

Former Oldchurch Hospital (west) site, Romford

in the London Borough of Havering

planning application no.P0975.10

Strategic planning application stage 1 referral (new powers)

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

The proposal

A detailed planning application for a development of 457 residential units comprising 135 one-bedroom, 236 two-bedroom, 72 three-bedroom, 7 four-bedroom and 7 five-bedroom dwellings.

The applicant

The applicant is **Swan Housing Group**, and the architect is **Chetwoods**.

Strategic issues

The principal issues to consider are: the **loss of hospital land**, the **health & safety** impact of an adjoining **gasholder**, the **density** and **mix** of housing; **level** and **tenure** of **affordable housing**; **design/architectural** quality; children's **play space**, **climate change** issues, **transport** and **inclusive access**.

Recommendation

That Havering Council be advised that while the application is generally acceptable in strategic planning terms it does not fully comply with the London Plan, for the reasons set out in paragraph 95 of this report; but that the possible remedies set out in paragraph 96 of this report could address these deficiencies.

Context

1 On 6 August 2010, the Mayor of London received documents from Havering Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 16 September 2010 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1A of the Schedule to the Order 2008: "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."

3 Once Havering Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 A 2.15-hectare site, on the western portion of the former Oldchurch District General Hospital in Romford. The site is bounded on the north by proposed key-worker housing, on the west by the publicly accessible Nursery Walk footpath, on the east by landscaped open space within the former hospital grounds, and on the south by Oldchurch Road.

6 The site is occupied by a variety of old, mostly two to three-storey hospital buildings, including nurses and ancillary medical accommodation, some dating back to the late nineteenth century. The existing Queen Mary and Front Drive Office (Treasury) heritage buildings front onto but are set back from Oldchurch Road, from which a two-way vehicular access is derived. A gasholder is situated to the immediate south-west, on the opposite side of Nursery Walk.

7 The immediate surroundings are predominantly residential, comprising a mixture of traditional two-storey terraced housing along the south side of Oldchurch Road and the recently-built 10-storey key-worker housing blocks just north of this application site. A replacement District General Hospital (the Queen's Hospital) has been built on Oldchurch Park- a large, public open space to the south and rear of the houses fronting onto Oldchurch Road.

8 The site is located close to Romford town centre, and is approximately 350 metres away from the junction of the A125 Waterloo Road with Old Church Road/ Rom Valley Way, all of which form part of the Strategic Road Network (SRN). There are four different bus routes within an acceptable walking distance of the site, with the nearest stops located approximately 100 metres away on Old Church Road. Romford railway station, which provides services into central London and East Anglia, is also located within an acceptable distance of the site. As such, it has been demonstrated by the applicant that the site records a good public transport accessibility level (PTAL) of 4, on a scale of 1-6, where 6 is classed as excellent.

Details of the proposal

9 Permission is sought for the full details of a residential development comprising 457 residential units comprising 135 one-bedroom, 236 two-bedroom, 72 three-bedroom, 7 four-bedroom and 7 five-bedroom dwellings.

10 The mixture of flats and houses would be provided in six blocks, with its main, two-way vehicular access directly off Oldchurch Road on the south; and the potential for a secondary, southbound-only access from Union Road off the northern boundary of the site.

11 The buildings would be arranged as four parallel linear blocks (1 to 4) with north-south orientation on the northern half of the site, and two courtyard-style blocks on its southern half. The development would be stepped downwards from north to south to reflect the existing 10-storey buildings to the immediately north of the site boundary and the two-storey houses fronting Oldchurch Road to the south.

12 Perimeter blocks 1 and 4 would be six storeys high, with the middle blocks 2 and 3 ranging from six to nine storeys. A combination of surface and undercroft parking would be provided to serve these blocks. Courtyard blocks 5 and 6 would comprise a mixture of houses and flats with integrated parking and amenity space.

13 A total of 240 car, 510 cycle and some motorcycle parking spaces would be provided to serve the development

Case history

14 Outline permission was granted on 22 December 2005 for a residential development of key worker and general housing on the former Oldchurch Hospital site. (PDU/287c/01) Detailed permission, with landscaping as the only reserved matter, was subsequently granted for the key worker housing (on plots 1 to 7) along the northern portion of the former hospital site, and has since been implemented. The permission excluded the area subject of this application, which was originally proposed as the site for a mental health facility but subsequently refused planning permission.

15 Proposals for a residential development of 437 units on the present application site were the subject of a pre-application meeting between the applicant's representatives and GLA officers on 29 May 2008 (PDU 287f/pre-02)

16 On 14 September 2009, Havering Council referred an outline application for a development of 463 residential units, which the Mayor considered on 21 October 2009. The Mayor commented that the proposal was acceptable in principle, but its details did not fully comply with the policy requirements of his London Plan. (PDU/287f/01). At the time of writing, that application had not been reported to the Council's planning committee or referred back to the Mayor.

17 On 17 June 2010, Havering Council's resolved to grant permission for a Taylor Wimpey development of 493 residential units, a local park, and an energy centre on the adjoining plots 9-14 Oldchurch Hospital, east of the present application site. On 14 July 2010, the Mayor allowed Havering Council to proceed in accordance with that resolution. (PDU/ 287g/02). There is every indication that the scheme will be implemented in accordance with that permission.

Strategic planning issues and relevant policies and guidance

18 The relevant issues and corresponding policies are as follows:

- Housing *London Plan; PPS3; Housing SPG; Providing for Children and Young People's Play and Informal Recreation SPG, Housing Strategy; Interim Housing SPG; Housing SPG EiP draft*
- Affordable housing *London Plan; PPS3; Housing SPG, Housing Strategy; Interim Housing SPG; Housing SPG EiP draft*
- Density *London Plan; PPS3; Housing SPG; Interim Housing SPG; Housing SPG EiP draft*
- Urban design *London Plan; PPS1*
- Transport/parking *London Plan; the Mayor's Transport Strategy; PPG13;*
- Access *London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Equal opportunities *London Plan; Planning for Equality and Diversity in Meeting the spatial needs of London's diverse communities SPG; Diversity and Equality in Planning: A good practice guide (ODPM)*

- Sustainable development *London Plan; PPS1, PPS1 supplement; PPS3; PPG13; PPS22; draft PPS Planning for a Low Carbon Future in a Changing Climate; the Mayor's Energy Strategy; Mayor's draft Climate Change Mitigation and Adaptation Strategies; Mayor's draft Water Strategy; Sustainable Design and Construction SPG*
- Flooding *London Plan; Mayor's draft Water Strategy; PPS25, RPG3B*
- Historic Environment *London Plan; PPS5*

19 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2008 Havering Core Strategy & Development Control Policies DPD, the Proposals Maps (north and south) DPD, Site Specific Allocations DPD and the London Plan (Consolidated with Alterations since 2004).

20 The Mayor's consultation draft replacement London Plan, published in October 2009 is a material consideration.

Health and safety considerations

21 As indicated above, a National Grid gasholders' site adjoins the south-western corner of the site. The gasholders are active for the storage of gas but there is some indication that the site might be decommissioned in the future.

22 The Health and Safety Executive is a statutory consultee for certain developments within the Consultation Distance of Major Hazard Sites/Pipelines, both of which are subject to London Plan policies. London Plan policy 4A.34 relates to the development of land within the vicinity of establishments where hazardous substances are present, in order to limit the consequences of any potential accidents. The policy states the Mayor will and borough councils should take account the presence of hazardous substances in making policies and determining applications that relate to the development of land in the vicinity of establishments where hazardous substances are stored. Policy 4B.6 adds that potential physical risks, including those arising as a result of fire and related hazards should be taken into account. New development should be compatible with fire safety solutions for major developments, and the London Fire and Emergency Planning Authority (LFEPA) should be engaged at an early stage in the design process in order to resolve potential fire engineering challenges.

23 The applicant commissioned Capita Symonds consultants to advise on the risks of developing the site as proposed. The study concluded that there was 'insignificant risk' to all phases of the proposed development, however, it is now understood that the gasholders will in time be decommissioned. For the time being, they have been 'mothballed' with gas removed. This means that 'insignificant' risk could be reduced to 'no risk'.

24 Full decommissioning would mean the demolition of gasholders as structures, however, cost pressures mean that this may not be undertaken in the immediate future.

25 Havering Council should confirm the HSE's response to consultation as part of any further referral of this application to the Mayor.

Housing issues

26 The Barking, Havering & Redbridge NHS Trust and the North East London Mental Health NHS Trust both provided written confirmation in 2005 that the Oldchurch Hospital site was surplus to local health requirements. A replacement District General Hospital has since been built on

Oldchurch Park, to the south and rear of the two-storey terraced houses fronting the south side of Oldchurch Road.

27 The disused brownfield site has no specific land use designation in the borough Proposals Map or Site Specific Proposals Document. It is, however, hatched horizontally in red on the Proposals Map to denote a site with a high public transport accessibility level (4-6), where high-density residential development would be acceptable. A residential development has been permitted and implemented on a strip of land along the northern boundary of the former hospital site and the Mayor has, in July 2010, approved Havering Council's resolution to grant permission for 493 residential units, a local park, and an energy centre on the adjoining Oldchurch Hospital East. The latter is included in the Council's forecast of homes to be delivered between 2007 and 2012, as indicated in the Housing Trajectory provided in Annex 3 to the Core Strategy Document.

28 Policy CP1 of its Core Strategy document commits Havering Council to ensure that a minimum of 535 new homes per annum are built in the borough. That figure is entirely consistent with the annual target for 2007/8 to 2016/17, as set in table 3A.1 'Housing Provision' of the London Plan.

29 A full breakdown of the proposed 457 dwellings is as follows:

Unit size	Market			Affordable						Combined total		
	total units	hab. rooms	% h.r.	social rented			intermediate			total units	hab. rooms	% h.r.
total units				hab. rooms	% h.r.	total units	hab. rooms	% h.r.				
1 bed	116	232	30	12	24	5	7	14	10	135	270	20
2 bed	160	480	62	63	189	43	13	39	29	236	708	53
3 bed	15	60	8	39	156	36	18	72	53	72	288	21.4
4 bed	0	0	0	5	25	6	2	10	8	7	35	2.6
5 bed	0	0	0	7	42	10	0	0	0	7	42	3
Total	291	772	100	126	436	100	40	135	100	457	1343	100
%	64	57	-	27	33	-	9	10	-	100	100	-

30 It can be calculated from figures above that the density of development would be approximately 213 residential units per hectare (or 625 habitable rooms per hectare), which is close to the upper end of the indicative range of 55-225 u/ha (or 200-700 hr/ha) provided in the London Plan density matrix for an urban site with a public transport accessibility level of 4-6. It is, therefore, acceptable in strategic planning terms.

Affordable housing

31 London Plan Policy 3A.10 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mix-use schemes. In doing so, each council should have regard to its own overall target for the amount of affordable housing provision. Policy 3A.9 states that such targets should be based on an assessment of regional and local housing need and a realistic assessment of supply, and should take account of the London Plan strategic target that 35% of housing should be social and 15% intermediate provision, and of the promotion of mixed and balanced communities. In addition, Policy 3A.10 encourages councils to have regard to the need to encourage rather than restrain residential development, and to the individual circumstances of the site. Targets should be applied

flexibly, taking account of individual site costs, the availability of public subsidy and other scheme requirements.

32 Policy 3A.10 is supported by paragraph 3.52, which urges borough councils to take account of economic viability when estimating the appropriate amount of affordable provision. The 'Three Dragons' development control toolkit is recommended for this purpose. The results of a toolkit appraisal might need to be independently verified.

33 Policy DC6 of the Council's Core Strategy and Development Control Development Plan Document sets a borough-wide affordable housing target of 50% of all new homes, but no specific minimum for development on individual sites.

34 The application proposals offer 166 (36%) of the units as affordable housing (approximately 43% by habitable room). The affordable element comprises a mixture of social rented (27%) and shared ownership (9%) tenures. The remaining 291 units (64%) would be retained for sale on the open market.

35 Jones Lang LaSalle has submitted a 'Three Dragons' toolkit appraisal of financial viability of the scheme on behalf of the applicant, Swan Housing Group, to demonstrate that the proposed level of affordable housing is the maximum reasonable amount that can be provided within the scheme.

36 It shows that Swan Housing Group purchased the site in April 2007, at the peak of the housing market and just a few months before the current economic downturn began to take effect. Whilst some recovery of capital values have since taken place, they are still significantly below the levels achievable at the time of purchase, thereby reducing the prospects of securing a profit margin from the scheme since the site was acquired. That situation is compounded by an unwillingness of some finance institutions to lend on schemes with an expected profit margin of less than 20% or 25%, compared to the default value of 17% specified in the toolkit.

37 The balancing of total development costs against expected income shows a residual site value of just £ 2.5 million, which is substantially below the site acquisition cost.

38 The scheme has a confirmed grant allocation from the Homes & Communities Agency for 140 affordable housing units to level 4 of the Code for Sustainable Homes, but this scheme proposes 166 units, i.e. an additional 26 social rented units. Without that grant, a 36% affordable housing contribution would produce a negative residual land value at current market sales, less the costs of development, which includes basement car parking at standard build cost. The applicant intends to seek a supplementary allocation from the HCA to cover the extra social housing provision, but in the current financial squeeze has no guarantee of securing the amount necessary to avoid bearing the financial risk itself. A further amount has been set aside to meet the predicted level of planning obligations, based on recent residential permissions in the locality.

39 At this stage, Swan Housing Group has opted not to include a land financing cost in its appraisal in order to secure a planning settlement on this development and to keep its return on the scheme to the toolkit default margin of 17%, whilst retaining the right to resort to a market approach if circumstances dictate so.

40 To summarise, the appraisal illustrates that scheme would not be viable from a normal developer perspective but that given Swan Housing Group's preferred partner status in the London Borough of Havering and, having already purchased the site, it can operate on a not-for-profit basis and is keen to proceed with the scheme as currently proposed.

Housing mix

41 With regard to housing mix, 27% of the habitable rooms within the combined market and affordable housing would be in three or more bedroom family units. The larger units would be concentrated within the affordable housing component, 52% of the social rented and 61% of the intermediate accommodation would be provided in three or more bedroom units. This is acceptable in strategic planning terms.

Children's play space

42 Policy 3D.13 of the London Plan sets out that "the Mayor will and the boroughs should ensure developments that include housing make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs." Using the methodology within the Mayor's supplementary planning guidance 'Providing for Children and Young People's Play and Informal Recreation' it is anticipated that there will be approximately 220 children within the development. The guidance sets a benchmark of 10 sq.m. of useable child playspace to be provided per child, with under-5 child playspace provided on-site. As such the development should make provision for 2,200 sq.m. of playspace.

43 The proposals include 11,178 sq.m. of amenity space, in addition to local park (of 1.8 hectares) proposed on the adjacent Oldchurch Hospital East site, approved by the Council and the Mayor in June and July 2010 respectively.

44 The development includes provision of private (4,243 sq.m.) and communal (6,935 sq.m.) amenity areas, with play opportunities for children of all ages. The latter is designed to be safe and close enough to the dwellings to allow natural surveillance and supervision.

45 Most of the residential flats would have access to private balconies and all houses would have access to private rear gardens. The courtyards within the residential blocks would provide further amenity space for use by the residents; whilst some semi-public open space will be available in the communal courtyards, home zones, pedestrianised areas, access roads and footpaths that link the residential blocks.

46 Whilst the designated play space fulfils the SPG requirement for children under 12, it is pertinent to add that the site adjoins a central park to its immediate east, which forms part of the consented development of the Oldchurch Hospital site; it also lies in close proximity to the new, linear, Queen's Hospital Park (previously Oldchurch Park), which is situated just south of Oldchurch Road. The latter is suitable for older children and those requiring less surveillance during play.

47 Overall, the scheme provides ample scope to formalise any additional play space requirements, and is therefore acceptable in strategic planning terms.

Urban design and architectural quality

48 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 4B which address both general design principles and specific design issues. London Plan Policy 4B.1 sets out a series of overarching design principles for development in London. Other design policies in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage, views, and the Blue Ribbon Network. The draft replacement London Plan reinforces these principles, with new development

required to have regard to its context, and reinforce or enhance the character, legibility and permeability of the neighbourhood (policy 7.1).

Design changes since October 2009 (previous Mayoral consultation)

49 The design is almost identical to the previous version of the scheme. However, as an application for full planning permission, rather than the outline form of the previous application, all design matters can be considered in detail. The changes within the scheme's design are of a minor nature, and include the lowering of the height of a portion of the proposed building (Block 6) adjoining the existing Treasury Building, elevational detail and some slight changes to building massing, and an increase in the level of parking both on at ground level and within the undercroft/below ground areas.

Relationship to context

50 Given its surroundings, the scale and massing of development is generally more sensitive along the boundaries of the site. Thus, the scheme is designed to provide a smooth transition between the traditional two-storey terraced houses on Oldchurch Road and the 10-storey key-worker housing blocks to the north of the site. Three-storey houses are proposed close to frontage of Oldchurch Road, with the highest buildings stepping up towards the north of the site. Low-rise development at the south of the site is also necessitated by the proximity of the gasholders.



Figure 1: Typical elevation treatment (Applicant's Design and Access Statement).



Figure 2: East-facing elevations showing transition along the proposed park (Applicant's Design and Access Statement).

51 A proposed park abuts the eastern edge of the site. The park forms part of the eastern portion of the Oldchurch Hospital redevelopment, and is the subject of a resolution to approve by Havering Council. The scale of buildings on the eastern side of the park would be similar to that proposed on this site. The size of the park is sufficient to enable successful enclosure by buildings of this scale, and therefore the scale of the development on this edge is appropriate.

Site layout

52 Site permeability is good, with proposed vehicle entry/egress points from Union Road, and a new opening to Oldchurch Road. The design of the park (not shown within this application) allows for a link between the main east-west routes in both the eastern development site, and this

site. However, four parking spaces have been located at the end of the main east-west route within the proposal site, forming both a visual and physical barrier between the route and the park. Likewise, this route seems to be dominated by parking within minimal opportunities for soft landscaping. The design and access statement describes the street approach as adopting shared surface principles, but a true shared-surface approach does not place such artificial barriers between traffic routes and adjoining areas.

53 Overall, the layout makes efficient use of the available land, retaining only one cul-de-sac at the rear of block 5 and a fair distribution of courtyard and other amenity space, including private gardens, within this relatively high-density development.

Internal layouts

54 The provision of public subsidy supports the applicant's indication that the scheme has been designed to the Homes & Communities Agency Design Quality Standards and Housing Quality Indicator with regard to minimum unit sizes. This is consistent with the thrust of emerging strategic policy, given that the draft replacement London Plan and London Housing Design Guide provide minimum space standards for new housing developments.

55 Approximately half of all dwellings would be double-aspect. The majority of flats within the tallest buildings, Blocks 1 to 4, would be single-aspect units, although none would be north-facing. The provision of long corridors has been avoided as a result of four cores in each of these blocks, each served by one lift. All flats would have balconies and access to rooftop amenity areas. While officers would prefer to see a greater proportion of double-aspect flats, and the taller cores provided with two lifts (in the event of lift failure), the overall standard of accommodation is acceptable.

Architectural expression

56 The proposed design would utilise contrasting materials to reflect the changing density of accommodation across the site -employing a traditional and suburban palette to suit the retained Treasury building and two-storey housing at the southern end of the site; and bolder modern colours, with a mix of brick, wood cladding and dark-coloured render, for the more urban northern end of the premises.



Figure 3: Elevations shown in the context of the retained Treasury Building (Applicant's Design and Access Statement).

57 Brick would be used throughout the development with variations between traditional stock brick to match the retained Treasury building, and a contemporary pattern to the north.

Heritage buildings

58 The Front Drive Offices (Treasury Building), built in the first half of the nineteenth century, and the early twentieth century Queen Mary Building have been assessed for their architectural and historic interest at the behest of the Council. The assessments concluded that the buildings did not meet the criteria for inclusion in the statutory list of buildings of special architectural or

historic interest, and are of limited local historic interest. As such, the new buildings would adopt a suitably deferential design that embraces the existing buildings within a revised urban character.

Landscaping

59 Although the loss of some existing trees is regrettable, the communal amenity spaces within blocks will have tree planting. The proposed treatment along the 'home zone' streets is appropriate with pockets of landscaping and variation in hard landscape detail to delineate parking spaces. There is less soft landscaping along more traditional internal streets such as the entrance road and east-west route, and the applicant should investigate the potential to reduce the domination of parking in these areas and increase the level of soft landscaping, such as tree planting.

Access/equal opportunities

60 Swan Housing has confirmed in its Design and Access Statement that all the proposed units would be built to Lifetime Homes standards, with 10% of the affordable housing designated as wheelchair units, and 10% of the market housing capable of easy adaptation to wheelchair accessible standards.

Transport for London's comments

61 Car parking for the site is proposed at a ratio of 0.52 spaces per residential unit. This is in accordance with the London Plan standards and therefore considered acceptable. TfL would, however, encourage the applicant to consider reducing the level of parking further, particularly due to the already congested nature of the Waterloo Road/Old Church roundabout. Whilst details of how parking is to be managed on site should be provided through the submission of a car parking management plan, TfL requires 20% of all parking spaces to have electric vehicle charging points installed, with a further 20% having passive provision, in accordance with draft replacement London Plan policy 6.13 '*Parking*'.

62 Additional information in relation to trip generation and distribution, along with the submission of a safety assessment, is required, to enable TfL make a robust assessment of any potential impacts on the SRN.

63 No information on modal split has been submitted as part of the revised Transport Assessment. This would need to be provided, to enable TfL determine the impact of the proposals on all modes of transport. In particular, trip generation figures should be included for buses, by time and direction, with the peak hour given separately. Depending on the output of the assessment, TfL may seek s106 contributions/mitigation measures, in accordance with the London Plan policy, 3C.20 '*Improving conditions for buses*' and draft replacement London Plan policy 6.7 '*Buses, bus transits, trams*'.

64 Although this particular application relates to the 'western' end of the site only, improvements to on-highway bus infrastructure along Old Church Road and Waterloo Road, as secured in the previous planning application for the site as a whole, are still required. The previous s106 agreement secured an eastbound bus lane on Old Church Road, facilitated by a strip of land take on the northern side of the street. TfL requires that the implementation costs of this highway scheme be retained as part of this and the neighbouring development, in accordance with the London Plan policy 3C.14 '*Enhanced bus priority, tram and busway transit schemes*', and for any expected shortfalls to be covered as well. In the absence of a bus stop audit, TfL would request that a maximum contribution of £30,000 be secured towards providing accessibility improvements to the two nearest bus stops on Old Church Road, unless otherwise covered.

65 As further detailed in TfL's letter, the proposed signalisation of the site access junction is a concern, as it is expected to cause delay to both buses and general traffic. Under this scenario, TfL would require maximum priority for buses on Old Church Road through (i) the implementation of a bus lane, as previously referred above (ii) an additional contribution of £20,000 towards part funding the western extension of the Old Church Road bus lane to the west of Old Church Rise, and (iii) the implementation of SVD (selected vehicle detection) iBus detection. With the provision of the new bus lane in this location, TfL also has some concerns regarding the proposed lay-by on Old Church Road, which is likely to cause unnecessary delay and accessibility issues to bus services.

66 A total of 510 cycle parking spaces are being proposed onsite. This complies with TfL's cycle parking standards and is therefore considered acceptable. As the site is well connected to both the London Cycle Network (LCN) and the LCN+, TfL recommends that appropriate signage should be provided to indicate the location of these to residents of the proposed development.

67 In accordance with the London Plan policy 3C.21 '*Improving conditions for walking*' and draft replacement London Plan policy 6.10 '*Walking*', TfL recommends that the applicant undertakes a pedestrian environment review system (PERS) audit of the site and surroundings in order to identify any areas in need of improvement. Alternatively, the applicant is encouraged to review the audit undertaken in relation to the neighbouring site, and propose improvements based on its findings. While the provision of a signalised pedestrian crossing at the proposed site access on Old Church Road would be supported, subject to appropriately mitigating the impact on bus journey times, TfL is concerned that the removal of the pedestrian crossing to the east of the site access may have a negative impact upon existing users, especially if the crossing meets existing pedestrian demands including those travelling to/from the nearby bus stops. Justification for this proposal is therefore required.

68 While TfL welcomes the submission of a travel plan, some improvements are required as per indicated in TfL's detailed letter to the applicant. The revised travel plan and its contents, including its targets, management, measures and monitoring programme should be secured via the s106 agreement.

69 In accordance with the London Plan policy 3C.25 '*Freight Strategy*' and draft replacement London Plan policy 6.14 '*Freight*', a construction logistics plan (CLP), and a delivery and servicing plan (DSP), should be secured for the site by condition. Further information on what these plans should contain is included in TfL's letter.

70 In conclusion, additional information, as further detailed above, is required in order to fully determine the impact of the proposals on the SRN, public transport network and pedestrian environment, and also to ensure the application is in general conformity with the London Plan policies 3C.14, 3C.20, 3C.21 and 3C.25 and draft replacement London Plan policies 6.7, 6.10, 6.13 and 6.14.

Climate change mitigation

71 The London Plan climate change policies as set out in chapter 4A collectively require developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures, prioritising decentralised energy supply, and incorporating renewable energy technologies with a target of 20% carbon reductions from on-site renewable energy. The policies set out ways in which developers must address mitigation of and adaptation to the effects of climate change. Chapter 5 of the draft replacement plan sets out the approach to climate change and requires developments to make the fullest contribution to minimizing carbon dioxide emissions.

Energy

72 Policies 4A.1 to 4A.8 of the London Plan focus on how to mitigate climate change, and the carbon dioxide reduction targets that are necessary across London to achieve it.

Be Lean

Baseline carbon emissions (policy 4A.4)

73 The total regulated and unregulated carbon dioxide emissions, based on a 2006 Building Regulations compliant development, are estimated as 1,059 Tonnes of CO₂ per annum. The applicant should separate the total emissions into regulated and unregulated annual tonnes of carbon dioxide emissions and provide these figures at each stage of the energy hierarchy.

Energy efficiency standards

74 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum requirements set by building regulations. Other features include energy efficient lighting and improved controls.

75 The development is estimated to emit 966 Tonnes of carbon dioxide emissions per annum after the application of passive design and energy efficiency measures. A reduction in regulated CO₂ emissions of approximately 15% compared to the Target Emissions Rate of a 2006 Building Regulations compliant development will be achieved through this first element of the energy hierarchy. On a whole energy basis, i.e. including regulated and unregulated, a reduction of 9% from energy efficiency is proposed.

76 The applicant should provide a table comparing the assumed values for energy efficiency parameters, e.g. U values, air permeability, etc. to the 2010 Building Regulations Notional Building and, where potential for improvement is identified, consider additional energy efficiency measures.

Be Clean

District heating

77 The applicant should investigate whether there are existing or proposed heat networks within the vicinity of the development. If there are no existing networks or if timescales with the development are incompatible with connecting to planned networks then the applicant should commit to ensuring the development is equipped with the provision for future connection to an external district heating scheme, should one be installed locally.

78 The applicant proposes communal heating for the apartments. This is welcomed. The applicant proposes to heat the 15 houses with individual gas condensing boilers. Given the higher distribution losses associated with heat networks supplying houses, it is accepted that individual gas boilers, rather than communal heating, will be used for these dwellings.

Combined Heat and Power

79 The energy strategy proposes a 140kWe gas fired CHP engine as the lead heat source for the communal heating network, supplemented by top-up gas boilers during times of peak demand and CHP maintenance. The size of the CHP is in line with the thermal loads that would be expected for a development of this scale.

80 The development is estimated to emit 725 Tonnes of carbon dioxide emissions per annum after the application of CHP. A further reduction in CO₂ emissions of 25% will be achieved through this second part of the energy hierarchy.

Cooling

81 Passive design measures including the use of shading devices are proposed to control summertime temperatures. No active cooling is proposed for the dwellings.

Be Green

Renewable energy technologies

82 The energy strategy suggests that commitment to the provision of natural gas fired CHP for the development means that renewable energy technology is no longer required. This is not in keeping with the principles of the Mayor's Energy hierarchy, which requires developers to investigate the opportunities for renewable energy, after first incorporating energy efficiency and CHP.

83 The technical potential for renewable energy should be considered after the first two elements of the energy hierarchy have been implemented and, where the potential for complementary renewables are identified, commitment should be made to its installation.

84 While it is accepted that renewable heat technologies are unlikely to be appropriate due to the use of onsite CHP, there is likely to be potential for renewable electricity technologies e.g. PV. Drawings should be provided showing the roof area potentially available for PV. Based on the maximum roof area available for PV panels, taking into account technical constraints, estimates should be provided of the amount of electricity that could be generated and carbon saved.

Summary

85 The estimated carbon emissions of the development are 725 tonnes of CO₂ per year after the cumulative effect of the proposed energy efficiency measures and CHP has been taken into account. This equates to a reduction of 32% compared to a 2006 Building Regulations compliant development. However, there may be further potential for improvement, for example from renewable energy.

Climate change adaptation

86 Developments are required to be adaptable to the climate they will face over their lifetime and address the five principles set out in policy 4A.9 of the London Plan. These are: to minimise overheating and contribution to heat island effects; minimise solar gain in summer; contribute to flood risk reductions, including the application of sustainable drainage principles; minimise water use; and protect and enhance green infrastructure. Specific policies cover overheating, living roofs and walls, and water conservation. Chapter 5 of the draft replacement London Plan considers climate change adaptation, specifically policies 5.9 through to policy 5.15.

87 The applicant aims to achieve level 4 on the Code for Sustainable Homes.

Flood risk management (policy 4A.13)

88 The applicant's flood risk assessment indicates that the site is in Zone 1 (low probability), wherein PPS25 allocates an annual probability of less than 1 in 1000 from river or sea flooding. In

such zones local planning authorities are requested to seek opportunities to reduce the overall risk of flooding through appropriate development and layout of land.

Sustainable drainage (policy 4A.14)

89 The London Plan policy requires consideration of sustainable urban drainage systems where feasible. The applicant has stated that the geotechnical information on the site was incomplete at the time of application, but early indications were that application of SUDS might be practicable. This should continue to be investigated and any system secured by appropriate planning condition.

Water conservation (Policy 4A.16)

90 To achieve level 4 on the Code for Sustainable Homes, the applicant proposes grey-water recycling for non-potable purposes and to reduce the typical water consumption level to 105 litres per person per day, representing an improvement over the average UK household consumption of 140 litres per day.

Local planning authority's position

91 Havering Council officers intend to report this application to the local planning committee towards the end of October 2010, but remain concerned over the design (scale massing and density) of this scheme. It is therefore not known at this stage what the officers' recommendation is likely to be.

Legal considerations

92 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

93 There are no financial considerations at this stage.

Conclusion

94 London Plan policies on health and safety; the provision, mix, density of housing; affordable housing; children's play space; transport, energy; climate change mitigation and adaptation are relevant to this application.

95 Whilst the application is broadly acceptable in strategic planning terms, on balance, the it does not comply with the London Plan for the following reasons:

- **Health and Safety:** The lack of verification of an 'insignificant risk' from the Health and Safety Executive and the uncertainty of a time scale for decommissioning the adjoining

gasholder fall short of the objectives of London Plan policies 4A.34 and 4B.6 (policy 5.22 of the consultation draft replacement London Plan).

- **Transport:** As indicated in paragraphs 61 to 70 of this report, inadequate information has been provided to enable TfL make a satisfactory assessment of the scheme and to ensure full compliance with London Plan polices 3C.14, 3C.20, 3C.21and 3C.25 and draft replacement London Plan policies 6.7, 6.10, 6.13 and 6.14.
- **Energy:** As explained in paragraphs 73 to 85 above, the submitted strategy follows with the London Plan energy hierarchy but is not sufficiently robust to ensure full compliance with the relevant energy policies. Further information is required before the proposals can be considered acceptable and carbon dioxide savings verified.

96 The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Health and Safety:** The applicant or Havering Council should provide a written response to consultation from the Health & Safety Executive to fulfil the requirements of London Plan policies 4A.34 and 4B.6. (policy 5.22 of the consultation draft replacement London Plan).
- **Transport:** The applicant should provide a full written response to each of the issues raised in the transport section of this report, including the financial contributions requested for local transport improvements.
- **Energy:** The applicant's attention is drawn to the shortcomings identified in the energy paragraphs of this report and the need to address them prior to any further referral of this application back to the Mayor.

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