

OFFICER REPORT FOR DECISION UNDER DELEGATED AUTHORITY

APPLICATION NO: P0428.20

WARD : Romford Town Date Received: 24th March 2020

ADDRESS: GREENVIEW HOUSE
75 LONDON ROAD
ROMFORD

PROPOSAL: Conversion of two vacant spaces into 2 x 1 bedroom residential units.

DRAWING NO(S): 2489-931 P2
2489-937 P1
2489-933 P2
2489-934 P2
2489-935 P2
2489-936 P2
770-940 P2
770-941 P2
770-942 P2
770-943 P2
2489-950 P1
2489-951 P1
2489-952 P1
2489-953 P1
770-944 P2
770-945 P2
770-946 P2
770-947 P2
2489-931 P3
2489-933 P4
2489-934 P4
2489-935 P3
2489-936 P3
2489-932 P2

RECOMMENDATION : It is recommended that planning permission be GRANTED subject to the condition(s) given at the end of the report

SITE DESCRIPTION

The application relates to the property at St Edwards Court, London Road, Romford. This has historically been in use as a large detached office building, set out over a 'H-shaped' shaped footprint with undercroft car parking and a parking area to the rear. The site is located adjacent to residential properties to the south and east and several industrial units to the west.

St Edwards Court and the surrounding commercial buildings have been the subject of a number of applications which have changed the use of the main building and surrounding units from commercial to residential. The current submission relates to an area of retained space which did not form part of the earlier prior-approval conversion which has since been implemented.

DESCRIPTION OF PROPOSAL

Consent is sought for the conversion of two spaces retained as part of the earlier prior approval conversion of the building. The applicant advises that at the time of submission these areas

were not in use as B1(a) office space. It is unclear as to what the use of these areas was if it was not in some ancillary capacity to the main functioning of the building.

To provide self-contained accommodation a number of changes are shown to the external elevations of the building, with the "St Edwards Court" signage relocated to enable new openings to serve the accommodation in the principal elevation. The windows are shown to be of a style commensurate with the existing building.

RELEVANT HISTORY

CONSULTATIONS/REPRESENTATIONS

A total of 136 neighbouring occupiers were consulted. No comments were received.

In addition the following comments were received from other stakeholders.

Environmental Health - No objection
Highway Authority - No objection.
Fire Brigade (Access) - No objection.
Fire Brigade (Hydrants) - No objection.
Streetcare - No objection

RELEVANT POLICIES

LDF

CP01 - Housing Supply
CP10 - Sustainable Transport
CP17 - Design
DC02 - Housing Mix and Density
DC03 - Housing Design and Layout
DC04 - Conversions to Residential & Subdivision of Residential Uses
DC16 - Core and Fringe Frontages in District and Local Centres
DC29 - Educational Premises
DC32 - The Road Network
DC33 - Car Parking
DC35 - Cycling
DC55 - Noise
DC61 - Urban Design
DC72 - Planning Obligations
ROM10 - Retail Core
ROM11 - Retail Fringe
SPD04 - Residential Extensions & Alterations SPD
SPD09 - Residential Design SPD
SPD11 - Planning Obligation SPD

OTHER

LONDON PLAN - 3.3 - Increasing housing supply
LONDON PLAN - 3.4 - Optimising housing potential
LONDON PLAN - 3.5 - Quality and design of housing developments
LONDON PLAN - 7.4 - Local character
LONDON PLAN - 7.6 - Architecture
LONDON PLAN - 8.2 - Planning Obligations

OTHER

LONDON PLAN - 8.3 - Community infrastructure Levy
NPPF - National Planning Policy Framework

MAYORAL CIL IMPLICATIONS

As the proposals relate to existing floor-space, there is no CIL liability.

STAFF COMMENTS

The main considerations relate to the principle of the development and the layout of the scheme, the impact on local character/the established pattern of development, the implications for the residential amenity of the future occupants and of nearby houses and the suitability of the proposed parking and access arrangements.

PRINCIPLE OF DEVELOPMENT

The National Planning Policy Framework 2019 states that housing applications should be considered in the context of the presumption in favour of sustainable development. The London Plan notes the pressing need for housing and the general requirement to improve housing choice, affordability and quality accommodation. The London Plan also (Policy 3.4) states that development should optimise housing output subject to local context and character.

The provision of additional accommodation is consistent with the NPPF and Policy CP1 as the application site is within a sustainable location. In landuse terms the development is considered to be acceptable in principle. However, the acceptability of the proposals would be subject to other design considerations, particularly those relating to access and servicing, proposed residential amenity and quality, impact on neighbours and general appearance.

Paragraph 005 of the Housing Supply and Delivery Planning Practice Guidance states that the housing requirement figure identified in adopted strategic housing policies should be used for calculating the 5 year housing land supply figures where

- The plan was adopted in the last 5 years, or
- The strategic housing policies have been reviewed within the last 5 years and found not to need updating.

In other circumstances the 5 year housing land supply will be measured against the area's local housing need calculated using the standard method. Although the Havering Core Strategy is more than 5 years old, the London Plan 2016 which forms part of Havering's Development Plan is less than 5 years old and, therefore, its strategic housing policies should be used to calculate the 5 years housing land supply. This is confirmed by Paragraph 006 of the Housing Supply and Delivery Planning Practice Guidance which states that if a new spatial development strategy supersedes an adopted local plan, the most recently adopted policies will need to be used for the purposes of calculating 5 year housing land supply.

The Standard Methodology is therefore not relevant for the purposes of calculating a 5 year housing land supply. The emerging Havering Local Plan was submitted for examination in April 2018 and in line with paragraph 214 of the NPPF 2019 is being examined under the policies of the NPPF 2012. An emerging Local Plan for Havering is now at a relatively advanced stage, having recently undergone an Examination in Public. The Council is awaiting advice from the Inspector following the hearings and its submission of further information (as requested by the Inspector) at the end of July 2019.

Hearings were held in October 2018 and May 2019. The Inspector's 'Matters, Issues and

Questions' dated 15-04-2019 stated that "The submission version of the Plan sets out to meet and exceed the minimum 10 year housing target in the London Plan of 11,701 dwellings over the period 2015-2025. Following discussion at the previous hearing sessions, I am currently minded to accept that this approach to the overall housing target in the Plan is justified and sound". Following extensive discussions at the Examination hearings and taking account of comments from the Inspector, the emerging Local Plan proposes the use of stepped targets to address housing supply. The reasoning for this approach is outlined in Policy 3 of the emerging Local Plan and in Section 5 of the Housing Position Statement May 2019.

The Housing Position Statement May 2019 sets out the methodology behind the Council's calculation of 5 year housing land supply, including assumptions regarding built out rates, discount rates, lead in periods, small site windfalls and determinations of deliverability. The Housing Position Statement is supported by a robust and comprehensive evidence base including individual site assessments. Paragraph 7.8 of the Housing Position Statement states that the Council is able to demonstrate a 5 year supply in 2019 based on the proposed stepped trajectory put forward at Examination and, at the request of the Inspector, use of the 'Sedgefield' approach to managing shortfall (5.62 years) or alternatively through a linear trajectory with application of the 'Liverpool' approach to managing shortfall (5.58 years). The Council's position is that due to the advanced stage of the emerging Local Plan, greater weight should be given to the stepped approach put forward at examination.

However, if the calculation of 5 years housing land supply is based on the linear London Plan targets the Liverpool approach should be used as Havering's anticipated supply contains a number of large strategic sites which will have a phased delivery or are likely to be delivered later in the plan period. Although it is not considered to be the appropriate approach, it is noted that the Council is also close to demonstrating a five year supply based on the linear London Plan targets and application of the Sedgefield approach (4.91 years).

The NPPF and Policy CP1 support the increase in the supply of housing in existing urban areas where development is sustainable.

Policy DC4 recognises the positive impact conversion or subdivision of existing units can make to the variety of housing stock in the borough provided that:

- residents/visitors are able to park without detriment to highway safety taking into account the availability of on and off street parking with regard to the standards set out in DC33
- there is no conflict with surrounding uses
- the proposal should not result in an unacceptable loss of privacy enjoyed by the occupants of adjoining properties by reason of overlooking and, should by its layout, provide a suitable degree of privacy and private sitting out/amenity space

Where the conversion or subdivision involves the provision of self contained residential accommodation provided that:

- the living rooms of new units do not abut the bedrooms of adjoining dwellings
- each flat has a reasonable outlook and aspect

- at least one, one bed self-contained flat is provided with a separate sleeping area. Studio flats will not be permitted
- the property has safe and secure access from the street.

These matters require further consideration.

DENSITY/SITE LAYOUT

Policy DC61 states that planning permission will not be granted for proposals that would significantly diminish local and residential amenity.

Policy 3.5 of the London Plan advises that housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment. To this end the policy requires that new residential development conform to minimum internal space standards. There are set requirements for gross internal floor areas of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and minimum floor to ceiling heights. Those requirements are derived from the Technical Housing Standards - Nationally Described Space document. The standards are to be applied to all new units, including those from conversions or subdivision of existing spaces.

Policy DC4 of the LDF is also applicable, which relates to subdivision or conversion of existing buildings. Each unit would have safe and secure access from the street and there would be no conflict between the new units and existing through the layout shown. However; each of the units are shown to be of a studio layout which is not supported by the LDF and each would have limited outlook and aspect through the absence of windows serving parts of each unit. The units therefore require further consideration.

The purpose of LDF Policy DC4 is to ensure a high standard of accommodation, which can often be felt to be diminished in conversion/subdivisions. Studio accommodation is sometimes suggestive of a limited internal floor area and a sense of confinement which would be worsened by internal partitioning. To that end, this is in some respects the case of each unit shown currently with the studio layout imposed to enable light to rooms which would otherwise not be served by any fenestration if partitioned. However; each unit would be of a gross internal floor area in general compliance with the London Plan Standards as genuinely 1B1P units.

It is important to recognise that the existing building is already in residential use and as is evident on the layout plans provided showing the internal arrangement of existing units, many fall below the required standards as a product of the prior-approval process. Whilst this is not justification for creating further low quality units, it seems unreasonable to impose policy standards so stringently when the proposed units would of broadly comparable quality to those existing units in situ. Officers would contend that the studio arrangement is in response to the constraints associated with the location of each of the units in otherwise vacant parts of the building and that the quality of those units is consistent with surrounding units and as such is a matter of choice for prospective occupants rather than a failing of the scheme to which permission could be withheld.

The Residential Design SPD states that private amenity space should be provided in single, high quality, usable, enclosed blocks which benefit from both natural sunlight and shading. The Residential Design SPD does not prescribe fixed standards for private amenity space which can be restrictive on small and awkward sites. In the absence of dedicated standard, the Council would concentrate on the quality and usability of a given area. No provision is made in this

location, owing to the close proximity to the town centre. The absence of dedicated amenity areas in similar locations has not been held to represent grounds for refusal, owing to the availability of recreational space and other amenities associated with town-centre living.

DESIGN/IMPACT ON STREET/GARDEN SCENE

Policy DC61 of the Havering Core Strategy and Development Control Policies and Development Plan Document (Adopted 2008) states that planning permission will only be granted for development which maintains, enhances or improves the character and appearance of the local area by responding to distinctive local building forms and patterns of development and by respecting the scale, massing and height of the surrounding physical context. Policy CP17 of the Core Strategy states that the appearance of Havering will be maintained and where possible enhanced, by requiring new development to maintain or improve the character and appearance of the local area in its scale and design.

The National Planning Policy Framework 2019 (NPPF) reinforces this by placing emphasis on good quality, design and architecture. The NPPF requires that planning decisions ensure developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change. The Framework states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. It goes on to set out that good design is a key aspect of sustainable development, in so far as that it creates better places in which to live and work and helps make development acceptable to communities.

The application site has been the subject of a combination of prior approval and planning consent for its conversion to residential. To facilitate the development of the redundant spaces the subject of the current application some minor changes are proposed to external elevations of the building. In terms of what would have an influence on the street-scene, this is limited to the relocation of existing signage to a position parallel to that of existing and the formation of two new window openings to serve the first floor unit. The repositioning of the chrome lettering presents no adverse visual implications. In respect of the new fenestration, the windows are shown to be of proportions in keeping with those on corresponding elevations and are not regarded as being detrimental to the appearance of the building. Indication is made on plans to suggest that detailing present elsewhere would be replicated.

In all the changes to the building would be relatively low-key. The proposals are held to align with Policy DC61 of the LDF and the guidance contained within the NPPF. In the event of an approval, a condition requiring a finish matching that of the existing building/accordance with plans would be imposed.

IMPACT ON AMENITY

The Residential Design SPD states that new development should be sited and designed such that there is no detriment to existing residential amenity through overlooking and/or privacy loss and dominance or overshadowing. Policy DC61 reinforces these requirements by stating that planning permission will not be granted where the proposal results in unacceptable overshadowing, loss of sunlight/ daylight, overlooking or loss of privacy to existing properties.

The new window openings would be located on the principal elevation where there is already a number of windows serving residential units. The arrangement shown on proposed plans would not be unusual or harmful and there are consequently no amenity consideration through which permission could be withheld.

HIGHWAY/PARKING

Policy DC33 seeks to ensure that all new developments make adequate provision for car parking. In this instance the application site is located within an area that is recognised to have a relatively poor level of access to public transport. The PTAL rating for the site is 4 which translates as good access to public transport.

Public Transport Accessibility Levels (PTALs) are used by TfL to produce a consistent London wide public transport access mapping facility to help boroughs with locational planning and assessment of appropriate parking provision by measuring broad public transport accessibility levels. There is evidence that car use reduces as access to public transport (as measured by PTALs) increases. Given the need to avoid over-provision, car parking should reduce as public transport accessibility increases. London Plan Policy 6.13 requires outer London boroughs to take account of residents' dependency on cars in areas with low public transport accessibility (generally PTALS 0-1). Where appropriate the London Plan suggests that Boroughs consider revised standards (which could include minima) and encourages higher levels of provision than what is generally permissible, to avoid generating unacceptable pressure for on-street parking.

No additional parking provision is made for the new units. The site has been the subject of extensive redevelopment, through a combination of prior approval and then subsequently planning permission. On the earlier implemented schemes the Council had sought to prevent any potential overspill arising from the development on surrounding roads through restrictions to prevent future occupiers from obtaining residents parking permits. However; in view of the low prospective occupancy of the units the parking standard would equate to less than one space per unit. It is not unreasonable to assert that car ownership/reliance could be low in this location at the lack of an allocated car parking space would be communicated to future occupants. As such, there is potential for car ownership to be low. To withhold permission as dedicated provision is made would represent a challenge in the opinion of officers as it would be hard to demonstrate the actual harm which would result.

This view is supported by the absence of an objection by the Highway Authority.

KEY ISSUES/CONCLUSIONS

The 2019 Housing Delivery Test results found that delivery of housing in the borough was well below the requirement over the designated three year period. Consequently the presumption in favour of sustainable development outlined in paragraph 11(d) of the National Planning Policy Framework (NPPF) is engaged.

Para 11(d) states that where the policies which are most important for determining the proposal are out of date, permission should be granted unless (i) the application of policies in the Framework that protect areas or assets of particular importance provide a clear reason for refusing the development, or (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole.

The Council regards the policies to be broadly consistent with the expectations of the Framework which seeks at paragraph 127 good standard of amenity for all existing and future occupants of land and buildings as a key aspect of sustainable development and by fundamentally placing emphasis on good quality, design and architecture. The Frameworks seek also to significantly boost the supply of housing to meet needs and the development is held to make effective use of this previously developed site, in addition to be located close to the town centre transport links and local facilities and amenities. These are facets which are strongly supported by the Framework.

Any harm which may arise is regarded as being within acceptable tolerances and would not significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole. APPROVAL is therefore recommended accordingly.

RECOMMENDATION

It is recommended that planning permission be GRANTED subject to the following conditions:

1. Time Limit

The development to which this permission relates must be commenced not later than three years from the date of this permission.

Reason: To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 (as amended by Section 51 of the Planning and Compulsory Purchase Act 2004).

2. Accordance with plans

The development hereby permitted shall not be carried out otherwise than in complete accordance with the approved plans, particulars and specifications (as set out on page one of this decision notice).

Reason: The Local Planning Authority consider it essential that the whole of the development is carried out and that no departure whatsoever is made from the details approved, since the development would not necessarily be acceptable if partly carried out or carried out differently in any degree from the details submitted. Also, in order that the development accords with Development Control Policies Development Plan Document Policy DC61.

3. SC10 (Matching materials)

All new external finishes including detailing around the new window openings shall be carried out in materials to match those of the existing building to the satisfaction of the Local Planning Authority.

Reason:-

To safeguard the appearance of the premises and the character of the immediate area, and in order that the development accords with the Development Control Policies Development Plan Document Policy DC61.

4. Cycle storage

Prior to the first occupation of the development hereby permitted cycle storage shall be provided in accordance with details previously submitted to and approved in writing by the Local Planning Authority. The cycle storage shall be permanently retained thereafter.

Reason: Insufficient information has been supplied with the application to demonstrate what facilities will be available for cycle parking. Submission of this detail prior to occupation in the case of new building works or prior to the use commencing in the case of changes of use is in the interests of providing a wide range of facilities for non-motor car residents and sustainability.

5. Waste/recycling

Prior to the first occupation of the development hereby permitted, refuse and recycling facilities shall be provided in accordance with details which shall previously have been submitted to and approved in writing by the Local Planning Authority. The refuse and recycling facilities shall be permanently retained thereafter.

Reason: Insufficient information has been supplied with the application to judge how refuse and recycling will be managed on site. Submission of this detail prior to occupation in the case of new building works or prior to the use commencing in the case of changes of use will protect the amenity of occupiers of the development and also the locality generally and ensure that the development accords with the Development Control Policies Development Plan Document Policy DC61.

6. Hours of construction

No construction works or deliveries into the site shall take place other than between the hours of 08:00 to 18:00 on Monday to Friday and 08:00 to 13:00 hours on Saturdays unless agreed in writing with the Local Planning Authority. No construction works or deliveries shall take place on Sundays, Bank or Public Holidays unless otherwise agreed in writing by the local planning authority.

Reason: To minimise the impact of the development on the surrounding area in the interests of amenity.

7. Non Standard Condition 1

The dwellings hereby approved shall be constructed to comply with Part M4(2) of the Building Regulations - Accessible and Adaptable Dwellings.

Reason: In order to comply with Policy DC7 of the Local Development Framework and Policy 3.8 of the London Plan.

8. Non Standard Condition 2

All dwellings hereby approved shall comply with Regulation 36 (2)(b) and Part G2 of the Building Regulations - Water Efficiency.

Reason: In order to comply with Policy 5.15 of the London Plan.

9. Non Standard Condition 3

The building(s) shall be so constructed as to provide sound insulation of 45 DnT,w + Ctr dB (minimum value) against airborne noise to the satisfaction of the Local Planning Authority.

Reason: To prevent noise nuisance to adjoining properties.

INFORMATIVES

1 Non Standard Informative 1

The developer is advised that if construction materials are proposed to be kept on the highway during construction works then they will need to apply for a license from the Council. If the developer requires scaffolding, hoarding or mobile cranes to be used on the highway, a license is required and Streetcare should be contacted on 01708434343 to make the necessary arrangements.

Please note that unauthorised works on the highway is an offence.

2 Non Standard Informative 2

Before occupation of the residential/ commercial unit(s) hereby approved, it is a requirement to have the property/properties officially Street Named and Numbered by our Street Naming and Numbering Team. Official Street Naming and Numbering will ensure that that Council has record of the property/properties so that future occupants can access our services. Registration will also ensure that emergency services, Land Registry and the Royal Mail have accurate address details. Proof of having officially gone through the Street Naming and Numbering process may also be required for the connection of utilities. For further details on how to apply for registration see:

<https://www.haverling.gov.uk/Pages/Services/Street-names-and-numbering.aspx>

3 Approval - No negotiation required

Statement Required by Article 35(2) of the Town and Country Planning (Development Management) Order 2015: No significant problems were identified during the consideration of the application, and therefore it has been determined in accordance with paragraph 38 of the National Planning Policy Framework 2018.

Authorising Officer: Neil Goate

03-07-2020
