared to the existing building, which is somewhat drab and unappealing in its current state.

12. Heritage

- 12.1 In accordance with the council's statutory duties under sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, it is necessary to have special regard to the desirability of preserving the setting of a listed building and to preserving or enhancing the character or appearance of a conservation area.
- 12.2 This requirement is borne out through the NPPF, which advises that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. Whether a proposal causes substantial harm will be a judgment for the decisionmaker, having regard to the circumstances of the case, relevant local policies and the consideration of the NPPF.
- 12.3 At a local level, Policy HC1 of the London Plan (Heritage conservation and growth) sets out that proposals affecting heritage assets and their settings,

should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings, whilst Policy 28 of the Havering Local Plan (Heritage Assets) seeks to conserve and enhance the significance of heritage assets in the borough, and will resist proposals which adversely affect the significance of a heritage asset.

- 12.4 Romford Conservation Area derives its significance from its ancient crossroads and the historic buildings associated with its position as a commercial trading post, including high-quality historic buildings at the western end of Market Place, such as the Golden Lion pub, the Lamb Inn, the St Edward the Confessor Church, and a series of early 20th century bank buildings (including the Lloyds Bank building). The intervisibility of these buildings positioned around the crossroads contributes to this significance, acknowledging that these buildings are of different styles and ages, representative of the constantly evolving pattern of development within Romford, as a historic market town.
- 12.5 The application site falls outside of Romford Conservation Area but affects its setting, and the existing building is considered to detract from the setting of Romford Conservation Area. The proposal would not compete with the St Edward the Confessor Church spire (a local landmark), and would blend in relatively well with the emerging buildings to the north, appearing as a small cluster of mid-height to tall buildings, with heights transitioning in a legible manner from south to north. Moreover, the proposal would not affect the core characteristics of the Conservation Area, from which it derives its significance. Given the height of the proposed buildings and the height of nearby buildings, only the very top part of the buildings is likely to be visible from the heart of the conservation area, and, it is noted in comments by the Conservation Officer, that the proposal would nonetheless have a less than substantial impact on the setting of Romford Conservation Area, owing to the likely visibility of the proposal from the High Street, the main crossroads and Market Place, all within the Conservation Area.
- 12.6 The application site is immediately adjacent to the Trinity Methodist Church, a locally listed building dating from the 1880s. The church is a good example of late nineteenth century Gothic revival style of architecture, with a symmetrical plan and elevations, and includes a variety of high quality details and materials.
- 12.7 The existing car park, as noted above, is considered to have an overall negative impact on the appearance of the local area by reason of its unsympathetic materiality, bulk and massing, and in this respect, the car park has an especially poor relationship with the Trinity Church. This is apparent in views from the ring road (looking east), where the impressive main façade of the church is somewhat diminished by the multi-storey car park lurking in the background of this view. In addition, noting that the Trinity Church is of a relatively modest scale and height, the church is largely obscured from view by the car park when approaching from the south or east (looking north or west), further reducing the ability to appreciate the church's unique characteristics.
- 12.8 The proposed development, whilst of a larger overall height, would have a significantly reduced footprint, and would be finished in sympathetic materials

to the surroundings, appearing as a much more contextual building in the setting of a town centre. This reduction in overall bulk would allow the locally listed church to be better experienced in its own right as a building of architectural and historical merit, thereby improving the setting of this locally listed building, whilst opening up additional views of the church from short distances, particularly when approaching the site from the south (from the High Street).

- 12.9 Owing to its proposed height, separation distances and the presence of intervening buildings, it is considered that the proposal would not have an adverse impact on the setting of the Grade II listed Golden Lion Pub, Lamb Public House, or the St Edward the Confessor Church.
- 12.10 On the basis that less than substantial harm to the setting of Romford Conservation Area has been established, it is therefore necessary to weigh up the planning benefits of the scheme against this harm, in accordance with the requirements of the NPPF. The proposal is considered to make efficient use of a brownfield site in a highly sustainable location to deliver new homes which is considered to be of benefit. Furthermore, the proposal would improve views of the adjacent locally listed church, and would generally improve the pedestrian environment in the immediate vicinity, whilst also increasing local permeability. As such, it is considered that the benefits of the scheme outweigh this less than substantial harm.
- 12.11 It is further considered that the proposal would not be harmful to the nearby listed buildings within the Conservation Area, or the locally listed Trinity Methodist Church, adjacent.
- 12.12 In addition, the Greater London Archaeological Advisory Service (GLAAS), have provided comments on the application, on the basis that the site falls within an Archaeological Priority Area, and have raised no objections, subject to the imposition of two conditions.

13. Affordable Housing

- 13.1 In accordance with Policy H4 of the London Plan (Delivering affordable housing), the strategic target for all major residential developments is to provide 50% of all new homes delivered across London to be genuinely affordable.
- 13.2 Affordable housing is a very important component of major residential proposals, encouraging social cohesion, and providing a reasonably-priced alternative to the private rented market, which is often unaffordable to many Havering residents. The provision of affordable housing is critical to enabling London to meet the housing needs of its workforce and maintain the function and resilience of the city. However, as set out in Policies H4 (Delivering affordable housing) and H5 (Threshold approach to applications) of the London Plan, applicants may demonstrate that a scheme cannot provide affordable housing through the submission of an FVA, and in such circumstances, the council will need to be satisfied that the viability information has been adequately reviewed.

- 13.3 To achieve this, Policy H5 of the London Plan sets out that to follow the Fast Track Route of the threshold approach, which means the applicant is not required to submit a financial viability assessment (FVA) to support their application, proposals must meet or exceed the relevant threshold level of affordable housing on site without public subsidy. In this case, that means providing 50% of the scheme (measured by habitable rooms) as affordable housing, given that the site is public sector land.
- 13.4 Furthermore, Policy H6 of the London Plan (Affordable housing tenure) states that affordable housing products within a development should include a minimum of 30% low-cost rented homes (including London Affordable Rent or Social Rent), a minimum of 30% intermediate products which meet the definition of genuinely affordable housing (including London Living Rent and London Shared Ownership), with the remaining 40% to be determined by the borough as low-cost rented homes or intermediate products, based on identified need, with a presumption that the 40% to be decided by the borough will focus on Social Rent and London Affordable Rent given the level of need for this type of tenure across London.
- 13.5 Policy 4 of the Havering Local Plan (Affordable Housing) confirms this approach and sets out that the council will seek to maximise affordable housing provision from all major residential proposals, providing at least 35% affordable housing (based on habitable rooms) at a 70%/30% split of affordable rent to intermediate tenures. The council will strongly resist proposals brought forward that do not meet the requirements of affordable housing in circumstances where the viability of the scheme has been compromised by unreasonably high acquisition or design costs.
- 13.6 Proposals which do not meet the relevant threshold (in this case 50%), or require public subsidy to do so, will be required to submit a detailed viability assessment, which will then be reviewed by an independent third party assessor, at the applicants cost.
- 13.7 The proposal for 106 new flats has been submitted without the provision of affordable housing, and in support of the application, a Financial Viability Assessment (prepared by Turner Morum, dated May 2025) seeks to establish that the scheme cannot viably provide any affordable housing, either on-site directly or through the provision of an off-site contribution. This Financial Viability Assessment has been independently reviewed by BNP Paribas on behalf of the council.
- 13.8 The review of the submitted Financial Viability Assessment concluded that the submitted scheme is unviable in planning terms, and that the scheme cannot viably provide on-site affordable housing or an off-site contribution, and it is concluded that the proposed development generates a deficit of £1,100,424, and there is no available surplus to fund the provision of affordable housing.
- 13.9 It should be noted that the above figures provided by BNP Paribas are different to those provided by Turner Morum, which presented a scheme with a deficit of

£5,455,587. This difference is largely driven by the difference in the Existing Use Value (EUV) of the site (and the subsequent Benchmark Land Value), construction costs, and a reduction of the viability benchmark.

- 13.10 For clarity, the council is adopting the values provided in the BNP Paribas report, as this is considered to be the best reflection of site circumstances, and BNPP's figures would be adopted within the accompanying S106 agreement as the basis for the early and late stage reviews, which would be applied to this development.
- 13.11 The findings of the FVA review are material to the assessment of the application's overall acceptability, and, if no major discrepancies or errors can be identified within the submitted FVA through the independent review, these policies allow for a scheme to be approved without meeting the affordable housing targets of the London Plan and Local Plan.
- 13.12 As such, whilst the lack of any affordable housing is considered to be a significant drawback of the scheme, which weighs heavily against the proposal in the wider planning balance, it would not be appropriate or reasonable to refuse the application on this basis.

14. Unit Mix

- 14.1 Policy H10 of the London Plan (2021) requires that schemes consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to robust local evidence of needs.
- 14.2 Policy 5 of the Havering Local Plan (Housing Mix) seeks new developments to provide a mix of dwelling types, sizes and tenures, and that all residential developments should include a proportion of family sized homes (3+ bedrooms), unless it can be robustly demonstrated that site circumstances justify a lack of family-sized homes.
- 14.3 The proposed scheme would comprise of 106 flats, with a mix of 39 x one-bedroom flats, 56 x two-bedroom flats, and 11 x three-bedroom flats, with 11 of the two-bedroom flats provided as M4(3) units, and all provided as market housing. This equates to 37%, 53%, and 10% for one, two and three-bedroom units respectively, which would not accord with the overall aims of Policy 5 of the Havering Local Plan.
- 14.4 This site sits in a town centre setting, where higher-density schemes are generally more appropriate, which tend to skew towards a higher quantum of smaller, 1 and 2 bedroom dwellings, rather than family-sized homes (3+ bedrooms). This allows for a greater number of overall units to be provided, noting that larger homes have larger floorspace requirements, and therefore an increase in family sized units has a disproportionate impact on the overall number of units within the scheme.

14.5 Furthermore, the site is in a highly accessible location to services and infrastructure, with a PTAL level of 6a, so is highly connected in terms of public transport, and therefore a higher proportion of 1 and 2-bed units is considered acceptable, and is likely to better cater for demand in this town centre setting. On this basis, the proposed unit mix is considered acceptable and would not warrant a reason for refusal.

15. Impact on Amenity

15.1 Policy 7 of the Havering Local Plan (Residential Design and Amenity) seeks to protect the amenity and quality of life of existing residents by resisting developments which result in an unacceptable loss of privacy, daylight and sunlight, and outlook, or which significantly increase levels of noise, vibration and disturbance. In this respect, the Mayor's Housing SPG sets out that to comply with policies seeking to optimise the use of land, some development proposals may be allowed even where harm has been identified.

15.2 Daylight and Sunlight

15.3 In support of the application, a Daylight and Sunlight Assessment (April 2025) has been submitted, which assesses the impact of the proposed development on neighbouring buildings.

15.4 The proposed development would result in the loss of some daylight and sunlight to neighbouring properties, most notably to the lower floor units of Blocks C and E of the development under construction to the north (Zog Development) and planned developments east of the site (6-14 High Street). However, this loss of light is considered to be in the acceptable tolerances as set out in BRE guidance, and is reflective of the higher-density developments being built in the area, and in general, the scheme performs relatively well in terms of its impact on neighbours for natural light.

15.5 It is further important to consider that a high-density scheme in an urban location, such as the application site, would inevitably result in some reductions in daylight and/or sunlight to some neighbouring properties which are beyond the numerical values set out in the BRE guidance.

15.6 Outlook

15.7 Owing to the lower-rise nature of the existing development site and having regard to Policy D3 of the London Plan, it is recognised that there would be some loss of aspect for nearby properties as a result of any comprehensive redevelopment of the site, including the properties to the south, on the High Street, and the properties to the west, at Leyland Court.

15.8 Having regard to Policy SD1 of the London Plan, it is considered that the loss of outlook experienced by nearby residential properties would be relatively minor in the context of a busy town centre setting and would not warrant a reason for refusal.

15.9 Privacy

15.10 The siting of the proposed buildings, in combination with the window and balcony placement is considered acceptable, and would be unlikely to give rise to a significant loss of privacy to nearby residential properties, including the emerging developments to the north and east.

15.11 Noise

15.12 Regard should further be had to Policy D13 (Noise) and Policy D14 (Agent of Change) in the London Plan, and Policy 34 of the Havering Local Plan (Managing Pollution), which together set out that proposals should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses.

15.13 In support of the application, a Noise Report (29th April 2025) has been submitted, which includes a survey of background noise levels, and includes recommendations relating to the noise of mechanical plant and the required acoustic performances of the facades. This has been reviewed by the Council's Environmental Health Officer, who is satisfied with the submitted details and raises no objections, subject to a condition requiring the submission of a comprehensive noise strategy and a post-completion acoustic verification.

16. Quality of Accommodation

16.1 The proposed development would be expected to meet the internal space standards of the London Plan (which reflect the National Space Standards). In addition, new residential properties to meet the minimum space standards and further states that the minimum floor to ceiling height must be 2.5m for at least 75 % of the Gross Internal Area (GIA) of each dwelling to avoid overheating and generally improve living conditions.

16.2 These internal space standards have been met, and in some cases, exceeded, and therefore no objections are raised in this respect.

16.3 Each unit would be provided with its own private amenity space in the form of a balcony or ground floor terrace, which is welcomed, and in accordance with Policy D6 of the London Plan and Standard 26 of the Mayor's London Housing SPG, which require a minimum of 5 sqm of private outdoor open space to be provided for 1-2 person dwellings, with an additional 1 sqm provided for each additional occupant, achieving a minimum width and depth of 1.5 metres to be functional and fit for purpose.

16.4 Furthermore, the thermal modelling results set out in the Overheating Risk Assessment demonstrate that the building design and services strategy of comfort cooling can deliver thermal comfort levels in the occupied residential spaces in accordance with the criteria set out in the Building Regulations.

16.5 Overall, on the basis of the above, it is considered that the proposal would provide a satisfactory level of accommodation for future occupiers.

17. Inclusive Design

- 17.1 Policy D5 of the London Plan (Inclusive design) sets out that proposals should achieve the highest standards of accessible and inclusive design by providing high quality people focused spaces that are designed to facilitate social interaction and inclusion, be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment, and be able to be entered, used and exited safely, easily and with dignity for all.
- 17.2 To provide suitable housing and genuine choice for London's diverse population, including disabled people and families with young children, Policy D7 of the London Plan (Accessible housing) and Policy 7 of the Havering Local Plan (Residential Design and Amenity), state that all residential development should include at least 10% of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.
- 17.3 The proposed Development contains both wheelchair accessible and wheelchair adaptable units, in accordance with the relevant requirements. In total 90% of the homes will meet Building Regulations requirement M4(2) for accessible and adaptable dwellings with the remaining 10% built to M4(3) standards, meeting the minimum requirement for M4(3) wheelchair user dwellings, as set out in the London Plan.

18. Transport

18.1 Car Parking

- 18.2 The application site has a Public Transport Accessibility Level (PTAL) of 6a. PTAL is a measure of a site's access to public transport, and is graded on a scale of 0 (worst) to 6b (best).
- 18.3 Policy T6 of the London Plan (Car Parking) states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Car-free developments have no general parking but should still provide disabled persons parking.
- 18.4 The proposal would be car-free, providing four wheelchair accessible spaces only, whilst also providing four spaces for use by the adjacent Trinity Methodist Church. Having regard to the site's excellent PTAL, the range of shops and services within walking distance, and the need to promote sustainable forms of development in accordance with Policy T1 of the London Plan (Strategic

approach to transport) and Policy 23 of the Havering Local Plan (Transport Connections), this car-free approach is supported.

18.5 Cycle Parking

18.6 Policy T5 of the London Plan (Cycling) sets out that proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located.

18.7 The scheme includes 193 long-stay cycle spaces (for use by future residents), with 109 within Block A and 84 within Block B, and 5% of these cycle spaces would cater for larger or adapted bikes. In addition, 4 short-stay (visitor) cycle spaces would also be provided on-site. Furthermore, 2 long-stay and 6 short-stay cycle spaces would be provided for the proposed non-residential unit. This is considered to be an acceptable level of provision.

18.8 Delivery and Servicing

18.9 The proposed development is expected to generate on average 14 deliveries per day, with 13 for the residential development and 1 for the non-residential unit.

18.10 Servicing to Block A, inclusive of the proposed commercial community unit is proposed to take place at the kerbside from the double yellow lines on Angel Way to the south of the site, with goods taken directly to the residential/commercial entrance. The proposed highway works include a partial removal of the current loading restrictions outside the site on Angel Way to allow for goods to be loaded/unloaded but prevent parking. This would ensure that there is dedicated space for servicing vehicles.

18.11 For Block B, servicing will be undertaken primarily from an on-site delivery bay accessed from Angel Way, to the east. It is also proposed to extend the existing double yellow lines on the corner of south-east corner of Angel Way to provide space for a refuse vehicle and occasional larger deliveries to Block B.

18.12 Waste Management

18.13 Refuse from the proposed development will be stored in an Underground Refuse System (URS) with bin stores placed beneath the surface. A total of 8 underground containers are proposed for the development located to the edge of the site on Angel Way. The bins will be in close proximity to the blocks' entrances for residents to deposit their waste. Refuse would be collected by LBH Refuse and Recycling Team as part of their existing rounds using a specialist refuse vehicle.

19. Ecology and Urban Greening

- 19.1 In accordance with the mandatory Biodiversity Net Gain requirements, the scheme would achieve a BNG score of 1637% for habitat units, far exceeding the 10% target in this respect. This is due to the existing site having virtually no ecological value or containing any special habitats. In terms of water units, the scheme does not achieve the 10% gain on-site, as the river Rom remains culverted. As such, off-site enhancements to water units will need to be provided, and this would be secured through the accompanying s106 agreement, for the provision of 0.01 units. This could be achieved through the direct enhancement of an off-site watercourse, the purchasing of biodiversity units from a biodiversity bank, or the purchase of statutory credits.
- 19.2 In accordance with Policy G5 of the London Plan (Urban Greening) and Policy 27 of the Havering Local Plan (Landscaping), any subsequent proposal should contribute to the greening of London by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage as a fundamental element of site and building design. As a predominantly residential development, it would be expected that an Urban Greening Factor (UGF) score of 0.4 is met under the proposals, and this appears feasible given the space available within the site.
- 19.3 In broad terms, the UGF is an assessment of the amount, type and value of natural environment provided on site as a proportion of the overall site area. The assessment assigns each landscape type (e.g. Semi-natural vegetation, intensive green roof to depth of 150mm, extensive green roof to depth of 80mm, amenity grassland, etc.) with a 'factor' (1, 0.8, 0.7 and 0.4 respectively for the landscapes listed above). These factors are a simplified measure of various benefits provided by soils, vegetation and water based on their potential for rainwater infiltration as a proxy to provide a range of benefits such as improved health, climate change adaptation and biodiversity conservation.
- 19.4 The proposed development would achieve an UGF of 0.42, slightly exceeding the minimum requirement of 0.4 for residential developments, and this is considered acceptable.

20. Play Space

- 20.1 Policy S4 of the London Plan (Play and informal recreation) states that residential development proposals should incorporate good-quality, accessible play provision for all ages. At least 10 square metres of play space should be provided per child.
- 20.2 This is supported by the Mayor's supplementary planning guidance (SPG) 'Shaping Neighbourhoods: Play and Informal Recreation', which sets a benchmark of 10 sqm of useable child play space to be provided per child, with under-fives play space provided onsite as a minimum, and makes clear that play space should not be segregated by tenure.

- 20.3 Where play space is relied upon off-site, Policy 18 of the Havering Local Plan (Open Space, Sports and Recreation) and the Mayor's supplementary planning guidance (SPG) 'Shaping Neighbourhoods: Play and Informal Recreation' set out that for play space to be relevant and reliably used, it must be:
- For ages 0-4; door step play/within 100m;
 - For ages 5-11; play within 400m of site; and
 - For ages 12+ years; play within 800m of site.
- 20.4 The proposed scheme would comprise of 106 flats, with a mix of 39 x one-bedroom flats, 56 x two-bedroom flats, and 11 x three-bedroom flats. It should be noted that for housing developments in Outer London with a PTAL of 5-6, there are only a limited number of sample sites from which to gather data, and as such, it is recommended that either 'Outer London' and 'PTAL 3-4' or 'London' and 'PTAL 5-6' are used when inputting data into the child yield calculator. Using the GLA's Population Yield Calculator (applying the 'Outer London' criteria and a PTAL of 3-4), the proposed development would be expected to provide accommodation for 30 children; 16 between the ages of 0-4, 10.5 between the ages of 5-11, and 3.5 aged 12+.
- 20.5 Consequently, applying the play space requirement of 10 sqm per child, the scheme creates demand for 300 sqm of child play space, broken down as a need for 160 sqm for 0-4 year olds, 105 sqm for 5-11 year olds, and 35 sqm for children aged 12+.
- 20.6 The proposal would provide 430 sqm of play space but there is no indication of how the different requirements for different age groups would be incorporated into the overall scheme. On the basis that ample room has been set aside for external play (with over 100 sqm extra provided), the amount of play space is considered acceptable, subject to a condition requiring further details of the specific play features to be included and how these relate to the different age groups being imposed.

21. Fire Safety

- 21.1 Policy D12 of the London Plan (2021) states that all major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor. The statement should explain how the proposal would function in terms of the building's construction and set out features which would reduce the risk to life.
- 21.2 A Fire Statement has been submitted in support of the application, and compliance with this submitted document would be secured through the use of a planning condition.

22. Flood Risk

- 22.1 Para. 170 of the NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, and where development is considered necessary, that the

development should be made safe for its lifetime without increasing flood risk elsewhere.

- 22.2 Paras. 173 and 174 of the NPPF further explain that a sequential risk-based approach should be taken to individual applications in areas known to be at risk from any form of flooding, with the aim of steering new development to areas with the lowest risk of flooding from any source, whilst para. 181 of the NPPF sets out that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere.
- 22.3 This is reflected at a city level through Policy SI 12 of the London Plan (Flood risk management) and at a borough level through Policy 32 of the Havering Local Plan (Flood Management).
- 22.4 In addition, proposals should incorporate Sustainable Urban Drainage Systems (SUDS), in accordance with Policy SI 13 of the London Plan (Sustainable drainage), with the aim of achieving greenfield run-off rates and ensuring that surface water run-off is managed as close to its source as possible, applying the London Plan drainage hierarchy and including clear arrangements for ongoing maintenance over the lifetime of the development.
- 22.5 The proposal has been reviewed by the Environment Agency and the Local Lead Flood Authority (LLFA), who raise no objections to the proposal on flood risk grounds. In this respect, one of the council's key strategic objectives for Romford is to naturalise the River Rom as it flows through the town centre, having been historically culverted, as set out in the Romford Masterplan SPD. This option has been extensively explored by the applicant, and it has been demonstrated to the LPA's satisfaction, in consultation with the Environment Agency, that it would not be possible to naturalise the River Rom as part of the development without increasing flood risk elsewhere. If the proposal had come forward with naturalisation of the Rom, but this increased flood risk off-site, the Environment Agency would have objected and the scheme would likely be unacceptable on that basis, and it therefore follows the failing to naturalise the Rom for this site specifically is considered acceptable as all opportunities to naturalise have been explored and found to be unfeasible.

23. Land Contamination

- 23.1 Policy 34 of the Havering Local Plan (Managing Pollution) sets out that proposals should not increase risks to human health in relation to land contamination and should optimise the design, layout and orientation of buildings and the use of green infrastructure to minimise exposure to any contaminants which are present. Where there is a potential for land contamination, a staged process of risk assessment will be required to demonstrate that land contamination has been effectively considered and addressed and that the land is suitable for its intended use, in accordance with the Council's Contaminated Land Inspection Strategy.
- 23.2 The Council's Environmental Health Officer has been consulted on this application and raises no objections. Due to the current use and demolition of

previous buildings, there is scope for some historic land contamination to have occurred, and on this basis, a multi-phase land contamination assessment, including a strategy for dealing with unexpected contamination, shall be secured through the use of conditions.

24. Energy and Sustainability

24.1 Policy SI 2 of the London Plan (Minimising greenhouse gas emissions) states that major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy, placing an additional requirement to monitor emissions beyond implementation to determine the effectiveness of the mitigation:

be lean: use less energy and manage demand during operation

be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly

be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site

be seen: monitor, verify and report on energy performance.

24.2 Policy SI 2 sets targets for carbon dioxide emission reductions in buildings. These are expressed as minimum improvements over the Target Emission Rate (TER) outlined in national building regulations. The current target for residential and non-residential buildings is zero carbon beyond the current Building Regulations Part L 2013.

24.3 Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy and how a minimum onsite reduction of at least 35% beyond Building Regulations will be achieved. Residential development should achieve 10%, and non-residential development should achieve 15% through energy efficiency measures alone. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either through a cash in lieu contribution to the borough's carbon offset fund or off-site, provided that an alternative proposal is identified and delivery is certain.

24.4 In support of the application, an Energy and Sustainability Statement (February 2026) has been submitted, and this sets out that the proposed development is anticipated to achieve 67% reduction in regulated CO₂ emissions over the Part L 2021 baseline. This exceeds the minimum on-site target reduction of 35%. To achieve a 100% reduction, the remaining 27% would be offset through a carbon offset payment which would be secured through the accompanying s106 agreement.

25. Air Quality

25.1 Policy SI 1 of the London Plan (Improving air quality) states that proposals should not lead to further deterioration of existing poor air quality or create any

new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits, so as not to create unacceptable risk of high levels of exposure to poor air quality. As such, as a minimum, proposals should be at least Air Quality Neutral and should use design solutions to prevent or minimise increased exposure to existing air pollution, whilst making provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures.

- 25.2 In addition, Policy 33 of the Havering Local Plan (Air Quality) seeks to improve air quality in Havering for the health and wellbeing of Havering's residents. As such, the council will expect new developments to be at least air quality neutral in Air Quality Management Areas (AQMAs) and to secure betterments in Air Quality Focus Areas (AQFAs). Moreover, proposals should optimise the use of green infrastructure to reduce pollution concentrations and exposure, deliver measures to support active travel to reduce vehicle emissions, and minimise carbon dioxide emissions during both construction and operational phases of development.
- 25.3 The council's Environmental Health Officer has been consulted on this application, and raises no objections to the proposal, subject to the imposition of a condition controlling dust.

26. Infrastructure Requirements

- 26.1 In accordance with the School Place Planning Team's comments, a financial contribution of £407, 225 is considered necessary to support the creation of new school places as a result of the increase in demand for school places arising from the development. This would be secured as a financial contribution through the accompanying s106 agreement.
- 26.2 In addition, comments from the NHS set out that Romford is currently experiencing relatively high levels of growth, and that this application, in combination with other consented and proposed developments nearby, could have an impact on the delivery of health services if not mitigated. As such, a financial contribution of £123,096 is considered necessary to mitigate the additional demand for health services arising as a result of the proposed development, and this would be secured through the accompanying s106 agreement. This payment would relate to the provision of primary care only.
- 26.3 The proposal would also be liable to make a payment under the Council's and Mayors Community Infrastructure Levy. A very general request for a condition to mitigate impacts of the degradation of TV and radio reception in the area was made, however, given the relatively modest height of the building and the proximity of much taller buildings nearby it is not considered to be appropriate to apply such a condition in this instance.

27. Planning Obligations

- 27.1 In accordance with section 106 of the Town and Country Planning Act (1990), the impacts of development should be mitigated, where possible, through the

use of planning obligations. Planning obligations assist in mitigating the impact of unacceptable development to make it acceptable in planning terms. To secure the necessary restrictions of applications for parking permits, Section 16 of the Greater London Council (General Powers) Act 1974 is an enabling power in the Section 106 Agreement.

27.2 In accordance with Regulation 122 of the Community Infrastructure Levy Regulations (2010), a planning obligation must be:

necessary to make the development acceptable in planning terms;
directly related to the development; and
fairly and reasonably related in scale and kind to the development.

27.3 To make the development acceptable in planning terms, the development of this site will require a legal agreement, and the Heads of Terms have been agreed between the London Borough of Havering and the applicant, as set out within this report. All payments shall be index linked in accordance with the Planning Obligations SPD, and the applicant shall be responsible for the payment of legal costs associated with the drafting, signing and completion of the s106.

28. Equality and Diversity

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

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

28.2 For the purposes of this obligation the term protected Characteristics includes: age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation. In recommending the application for approval, officers have had regard to the requirements of the Act and have concluded that a decision to grant planning permission for this proposed development will comply with the Council's statutory duty

29. Conclusion

29.1 The proposal seeks planning permission for the complete demolition of all buildings on site and the subsequent erection of two residential blocks arranged around a central courtyard, with the re-provision of some ground floor commercial space.

- 29.2 The proposed land uses are considered appropriate for this site, and the proposal would make much more efficient use of a brownfield site in a highly sustainable location to deliver much-needed new homes whilst maintaining an element of street-level activity.
- 29.3 The proposal would not have a significant adverse impact on the amenity of nearby residential properties, and is considered to respond appropriately in scale, massing and height to the existing and emerging context of the area. In this respect, less than substantial harm to the setting of Romford Conservation Area has been identified, and it is considered that the benefits of the scheme, namely the provision of new housing and improvements to the pedestrian environment, outweigh this very minor level of harm.
- 29.4 On this basis, the proposal is recommended for approval, subject to the conditions set out below and the obligations being secured through a legal agreement as set out in the Heads of Terms.

Conditions

1. Time Limit

The development hereby permitted shall begin no later than three years from the date of this decision.

Reason: To comply with the requirements of Section 91 of the Town and Country Planning Act 1990

2. Approved Plans

The development hereby approved shall not be carried out otherwise than in complete accordance with the following approved plans:

- 1393-GSA-AWZ-00-DR-A-1001 (Rev. P04)
- 1393-GSA-AWZ-00-DR-A-1003 (Rev. P04)
- 1393-GSA-AWZ-00-DR-A-2100 (Rev. P08)
- 1393-GSA-AWZ-01-DR-A-2101 (Rev. P04)
- 1393-GSA-AWZ-06-DR-A-2106 (Rev. P04)
- 1393-GSA-AWZ-RF-DR-A-2108 (Rev. P04)
- 1393-GSA-AW1-00-DR-A-2120 (Rev. P06)
- 1393-GSA-AW1-ZZ-DR-A-2121 (Rev. P05)
- 1393-GSA-AW1-05-DR-A-2122 (Rev. P05)
- 1393-GSA-AW1-06-DR-A-2123 (Rev. P05)
- 1393-GSA-AW1-07-DR-A-2124 (Rev. P05)
- 1393-GSA-AW1-RF-DR-A-2125 (Rev. P04)
- 1393-GSA-AW2-00-DR-A-2140 (Rev. P07)
- 1393-GSA-AW2-ZZ-DR-A-2141 (Rev. P05)
- 1393-GSA-AW2-RF-DR-A-2142 (Rev. P04)
- 1393-GSA-AWZ-XX-DR-A-3110 (Rev. P03)
- 1393-GSA-AWZ-XX-DR-A-3111 (Rev. P02)
- 1393-GSA-AW1-XX-DR-A-3101 (Rev. P03)
- 1393-GSA-AW1-XX-DR-A-3102 (Rev. P03)
- 1393-GSA-AW1-XX-DR-A-3103 (Rev. P03)
- 1393-GSA-AW1-XX-DR-A-3104 (Rev. P03)
- 1393-GSA-AW2-XX-DR-A-3105 (Rev. P03)
- 1393-GSA-AW2-XX-DR-A-3106 (Rev. P03)
- 1393-GSA-AWZ-XX-DR-A-4120 (Rev. P02)
- 1393-GSA-AW1-XX-DR-A-4110 (Rev. P04)
- 1393-GSA-AW1-XX-DR-A-4111 (Rev. P04)
- 1393-GSA-AW2-XX-DR-A-4112 (Rev. P04)
- 1393-GSA-AW2-XX-DR-A-4113 (Rev. P04)
- 23025-GUA-XX-XX-DR-L-004 (Rev. P12)
- 23025-GUA-XX-XX-DR-L-005 (Rev. P06)
- 23025-GUA-XX-XX-DR-L-006 (Rev. P11)
- 23025-GUA-XX-XX-DR-L-007 (Rev. P05)

Reason: For the avoidance of doubt and to ensure that the development is carried out as approved and is compliant with development plan policies.

3. Land Contamination

Prior to the commencement of the development hereby approved (excluding demolition and site clearance works), the following information shall be submitted to, and approved in writing by, the local planning authority:

a) A Phase I (Desktop Study) Report documenting the history of the site, its surrounding area and the likelihood of contaminant/s, their type and extent incorporating a Site Conceptual Model.

b) A Phase II (Site Investigation) Report if the Phase I Report confirms the possibility of a significant risk to any sensitive receptors. This is an intrusive site investigation including factors such as chemical testing, quantitative risk assessment and a description of the sites ground conditions. An updated Site Conceptual Model should be included showing all the potential pollutant linkages and an assessment of risk to identified receptors.

c) A Phase III (Remediation Strategy) Report if the Phase II Report confirms the presence of a significant pollutant linkage requiring remediation. A detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to all receptors must be prepared, and is subject to the approval in writing of the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works, site management procedures and procedure for dealing with previously unidentified any contamination. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

d) Following completion of measures identified in the approved remediation scheme mentioned in 1(c) above, a "Verification Report" that demonstrates the effectiveness of the remediation carried out, any requirement for longer-term monitoring of contaminant linkages, maintenance and arrangements for contingency action, must be produced, and is subject to the approval in writing of the Local Planning Authority.

Reason: To protect residential amenity in accordance with Policy 34 of the Havering Local Plan (2021).

4. Habitat Management and Monitoring Plan

A Habitat Management and Monitoring Plan (HMMP) for significant on-site enhancements, prepared in accordance with the approved Biodiversity Gain Plan, shall be submitted to, and approved in writing by the local authority, prior to commencement of development, including:

(a) a non-technical summary;

- (b) the roles and responsibilities of the people or organisation(s) delivering the HMMP;
- (c) the planned habitat creation and enhancement works to create or improve habitat to achieve the on-site significant enhancements in accordance with the approved Biodiversity Gain Plan;
- (d) the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development;
- (e) the monitoring methodology in respect of the created or enhanced habitat to be submitted to the local planning authority; and
- (f) details of the content of monitoring reports to be submitted to the LPA including details of adaptive management which will be undertaken to ensure the aims and objectives of the Biodiversity Gain Plan are achieved.

Notice in writing shall be given to the Council when the:

- initial enhancements, as set in the HMMP, have been implemented; and
- habitat creation and enhancement works, as set out in the HMMP, have been completed after 30 years.

The created and/or enhanced habitat specified in the approved HMMP shall be managed and maintained in accordance with the approved HMMP.

Unless otherwise agreed in writing, monitoring reports shall be submitted in years 1, 3, 5, 10, 15, 20, 25, and 30 to the Council, in accordance with the methodology specified in the approved HMMP.

The Council shall only issue approval of the habitat creation and enhancement works until:

- the habitat creation and enhancement works set out in the approved HMMP have been completed; and
- a completion report, evidencing the completed habitat enhancements, has been submitted to, and approved in writing by the Local Planning Authority.

Reason: To satisfy the requirement of Schedule 7A, Part 1, section 9(3) of the Town and Country Planning Act 1990 that significant on-site habitat is delivered, managed, and monitored for a period of at least 30 years from completion of development.

5. CMS/CMP/CEMP

Prior to the commencement of the development hereby approved (including demolition and site clearance works), a Construction Logistics Plan (CLP) and a Construction Management Plan (CMP) shall be submitted to, and approved in writing by, the Local Planning Authority, to minimise impacts to the local highway network and to control noise, vibration and air pollutants generated as a result of the construction process. These documents shall be prepared in accordance with the most recently published version of the London Freight Plan, 'The control of dust and emissions from construction and demolition' Supplementary Planning Guidance, BRE Pollution Control Guides 'Controlling particles and noise pollution from construction sites' and

'Controlling particles, vapour and noise pollution from construction sites', and the IAQM's 'Guidance on the assessment of dust from demolition and construction'.

The CLP, CMP and CEMP shall include details of (but shall not necessarily be limited to):

- (a) loading and unloading of plant and materials;
- (b) storage of plant and materials;
- (c) programme of works;
- (d) measures for traffic management and encouragement of sustainable modes of transport for workers;
- (e) the parking of vehicles of site personnel and visitors, including a vehicle booking system;
- (f) provision of boundary hoarding and visibility zones of construction traffic routing, depicting a readily visible 24-hour contact number for queries or emergencies;
- (g) hours of construction (no works or deliveries should be carried out on the site other than between the hours of 08:00 to 18:00 Mondays to Fridays, between the hours of 08:00 to 18:00 on Saturdays, nor at any time on Sundays, Bank or Public Holidays);
- (h) means to prevent deposition of mud on the highway;
- (i) likely noise levels to be generated from plant and construction works;
- (j) a dust risk assessment and dust management plan;
- (k) means to monitor, control, and mitigate dust, noise and vibrations;
- (l) use of a banksman (if applicable)
- (m) haulage routes;
- (n) a site plan identifying location of site entrance, exit, wheel washing, hard standing hoarding (distinguishing between solid hoarding and other barriers such as heras and monarflex sheeting), stock piles, temporary buildings, dust suppression, location of water supplies and location of nearest neighbouring receptors;
- (o) bonfire policy;
- (p) confirmation that a mobile crusher will/won't be used on site and if so, a copy of the permit and intended dates of operation;
- (q) confirmation of all Non-Road Mobile Machinery (NRMM) to be used, or a statement confirming that NRMM will not be used. All Non-Road Mobile Machinery (NRMM) and plant to be used on site of net power between 37kW and 560 kW must be registered at <http://nrmm.london/>;
- (r) details of any closures of public routes and diversions, demonstrating how time spent closed to the public has been minimised;
- (s) the arrangement for monitoring and responding to complaints relating to demolition and construction;
- (t) cranes and other tall construction equipment (including the details of obstacle lighting);
- (u) the disposal of waste arising from the construction programme, including final disposal points;
- (v) an ecology risk assessment of potentially damaging construction activities, including the identification of biodiversity protection zones, and the removal of any invasive non-native species; and
- (w) practical measures (both physical and sensitive working practices) to avoid or reduce ecological impacts during construction, including the location and timing of any sensitive works and whether specialist ecologists would be required to oversee any works.

The development hereby approved shall be implemented in accordance with the approved CLP and CMP.

Reason: To ensure that the proposed development does not interfere with the free flow of traffic and conditions of safety on the public highway, to ensure the development process does not have a significant adverse impact on the amenities of nearby residential properties, and to protect ecological features in accordance with Policies 33 and 34 of the Havering Local Plan (2021) and Policies D14, SI 1, T4 and T7, and G5 of the London Plan (2021).

6. Protection of Trees

Prior to the commencement of the development hereby approved (including demolition and site clearance works), an Arboricultural Impact Assessment, Arboricultural Method Statement and Tree Protection Plan, all prepared in accordance with the requirements of BS 5837 (2012) 'Trees in Relation to Design, Demolition and Construction' shall be submitted to, and approved in writing by, the Local Planning Authority.

The protection measures, as approved under this condition, shall be implemented on site before development commences and shall be retained for the entire construction period.

Reason: To protect existing trees close to the development in accordance with Policy 27 of the Havering Local Plan (2021).

7. Archaeology Written Scheme of Investigation

Prior to the commencement of development (including demolition and site clearance works) a stage 1 written scheme of investigation (WSI) shall be submitted to, and approved in writing by, the local planning authority. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

- A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works;
 - B. Where appropriate, details of a programme for delivering related positive public benefits; and
 - C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material.
- This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

Reason: To protect and conserve assets of archaeological significance in accordance with Policy HC1 of the London Plan (2021).

8. Archaeology Engagement

Prior to the commencement of the development hereby approved, an appropriate programme of public engagement shall be submitted to, and approved in writing by, the local planning authority. The approved programme must be implemented in accordance with a timetable set out in the programme.

Reason: To protect and conserve assets of archaeological significance in accordance with Policy HC1 of the London Plan (2021).

9. Noise Strategy

Prior to above ground works for the development hereby approved (excluding demolition and site clearance works), a Comprehensive Noise Strategy shall be submitted to and approved in writing by the Local Planning Authority. The strategy shall consolidate all noise mitigation measures into a single coordinated document and shall include:

- Facade and glazing specifications demonstrating compliance with BS 8233:2014 internal noise criteria for all habitable rooms, including assessment of night-time LAF_{max} events.
- An acoustically compliant ventilation and overheating strategy demonstrating that internal noise standards are achieved with windows closed, in accordance with Approved Document O and TM59.
- Assessment and mitigation of noise from all fixed plant and the proposed substation in accordance with BS 4142:2019, demonstrating that plant noise does not exceed background LA₉₀ -5 dB at the nearest noise-sensitive premises.
- Internal sound insulation measures demonstrating compliance with Approved Document E, with enhancements where habitable rooms adjoin communal, commercial or plant spaces.
- Assessment of noise levels within external amenity areas and details of any required mitigation.

The development shall be implemented in full accordance with the approved strategy and retained thereafter.

Reason: To ensure that future residents are adequately protected from environmental noise and that an acceptable standard of residential amenity is achieved, in accordance with Policies 7 and 34 of the Havering Local Plan (2021) and Policy D13 of the London Plan (2021).

10. External Materials

Prior to above ground works for the development hereby approved (excluding demolition and site clearance works), details and samples for all materials, including

a schedule of their locations, shall be submitted to, and approved in writing by, the Local Planning Authority. Where relevant, the materials shall include walls, roofs, windows and doors, sills and lintels, balconies, balustrades, visible pipes, grids and louvers, outdoor pavements, stairs, gates, boundary walls and fences to be used on the external surfaces of the buildings and hard surfaced areas.

The development shall be constructed and retained for the lifetime of the development in full accordance with the approved details.

Reason: To ensure a high quality design in accordance with Policy 26 of the Havering Local Plan (2021).

11. Biodiversity Enhancement Strategy

Prior to above ground works (excluding demolition and site clearance works), a Biodiversity Enhancement Strategy for protected, priority and threatened species, prepared by a suitably qualified ecologist in line with the recommendations of the Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment report (Thompson, May 2025) and the Bat Emergence Survey (Thompson, June 2025), shall be submitted to and approved in writing by the local planning authority.

The content of the Biodiversity Enhancement Strategy shall include the following:

- (a) Purpose and conservation objectives for the proposed enhancement measures;
- (b) detailed designs or product descriptions to achieve stated objectives;
- (c) locations of proposed enhancement measures by appropriate maps and plans (where relevant);
- (d) persons responsible for implementing the enhancement measures; and
- (e) details of initial aftercare and long-term maintenance (where relevant).

The works shall be implemented in accordance with the approved details and shall be retained in that manner thereafter.

Reason: To enhance protected, Priority and threatened species and allow the LPA to discharge its duties under paragraph 187d of NPPF 2024 and s40 of the NERC Act 2006 (as amended).

12. Landscaping

Prior to above ground works (excluding demolition and site clearance works), a scheme of hard and soft landscaping shall be submitted to, and approved in writing by, the local planning authority.

The scheme shall include:

- Planting plans;
- Written specification of planting and cultivation works to be undertaken;
- Schedule of plants, including species, plant sizes, proposed numbers and densities where appropriate;

- Means of enclosure and boundary treatments;
- Hard surfacing materials;
- External lighting;
- Living walls and roofs; and
- Landscape maintenance.

Thereafter the scheme of landscaping shall be carried out prior to the first occupation of the development and maintained in full accordance with the approved details in perpetuity.

In addition, the proposal shall achieve an Urban Greening Factor (UGF) of at least 0.42.

Reason: To ensure that the proposed development will preserve and enhance the visual amenities of the locality and provide adequate facilities in compliance with Policy G1 of the London Plan (2021).

13. Water Efficiency

Prior to above ground works (excluding demolition and site clearance works), Water Efficiency Calculations prepared by a suitably qualified assessor, shall be submitted to, and approved in writing by, the local planning authority, to demonstrate that the detailed design of the development is designed to meet water efficiency standards with a maximum water use target of 105 litres of water per person per day for the residential uses, and BREEAM Excellent standard for the 'Wat 01' BREEAM water category for the non-residential uses.

Reason: To ensure the sustainable use of water, in accordance with Policy SI5 of the London Plan (2021).

14. Play Space

Prior to above ground works (excluding demolition and site clearance works), full details of the children's play areas, including details of play equipment and safety measures, shall be submitted to and approved in writing by the Local Planning Authority.

The details of the children's play area and play equipment to be installed shall achieve substantial compliance with the Mayor's Supplementary Planning Guidance 'Shaping Neighbourhoods: Children and Young People's Play and Informal Recreation' (September 2012) (or such other relevant standard).

The play areas and play equipment shall be fully implemented in accordance with the approved details prior to the first occupation of the development and shall be retained in perpetuity thereafter.

Reason: In order to ensure that sufficient on-site play facilities are provided for the future occupiers of the development and to ensure compliance with Shaping Neighbourhoods: Play and Informal Recreation SPG (2012) and Policy S4 of the London Plan (2021).

15. Refuse and Recycling Strategy

Prior to above ground works (excluding demolition and site clearance works), details of waste collection and management shall be submitted to, and approved in writing by, the local planning authority. These details shall include total waste storage capacity for all residential and non-residential elements, stopping and collection points for waste collection vehicle, drag distances (which shall not be more than 15 metres), and tracked vehicle movements for waste collection vehicles (including interactions with other vehicles which have to enter the site).

Reason: To ensure that the site can be satisfactorily serviced for waste collection in accordance with Policy 35 of the Havering Local Plan (2021).

16. Culvert Post-Development Condition Survey (EA)

Prior to the first occupation of the development hereby approved, and within 90 days of completion of the development, a post-development CCTV/structural survey of the culverted River Rom shall be submitted to, and approved in writing by, the local planning authority, in consultation with the Environment Agency. The submitted surveys shall demonstrate that the development has not caused any adverse impacts on the structural integrity of the culvert.

Any defects identified shall be made good at the applicant's expense and to the LPA's satisfaction within a timeframe agreed with the LPA, in conjunction with the Environment Agency.

Reason: To ensure the structural integrity of the culvert (River Rom) thereby reducing the risk of flooding, in accordance with paragraphs 181 and 187 of the National Planning Policy Framework (2024) and Policy 31 of Havering Borough Council's Local Plan (2021).

17. Acoustic Verification

Prior to first the occupation of the development hereby approved, a post-completion acoustic verification report shall be submitted to and approved in writing by the Local Planning Authority confirming compliance with all elements of the approved Comprehensive Noise Strategy, including internal noise levels, ventilation noise, plant noise and internal sound insulation performance.

Reason: To ensure that future residents are adequately protected from environmental noise and that an acceptable standard of residential amenity is achieved, in accordance with Policies 7 and 34 of the Havering Local Plan (2021) and Policy D13 of the London Plan (2021).

18. Mechanical Plant

Prior to the first occupation of the development hereby approved, a scheme for mechanical plant and machinery shall be submitted to, and approved in writing by, the local planning authority.

No plant or machinery shall be installed unless it meets, or mitigation is provided, to meet the following standard:

The Rating Level (L_{ar}, Tr) of the plant or machinery shall be at least 10dB below the prevailing background noise level (LA₉₀, T). The measurement position, assessment and definitions shall be made according to BS4142:2014 + A1:2019 'Methods for rating and assessing industrial and commercial sound'.

Any plant and machinery shall be permanently maintained to meet this standard.

Reason: To prevent loss of amenity to neighbouring residential properties in accordance with Policy 34 of the Havering Local Plan (2021).

19. Pedestrian Connections

Prior to the first occupation of the development hereby approved, full details of the proposed pedestrian connection with the emerging development to the north, shall be submitted to, and approved in writing by, the Local Planning Authority.

The submitted details shall be implemented prior to the first occupation of any part of the development and so maintained in perpetuity.

Reason: To ensure the scheme delivers on the key objectives of the Romford Masterplan SPD and to improve pedestrian permeability and connectivity in the local area more generally, in accordance with Policy T2 of the London Plan (2021).

20. Secured by Design

The development hereby approved shall achieve 'Secured by Design' accreditation awarded by the Havering Metropolitan Police Crime Prevention Design Adviser (CPDA) on behalf of the Association of Chief Police Officers (ACPO). No part of the development hereby approved shall be occupied until accreditation has been achieved.

Reason: To promote the use of security standards and crime prevention, in accordance Policy 26 of the Havering Local Plan (2021).

21. Unexpected Contamination

If, during development, contamination not previously identified is found to be present at the site then no further development shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

Reason: To protect those engaged in construction and occupation of the development from potential contamination in accordance with Policy 34 of the Havering Local Plan (2021).

22. Trees

During construction of the development hereby approved, any trees within the application site which are not shown to be removed shall not be lopped, felled or otherwise harmed, and shall be retained post-construction.

Reason: To protect existing trees close to the development in accordance with Policy 27 of the Havering Local Plan (2021).

23. Cycle Spaces

The development hereby approved shall provide a minimum of 193 long-stay cycle spaces and 4 short-stay cycle spaces for the residential component, and shall provide 2 long-stay cycle spaces and 6 short-stay cycle spaces for the non-residential component.

Reason: To ensure that an appropriate provision of cycle spaces is provided within the development in accordance with Policy T5 of the London Plan (2021).

24. Ecological Appraisal

All mitigation measures and/or works shall be carried out in accordance with the details contained in the Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment report (Thompson, December 2025) and the Bat Emergence Survey (Thompson, June 2025) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

This will include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW) to provide on-site ecological expertise during construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details.”

Reason: To conserve protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (as amended).

25. Accessible Dwellings

The development hereby approved shall ensure that at least 10% of the dwellings are delivered and maintained to meet the standards of a Category 3 M4(3) dwelling, and all other dwellings shall meet the standards of Category 2 M4(2) dwelling, as set out in Approved Document M of the Building Regulations (2010) 2015.

Reason: To ensure the scheme complies with Policy D5 of the London Plan (2021).

26. Fire Strategy

The development hereby approved shall comply with the submitted Outline Fire Safety Strategy and shall ensure that the recommended measures as set out in this Fire

Safety Strategy are implemented and adhered to throughout the lifetime of the development.

Reason: To ensure compliance with Policy D12 of the London Plan (2021).

27. Flexible use class for commercial unit

The commercial unit hereby approved shall operate only within use classes E and F1 of the Town and Country Planning (Use Classes) Order 1987 (as amended).

Reason: To ensure the proposal re-provides an element of town centre uses within the scheme, in accordance with Policy 13 of the Havering Local Plan (2021).

28. Energy Strategy

The development hereby approved shall comply with the submitted Energy and Sustainability Statement (Ecolytik, February 2026) and ensure that the scheme delivers an on-site carbon saving of at least 67% compared to the baseline.

Reason: To mitigate the adverse impacts of carbon release in accordance with Policy SI 2 of the London Plan (2021).

29. DSP

The development hereby approved shall comply with the details as set out in the submitted Delivery and Servicing Plan (TPP, April 2025).

Reason: To ensure compliance with Policy T4 of the London Plan (2021).

30. SUDS

The development hereby approved shall be implemented in accordance with the 'Flood Risk Assessment & Drainage Strategy' (prepared by Ardent, dated April 2025), and the development shall achieve discharge rates of at least 1.7 litres per second.

Reason: To ensure suitable site drainage in accordance with Policy 32 of the Havering Local Plan (2021).