



**Havering**  
LONDON BOROUGH

**Strategic Planning  
Committee  
9<sup>th</sup> July 2026**

**Application Reference:**

**P0867.25**

**Location:**

**Jewson, 307-309 South Street**

**Ward:**

**St. Albans**

**Description:**

**Redevelopment of the existing Builders Merchants to provide a new Builders Merchants branch, including the demolition of the existing building, construction of a new branch building (sales area, warehouse, tool hire and associated office) and a cantilever racking, external storage area/racking, loading/unloading area, car and cycle parking spaces, fencing and landscaping.**

**Case Officer:**

**Andrew Thornley**

**Reason for Committee:**

**A Councillor call-in has been received which accords with the Committee Consideration Criteria**

## **1. Background**

- 1.1 This is a major planning application relating to the redevelopment of a builder's merchant to increase its capacity.

## **2. Summary of Key Reasons for Recommendation**

- 2.1 The proposed development is considered to be acceptable in principle, representing an appropriate land use for a designated Locally Significant Industrial Site (LSIS). In addition, the proposal would allow an existing business to grow and expand, providing further employment opportunities and encouraging economic growth.
- 2.2 Subject to conditions controlling noise, the proposal would not have a significant adverse impact on the amenity of neighbouring residents, and there would not be any significant transport impacts.
- 2.3 As such, the proposal is considered acceptable, and is recommended for approval, subject to the conditions and obligations set out in this report.

### **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
  - Scheme for Employment, Skills and Training.
  - Mandatory BNG Requirements, including Monitoring
  - Carbon Offset Payment
  - Payment of a financial contribution toward s106 monitoring costs
  - Payment of legal 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 as set out in Appendix 1 of this report, or to alter the wording of planning conditions as necessary.

### **4. Site Description**

- 4.1 The application site comprises a 0.75 hectare rectangular plot to the east of South Street, in use as a builder's merchants (sui generis). The site is predominantly undeveloped and laid with hardstanding, with a two-storey building of various heights positioned against the northern boundary adjoining the rear gardens of properties in Dymoke Road. There are numerous uncovered storage shelves positioned within the site, each approximately two storeys tall, and much of the site appears to be used for open-air storage in a relatively ad-hoc manner.
- 4.2 The site includes customer and staff parking, with a total of 16 car parking spaces including 2 disabled bays, and 2 van spaces, albeit there is no cycle parking at present. Access into and out of the site is achieved from Lyon Road, to the south.
- 4.3 The surrounding area has a mixed character, with commercial and light industrial uses to the east and south of the site, on either side of Lyon Road. Beyond this collection of commercial buildings, and immediately to the north of the site, are residential properties; typically two-storey detached, semi-detached and terraced housing but with some examples of low-rise flatted developments on South Street.

### **5. Planning Policy Designations**

- 5.1 The application site falls within the Lyon Road Locally Significant Industrial Site (LSIS) and the Romford Strategic Development Area. The site is also potentially contaminated because of previous and existing uses.

## **6. Relevant Planning History**

- 6.1 P0108.20 - Redevelopment of existing commercial site to provide a new commercial single storey building providing 1,260 sqm of Sui Generis Builders Merchants with associated office, trade counter (sales area)/showroom and external storage/racking. Approved on 15/10/21.
- 6.2 P0109.20 – Redevelopment of the site to provide a mixed-use scheme with 47 self-contained apartments, ground floor commercial space (Use Classes B2/B8 with ancillary trade counter) built over 4-7 storeys, and associated car parking and landscaping. Approved on 15/10/21.

## **7. Proposal**

- 7.1 The proposal seeks to redevelop the site within the same use class to provide a larger building, still positioned in the north-east corner of the site, whilst creating more formalised external storage areas. The Planning Statement sets out that the site no longer meets the needs of the business, and that some form of redevelopment is required to operate the site more efficiently, to allow the existing business to expand.
- 7.2 The existing building has a Gross Internal Area (GIA) of 1107 sqm, whilst the proposed building would have a GIA of 2520 sqm; an increase of 1413 sqm. In terms of the buildable area, the existing buildings have a footprint of approximately 1314 sqm, whilst the proposed building would have a footprint of approximately 2652 sqm.
- 7.3 The existing building has a maximum height of 7.2 metres, and an eaves height of 4.3 metres, whilst the proposed building would have a dual-pitched roof, with a maximum height of 10.2 metres, sloping down to 8.4 metres at the eaves.
- 7.4 The proposal further seeks to amalgamate the external storage racks into a single large, covered racking structure in the north-west of the site.
- 7.5 The proposed development would look to create a one-way system within the site, with separate access and egress points adjacent to each other from Lyon Road. Both the access and egress points already exist, however at present only one is utilised. Ten customer parking bays are proposed, one of which would be wheelchair accessible, and ten staff parking bays are proposed, one of which is marked as being a 'car share' bay, in addition to 5 collection parking laybys located throughout the site, which could accommodate between 14 to 18 transit vans (depending on van length).

## **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. Local Representation**

- 9.1 Letters to neighbouring properties were sent out on the 16th July 2025 and a site notice was displayed outside the application site on the 1st August 2025.
- 9.2 Councillor Holt, former ward councillor, called-in the application for the following reasons:
- Overlooking / Loss of Privacy - the proposed new building would overlook the houses and gardens of numbers 2, 4, 6, 8, 10, 12, 14 and 16 Dymoke Road to an intrusive, unacceptable level.
  - Noise and Air Pollution - the changing of the collection point to allow traffic to drive around the new warehouse next to the boundaries of the above properties in Dymoke Road would mean an unacceptable level of noise and air pollution for the residents of these houses.
- 9.3 Representations have been received, including four objections which are summarised below:
- Where will the palisade fence be erected along the northern boundary
  - Loss of mature trees along the northern boundary, which provide an effective screen
  - Opening hours seem excessive
  - Scale and layout of previous applications should be honoured
  - Loss of skyline and outlook from properties on Dymoke Road
  - More tree planting and install bird boxes, especially replacement tree planting along the northern boundary.
  - On-site tree planting would help to achieve the mandatory BNG requirements, as well as improve the aesthetic qualities of the proposal.
  - The proposed façade colour (Anthracite Grey) is very oppressive and a light grey (e.g. RAL 7035) would be less oppressive.
  - Location of ASHPs could create a noisy environment and we request they be positioned away from the adjoining residential areas
  - High chance of dust impacts
  - Removal of asbestos is likely to be a health hazard
  - Loss of privacy and increase in potential for overlooking into residential gardens
  - Any landscaping should be suitable for invertebrates and pollinators

- Increase in overlooking and a loss of privacy to the residents of the even numbered properties on Dymoke Road
- Increase in noise and air pollution, as a result of the relocation of the collection point closer to Dymoke Road

#### 9.4 External Consultee Comments:

TfL: The site is located approximately 300m from the A125 Rom Valley Way, which forms part of the Strategic Road Network (SRN). While the Council is the Highway Authority for those roads, TfL has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN.

A bus stop (Brentwood Road Stop D) is located immediately outside the site on South Street. This bus stop serves three bus services. Romford Station is approximately 730m walking distance from the site. Subsequently, this site has a PTAL of 5.

Policy T6(B) states that the starting point for all development in well-connected areas is that they should be car-free. However, due to the nature of this development as a builders merchant, it is deemed that a number of customer car parking spaces are required. Therefore, the 15 customer parking spaces is in line with the London plan standard.

Robust justification should be provided to demonstrate why staff parking is necessary.

A Parking Design and Management Plan (PDMP) should be secured by condition.

Six cycle storage spaces are proposed – it appears that these are provided as three Sheffield stands adjacent to the customer parking bays. Four long-stay spaces and two short-stay spaces are required for the proposals to be in line with Policy T5 of the London Plan. It should be ensured that these are in line with the London Cycling Design Standards. Furthermore, supporting facilities for staff should be provide (lockers, showers).

A finalised Delivery and Servicing Plan (DSP) should be secured by condition.

A full Construction Logistics Plan (CLP) should be secured by condition on any consent.

#### 9.5 Internal Consultee Comments:

Arboricultural Officer: Submitted with this application is an Arboricultural Baseline Report and Impact Assessment (hereafter the 'report') that has surveyed all trees on and within 15m of the redline boundary. A total of 9 trees and groups have been identified, of which one group is Category B, four trees are Category C and four groups are Category C. There are no active TPOs present, nor is the site located within a Conservation Area.

The proposal seeks the entire removal of T9 (Category C) and G4 (Category C) and the partial removal of G3 (Category B). These trees are located on the boundary of the site and their removal does not unduly impact the visual amenity of the locality. They are expected to be mitigated through appropriate replacement tree planting.

The loss of G3 does remove several higher category trees that currently provide a screening benefit to the adjacent properties. However, the trees are located in an inappropriate location and are in close proximity to the boundary treatment with the adjacent residential properties. The removal of G3 is justified due to a change in the ground levels to facilitate the proposal. Balancing the impact of the loss against the proposal and offer for replacements, this can be mitigated.

A scheme of replacement tree planting has been identified on the boundary of the site, with a total of 19 new trees on the northern boundary and 12 trees to be planted on the southern boundary. The trees are heavy standards that will provide an instant impact to visual amenity. From an arboricultural perspective, the replacement planting is suitable.

The proposal will encroach the Root Protection Area of T5 (Category C), however this encroachment is negligible and the report has provided working methods for hand dig excavations and root severance methodology. These methods are sufficient to mitigate against undue harm and impacts to this tree.

Given the location of the proposal adjacent to the boundary trees and groups, the lateral crown spreads of these trees are to be managed to create a favourable relationship between the proposal and the retained trees.

Air Quality Officer: agree with the findings for the Building Emissions and Transport Emissions, and therefore the site is AQN for both of these factors.

I note that 1 active EVC charging point will be installed, but with no passive points. I would like to see this increased to 4, to comply with our standard condition of 20% of parking spaces to be provided with EVC facilities, and the remaining spaces to have passive provision for possible future use.

Contaminated Land Officer: Although the land could potentially be contaminated land, all areas will be hard standing so a land contamination assessment won't be required. However, I recommend the unexpected contamination condition be applied should approval be granted.

Ecology Officer: We are now satisfied that there is sufficient ecological information available to support determination of this application.

This provides certainty for the LPA of the likely impacts on designated sites, protected and Priority species & habitats and, with appropriate mitigation measures secured, the development can be made acceptable.

The mitigation measures for nesting birds and mobile species, identified in the Preliminary Ecological Appraisal (SLR, June 2025) should be secured by a condition of any consent and implemented in full.

This is necessary to conserve and enhance protected and Priority species particularly those recorded in the locality.

The Bat Emergence Survey found no emergence from the buildings to be demolished, therefore no further surveys are required. However, it recommended that a sensitive lighting scheme is secured by condition.

With regard to mandatory biodiversity net gains, it is highlighted that we support the submitted Statutory Biodiversity Metric (no date, no author) and baseline condition assessment. Biodiversity net gains is a statutory requirement set out under Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act 1990 and we are satisfied that submitted information provides sufficient information at application stage. As a result, a Biodiversity Gain Plan should be submitted prior to commencement.

In addition, a Habitat Management and Monitoring Plan (HMMP) should be secured for all significant on-site enhancements. Based on the submitted post-intervention values, it is suggested that this includes the following habitats: urban tree and other neutral grassland.

We also support the proposed reasonable biodiversity enhancements for protected, Priority and threatened species, which have been recommended to secure net gains for biodiversity, as outlined under Paragraph 187d and 193d of the National Planning Policy Framework (December 2024). These include installation of two to three integrated bat tubes and two to three integrated bird boxes in the newly constructed on-site in suitable locations, as recommended in the PEA. The reasonable biodiversity enhancement measures should be outlined within a separate Biodiversity Enhancement Strategy and should be secured by a condition of any consent.

Noise Officer (23/01/26): In respect to noise from plant, the noise report provided addresses my concerns, however due to the plant not being chosen, and the mitigation suggested in the report not being included in the current application, I suggest it is secured by condition.

Have some concern regarding noise from customer collections, and suggest a condition controlling the hours of use is applied.

I would also recommend a condition regarding the fencing along this boundary, to afford additional protection, and ensure that a simple close boarded fence is not installed along the boundary, but a more robust, acoustically performing fence is included.

Regarding the proposed hours of deliveries, this remains a concern, particularly with the storage area being out in the carpark area, and the impact

that this would have on those residential properties. I note that a BS4142 assessment has indicated that there is a between a -1 and - 2dB rating level when compared to the background level, which does not meet with the Council's standard noise requirement of -10dB. Whilst the assessment does add a 5dB penalty for the impact noise of the deliveries, the purpose of a - 10dB rating level is to prevent background creep (and essentially means that the noise is inaudible). A difference of -2dB, whilst having a low impact, does not mean that there is no impact, particularly between 6.30-7.00am where residents would be getting up for their day, but may not be wishing to be woken up each morning by the noise of deliveries.

As such, I cannot recommend that the proposed hours of delivery are agreed (even with a noise management plan in place) and suggest the initial condition to remain for the development.

## **10. Principle of Development**

- 10.1 The application site falls within the Lyon Road Locally Significant Industrial Site (LSIS). LSISs are well-functioning industrial employment areas with an on-going demand for space to service industrial and logistical occupiers, and they are areas that remain the most suitable locations for accommodating Havering's industrial and warehousing demand.
- 10.2 Policy 19 of the Havering Local Plan (Business Growth) sets out that LSISs will be maintained for industrial uses, whilst Policy 20 of the Havering Local Plan (Loss of locally significant industrial sites and non-designated land) seeks to protect and enhance the employment potential for delivering industrial and employment floorspace to ensure that Havering has a strong and prosperous economy.
- 10.3 Whilst a builder's merchant is not strictly an industrial use (B1, B2 or B8) and is probably better described as being sui generis as a result of the retail offer and the regular comings and goings of customers alongside the storage of materials, it is recognised that because of the range of functions it provides on-site, there is significant overlap between how a builder's merchants is used with many industrial uses, and it is recognised that this use provides a level of employment which is broadly consistent with the intentions of the LSIS. As such, the principle of development is supported, noting that the proposal would better allow the existing business to function and expand, thereby supporting Havering's employment prospects and the wider economic function of the borough. On this basis, it is considered that the proposed use would continue to support the intentions of Policies 19 and 20 of the Havering Local Plan in encouraging business growth and protecting designated employment land.

## **11. Design**

- 11.1 Policy 26 of the Havering Local Plan (Urban Design) sets out that proposals which respect and complement the identity and character of the site's context and integrate with neighbouring developments will generally be supported.

- 11.2 The site's context has a mixed character, with commercial and industrial uses appearing as the dominant type of development to the south and east (within the LSIS), whilst residential uses in the form of suburban housing or small blocks of flats are present to the north and west. In this respect, whilst having an overall functional and industrial appearance, the existing building nonetheless appears as an appropriate form of development for its context.
- 11.3 As discussed above, the proposed development would increase both the footprint and massing of built form across the site, doubling the size of the existing building's footprint and increasing the overall height from 7.2 metres to 10.2 metres at the ridge and from 4.3 metres to 7.2 metres at the eaves.
- 11.4 Whilst this represents a fairly significant increase in built form across the site, it is considered that owing to its location in the north-east corner and the large areas of open hardstanding which would be retained, the proposed building sits relatively comfortably within its plot and does not dominate either the South Street or Lyon Road streetscene. Moreover, whilst the height and scale of the development represent a significant increase compared to the existing building, it would appear broadly contextual in terms of its overall scale and massing with the existing industrial buildings within the rest of the LSIS, including the three large buildings on the south side of Lyon Road, although it is recognised that the proposed height would be taller.
- 11.5 It is further considered that the proposed materials reflect the intended use of the site, still appearing somewhat functional, but appearing as a more modern structure which is still fit for purpose. In this respect, some parts of the existing building appear somewhat dated, especially in relation to the roof and elevational treatments, and the proposal would address this.
- 11.6 Some concern is raised in respect of the proposed external storage rack, which would be of a similar height to the proposed building and would act to amalgamate the ad-hoc storage racks currently spread across the site. This part of the development would be highly visible, especially in longer views approaching from the south, and being close to South Street. Whilst, this element of the scheme would detract from the appearance of the wider site, appearing slightly out of place in the context of a predominantly residential-lined road, it is recognised that the amalgamation of storage areas into one defined location would significantly improve the efficacy and day-to-day management of the site, and it is further recognised that the current ad-hoc arrangements for the storage of materials across the site does little to enhance the site's appearance. As such, on balance taking together the need to allow businesses within LSISs to expand and grow, it is considered that this minor harm would not warrant a reason for refusal.
- 11.7 Overall, the proposal is considered to be of an acceptable level of design quality for the intended use, taking into account the relevant site designations and the surrounding context.

## **12. Impact on Amenity**

- 12.1 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.
- 12.2 Daylight and Sunlight
- 12.3 Daylight and Sunlight (DLSL) is broken into two main arms: 'adequacy', i.e. levels within the proposed accommodation (including external amenity spaces); and 'impact', i.e. the effect a proposal has on the surrounding neighbours. As this proposal is for a non-residential use, only 'impact' is discussed below.
- 12.4 In support of the application, a 'Daylight & Sunlight Amenity Study (Neighbouring) Report' has been submitted, which has been prepared in accordance with the Building Research Establishment's (BRE's) Report 209 "Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice (2022 3rd Edition)", which is considered to be the accepted industry standard.
- 12.5 The report identified 9 neighbouring residential properties, and assessed the impact of the proposal on 71 windows and 58 rooms within proximity to the development. The findings confirm that all neighbouring windows pass the BRE diffuse daylight and direct sunlight tests, whilst also satisfying the BRE overshadowing to gardens and open spaces requirements. On this basis, the proposal is considered acceptable in relation to its impact on access to natural light.
- 12.6 Outlook and Privacy
- 12.7 The proposed development would increase the scale and massing of built form on the site, with an increase in eaves height of 4.1 metres and an overall increase of 3 metres, and the applicant sets out that this is the minimum increase which would facilitate the increased internal headroom required for the proposal. In addition, the proposed building would be sited approximately 20 metres south of the rear elevations of the houses on Dymoke Road (approximately 24 metres at first floor level), which would be 2 metres further away from these properties than the existing building, albeit, the proposal would likely appear larger due to the increase in height.
- 12.8 Owing to the separation distance between the rear windows of the properties on Dymoke Road and the northern elevation of the building, it is considered that this increase in height would not result in an unacceptable loss of outlook, and noting that no windows are proposed across this elevation, there would further be no loss of privacy.
- 12.9 Noise

- 12.10 Regard should 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. Proposals should manage noise and other potential nuisances by ensuring good design mitigates and minimises existing and potential nuisances with necessary and appropriate provisions including ongoing and future management responsibilities, and proposals should seek to separate new noise-sensitive development from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures.
- 12.11 In support of the application, a Noise Impact Assessment has been submitted, and this has been reviewed by the Council's Environmental Health Officer, who raises concerns with the proposed hours of operation, but is otherwise satisfied that the proposal would not have a significant impact on neighbours' amenity. On this basis, conditions controlling the hours of use and hours of deliveries, in addition to conditions requiring details of an acoustic fence along the northern boundary and for the noise mitigation measures outline in the submitted Noise Assessment to be implemented. On this basis, it is considered that the increase in noise and disturbance, which is likely to be relatively minor, can be adequately controlled through the use of planning conditions, thereby making the scheme acceptable in this regard.

### **13. Transport**

- 13.1 The application site has a Public Transport Accessibility Level (PTAL) of 5, indicative of very good access to public transport. PTAL is a measure of a site's access to public transport, and is graded on a scale of 0 (worst) to 6b (best).
- 13.2 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').
- 13.3 The existing site has 18 spaces (16 for cars and 2 for vans). Of these spaces, 7 are designated as staff parking with the remainder for customers. The proposed development would provide 20 spaces; comprised of 10 customer bays (1 of which would be accessible) and 10 staff bays (1 of which would be provided with an electric vehicle charging point and 1 of which would be for car shares). In addition, 5 laybys would be positioned throughout the site which could accommodate approximately 14-18 transit vans for short-stay collections.
- 13.4 There are no specific parking standards within either the London Plan or the Havering Local Plan relating to sui generis use classes, but rather, each site

should be assessed on its own merits. The site has a Public Transport Accessibility Level (PTAL) of 5, indicative of very good access to public transport, with Brentwood Road bus stop immediately west of the site on South Street and Romford Train Station an approximately 10-15 minute walk away to the north.

- 13.5 The overall increase in parking provision of two spaces is considered to be acceptable in this instance, owing to its use as a builder's merchant, most people would arrive and leave by car.
- 13.6 Furthermore, having regard to para. 116 of the NPPF, it is recognised that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe. As such, whilst the objection from TfL in relation to the increase in parking provision is noted, it is considered that any increase in parking is very unlikely to have severe adverse impacts on the road network, and a refusal on this ground would not be warranted.
- 13.7 In addition, the applicant has submitted a Transport Assessment (Jun 2025), which outlines that the proposed development would likely lead to an increase in daily vehicle movements of 112 (56 each way), based on comparable TRICS data, although it is recognised that the TRICS data predicts higher vehicle movements than indicated by the on-site surveys carried out by the applicant.
- 13.8 This increase in vehicle movements is considered to be acceptable and commensurate with the increase in proposed floorspace, and would not significantly affect the number of vehicle movements in the area.
- 13.9 The proposal seeks to provide six cycle parking bays within the scheme, and this is considered to be an acceptable level of provision, noting that this would largely cater for staff living locally, and would be unlikely to be used extensively by potential customers.
- 13.10 Overall, the proposal is considered to be acceptable in relation to transport impacts.

#### **14. Ecology**

- 14.1 Policy 30 of the Havering Local Plan (Biodiversity and Geodiversity) seeks to protect and enhance the borough's natural environment and seek to increase the quantity and quality of biodiversity in Havering. This will be achieved by ensuring applicants demonstrate that the impact of proposals on protected sites and species have been fully assessed when development has the potential to impact on such sites or species, with appropriate mitigation and compensation measures included where harm has been identified (if it can't be avoided). New development will be expected to incorporate biodiversity in and around the development, whilst promoting the qualitative enhancement of sites of biodiversity value.

- 14.2 The council's Ecology Consultant, following the receipt of additional information, removed their objection, on the basis that with appropriate mitigation measures secured, the development can be made acceptable. In this respect, the mitigation measures for nesting birds and mobile species, identified in the Preliminary Ecological Appraisal (SLR, June 2025) will be secured by condition.
- 14.3 The submitted Bat Emergence Survey found no emergence from the buildings, and therefore no further surveys are required, however, a sensitive lighting scheme shall be secured by condition.
- 14.4 With regard to mandatory biodiversity net gains, the council is satisfied that submitted information provides sufficient information at application stage. As a result, a Biodiversity Gain Plan will be secured by condition, to be submitted prior to commencement.
- 14.5 On this basis, the proposal is considered acceptable in regard to ecological impacts.

## **15. Flood Risk**

- 15.1 The application site falls fully within Flood Zone 1, which is at the lowest risk of flooding and has a site area of 0.75 hectares. As such, the need for a Flood Risk Assessment is not triggered.

## **16. Land Contamination**

- 16.1 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.
- 16.2 Having regard to the Council's Contamination Officer's comments, whilst there is the potential for some land contamination to have occurred, on the basis that all relevant areas will remain as hard standing, no concerns are raised.

## **17. Energy and Sustainability**

- 17.1 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.

- 17.2 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.
- 17.3 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.
- 17.4 The proposed development would achieve a saving of 117% when compared to the baseline, inclusive of a 16% improvement through 'be lean' measures. On this basis, no carbon offset payment would be required and the scheme is considered acceptable in this regard.

## **18. Air Quality**

- 18.1 The whole of the borough is identified as an Air Quality Management Area on the basis of Nitrogen Dioxide (NO<sub>2</sub>) levels, and whilst these levels are not breached in all areas of the borough it is acknowledged that activities which cause air pollution affect the wider area.
- 18.2 An Air Quality Assessment has been undertaken by Redmore Environmental. It confirms that potential impacts during the construction phase and the operational phase of the proposed development are not predicted to be significant.
- 18.3 This has been reviewed by the Council's Environmental Health Team, who agree with the findings of the Air Quality Assessment, and have recommended conditions relating to the use of Non-Road Mobile Machinery, the submission of a Dust Management Plan and the provision of additional active and passive electric vehicle charging.

## **19. Planning Obligations**

- 19.1 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.
- 19.2 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.
- 19.3 To make the development acceptable in planning terms, the development of this site will require a legal agreement, and the following Heads of Terms have been agreed between the London Borough of Havering and the applicant:
- Submission of a Biodiversity Net Gain Plan and Habitat Management and Monitoring Plan
  - Submission of a Travel Plan
  - Programme of Employment Skills and Training
  - Carbon Offset Payment
  - Payment of a financial contribution toward s106 monitoring costs.
  - Payment of legal costs associated with the drafting, signing and completion of the s106.

## **20. Equality and Diversity**

- 20.1 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.
- 20.2 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

## **21. Conclusion**

- 21.1 The proposed development is considered to be acceptable in principle, representing an appropriate land use for a designated LSIS. In addition, the

proposal would allow an existing business to grow and expand, providing further employment opportunities and encouraging economic growth.

- 21.2 Subject to conditions controlling noise and the planting of both replacement and additional trees, the proposal would not have a significant adverse impact on the amenity of neighbouring residents, and there would not be any significant transport impacts.
- 21.3 As such, the proposal is considered acceptable, and is recommended for approval, subject to the conditions and obligations set out in this report.

## **Appendix 1: Conditions**

### **1. Time Limit**

The development to which this permission relates must be begun not later than the expiration of three (3) years beginning with the date on which the permission is granted.

Reason: As required by Section 91 of the Town and Country Planning Act 1990.

### **2. In Accordance with Plans**

The development hereby approved shall be carried out in accordance with the following approved drawings:

- Location Plan (Drawing No: 001, Rev. 01)
- Proposed Site Plan (Drawing No: 100 Rev. 06)
- Proposed Block Plan (Drawing No: 105, Rev. 02)
- Proposed Floor Plan (Drawing No: 200 Rev. 03)
- Proposed Roof Plan (Drawing No: 201, Rev. 03)
- Covered Storage Structure – Proposed Plan and Elevations (Drawing No: 250, Rev. 02)
- Proposed Elevations (Drawing No: 300 Rev. 05)
- Proposed Street Scene Elevations (Drawing No: 301 Rev. 03)
- Existing and Proposed Rear Elevations (Drawing No: 305)
- Proposed Section (Drawing No: 400, Rev. 02)
- Existing and Proposed Site Section A – A (Drawing No: 405 Rev. 02)
- Existing and Proposed Site Section B – B (Drawing No: 406 Rev. 02)
- Existing and Proposed Site Section C – C (Drawing No: 407 Rev. 02)
- Proposed Tree Planting Plan (Drawing No: 425.066813.00001-LSP-D- 001 Rev. 3)

The approved development shall thereafter be retained as such for as long as the development remains in existence.

Reason: For the avoidance of doubt and in the interests of proper planning.

### 3. CLP/CMP (Pre-Com) (inc. NRMM, Dust Management Plan, Hours)

Prior to the commencement of the development hereby approved, 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 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 and CMP 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); and

(u) the disposal of waste arising from the construction programme, including final disposal points.

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, and to ensure the development process does not have a significant adverse impact on the amenities of nearby residential properties in accordance with Policies 33 and 34 of the Havering Local Plan (2021) and Policies D14, SI 1, T4 and T7 of the London Plan (2021).

#### 4. Gas Protection Measures (Pre-Com)

- a) Prior to the commencement of the development hereby approved, details shall be submitted to and agreed in writing by the Local Planning Authority setting out suitable gas protection measures to be employed on site including, but not necessarily limited to, the installation of a suitable gas resistant membrane, in compliance with BS 8485:2015.

The gas protection measures shall be carried out in strict accordance with the agreed details.

- b) Upon completion of the measures set out under (a) and prior to any above ground works, a 'Verification Report' shall be submitted to, and approved in writing by, the local planning authority, demonstrating that the approved works have been carried out.

Reason: Information supplied with the application indicates a risk arising from landfill gases (methane and carbon dioxide). Submission of an assessment prior to commencement will protect people on or close to the site from the risks associated with migrating landfill gas is necessary in accordance with Policy 34 of the Havering Local Plan (2021).

#### 5. Parking Design and Management Plan (inc. EVCPs requirement) (Pre-AGW)

Prior to any above ground works for the development hereby approved (excluding demolition and site clearance works), a Parking Design and Management Plan shall be submitted to, and approved in writing by, the Local Planning Authority.

It shall include the following:

- (i) The arrangements for all on-site parking, and to include provisions for managing, monitoring, enforcement and review. All on-site parking spaces shall be solely for use by the development hereby approved (e.g. staff, customers) and shall not be used for any other purpose or leased/sub-let.
- (ii) Measures to prevent overspill parking.
- (iii) Arrangements for the management of drop-off and collection spaces, including details of a booking service.
- (iv) Measures to ensure the proposed one-way system will remain free at all times and will not be subject to ad-hoc parking.
- (v) Details of 1 wheelchair accessible space, to be permanently retained within the car parking area.
- (vi) Details of 4 active electric vehicle charging points and 16 passive vehicle charging points.

No more than 20 car parking spaces shall be provided on site, in accordance with the submitted details.

The vehicle parking provision and its management, as outlined in the approved Parking Design and Management Plan, shall be fully implemented as approved prior to the first occupation of the development, and the parking area shall not be used for any other purpose.

Reason: To ensure the appropriate operation of the car park in accordance with Policy T6 of the London Plan (2021).

#### 6. Cycle Parking (Pre-AGW)

Prior to any above ground works for the development hereby approved (excluding demolition and site clearance works), details of 6 covered and secure cycle storage spaces designed in accordance with London Cycling Design Standards, alongside changing facilities, lockers and showers for users of and visitors to the development, shall be submitted to and approved in writing by the Local Planning Authority.

Thereafter, the development shall not be occupied or brought into use until the approved cycling facilities have been implemented in accordance with the approved plan, with the facilities being permanently retained for use by cyclists.

Reason: To encourage an uptake in cycling in accordance with Policy T5 of the London Plan (2021).

#### 7. DSP (Pre-AGW)

Prior to the first use of the development hereby approved, a Delivery and Servicing Plan, including tracked vehicle movements where necessary, shall be submitted to, and approved in writing by, the Local Planning Authority. Thereafter the development shall be carried out and maintained in full accordance with the approved details.

Reason: To help mitigate the site's contribution to local congestion levels in compliance with Policy T7 of the London Plan (2021).

## 8. External Materials (Pre-AGW)

Prior to above ground works for the development hereby approved, 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).

## 9. Biodiversity Enhancement Strategy (Pre-AGW)

Prior to any above ground 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 (SLR, 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 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), and in accordance with Policy 30 of the Havering Local Plan (2021).

## 10. Replacement Tree Planting (Pre-Occ)

Prior to the first use of the development hereby approved, full details of the location, size, type and species of replacement trees shall be submitted to, and approved in writing by, the local planning authority, utilising 'Heavy Standards' to ensure instant visual amenity. At least 19 new trees shall be planted along the northern boundary and at least 12 shall be planted along the southern boundary.

The replacement trees shall be planted prior to the first use of the development, and so maintained in perpetuity. Any trees which die, are damaged or are otherwise lost shall be replaced in the next planting season available.

Reason: To ensure the scheme provides an acceptable level of visual amenity and to provide an element of natural screening along the northern boundary, in accordance with Policy G5 of the London Plan (2021).

#### 11.Noise Barrier (Pre-Occ)

Prior to the first use of the development hereby approved, details, specifications and drawings of a suitable noise barrier between the application site and the properties on Dymoke Road shall be submitted to, and approved in writing by, the local planning authority.

The noise barrier shall have a minimum surface mass density of at least 10kg/m<sup>2</sup>.

The approved details shall be implemented prior to the first use of the development hereby approved and permanently maintained as such.

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

#### 12.Wildlife Sensitive Lighting Scheme (Pre-Occ)

Prior to first use of the development hereby approved, a Lighting Design Strategy for Biodiversity shall be submitted to, and approved in writing by, the Local Planning Authority. The Lighting Design Strategy for Biodiversity shall be prepared in accordance with Guidance Note 08/23 (Institute of Lighting Professionals), and shall:

- a) identify those areas/features on site that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and
- b) show how and where external lighting will be installed so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.

All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

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), in accordance with Policy 30 of the Havering Local Plan (2021).

#### 13.Ecology Mitigation (Compliance)

All ecological mitigation measures and works shall be carried out in accordance with the details contained in the Preliminary Ecological Appraisal (SLR, June 2025).

This includes 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 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), in accordance with Policy 30 of the Havering Local Plan (2021).

#### 14. Tree Protection (Compliance)

The measures to protect trees before, during and after construction as set out in the Arboricultural Baseline Report & Impact Assessment (18 June 2025), and shown within Appendix 3 of the report (Tree Protection Plan), shall be adhered to.

Reason: To protect trees during the construction process in accordance with Policy G5 of the London Plan (2021).

#### 15. Noise From Plant (Compliance)

The scheme to control noise and vibration, as detailed in the noise report provided by Sharps Redmore Acoustics Consultant (dated 17 November 2025) shall be implemented, as a minimum, before the first occupation of the development hereby approved and thereafter retained and maintained in accordance with such details.

In addition, the Rating Level (L<sub>ar</sub>, Tr) of any mechanical plant or machinery shall be at least 10dB below the prevailing background noise level (LA<sub>90</sub>, 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."

Reason: To protect the amenity of noise sensitive premises from noise from mechanical plant in accordance with Policy 34 of the Havering Local Plan (2021).

#### 16. Hours of Use (Compliance)

The development hereby approved shall not open to the public other than between the hours of 07:00 and 19:00 on Monday to Friday, between the hours of 08:00 to 16:00 on Saturday and not at all on Sundays and Bank Holidays.

Reason: In order to protect the amenity of the area in accordance with Policy 34 of the Havering Local Plan (2021).

#### 17. Hours of Deliveries (Compliance)

No deliveries or waste collections shall be taken at or despatched from the site outside the hours of 07:00 to 18:00 on Monday to Friday, outside the hours of 08.00 to 13.00 on Saturdays, and no deliveries shall take place on Sundays, Bank or Public Holidays.

Reason: In order to protect amenity of the area in accordance with Policy 34 of the Havering Local Plan (2021).

#### 18. Unexpected Contamination (Compliance)

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).

#### 19. Energy

The development hereby approved shall be implemented and thereafter retained in accordance with the measures outlined in the 'Sustainability and Energy Report' (22/04/26), and shall achieve a 117% improvement over Part L of the Building Regulations, including a 16% improvement through 'Be Lean' energy efficiency measures.

In addition, the development shall achieve a 'Very Good' BREEAM rating.

Reason: To ensure compliance with Policy SI 2 of the London Plan (2021).