

Solar, Serena and Sunrise Court, Hornchurch

in the London Borough of Havering

planning application no. P1809.19

Strategic planning application stage 1 referral

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

The proposal

Estate regeneration comprising the demolition and redevelopment of the site and the construction of 175 specialist housing units for older people in Class C3 use within buildings ranging in height from 3 to 10-storeys, together with internal communal facilities, car parking, cycle parking and landscaping.

The applicant

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

Strategic issues

Principle of estate regeneration: The application proposes a significant increase in the quantum of social rented accommodation on site in terms of floorspace, units and habitable rooms and complies with the Mayor's key principles for estate regeneration. Accordingly, the principle of the comprehensive redevelopment and housing intensification of the site is supported (paragraphs 16 to 24).

Housing and affordable housing: 74% affordable housing by habitable room (77% by unit) comprising a mix of social rent, affordable rent and shared ownership units, with a 60:40 tenure split by unit (56:44 by habitable room). This is supported. The affordability of the proposed affordable rent and shared ownership units should be confirmed and secured by S106. Early and late stage viability review mechanisms should be secured (paragraphs 25 to 35).

Urban design and heritage: The density, design and layout, height and massing of the scheme and would not impact any heritage assets. A high standard of inclusive design is proposed. A fire strategy should be secured (paragraphs 36 to 45).

Climate change, drainage and urban greening: The energy, drainage and urban greening strategies are acceptable; however, further information is required in relation to overheating (paragraphs 46 to 48).

Transport: The application complies with the car parking, disabled parking and cycle parking complies with quantitative standards; however, design details should be amended to ensure that cycle parking complies with the London Cycling Design Standards. Further discussion is required to assess and potentially mitigate the impact on bus capacity (paragraphs 49 to 53).

Recommendation

That Havering Council be advised that whilst the scheme is supported in principle, the application does not yet fully comply with the London Plan and the intend to publish London Plan as set out in paragraph 57 of this report; however, the possible remedies set out in this report could address these deficiencies.

Context

1 On 16 December 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.

Site description

5 The 1.08 hectare site is located in Hornchurch and includes a series of one and two-storey buildings in residential use in social rent tenure which comprises sheltered housing for older people, as well as internal communal space in the form of a resident's lounge, laundry area and associated open space and surface car parking. In total, the site contains 55 social rented units. There are no leaseholders within the application site.

6 The site is bounded by three 13 and 14-storey residential towers to the west and north and one and two storey residential properties to the south and east, the rear boundaries of which run adjacent to the site. Harrow Lodge Park and the Ravensbourne River are to the west, which comprise locally designated open space. The application site boundary is extended to the south to include a pedestrian alleyway route which leads onto Sunrise Avenue.

7 The Public Transport Access Level (PTAL) the site is 1b (on a scale from 0 to 6b where 6b represents the highest level of access to the public transport network). The nearest London Underground stations are Elm Park and Hornchurch Station on the District Line, which are both approximately 1.3km away. Bus stops are within walking distance of the site on Abbs Cross Lane which provide access to routes 165, 365, 372 towards Romford, Hornchurch, Elm Park, Rainham and Lakeside.

8 There are no conservation areas or Statutory listed buildings in close proximity to the site.

Details of the proposal

9 The application seeks full planning permission for the demolition and redevelopment of the existing site to construct 175 self-contained residential units in Class C3 use, within five residential blocks ranging between 3 and 10 storeys, with associated communal open space located in the centre of the scheme. Internal communal amenity space (426 sq.m.) would be provided at ground floor level within Block C. All of the proposed residential units would comprise specialist accommodation for older people. A total of 79 residential car parking spaces are proposed, of which 10 would be designated Blue Badge spaces for disabled

residents. An additional 12 visitor car parking spaces are proposed. All of the car parking would be at surface level within landscaped areas to the south and north of the site. The layout and massing of the scheme is shown below.

Figure 1 – proposed development layout and massing



Wider context – Havering Council’s Estate Regeneration Programme

10 The application site is one of 12 Havering Council owned estates being 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 the following three sites which are the subject of separate planning applications and located in different parts of the borough:

- Napier and New Plymouth House in Rainham, which is subject to a live planning application for the construction of 197 residential units¹.
- this application at Solar, Serena and Sunrise Court in Hornchurch; and
- the Waterloo and Queen Street Estate in Romford – which proposes the demolition and redevelopment of 274 existing homes and construction of approximately 1,400 residential units, with community and commercial uses.

11 A planning application for the latter larger site in Romford is expected to be submitted later this year.

Case history

12 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.

¹ Link to case and LPA ref

Strategic planning issues and relevant policies and guidance

13 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 Council'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).

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

- Principle of estate regeneration *London Plan; the Mayor's Good Practice Guide to Estate Regeneration (2018);*
- Land use principles *London Plan;*
- 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);*

15 The following are also relevant material considerations:

- The National Planning Policy Framework (2019)
- National Planning Practice Guidance
- The London Plan Intend to Publish version (December 2019)
- The Mayor's Affordable Housing and Viability SPG
- Havering Local Plan (2016 – 2031) Proposed Submission Document (2019)

Principle of estate regeneration

16 Strategic policies relating to the replacement of existing housing and estate regeneration are set out within London Plan Policy 3.14, Policy H8 of the Mayor's intend to publish London Plan, with further guidance provided in the Mayor's Affordable Housing and Viability SPG and the Mayor's Good Practice Guide to Estate Regeneration (GPGER). London Plan Policy 3.14 states that the loss of existing housing, including affordable housing, should be resisted unless it is replaced at existing and higher densities with at least equivalent floorspace. Policy H8 of the Mayor's intend to publish London Plan resists the demolition of affordable housing unless it is replaced by an equivalent amount of affordable housing floorspace, affordable housing floorspace reprovided on a like for like basis and integrated into the development to ensure mixed and inclusive communities. As set out in the Mayor's intend to publish London Plan, all estate regeneration schemes should take into account and reflect the following key principles set out in the Mayor's Good Practice Guide to Estate Regeneration (GPGER) which apply to all estate regeneration schemes in London:

- like for like replacement of existing affordable housing floorspace
- an increase in affordable housing
- full rights of return for any social housing tenants
- fair deal for leaseholders/freeholders
- full and transparent consultation and involvement

Like for like replacement of social rent accommodation

17 As set out above, the loss of existing affordable housing should be resisted unless it is replaced by an equivalent amount of affordable housing floorspace (with no overall net loss). This principle applies to all existing affordable housing floorspace including both occupied and vacant units, regardless of the quality of the current stock. The existing and proposed quantum of social rented accommodation on site is shown below in Table 1. This demonstrates that the quantum of existing social rented floorspace would be doubled, with a net increase of 25 residential units, which is strongly supported.

Table 2 – Existing and proposed housing in social rent/ affordable rent tenure

	Existing	Proposed	Net change
Floorspace (sq.m.)	3,330	6,690	+3,360
Habitable rooms	110	160	+50
Units	55	80	+25

Full right of return or remain for social tenants

18 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. Policy H8 of the Mayor's intend to publish 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.

19 The applicant has stated that all of the existing social rented tenants on long-term secure tenancies would be offered a right to return to the site. Where affordable homes are not taken up for return, the re- provided affordable homes will be offered to other over-55s on the Council's social housing waiting list and provided at social rent levels. This is supported.

Full and transparent consultation

20 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.

21 In this instance, GLA funding was secured prior to this cut off date, so the GLA has exempted this particular scheme from needing to undertake a ballot². The Mayor encourages landlords to use ballots as widely as possible, in line with his Good Practice Guide. In line with GLA pre-application advice, the applicant has full details of the public consultation and engagement undertaken with occupants of the estate and surrounding residents which is set out in detail in their Statement of Community Involvement. GLA officers consider that the approach undertaken to generally accords with the key principles set out in the GPGER in terms of meaningful engagement, collaboration and feedback.

Specialist housing accommodation for older people

22 London Plan Policy 3.8 and Policy H13 of the Mayor's intend to publish London Plan emphasise the importance of increasing the provision of specialist housing for older people, particularly in Outer London, in view of demographic changes, growing need and in order to improve the quality of the existing stock. To address this aim, the London Plan and intend to publish London Plan provide indicative benchmarks for specialist housing provision for older

² https://www.london.gov.uk/sites/default/files/31.07.19_for_website_-_list_of_exemptions.pdf

people. Havering has an annual benchmark of 185 units in both documents. Policy H13 states that specialist housing developments for older people should deliver affordable and accessible housing, comprising the highest standards of inclusive design and including suitable internal storage facilities and pick up and drop off parking provision.

23 The existing and proposed housing provision on site would comprise self-contained specialist sheltered housing for older people in Class C3 use. Internal communal amenity space (426 sq.m.) would be provided to replace the existing facilities on site, with a significant improvement in the quality of this facility. Overall, the development proposes a net increase of 120 residential units, which is strongly supported and would contribute towards achieving both the overall 10 year targets for net additional housing supply, as well as annual benchmarks for specialist housing provision.

Conclusion – Principle of estate regeneration

24 In summary, the proposed development would ensure a significant quantitative increase in the level of social rented accommodation on site in terms of floorspace, units and habitable rooms and accords with the relevant principles set out in the intend to publish version of the London Plan, GPGER and London Plan. Accordingly, the principle of the comprehensive redevelopment and housing intensification of the site is supported.

Housing and affordable housing

25 The application proposes 175 residential units, including 80 social rent/ affordable rent tenure units, 54 intermediate shared ownership units and 41 market units. In gross terms, this represents an affordable housing offer of 74% by habitable room (77% by unit), with a 56:44 tenure split by habitable room in terms of the proportion of low cost rent and intermediate affordable housing provision (60:40 by unit). As set out above, 55 of the low cost rent units would be secured as social rent to facilitate the ‘right to return’ of residents on long-term social rented tenancies, with an additional 25 low cost rent units secured in affordable rent.

Table 2 – proposed housing mix by tenure

	Social rent/ Affordable rent	Shared ownership	Market	Total
1 bedroom 2 person	80	35	22	137
2 bedroom 4 person	0	19	19	38
Total	80	54	41	175

26 Once the baseline minimum requirement for the like for like replacement of the existing 55 social rent units on site is accounted for, the application would provide 79 net additional affordable housing units. As such, the affordable housing provision on the overall net uplift in housing proposed (120 units) represents 64% affordable housing by habitable room (66% by unit), with a 28:72 tenure split by habitable room (32:68 by unit).

Affordable housing and viability

27 London Plan Policies 3.11 and 3.12 and Policy H4 of the Mayor’s intend to publish London Plan seek to maximise the delivery of affordable housing, with the Mayor setting a strategic target for 50% of all new homes to be affordable. In terms of tenure split, Policy H6 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. At the local level, Havering Council’s adopted core strategy (2008) and emerging Local Plan (2019) seek a 70:30 split between social/affordable rent and intermediate housing provision.

28 As set out in Policy H5 and H8 of the Mayor's intend to publish London Plan, all estate regeneration schemes which propose demolition are not eligible for the 'Fast Track Route' and are required to follow the 'Viability Tested Route'. These applications are expected to provide an uplift in affordable housing in addition to the baseline requirement for like for like replacement of existing affordable housing floorspace. A Financial Viability Appraisal (FVA) has been submitted as part of the application, which is currently being scrutinised by the Council and GLA officers to ensure the scheme provides the maximum viable amount of affordable housing.

29 Early implementation and late stage review mechanisms should be secured, in accordance with Policy H5 of the Mayor's intend to publish London Plan and Affordable Housing & Viability SPG. 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 seek early engagement and discussions on the wording of the Section 106 agreement, prior to Stage 2, to ensure the above matters are fully addressed.

Housing affordability

30 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 or close to the London Affordable Rent benchmarks, which are set out in the Mayor's affordable housing funding guidance (2016)³, which are updated annually. Further discussion is required to confirm the affordability of the proposed offer in terms of rent levels. Implications in relation to service charges should also be fully considered and subject to appropriate caps to ensure the overall affordability of the proposed affordable units.

31 Shared ownership units should be available to households on a range of incomes below the maximum income threshold set out in the draft London Plan (£90,000 a year). In addition to this, annual housing costs (including service charges, rent and any interest payment) should be no greater than 40% of net household income. These requirements will need to be secured in any Section 106 agreement, in accordance with London Plan Policy 3.10, Policy H6 of the Mayor's intend to publish London Plan and the Mayor's Affordable Housing & Viability SPG.

Housing choice

32 London Plan Policy 3.8 and Policies H10 and H13 of the intend to publish London Plan state that residential developments should normally provide a mix of housing sizes and types to meet housing demand and address the needs of different groups. The need to address the varied housing requirements of older people is also recognised, as well as the need to encourage downsizing and the potential this has to help free up family sized housing within the existing housing stock.

33 As noted above, the scheme is comprised entirely of one and two-bedroom specialist sheltered housing units in Class C3 use and is designed to specifically address the needs of older people who require little or low levels of care and support. Overall, 75% of the units would be one-bedroom/two person units, with the remaining units all 2 bedroom/4 person sized units. Internal and external communal space is proposed. The housing size mix is therefore strongly supported in this instance, taking into account the particular circumstances of the existing site and proposed development.

³ Mayor of London, 2016, Affordable Homes Programme 2016-21 Funding Guide
<https://www.london.gov.uk/what-we-do/housing-and-land/homes-londoners-affordable-homes-programme-2016-21>

Equality

34 London Plan Policy 3.1 seeks to ensure that development proposals protect and enhance facilities and services that meet the need of particular groups and communities, and resists their loss without adequate justification or reprovision. In addition, Policy CG1 of the intend to publish London Plan seeks to support and promote the creation of an inclusive city to address inequality. More generally, the Equality Act 2010 places a duty on public bodies, including the GLA and local authorities, in the exercise of their functions, to have due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This requirement includes removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic and taking steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.

35 Havering Council has undertaken an Equality Impact Assessment for the 12 HRA Site Regeneration Programme which considers the impact of the proposed scheme on the protected characteristics. In view of the stakeholders affected by the development proposals, the most significant impacts in this case would relate to the protected characteristics of age, disability and gender. Whilst with any development proposal there would be temporary adverse impacts arising from the demolition and redevelopment and the decanting existing tenants from the site, these impacts would be mitigated by appropriate re-housing options and support being provided for residents and a right to return. Over the longer-term, the impact of the scheme on residents which have protected characteristics in terms of age, disability and gender would be significantly positive by providing improved housing choice, a significant improvement in the quality and accessibility of the existing housing provision on site and an overall increase in the quantum of specialist housing to meet the need for specialist accommodation for older and disabled people of all genders.

Urban design

Design, layout, public realm and landscaping

36 London Plan Policies 7.1 to 7.5, together with Policies D1-D3, D7 of the Mayor's intend to publish London Plan and the Housing SPG (2016) apply to the design and layout of development and set out a range of urban design principles relating to the quality of public realm, the provision of convenient, welcoming and legible movement routes, the importance of designing out crime by, in particular, maximising the provision of active frontages and minimising inactive frontages.

37 Overall, GLA officers consider that the layout, design and landscaping of the scheme responds positively to these urban design objectives and the opportunities and constraints presented by the redevelopment of the site. Active frontages and clearly identifiable and welcoming communal core entrances would be provided fronting the central communal courtyard and external street to the north and west, with ground floor flats provided with defensible space in the form of landscaped terraces to ensure appropriate privacy. Areas of surface parking would be appropriately landscaped and overlooked by the adjacent residential units. Landscaping proposals for the central communal space demonstrate that this would be of a high quality providing a multifunctional and attractive social space for residents comprising seating and a mix of low maintenance soft planting, lawns and a community growing space.

Residential quality

38 London Plan Policy 3.5 and Policy D6 of the Mayor's intend to publish London Plan seek housing of a high quality in design, with further standards and guidance set out in the Mayor's Housing SPG (2016). Minimum quantitative standards for private internal space, private outdoor space and floor to ceiling heights apply to all tenures and types of self-contained housing in Class C3 use within London. In addition, residential and mixed use

developments should maximise the provision of dual aspect units and normally avoid single aspect units that are north facing or exposed to significant adverse noise impacts.

39 GLA officers consider the scheme would provide a high standard of residential quality. Generously sized residential units are proposed which all exceed the relevant minimum space standard and including private external amenity space in the form of balconies and ground floor terraces. In terms of orientation, 61% of the units proposed dual aspect and no north facing single aspect units proposed. A limited number of south facing single aspect units are proposed within Blocks D and B, which is acceptable; however, appropriate levels of mitigation should be provided for these units to avoid overheating and excessive solar gain during heat wave conditions. The units to core per floor ratio for all of the blocks accords with the benchmark in the SPG.

Density and design review

40 London Plan Policy 3.4 and Policies D3 and D4 of the Mayor's intend to publish London Plan seek to optimise housing density, with the latter policies 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. The scheme has been subject to design review and developed via an iterative series of pre-application meetings with GLA which is welcomed and the resultant density (165 units per hectare) is considered appropriate in this context, taking into account the site location, context and opportunities and design constraints on site.

Height and massing

41 The massing of the development is well-considered and has been appropriately refined to ensure that the scheme steps down in height to address the immediate suburban one and two-storey context to the south and east, with 6 to 10 storey blocks proposed to address the western site boundary which respond to the very different urban context. GLA officers consider that the scheme would be acceptable in terms of daylight and sunlight impacts both in terms of the housing proposed on site and the adjacent residential homes, taking into account the site location and the layout and orientation of the proposed buildings and their proximity to neighbouring residential homes.

Architecture and materials

42 The scheme proposes a simple and attractive architectural and materials approach comprising three different tones of brick, together with perforated bronze metal balconies and copper coloured metal canopies serving communal core entrances. Overall, GLA officers consider that the scheme would provide a cohesive and appropriately varied approach to the surrounding townscape context, with high quality materials proposed throughout. This should be secured appropriately by condition.

Inclusive design

43 In total, 25% of the proposed homes would be designed to meet the M4(3) standard for 'wheelchair user dwellings', with the remaining units designed to meet the Building Regulations M4(2) standard for 'accessible and adaptable dwellings'. This exceeds the minimum requirements set out in London Plan Policy 3.8 and Policy D5 of the intend to publish London Plan and is strongly supported. The M4(3) units have been distributed across all buildings, tenures and floors to enable choice for residents which is welcomed. The design of internal and external spaces would also ensure a high standard of inclusive and accessible design with acceptable gradients, circulation spaces and entrances provided throughout. A total of 9 disabled parking spaces would be provided from the outset, which is acceptable. Overall, GLA officers consider that the application accords with London Plan Policies 7.1 and 7.2 and Policies D5 and D7 of the intend to publish London Plan.

Fire safety and resilience

44 In line with Policy D12 of the draft London Plan, a fire statement should be submitted by a suitably qualified third party assessor demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.

Heritage

45 Having considered the application documents and site and surroundings, GLA officers consider that the proposals would not give rise to any harm in relation to heritage assets. As set out above, there are no conservation areas or Statutory listed buildings in close proximity to the site, with the closest being the St Leonard's Conservation Area and Hall of St Leonard's Children Home (Grade II). These heritage assets are a substantial distance from the site, on the other side of Harrow Lodge Park and would not be visually impacted by the proposed scheme. As such, the application accords with the relevant policies in the London Plan and intend to publish London Plan in respect of heritage assets.

Climate change

46 Based on the energy assessment submitted, an on-site reduction in CO₂ emissions of 38% beyond 2013 Building Regulations compliant development is expected, of which 11% would be achieved through energy efficiency measures alone. This would meet the minimum targets for CO₂ emissions reductions set out in the London Plan and intend to publish London Plan. The scheme proposes 337 photovoltaic (PV) panels, with the main heat supply provided via an energy centre which would contain condenser boilers. Heat supply for the communal space would be via an Air Source Heat Pump. This is welcomed. Whilst the overall energy strategy is supported in this particular instance, the applicant should submit the overheating checklist and undertake dynamic overheating analysis to identify risks of overheating, in line with GLA guidance. 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.

Flood risk, sustainable drainage and urban greening

47 The site is within Flood Zone 1 within the River Ravensbourne catchment. Environment Agency Flood Risk maps show that most of the site has a low/very low risk of surface water flooding. The drainage strategy for the site comprises soft landscaping, green and biodiverse brown roofs, with resin bonded gravel and permeable paving within area of hard standing including paths and parking areas. In addition, underground storage attenuation tanks would be provided. This is considered acceptable in this instance, taking into account the site circumstances. As such, GLA officers consider that the application accords with the flood risk and drainage policies in the London Plan and intend to publish London Plan.

48 In line with GLA pre-application advice, the applicant has undertaken an Urban Greening Factor (UGF) assessment of the existing and proposed development. This shows that the existing site has a UGF score of 0.23 and the proposed development would have a score of 0.35. This falls slightly short of the 0.4 target set out for residential sites in the draft London Plan; however, GLA officers consider that the approach to urban greening has been maximised within the proposed development, taking into account the particular site circumstances and noting the increase in the density of the site and range of improvements proposed in terms of urban greening and biodiversity, as well as the reduction of impermeable surfaces on the site. The landscape proposals 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 intend to publish London Plan.

Transport

Car Parking

49 In total, 91 car parking spaces are proposed, of which 18 are to be visitor car parking spaces and 10 would be designated Blue Badge spaces for disabled residents. Including the visitor parking, a parking ratio of 0.52 per dwelling is proposed. In line with the Mayor's intend to publish London Plan, disabled parking provision should be provided to serve a minimum of 3% of the proposed residential units which should be available from the outset. In this instance, the application provides disabled parking for 6% of the residential units which would be available from the outset, with the potential for this to be increased in the future to 10% through the conversion of standard parking spaces. In addition, the application proposes active Electric Vehicle Charging Points (EVCPs) for 20% of the car parking proposed. Car parking complies with the intend to publish London Plan and should be secured by condition via a Parking Design and Management Plan.

Cycle Parking

50 In total, 296 long-stay and six short-stay cycle parking spaces are proposed, which complies with the minimum quantitative standard set out in the intend to publish London Plan; however, design details should be amended to ensure that cycle parking complies with the London Cycling Design Standards and this should be secured by condition.

Healthy Streets

51 A Pedestrian Environment Review System audit (PERS) has been supplied. The Council should work with the applicant to determine whether the routes selected for audit were sufficient and secure any necessary improvements to support strategic mode shift at this site.

Public transport impact and mitigation

52 The trip generation methodology is generally acceptable considering the site's scale and location. However, clarification is required regarding the mode share assumptions, given that the nearest tube/train stations are outside of acceptable walking distance, and to ensure the potential impact on the local bus network is robustly assessed and mitigated where necessary.

Travel Plan, deliveries and construction

53 The proposed use of underground waste storage is supported. 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

54 Havering Council planning officers are targeting planning committee in the spring.

Legal considerations

55 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

56 There are no financial considerations at this stage.

Conclusion

57 London Plan and intend to publish London Plan policies on estate regeneration, specialist housing for older people, housing and affordable housing, urban design, inclusive design, climate change, flood risk and sustainable drainage, urban greening and transport are relevant to this application. Whilst the scheme is supported in principle, the below issues relating to affordable housing, transport and energy should be addressed to ensure the proposal fully complies with the London Plan and draft London Plan:

- **Principle of estate regeneration:** The application proposes a significant increase in the quantum of social rented accommodation on site in terms of floorspace, units and habitable rooms and complies with the Mayor's key principles for estate regeneration. Accordingly, the principle of the comprehensive redevelopment and housing intensification of the site is supported in strategic planning terms.
- **Housing and affordable housing:** 74% affordable housing by habitable room (77% by unit) comprising a mix of social rent, affordable rent and shared ownership units, with a 60:40 tenure split by unit (56:44 by habitable room). This is supported. The affordability of the proposed affordable rent and shared ownership units should be confirmed and secured by S106. Early and late stage viability review mechanisms should be secured.
- **Urban design and heritage:** The density, design and layout, height and massing of the scheme and would not impact any heritage assets. A high standard of inclusive design is proposed. A fire strategy should be secured.
- **Energy, drainage and urban greening:** The energy, drainage and urban greening strategies are acceptable; however, further information is required in relation to overheating.

Transport: The application complies with the car parking, disabled parking and cycle parking complies with quantitative standards; however, design details should be amended to ensure that cycle parking complies with the London Cycling Design Standards. Further discussion is required to assess and potentially mitigate the impact on bus capacity. Standard conditions and/or obligations are required to secure the submission and approval of a car parking, disabled parking, electric vehicle charging facilities, cycle parking, Travel Plans, delivery and servicing plans (DSPs) and construction logistics plans (CLPs).

for further information, contact GLA Planning Unit (Development Management Team):

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