**Strategic planning application stage 1 referral**


**The proposal**

Estate regeneration comprising the redevelopment of the site and the construction of 197 residential units within buildings ranging between 3-10 storeys, together with new public, communal and private open space, associated car and cycle parking, new accesses and alterations to existing accesses.

**The applicant**

The applicant is Havering Council and Wates Regeneration LLP and the architect is JTP.

**Strategic issues**

**Land use principle:** Comprehensive redevelopment and housing intensification is supported, subject to compliance with London Plan and draft London Plan policies on estate regeneration (paragraphs 18 to 19).

**Estate Regeneration and affordable housing:** Like for like re-provision of existing social rented floorspace, with a substantial net increase in social rent/London Affordable Rent provision in terms of floorspace, units and habitable rooms. 65% affordable housing comprising entirely of social rent/London Affordable Rent units. This is supported, subject to this being verified as the maximum viable level of affordable housing. Rent levels must be confirmed and secured by S106, together with an Early and Late Stage Viability Review Mechanisms (paragraphs 20-39).

**Urban design and heritage:** The height, scale and massing of the application is supported, subject to further information being provided for assessment in relation to townscape and heritage impact. Further information and revisions are required in relation to residential quality (paragraphs 37-55).

**Climate change:** The energy strategy is supported. Further information is required on overheating and future proofing the scheme to enable the potential connection to a district heat network, together with a drainage strategy. The approach to urban greening is supported (paragraphs 56-65).

**Transport:** The application complies with the car parking and quantitative cycle parking standards in the draft London Plan. The scheme should help deliver the proposed Beam Parkway enhancement proposals along New Road (A1306). Other standard conditions and obligations are required (paragraph 66-71).

**Recommendation**

That Havering Council be advised that the application does not yet comply with the London Plan and draft London Plan, for the reasons set out in paragraph 76 of this report; however, the possible remedies set out in that paragraph could address these deficiencies.
Context

1  On 13 June 2019, 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 must 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.

2  The application is referable under the following categories of the Schedule to the Order 2008:

- **Category 1A**: “Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats”.

- **Category 1C**: “Development which comprises or includes the erection of a building of...more than 30 metres high and is outside the City of London”

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](http://www.london.gov.uk).

Site description

5  The 0.79 hectare site is located in Rainham, within the London Riverside Opportunity Area. It is bounded by New Road (A1306) to the south; Dunedin Road to the north; school playing fields to the east; and a terrace of two storey residential properties along New Road to the west. The site comprises two 13 storey towers – Napier House and New Plymouth House - which contain 97 residential units, the majority of which are in social rent tenure, with 10 leasehold flats. The site is currently vacant and boarded up, with all existing social rent and leasehold tenants having been decanted, as of end of May/early June. The site also contains a two level car park with ramp accesses over ground and basement levels, two additional areas of surface car parking, amenity green space and a children’s play space. A north-south pedestrian and cycle route runs through the site to the east of Napier House and connects Dunedin Road to New Road and is a public right of way. The site's boundary with New Road (A1306) previously comprised a line of mature evergreen trees; however these have recently been removed. Rainham Town Centre is approximately 500 metres to the south-east.

6  The site has a PTAL of 2. Rainham Station is located approximately 1 kilometre from the site via New Road (A1306) and Bridge Road. This provides access to services between Grays, Essex and London Fenchurch Street, which also serves Limehouse, Barking, West Ham stations. In addition, a new station is to be delivered at Beam Park a similar distance away from the site and on the same railway line but one stop closer to central London. Bus stops and a pelican crossing are located immediately adjacent to the site on New Road, which provide access to Routes 165, 287, 372 and 652 towards Romford, Rainham, Barking and Hornchurch. The site is well served by existing cycle infrastructure with marked and signed cycle routes running along both sides of New Road (National Cycle Route 13) which can be accessed via a north-south pedestrian and cycle route running through the site.
New Road (A1306) is subject to proposed investment as part of the Beam Parkway public realm and landscaping improvement proposals, which are being funded by the Mayor and TfL. The application site boundary extends to the south to include the entirety of the existing footway/cycle way along New Road immediately adjacent to the site. This would allow for these public realm works to be delivered as part of the scheme.

Land to the south of New Road comprises an area of de-designated industrial land, which is subject to a wider site allocation for mixed use development (SSA 12 – Rainham West) and is undergoing significant change as part of the Rainham and Beam Park Planning Framework (2016) and the London Riverside Opportunity Area Planning Framework (OAPF). A total of 51 residential units have been recently completed at the former Carpet Right site and Havering College Rainham Campus development is being constructed on the adjacent site. In addition, a further 394 residential units have been approved at Dovers Corner Industrial Estate to the south-west. In contrast, the area to the north of the site is characterised by two storey suburban residential properties.

There are no designated heritage assets within close proximity to the site; however, Rainham Conservation Area is located approximately 400 metres to the south-east and includes a number of listed buildings, including the Grade I listed Church of St Helen and St Giles and the Grade II* listed Rainham Hall and Lodge.

Details of the proposal

The application seeks full planning permission for the demolition of the two existing buildings which contain 97 residential units and the redevelopment of the site to construct 197 residential units within buildings ranging between 3-10 storeys, together with public, communal and private open space, associated car and cycle parking, new accesses and alterations to existing accesses. The scheme would result in a net increase in 100 residential units on site, with net increase of 39 social rent/London Affordable Rent units.

Two residential blocks are proposed containing three separate buildings (A, B and C) which would front New Road and Dunedin Road, as well as a new landscaped public space within the centre of the scheme. This green link would form a pedestrianised north-south connection through the site linking New Road and Dunedin Road and would include a dedicated pedestrian and cycle route to replace the existing public right of way, as well as play space, landscaping and Sustainable urban Drainage (SuDs) features. The layout of the proposed development is shown in Figure 1 below. Buildings A and B would be linked within the same block and would contain the affordable accommodation, with Building C containing market housing.

Figure 1 – proposed layout
12 Car parking and cycle parking would be located at ground floor level below podium level communal gardens and would be wrapped by ground floor flats and duplex apartments fronting the adjacent public spaces. Two separate vehicle and cycle access points to the car parking facilities are proposed on Dunedin Road adjacent to the site’s eastern and western boundaries.

**Wider context – Havering Council’s Estate Regeneration Programme**

13 The Napier and New Plymouth House site is the first of 12 Havering Council owned estates to be brought forwards as part of a joint venture between London Borough of Havering and the Wates Group. In total, this programme expects to deliver 3,000 additional homes across Havering over the next 12 years. The first phase of this estate regeneration programme comprises three linked sites, which will be subject to separate planning applications, with this application being the first to be submitted. The other two sites included within phase 1 of the wider estate regeneration programme are at Solar, Serena and Sunrise in Hornchurch; and Waterloo Estate and Queen Street in Romford.

**Case history**

14 An initial pre-application meeting was held with the applicant and GLA officers on 10 July 2018, which covered all three of the above mentioned sites, with a follow-up pre-application meeting also held on 21 December 2018. Following these meetings, GLA pre-application reports were issued on 3 August 2018 and 11 January 2019 respectively. In summary, the principle of redevelopment of the sites was supported by GLA officers, subject to each individual scheme ensuring the like-for-like replacement of social housing floorspace and the affordable housing being maximised, and further details being provided to confirm compliance with the Mayor’s Good Practice Guidance on Estate Regeneration. The approach to urban design and parking provision was supported.

**Strategic planning issues and relevant policies and guidance**

15 The relevant issues and corresponding strategic policies and guidance are as follows:

- **Land use principles**  London Plan;
- **Estate regeneration**  London Plan; the Mayor’s Good Practice Guide to Estate Regeneration (2018);
- **Housing and affordable housing**  London Plan; Affordable Housing and Viability SPG; Housing SPG; the London Housing Strategy (2018);
- **Play space**  London Plan; Children and Shaping Neighbourhoods: Play and Informal Recreation SPG;
- **Urban design**  London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG;
- **Historic environment**  London Plan;
- **Inclusive access**  London Plan; Accessible London: Achieving an Inclusive Environment SPG;
- **Climate change, flood risk and drainage**  London Plan; Sustainable Design and Construction SPG; the London Environment Strategy (2018);
- **Transport**  London Plan; the Mayor’s Transport Strategy (2018);

16 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is made up of Havering’s Core Strategy and Development Control Policies (2008); Site Specific Allocations (2008) Development Plan Documents; and the 2016 London Plan (Consolidated with Alterations since 2011).

17 The following are also relevant material considerations:
• The National Planning Policy Framework (2019);
• National Planning Practice Guidance;
• the Draft London Plan – Consolidated Suggested Changes Version (July 2019), which should be taken into account on the basis explained in paragraph 48 of the NPPF;
• The Affordable Housing and Viability SPG. This must now be read subject to the decision in R (McCarthy & Stone) v the Mayor of London;
• Rainham and Beam Park Planning Framework (2016);
• Havering Local Plan Proposed Submission Document – Regulation 19 (March 2019); and
• London Riverside OAPF (2015).

Principle of development

18 The London Plan sets Havering Council a target of 1,170 homes a year, and the draft London Plan sets out a significantly increased target of 1,875 homes per year. London Plan Policy 3.3 and Policy H1 of the draft London Plan seek to optimise potential housing delivery across London, particularly through higher density residential development on brownfield sites with good existing or planned access to public transport and within walking distance of stations and town centres, including through the sensitive intensification of existing residential areas.

19 The Napier House and New Plymouth House site in Rainham lies within the London Riverside Opportunity Area within the A1306 corridor, which is designated for regeneration and development. The existing site is currently under-utilised, with large areas of hard-landscaping, parking and poor quality, underutilised open space adjacent to New Road. The application proposes the doubling of the residential density of the site, to provide an overall net increase of 100 residential units, as well as a net increase of 39 social rented units. As such, the principle of the comprehensive development and housing intensification of the site is strongly supported, subject to compliance with the London Plan and draft London Plan policies on estate regeneration and affordable housing.

Estate regeneration

20 The Mayor’s Good Practice Guide to Estate Regeneration Guide (GPGER) sets out a number of clear expectations which apply to estate regeneration schemes across London. This includes the need to ensure that existing affordable housing floorspace is reprovided (based on the principle of like-for-like replacement); full rights of return or remain for existing social housing tenants; a fair deal for leaseholders and freeholders; and full and transparent consultation and involvement with existing residents. Furthermore, the Mayor expects estate regeneration schemes to deliver as much affordable housing as possible and to provide an uplift in affordable housing where possible.

Like for like replacement

21 London Plan Policy 3.14 requires existing affordable housing floorspace to be replaced at equivalent levels, as a minimum. Policy H10 of the draft London Plan, the Mayor’s GPGER and the Affordable Housing and Viability SPG, require existing affordable housing floorspace to be replaced on a like-for-like basis, providing equivalent or better quality accommodation. The principle of like-for-like replacement applies to all existing affordable housing floorspace (including both occupied and vacant units), and this principle applies regardless of the quality of the current stock.
As set out in Table 1 below, the scheme would provide a significant net uplift in the quantum of social rent/London Affordable Rent housing on site in terms of floorspace, habitable rooms and units. This is strongly supported and accords with the draft London Plan and the Mayor’s GPGER. GLA officers understand that the applicant is not relying on the uplift in social rented accommodation to off-set any loss elsewhere in the programme, but this should be confirmed. For the avoidance of doubt, like-for-like re-provision should be achieved on each of the three sites, given the distance between them.

Table 1 – Existing and proposed housing in social rent/London Affordable Rent

<table>
<thead>
<tr>
<th></th>
<th>Existing</th>
<th>Proposed</th>
<th>Net change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Floorspace (sq.m)</td>
<td>4,708</td>
<td>8,247</td>
<td>+3,539</td>
</tr>
<tr>
<td>Units</td>
<td>87</td>
<td>126</td>
<td>+39</td>
</tr>
<tr>
<td>Habitable rooms</td>
<td>218</td>
<td>328</td>
<td>+110</td>
</tr>
</tbody>
</table>

Policy H10 of the draft London Plan confirms that replacement affordable housing must be provided at social rent levels, where it is being provided to facilitate a right of return for existing social rent tenants. Where existing social rented floorspace is being replaced and there is no right of return for the existing residents, it may be re-provided as London Affordable Rent, for example, where units are being used for temporary short term let accommodation. In line with Policy H10 of draft London Plan, all 87 existing social rent units would be replaced on a like for like basis, with replacement units provided at social rent levels.

Full right of return or remain for social tenants

The GPGER seeks to ensure that social tenants have a full right to return to a property on the regenerated estate of a suitable size, taking into account levels of overcrowding or under-occupancy within each household, and at the same or similar rent level, with the same security of tenure. The applicant has stated that 87 existing social rent units would be subject to ‘right to return’, with the existing homes re-provided at social rent levels. This is supported and should be secured via Section 106 agreement. GLA officers understand that the blocks are now predominantly vacant and earmarked for early demolition by the Council. Notwithstanding this, the applicant should outline the arrangements which have been put in place to enable those social housing tenants on long-term leases to take up their ‘right to return’ to the redeveloped estate.

Fair deal for leaseholders and freeholders

The GPGER seeks to ensure that leaseholders and freeholders affected by estate regeneration are treated fairly and fully compensated and sets out the Mayor’s preference that these units should be acquired by negotiation in the first instance and subject to an independent valuation paid for by the applicant. Of the 10 leasehold units, GLA officers understand that five of these units were acquired during 2017 and 2018. Subject to the above GPGER principles being met in respect of fairness and independent valuation, the approach undertaken is acceptable.

Full and transparent consultation

The GPGER sets out the Mayor’s aspirations for full and transparent consultation, and meaningful ongoing involvement with estate residents throughout the regeneration process, to ensure resident support. From 18 July 2018, the Mayor requires any landlord seeking GLA funding for estate regeneration projects which involve the demolition of existing affordable or leasehold homes to demonstrate that they have secured resident support for their proposals through a ballot, subject to certain specified exemptions and transitional arrangements.
In this instance, a ballot has not been undertaken. Havering Council have submitted a request for formal exemption from the requirement to undertake a ballot under Exemption 5 of the GLA’s Affordable Housing Capital Funding Guide. This is on the basis that GLA funding was already committed prior to 18 July 2018. This exemption was granted in April 2019. Whilst considerations around ballots and funding conditions are not planning issues, the Mayor encourages landlords to use ballots as widely as possible in line with his Good Practice Guide. The applicant should also set out the details of public consultation engagement process undertaken with residents, full details of which should be set out in the statement of community involvement, in line with the GLA’s pre-application advice.

**Open space**

Currently, the existing site comprises 3,939 sq.m. of green open space in the form of two large lawns and a 540 sq.m. children’s playground. The other areas of the site comprise hard standing, including three areas of car parking and the roofs and spaces immediately around the two existing tower blocks. Whilst the site’s southern boundary previously contained a line of mature evergreen trees, these have been removed recently to enable the proposed development. The application proposes a number of public and communal open spaces within the scheme which would provide a total of 2,090 sq.m. of amenity space. In addition to this, buffer landscaping is proposed alongside properties facing New Road. Overall, there would be a net reduction in open space (~1,849 sq.m.). Notwithstanding this, GLA officers consider that the proposed private, communal and public open space would provide a significant qualitative improvement on the existing situation, both in terms of access, ownership, function but also in terms of biodiversity, urban greening and in addressing the impacts of climate change, as set out in more detail below under urban greening.

**Housing and affordable housing**

The application proposes 197 residential units, comprising 126 social rent/London Affordable Rent units and 71 market sale units. This represents 65% affordable housing by habitable room and 64% affordable housing by unit, as shown below in Table 2. In terms of tenure split, all of the affordable housing would comprise low cost rent units. Of these, 87 would comprise social rent units, which would be provided under the ‘right to return’ re-provision, with a further 39 London Affordable Rent units.

<table>
<thead>
<tr>
<th></th>
<th>Units</th>
<th>Habitable Rooms</th>
<th>% by unit</th>
<th>% by habitable room</th>
</tr>
</thead>
<tbody>
<tr>
<td>Affordable</td>
<td>126</td>
<td>339</td>
<td>64%</td>
<td>65%</td>
</tr>
<tr>
<td>Market</td>
<td>71</td>
<td>185</td>
<td>36%</td>
<td>35%</td>
</tr>
<tr>
<td>Total</td>
<td>197</td>
<td>524</td>
<td>100%</td>
<td>100%</td>
</tr>
</tbody>
</table>

**Affordable housing and viability**

In addition to ensuring the like-for-like replacement of existing affordable housing floorspace, estate regeneration schemes must provide as much affordable housing as possible. GLA officers note that in this instance there would be a significant increase in affordable housing. Notwithstanding this, as an estate regeneration scheme, the application must be considered under the Viability Tested Route and GLA officers shall be robustly interrogating the scheme’s viability to ensure the maximum amount of affordable housing is delivered. GLA comments on the applicant’s Financial Viability Assessment (FVA) will be provided in due course, following the issuing of this report.
31 Early implementation and late stage review mechanisms must be secured, in accordance with Policy H6 of the draft London Plan and the Mayor’s Affordable Housing & Viability SPG, given the linked programme wide nature of the proposal. Full compliance with this criteria should be confirmed and robustly secured within any Section 106 planning agreement. Suggested formulas for Viability Review Mechanisms are set out in Annex A of the Mayor’s Affordable Housing & Viability SPG and template S106 review clauses have been sent to the Council and applicant which are based on the approach in the SPG. GLA officers request early engagement and discussions on the wording of the Section 106 agreement, prior to Stage 2, to ensure the above matters are fully addressed.

Tenure mix

32 In terms of tenure split, Policy H7 of the draft London Plan sets out the Mayor’s preference for at least 30% low cost rent (social rent or London Affordable Rent) and 30% as intermediate housing products, with the remaining 40% to be determined by the Council. The application proposes all of the affordable housing as social rent/ London Affordable Rent units. This is acceptable in this instance, given the priority to ensure the like-for-like re-provision of social rented accommodation, with the market units proposed ensuring a mixed tenure scheme is provided, in line with London Plan Policy 3.9 and Policy H7 of the draft London Plan.

Housing affordability

33 The provision of low cost rented housing in the form of social rent is strongly supported and this should be secured in any Section 106 agreement by reference to Social Target Rent levels. The affordable rent units should comprise low cost rented accommodation at the London Affordable Rent benchmarks set out in the Mayor’s affordable housing funding guidance (2016), which are updated annually on the GLA website1.

Housing choice

34 London Plan Policy 3.8 states that new development should provide a mix of housing sizes and types, taking into account local and strategic housing requirements, the needs of different groups, the strategic priority for affordable family housing provision and the need to support the private rented sector. Policy H12 of the draft London Plan states that schemes should generally consist of a range of unit sizes and sets out a number of factors which should be considered when determining the appropriate housing mix on a particular scheme. This includes housing need and demand, the nature and location of a site and the requirement to optimise housing potential and deliver mixed and inclusive neighbourhoods.

35 The applicant’s proposed housing mix is shown in Table 3 and includes 20 three bedroom units (10%), with the remaining mix comprising 44% one bedroom units and 46% two bedroom units. In this instance, the proposed housing mix is driven by the requirement for re-provision of the existing social housing on site. Currently, there are no three bed units within the two towers on site, which comprises a mix of one and two bedroom flats. A housing need assessment has been undertaken which has identified that there is a need for five family sized three bed units to meet the needs of the social rent tenants with a ‘right to return’. This requirement is being met within the proposed development. As such, the overall housing mix is acceptable in strategic planning terms, having regard to the requirement for like-for-like re-provision and the range of factors set out in Policy H12 of the draft London Plan and the PTAL, density and site location.

Table 3 – proposed housing mix

<table>
<thead>
<tr>
<th></th>
<th>Social rent (reprovision)</th>
<th>London Affordable Rent</th>
<th>Market</th>
<th>Total</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 bedroom</td>
<td>56</td>
<td>0</td>
<td>31</td>
<td>87</td>
<td>44%</td>
</tr>
<tr>
<td>2 bedroom</td>
<td>26</td>
<td>27</td>
<td>37</td>
<td>90</td>
<td>46%</td>
</tr>
<tr>
<td>3 bedroom</td>
<td>5</td>
<td>12</td>
<td>3</td>
<td>20</td>
<td>10%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>87</strong></td>
<td><strong>39</strong></td>
<td><strong>71</strong></td>
<td><strong>197</strong></td>
<td><strong>100%</strong></td>
</tr>
</tbody>
</table>

Children’s play space

36 Policy 3.6 of the London Plan states that development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. Policy S4 of the draft London Plan states residential developments should incorporate high quality, accessible play provision for all ages, of at least 10 sq.m per child. Play space provision should normally be provided on-site; however, off-site provision may be acceptable where it can be demonstrated that this addresses the needs of the development and can be provided nearby within an accessible and safe walking distances, and in these circumstances contributions to off-site provision should be secured by Section 106 agreement.

37 The applicant has assessed the play space provision using the now superseded GLA play space/child yield calculator. Based on the applicant’s submitted child yield assessment, 103 children are expected within the scheme, resulting in a requirement for 1,033 sq.m. of play space provision. Based on the GLA’s updated play space calculator (June 2019), the proposed housing mix would generate a total play space requirement of 1,275 sq.m.

38 The existing site includes 540 sq.m. of formal playspace provision including equipment. The application proposes a total of 1,170 sq.m. of on-site play space provision. This would be distributed across three podium level courtyard amenity spaces and within the central green link and would comprise a mix of formal play structures and informal landscape play features. These play areas would be well overlooked by the adjacent residential units. The main play space provision would be located within the central public green spine, which would be available for to all housing tenures. Additional more informal door step play space provision is also proposed within communal gardens at podium level, which would be accessible by residential units within the individual blocks.

39 Whilst the overall quality and quantity of on-site play space provision proposed is supported, further information should be provided to confirm the quantity of formal play space within the public green link to allow this to be compared to the existing provision on site. The shortfall in play space provision should also be mitigated via financial contribution towards off-site play space, in accordance with London Plan Policy 3.6 and Policy S4 of the draft London Plan.

Urban design

Density and design review

40 London Plan Policy 3.4 and Policy D6 of the draft London Plan seek to optimise housing density, with the draft London Plan placing greater emphasis on a design-led approach to density assessments with consideration given to site context, public transport, walking and cycling accessibility and the capacity of surrounding infrastructure. Taking into account the
existing and emerging context, and also mindful of the requirement to ensure the like-for-like replacement of affordable housing floorspace with the scheme, GLA officers consider the site lends itself to the provision of a well-designed high density scheme.

41 The scheme would have a net residential density of 249 residential units per hectare/662 habitable rooms per hectare. In view of the PTAL of the site (PTAL 2), this exceeds the indicative density guidelines in the London Plan and draft London Plan and thereby triggers the requirement for additional design scrutiny and management. The scheme has been subject to an iterative process of design review. Locally, two design review meetings have been undertaken on the scheme as part of Havering Council’s Quality Review Panel and copies of the Panel’s recommendations have been shared with GLA officers prior to the submission of the application. In addition to this, two separate pre-application meetings have been undertaken on the proposals with GLA officers. This design-led approach is strongly supported, in accordance with Policy D2 of the draft London Plan.

42 Overall, GLA officers are satisfied that the application has been subject to appropriate levels of design scrutiny and that, subject to the applicant addressing the issues set out below and appropriate management arrangements being secured by condition, the application proposes a high quality, comprehensive and well-designed scheme, in line with the objectives of London Plan Policy 3.4 and Policy D6 of the draft London Plan.

Design, layout, public realm and landscaping

43 Currently, the two residential tower blocks do not form a positive relationship with the surrounding context, with the tower blocks looming over Dunedin Road, dominated by dead frontage at ground floor level and set back substantially from New Road. The surrounding areas of parking and open space within the existing site do not benefit from good levels of natural surveillance or a clear sense of ownership and purpose. Overall, the present arrangement constitutes the sub-optimal use of the site. In contrast, the design and layout of the proposed development is well-considered and fully optimises the potential housing capacity of the site, whilst responding appropriately to the immediate urban and landscape context and enhancing the legibility and permeability of the area.

44 Two residential blocks are proposed, which would front Dunedin Road, New Road and the new green link through the centre of the site. These three key public routes would be fronted by a mix of ground floor residential flats and two storey duplex apartments. These would be served by private terraces, with well-defined boundaries and defensible buffer landscaping. Communal residential core entrances would be located in prominent and easily identifiable locations to enhance orientation and activity. Ground floor residential units would effectively wrap car parking and the majority of cycle parking, which would be located under podium level communal gardens. The use of underground refuse stores would also ensure that areas of dead frontage would be limited to two relatively short sections of facade which would accommodate cycle parking and bulk storage facilities.

45 The central green link would be active and well-overlooked by adjacent ground floor residential units and balconies upper levels. This public space would include a generously landscaped central garden and play ground, with rain garden SuDs features and a pedestrian footpath and cycle path, which would link clearly to the surrounding pedestrian and cycle network.

46 The three separate podium level communal amenity spaces would comprise generously landscaped gardens, which would be well shielded by blocks from noise generated by New Road. The proposed landscape design would ensure that private amenity spaces serving first floor level residential units immediately adjacent to the courtyards would be well-defined and buffered with landscaping to ensure appropriate balance between privacy and overlooking is achieved.
The applicant’s overshadowing assessment also shows that these courtyards would receive acceptable levels of sunlight. Landscaping and tree planting is proposed alongside ground floor residential units on New Road to address potential noise and privacy issues.

Overall, the layout, design and landscaping of the proposed development is strongly supported and accords with London Plan Policies 3.5, 3.7, 7.1, 7.3, 7.5 and Policies D1, D2, D6 of the draft London Plan.

Residential quality

In total, 109 units would be dual aspect, which accounts for 55% of the total residential units proposed. In general, dual aspect units have been provided where possible, for example, by accommodating these within centre and sides of the linear blocks and by including two storey duplex apartments. However, it is unclear why residential units within Building C with facades adjacent to the school playing fields are proposed as single aspect units, with no east facing windows on that side of the block. This results in north and south facing single aspect units which face onto the courtyard on both sides, which could be substantially improved with the provision of additional glazing and ventilation on this east facing side of the building. Whilst this may be due to privacy concerns in relation to the adjacent school playing fields, this could be addressed by rising the height of the window openings and considering opaque glazing. Further revisions and/or sufficient justification is required in relation to these units before the application is considered to have fully maximised the potential for dual aspect units, as required by Policy D4 of the draft London Plan and the Mayor’s Housing SPG (2016).

In terms of the ratio of units per floor per core, the application complies with the benchmark of 8 set out in the 2016 Housing SPG, with most of the majority of communal cores provided below this level. The submitted floorplans show that residential units proposed would comply with the minimum London Plan space standards; however, no floorspace information is provided for the duplex units, which must be confirmed. The application proposes a tenure blind scheme in which social rent/London Affordable Rent units would have a similar external appearance to private units in terms of architectural design, access arrangements and the proposed high quality brick facing materials. Having regard to the submitted plans and technical assessments, GLA officers also consider that the proposed residential units would benefit from an acceptable level of daylight, sunlight and privacy.

Whilst the scheme is considered to be generally compliant with London Plan Policy 3.5, Policy D4 of the draft London Plan and the 2016 Housing SPG, the applicant should address the points set out above in relation to the potential for further dual aspect units to be provided within Building C and the internal size of duplex units.

Height, scale, massing and tall buildings

The applicant has moderately increased the height of the blocks facing New Road, in line with the GLA’s initial pre-application advice. Taller 7, 9 and 10 storey buildings would be located on New Road, with the two tallest buildings within the scheme paired to mark the entrance to the central green link and enhance the legibility of this key route. Building heights would be stepped down on Dunedin Road and adjacent to the site’s eastern and western boundaries. This responds appropriately to the immediate residential and landscape context and helps to allow sufficient daylight and sunlight into the podium level courtyards.

Overall, the submitted visual representations of the scheme showing the proposed massing on Dunedin Road and New Road demonstrates that the height and massing of the scheme is well-considered, appropriately varied and would respond appropriately to the existing and emerging urban context, in line with London Plan Policies 7.4, 7.6 and 7.7 and Policies D1, D2 and D8 of the draft London Plan. As set out under heritage, the applicant has not provided a
townscape and visual impact assessment (TVIA) to allow officers to fully assess the wider visual, townscape, heritage and landscape impact of the proposals. There should be further discussion on this issue, taking into account the Havering Council’s local validation requirements for schemes of this size.

Architectural appearance and materials

53 In terms of building materials, the application proposes six subtly different shades of brick on the various facades within the scheme, alongside white aluminium balcony bases and bronze aluminium balustrades and window frames. Communal core entrances would be well defined through the use of rusted steel panels and canopy entrances. Corners of the scheme would be visually emphasised through the provision of balconies and angled recesses on building edges. Additional detailing would also be provided by slightly recessing the depth of brickwork around windows to reveal vertical brickwork columns. Overall, this simple architectural approach and the use of high quality facing materials would provide an attractive, cohesive and visually distinctive development which is supported, in line with London Plan Policy 7.6 and Policies D1 and D2 of the draft London Plan. The proposed materials and detailing should be secured by condition to ensure the finished quality of the scheme is carried through to completion, in accordance with the above mentioned policies.

Inclusive design

54 The applicant has stated that 90% of the homes will be designed to comply with the M4(2) standard for ‘accessible and adaptable dwellings’, with the remaining 10% of the homes designed to meet Building Regulation M4(3) ‘wheelchair user dwellings’. This is acceptable and these requirements should be secured by condition. Wheelchair user dwellings would be distributed across social/London Affordable Rented and market tenures and across unit sizes to enable choice for wheelchair users, which is strongly supported. Step free access would be provided within all communal residential entrances and with step free access provided to residential units on all of the floors and ground floor car parks. As set out under parking, the application proposes 10% Blue Badge parking provision from the outset. As such, the application complies with London Plan Policy 7.2 and Policy D5 and D3 of the draft London Plan.

Heritage

55 Although there are no designated heritage assets within close proximity to the site, Rainham Conservation Area is located approximately 400 metres to the south–east and includes a number of listed buildings, including the Grade I listed Church of St Helen and St Giles, the Grade II* listed Rainham Hall and Lodge and Grade II Listed Rainham War Memorial. GLA officers note that the existing tower blocks are visible from Rainham Triangle, on Broadway (B1335).

56 London Plan Policy 7.8. and Policy HC1 of the draft London Plan states that development should conserve heritage assets and avoid harm. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should “have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”. The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset’s conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

57 Where a proposed development will lead to ‘substantial harm’ to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent,
unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to ‘less than substantial harm’, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

58 The proposed development proposes buildings below the current height of the two residential tower blocks (13 storeys), with a more varied massing proposed, comprising buildings ranging in height between 10, 9, 7, 4 and 3 storeys. Given the distance from the designated heritage assets described above, and taking into account the improved architectural design and appearance of the proposed development compared to the existing tower blocks, GLA officers would expect the development would have a positive impact on the wider setting of the Rainham Conservation Area and listed buildings. However, the applicant has not submitted any verified views showing the existing and proposed conditions to demonstrate that this would be the case and to allow heritage impact of the scheme to be fully assessed, in accordance with London Plan Policy 7.8. and Policy HC1 of the draft London Plan and the relevant statutory and national policy tests set out above. Fully rendered visualisations showing the potential impact on heritage assets and on local views should therefore be provided.

Climate change

59 Based on the energy assessment submitted, an on-site reduction in CO₂ emissions of 32% beyond 2013 Building Regulations compliant development is expected. This would be achieved through a range of passive design features and energy efficiency measures; approximately 528 sq.m. of Photovoltaic (PV) panels; and an energy centre/plant room, which is expected to include a gas fired condensing boiler, instead of a Combined Heat and Power (CHP) facility.

60 Whilst this falls short of the targets set out in London Plan Policy 5.2 and Policy SI2 of the draft London Plan, in this instance, GLA officers accept that there is little further potential for carbon dioxide reductions onsite and the proposed energy strategy has been prepared is in accordance with the London Plan energy hierarchy. Accordingly, the remaining regulated carbon dioxide emission reductions should be met through a Section 106 contribution to the Council’s offset fund in order to meet the zero carbon target. Further information has been requested in relation to technical aspects of the energy strategy, specifically in relation to overheating and future proofing the scheme to enable potential connection to a district heat network. Full details of which has provided to the applicant and the Council.

Flood risk and sustainable drainage

61 The site is within flood Zone 3a in a location which benefits from flood defenses, according to Havering Council’s Strategic Floor Risk Assessment (2016). The Ingrebourne River/Rainham Creek flows to the east of the Creekside industrial estate and Dovers Corner roundabout, towards the River Thames. Environment Agency Flood Risk maps show that most of the site has a very low risk of surface water flooding; however the existing surface car parks have a high risk of surface water flooding, as does the adjacent Dunedin Road.

62 Flood management and mitigation measures include raising finished floor levels of residential units to 3.74 metre AOD. In addition, the FRA proposes preparing a Flood Warning and Evacuation plan. These measures are supported and should be secured by appropriate condition. Subject to the proposed flood risk mitigation measures being secured, the residual flood risk to the site is considered to be low. Overall, the approach to flood risk management for the proposed development complies with London Plan Policy 5.12 and Policy SI.12 of the draft New London Plan.
The applicant has not submitted a drainage strategy. As such, the surface water drainage strategy for the proposed development does not comply with London Plan Policy 5.13 and Policy SI.13 of the draft London Plan. A detailed drainage strategy, including design information and relevant flow calculations must be provided prior to Stage 2 to allow GLA officers to assess compliance against the sustainable urban drainage policies in the London Plan and draft London Plan.

**Urban greening**

The application proposes a range of urban greening measures. This would include areas of lawn, tree planting, perennial, grass and shrub planting areas, green and brown roofs and rain gardens. The applicant has undertaken an Urban Greening Factor assessment of the existing and proposed development, in line with GLA pre-application advice. This shows that the proposed development would have a score of 0.35, which falls slightly short of the 0.4 target set out for residential sites in the draft London Plan.

In contrast, the existing site, yields a score of 0.19 and has a low biodiversity and ecological value. Overall, GLA officers consider that the approach to urban greening is acceptable in this instance, taking into account the net improvements achieved and the requirement to effectively double the existing density of the site. The landscape proposals both within the site and along New Road should be secured by either planning condition or obligation, with commensurate levels of tree re-planting provided, in line with London Plan Policy 5.10 and 7.21 and Policies G5 and G7 of the draft London Plan.

**Transport**

**Car parking**

A total of 92 car parking spaces are proposed which equates to a ratio of 0.47 parking spaces per residential unit. This complies with the maximum residential parking standard set in the draft London Plan for Outer London Opportunity Areas (0.5 spaces per dwelling). Of the parking spaces proposed, 10 would be designated blue badge parking bays. This accounts for 5% of the total residential units proposed and therefore complies with the minimum 3% requirement set in Policy T6.1 of the draft London Plan. In addition to this, the applicant should demonstrate how suitable spaces equivalent to an additional 5% of the residential units could be for disabled parking in the future, in line with Policy T6.1 of the draft London Plan. The applicant has stated that 20% of the parking spaces proposed will have active charging facilities, with passive provision for electric charging facilities provided for all remaining spaces. This should be secured by condition. A car parking management plan should also be secured by condition to regulate the use of the car park and disabled parking bays. Overall, the approach to parking complies with the current and draft London Plan and is supported.

**Cycle parking**

The development will provide a total of 350 long stay cycle parking spaces and 6 short stay cycle parking spaces. This complies with the minimum quantitative cycle parking standards in the current London Plan and draft London Plan. Long-stay cycle parking would comprise a mix of two-tier spaces and Sheffield Stands and would be provided in accessible, secure and convenient locations within the scheme. Short-stay cycle parking would be provided within the green link through the centre of the site. The proposed cycle parking should be secured by condition and designed in accordance with the London Cycling Design Standards. Financial contributions towards the provision of additional cycle parking at Rainham Station may be required, subject to further assessment of the existing provision and demand.
Walking, cycling and Healthy Streets

68 The site is well served by existing cycle infrastructure with marked and signed cycle routes running along both sides of New Road (National Cycle Route 13) which can be accessed via a north–south route running through the site. A signed walking and cycling route also runs north–south through the site to the east of Napier House and connects New Road and Dunedin Road. This route links immediately to a pelican crossing and provides access to bus stops on either side of New Road.

69 Building on the objectives set out in the Rainham and Beam Park Planning Framework and Housing Zone proposals, Havering Council has secured £4.5 million of funding from the Mayor, with a further £1.8 million from TfL to transform New Road (A1306) from a road dominated space to a greener and more pedestrian and cycle friendly space, with enhanced public realm and landscaping.

70 The application site boundary extends to the south to include the entirety of the footway/cycle way adjacent to the site to allow for these public realm works to be delivered as part of the scheme. However, whilst illustrative designs are provided in the applicant’s Design and Access Statement, it is unclear from the applicant’s planning statement and transport assessment whether these works are to be delivered as part of this application. Given that the proposed route would run directly past the application site and provide substantial qualitative benefits in terms of walking and cycling infrastructure, it is important that the development is fully integrated with these proposals and either works undertaken as part of this application or secured by a financial contribution. GLA officers would welcome further discussion with the applicant and Havering Council on this issue and further information should be provided in relation to the design, timescales and mechanism for securing the delivery of these works.

Public Transport

71 Given the 1 kilometre walking distance to Rainham station, many people are likely to catch a bus to this station, or the new Beam Park station to be located a similar distance away but to the west and thus closer to central London. As such, further discussion is required to assess the public transport impacts of the development and identify whether any mitigation is necessary.

Travel Plan, deliveries and construction

72 The proposed use of underground waste storage is supported; however, there should be further discussion on proposals to collect waste and recycling on New Road to ensure pedestrian and cycle routes are not blocked. The submission and approval of Travel Plans, delivery and servicing plans (DSPs) and construction logistics plans (CLPs) should be secured by condition or obligation.

Local planning authority’s position

73 Havering Council planning officers have requested that further documents to be submitted by the applicant before they are able to take the application to Planning Committee.

Legal considerations

74 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

Financial considerations

75 There are no financial considerations at this stage.

Conclusion

76 London Plan and draft London Plan policies on open space, estate regeneration, housing and affordable housing, urban design, inclusive design, heritage, climate change, flood risk and sustainable drainage and transport are relevant to this application. The application does not yet fully comply with the London Plan and draft London Plan. However, the following changes might lead to the applications becoming compliant:

- **Land use principle:** The principle of the comprehensive redevelopment and housing intensification of the site is strongly supported, subject to compliance with London Plan and draft London Plan policies on estate regeneration (paragraphs 18 to 19).

- **Estate regeneration and affordable housing:** Like for like re-provision of existing social rented floorspace, with a substantial net increase in social rent/London Affordable Rent provision in terms of floor space, units and habitable rooms. 65% affordable housing comprising entirely of social rent/London Affordable Rent units. This is supported, subject to this being verified as the maximum viable level of affordable housing, following the further assessment of the applicant’s FVA. Rent levels must be confirmed and secured by S106, together with an Early and Late Stage Viability Review Mechanisms (paragraphs 20-39).

- **Urban design and heritage:** The height, scale and massing of the application is supported, subject to further information being provided for assessment in relation to townscape and heritage impact. Further information and revisions are required in relation to residential quality – specifically, clarification on the internal size of duplex units and the provision of additional east facing windows within residential units in Building C adjacent to the playing fields to increase the number of dual aspect units (paragraphs 40-58).

- **Energy:** Whilst this falls short of the targets set out in London Plan Policy 5.2 and Policy SI2 of the draft London Plan, in this instance, GLA officers accept that there is little further potential for carbon dioxide reductions onsite. Accordingly, the remaining regulated carbon dioxide emission reductions should be met through a Section 106 contribution to the Council’s offset fund in order to meet the zero carbon target. Further information in relation to overheating and future proofing the scheme for connection to a potential district heat network and overheating is required (paragraph 59-60).

- **Sustainable urban drainage:** Flood management and mitigation measures, including raising finished floor levels of residential units to 3.74 metre AOD should be secured by condition, together with the preparation of a Flood Warning and Evacuation Plan. A drainage strategy, including design information and relevant flow calculations must be provided prior to Stage 2 to allow GLA officers to assess compliance against the sustainable urban drainage policies in the London Plan and draft London Plan (paragraph 61 to 63).
- **Urban greening:** Although there would be a net reduction in open space (-1,849 sq.m.), GLA officers consider that the proposed private, communal and public open space would provide a significant qualitative improvement on the existing situation, both in terms of access, ownership, function but also in terms of biodiversity, urban greening and in addressing the impacts of climate change. The proposed urban greening, including landscape proposals both within the site and along New Road should be secured by either planning condition or obligation, with commensurate levels of tree re-planting also secured, in line with London Plan Policy 5.10 and 7.21 and Policies G5 and G7 of the draft London Plan (paragraph 64-65).

**Transport:** The application complies with the parking and quantitative cycle parking standards in the draft London Plan. The scheme should help deliver the proposed Beam Parkway enhancement proposals along New Road (A1306) and either directly deliver the section within the site or a financial contribution secured towards this. Further information is required on public transport impacts. A travel plan should be secured by obligation. A Delivery and Servicing Plan, Construction Management and Logistics Plan and Car Parking Management Plan should be secured including provisions on disabled parking, as should the proposed cycle parking in accordance with LCDS and electric vehicle charging facilities (paragraph 66-71).