



ALLEN PLANNING Ltd
Town Planning and Development Consultants

Planning Statement



In support of an application for the demolition of the existing single storey warehouse buildings and the erection of a building comprising of 6 dwellings

**Site at Mint House,
3-11 Grenfell Avenue
Hornchurch
RM12 4DN**

July 2024

1.0 Introduction

- 1.1 This Planning Statement has been prepared by Allen Planning Limited on behalf of our client to support a planning application for the demolition of the existing single storey warehouse buildings and the erection of a two storey building comprising of 6 dwellings.
- 1.2 The purpose of this Statement is thereby to describe the relevant site context and surrounding area together with the details of the proposed scheme's development. It also outlines the planning policy context and provides an assessment of those policies that apply.
- 1.3 A previous proposal for the demolition of the existing single storey warehouse/commercial buildings on the site and the erection of seven two storey residential terraced houses arranged in two rows parallel to the northern and southern boundaries with a section returning along the western boundary was refused by the LPA under reference P1864.23.
- 1.4 The full reasons for refusal are set out below:

"1 The proposed development through the arrangement of built form at the extremities and their massing would present as visually cramped through the limited separation from the shared boundaries of the site. This would be exacerbated by the two storey form of the buildings and in doing so the proposals would neither reflect existing local character and patterns of development, nor introduce positive new character. The proposals would therefore be contrary to Policies 7, 10 and 26 of the Havering Local Plan 2016-2031 and also Paragraph 135 of the NPPF which amongst other considerations requires fundamentally that development add to the overall quality of the area whilst also establishing or maintaining a strong sense of place.

2 The proposals through the cramped nature of the development and limited separation from shared boundaries would provide confined and enclosed private amenity areas within which outlook from internal and external spaces would be poor. Outlook from first floor windows would be directed at the flank walls of adjoining premises in some instances. These factors would contribute to the development resulting in substandard residential accommodation to the detriment of the amenity of future occupiers and therefore contrary to the objectives of Havering Local Plan 2016-2031 Policy 7 and London Plan Policy D6. There would also be conflict with Paragraph 135 of the National Planning Policy Framework which seeks to ensure a high standard of amenity for existing and future occupiers.

3 The terraced row sited along the southern boundary of the site through lack of separation from shared boundaries to the side and rear in conjunction with the massing proposed would form a visually intrusive and overbearing feature from the adjoining sites. This would result in levels of overlooking and overshadowing which would be harmful to amenity and enjoyment of these properties. The proposals are therefore contrary to Havering Local Plan 2016-2031 Policies 7, 26 and 34. There would also be conflict with Paragraph 135 of the National Planning Policy Framework which seeks to ensure a high standard of amenity for existing and future occupiers."

- 1.5 In overview therefore the three reasons for refusal can be distilled into concerns relating to matters of design and massing; the amenity of future residential occupiers and the impact on neighbouring residential properties.

- 1.6 Importantly the principle of residential development was supported and in addition no issues were raised in terms of matters of transportation or ecology.
- 1.7 This revised application in terms of the major amendments proposed seeks an alternative scheme which would provide for one two storey building towards the rear of the site comprising of six dwellings.
- 1.8 Indeed the proposal addresses the issues raised in the previous planning application on the site, focusing on reducing massing, improving the quality of external amenity, and maintaining the local character. The volume of the proposed buildings has been significantly reduced and the footprint has been decreased from 594m² of existing built form to 292m², representing a 49% reduction in built form. The single-storey aspect of the warehouse has been retained, and the overall built form will be significantly reduced.
- 1.9 In addition car parking and cycle storage and refuse storage is provided towards the front of the site and these proposals thereby represent a significant amendment to the previously refused scheme.
- 1.10 The previous refusal does however establish in terms of land use the LPA's acceptance that the existing building and commercial land use on the site can be removed and replaced by residential development of a high standard of design, layout and amenity provisions.
- 1.11 At the outset of this Statement and given the previous planning history especially in terms of appropriate residential land use in principle it is noteworthy that p124 of the NPPF promotes, amongst other matters:

“c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;

d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure); and ...”

2.0 Site Location

- 2.1 The application relates to Mint House, 3-11 at the northern end of Grenfell Avenue. Set back from the street on the eastern side of Grenfell Avenue, this premises is accessed via an access way which opens into a courtyard to the front of the entrances.
- 2.2 Unit 6 was formally a mixed use premises, the majority of the building has been occupied solely by 'Futura' (Flooring Contractor) over the years as a storage/warehouse facility (Use Class B8). The floorspace comprised of a warehouse with ancillary kitchen/toilet on the ground floor, with additional storage space and offices at mezzanine level.

- 2.3 the application site is almost totally surrounded either by residential properties or their garden areas and the general character of the area within the context of the site is residential.
- 2.4 The site has been subject to numerous applications over the years seeking to convert/alter the premises for residential function. The surrounding area is largely residential in nature, comprising a range of properties types and designs. In addition, there are also a number of commercial premises within the vicinity.
- 2.5 The site is neither listed, nor within a Conservation Area and not located within an area of flood risk.
- 2.6 The general location of the site is shown in Figure 1 below:



Figure 1 – Site location

3.0 Planning History

- 3.1 As set out above the most recent application was a previous proposal for the demolition of the existing single storey warehouse/commercial buildings on the site and the erection of seven two storey residential terraced houses arranged in two rows parallel to the northern and southern boundaries with a section returning along the western boundary was refused by the LPA under reference P1864.23.

- 3.2 The previous refusal does however establish in terms of land use the LPA's acceptance that the existing buildings and previous commercial land use on the site can be removed and replaced by residential development of a high standard of design, layout and amenity provisions.

4.0 Planning Policy

- 4.1 For the purposes of Section 38 of the Planning and Compulsory Purchase Act 2004, the Development Plan is made up of the recently revised National Planning Policy Framework 2023, The London Plan and Havering Local Plan 2016-2031.

National Policy - Revised National Planning Policy Framework, December 2023

- 4.2 Turning first to national guidance **Paragraphs 8 -10** of the NPPF advise:

8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

*a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

*c) **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

9. These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.

*10. So that sustainable development is pursued in a positive way, at the heart of the Framework is a **presumption in favour of sustainable development** (paragraph 11).*

- 4.3 **Paragraph 11** identifies the fundamental thrust of the guidance which states that Plans and decisions should apply a presumption in favour of sustainable development which for decision taking means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed⁷;*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole*

Housing/Best use of land

- 4.4 Paragraph 70 advises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should amongst other matters:

- a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;*
- b) seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing and self-build and custom-build housing;*
- c) use tools such as area-wide design assessments, permission in principle and Local Development Orders to help bring small and medium sized sites forward;*
- d) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and*

- 4.5 Furthermore, paragraph 123 adds that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

- 4.6 In addition amongst other matters paragraph 124 adds that planning policies and decisions should:

“c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;

d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)⁵⁰; and

e) support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well- designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers. They should also allow mansard roof extensions on suitable properties where their external appearance harmonises with the original building, including extensions to terraces where one or more of the terraced houses already has a mansard. Where there was a tradition of mansard

construction locally at the time of the building's construction, the extension should emulate it with respect to external appearance. A condition of simultaneous development should not be imposed on an application for multiple mansard extensions unless there is an exceptional justification."

Design

- 4.7 In terms of design paragraph 131 advises that:

"The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process."

- 4.8 Paragraph 135 adds that planning policies and decisions should ensure that developments:

"a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."

- 4.9 Furthermore, Paragraph 139 adds that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:

a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or

b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings

Highways & Parking

- 4.10 Paragraph 111 advises that if setting local parking standards for residential and non-residential development, policies should take into account:
- a) the accessibility of the development;
 - b) the type, mix and use of development;
 - c) the availability of and opportunities for public transport;
 - d) local car ownership levels; and
 - e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.
- 4.11 Paragraph 112 advises that maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.
- 4.12 In addition, paragraph 115 adds that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

London Plan

- 4.13 **Policy D3** deals with optimising site capacity through the design-led approach stating:

A All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in Policy D2 Infrastructure requirements for sustainable densities), and that best delivers the requirements set out in Part D.

B Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 Infrastructure requirements for sustainable densities. Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. This could also include expanding Opportunity Area boundaries where appropriate.

C In other areas, incremental densification should be actively encouraged by Boroughs to achieve a change in densities in the most appropriate way. This should be interpreted in the context of Policy H2

4.14 Policy D4 in terms of delivering good design adds:

Design analysis and development certainty

A Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and place-making based on the requirements set out in Part B of Policy D3 Optimising site capacity through the design-led approach.

B Where appropriate, visual, environmental and movement modelling/assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform plan-making and decision-taking, and to engage Londoners in the planning process.

Design scrutiny

C Design and access statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan.

D The design of development proposals should be thoroughly scrutinised by borough planning, urban design, and conservation officers, utilising the analytical tools set out in Part B, local evidence, and expert advice where appropriate. In addition, boroughs and applicants should make use of the design review process to assess and inform design options early in the planning process. Development proposals referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made, or demonstrate that they have undergone a local borough process of design scrutiny, based on the principles set out in Part E if they:

1) include a residential component that exceeds 350 units per hectare; or

2) propose a building defined as a tall building by the borough (see Policy D9 Tall buildings), or that is more than 30m in height where there is no local definition of a tall building

E The format of design reviews for any development should be agreed with the borough and comply with the Mayor's guidance on review principles, process and management, ensuring that:

1) design reviews are carried out transparently by independent experts in relevant disciplines

2) design review comments are mindful of the wider policy context and focus on interpreting policy for the specific scheme

3) where a scheme is reviewed more than once, subsequent design reviews reference and build on the recommendations of previous design reviews

4) design review recommendations are appropriately recorded and communicated to officers and decision makers

5) schemes show how they have considered and addressed the design review recommendations

6) planning decisions demonstrate how design review has been addressed.

Maintaining design quality

F The design quality of development should be retained through to completion by:

1) ensuring maximum detail appropriate for the design stage is provided to avoid the need for later design amendments and to ensure scheme quality is not adversely affected by later decisions on construction, materials, landscaping details or minor alterations to layout or form of the development

2) ensuring the wording of the planning permission, and associated conditions and legal agreement, provide clarity regarding the quality of design

3) avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter

4) local planning authorities considering conditioning the ongoing involvement of the original design team to monitor the design quality of a development through to completion.

4.15 Policy D6 addresses matters of housing quality and standards and states:

Housing development should be of high quality design and provide adequately-sized rooms (see [Table 3.1](#)) with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.

Qualitative aspects of a development are key to ensuring successful sustainable housing. [Table 3.2](#) sets out key qualitative aspects which should be addressed in the design of housing developments.

Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in [Policy D3 Optimising site capacity through the design-led approach](#) than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.

The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

Housing should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food waste as well as residual waste.

Housing developments are required to meet the minimum standards below which apply to all tenures and all residential accommodation that is self-contained.

Private internal space

1) Dwellings must provide at least the gross internal floor area and built-in storage area set out in [Table 3.1](#).

2) A dwelling with two or more bedspaces must have at least one double (or twin) bedroom that is at least 2.75m wide. Every other additional double (or twin) bedroom must be at least 2.55m wide.

3) A one bedspace single bedroom must have a floor area of at least 7.5 sq.m. and be at least 2.15m wide.

4) A two bedspace double (or twin) bedroom must have a floor area of at least 11.5 sq.m..

5) Any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (If the area under the stairs is to be used for storage, assume a general floor area of 1 sq.m. within the Gross Internal Area).

6) Any other area that is used solely for storage and has a headroom of 0.9-1.5m (such as under eaves) can only be counted up to 50 per cent of its floor area, and any area lower than 0.9m is not counted at all.

7) A built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. Any built-in area in excess of 0.72 sq.m. in a double bedroom and 0.36 sq.m. in a single bedroom counts towards the built-in storage requirement.

8) The minimum floor to ceiling height must be 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling.

Private outside space

9) Where there are no higher local standards in the borough Development Plan Documents, a minimum of 5 sq.m. of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sq.m. should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m. This does not count towards the minimum Gross Internal Area space standards required in Table 3.1

G The Mayor will produce guidance on the implementation of this policy for all housing tenures.

4.16 **Policy H1** addresses the issue of increasing housing supply stating:

Table 4.1 sets the ten-year targets for net housing completions that each local planning authority should plan for. Boroughs must include these targets in their Development Plan Documents.

To ensure that ten-year housing targets are achieved, boroughs should: 1) prepare delivery-focused Development Plans which: allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period, especially from the sources of supply listed in B2 enable the delivery of housing capacity identified in Opportunity Areas, working closely with the GLA.

2) optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity: sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station³⁹ or town centre boundary⁴⁰ mixed-use redevelopment of car parks and low-density retail parks and supermarkets housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses the redevelopment of surplus utilities and public sector owned sites small sites (see Policy H2 Small sites) industrial sites that have been identified through the processes set out in Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Industrial intensification, co-location and substitution.

3) establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value.

C Boroughs should proactively use brownfield registers and permission in principle to increase planning certainty for those wishing to build new homes.

D Boroughs should publish and annually update housing trajectories based on the targets in Table 4.1 and should work with the Mayor to resolve any anticipated shortfalls.

E Where new sustainable transport infrastructure is planned, boroughs should re-evaluate the appropriateness of land use designations and the potential to accommodate higher-density residential and mixed-use development, taking into account future public transport capacity and connectivity levels.

F On sites that are allocated for residential and mixed-use development there is a general presumption against single use low-density retail and leisure parks. These developments should be designed to provide a mix of uses including housing on the same site in order to make the best use of land available for development

4.17 **Policy H2** addresses matters of residential development on small sites adding: Boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making in order to:

- 1) significantly increase the contribution of small sites to meeting London's housing needs
- 2) diversify the sources, locations, type and mix of housing supply
- 3) support small and medium-sized housebuilders
- 4) support those wishing to bring forward custom, self-build and community-led housing
- 5) achieve the minimum targets for small sites set out in Table 4.2 as a component of the overall housing targets set out in Table 4.1.

Boroughs should:

- 1) recognise in their Development Plans that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites

- 2) where appropriate, prepare site-specific briefs, masterplans and housing design codes for small sites
- 3) identify and allocate appropriate small sites for residential development
- 4) list these small sites on their brownfield registers
- 5) grant permission in principle on specific sites or prepare local development orders

4.18 **Policy H4** in terms of delivering affordable housing advises:

The strategic target is for 50 per cent of all new homes delivered across London to be genuinely affordable. Specific measures to achieve this aim include: 1) requiring major developments which trigger affordable housing requirements⁵⁰ 50 All major development of 10 or more units triggers an affordable housing requirement. Boroughs may also require affordable housing contributions from minor housing development in accordance with Policy H2 Small sites to provide affordable housing through the threshold approach (Policy H5 Threshold approach to applications)

2) using grant to increase affordable housing delivery beyond the level that would otherwise be provided

3) all affordable housing providers with agreements with the Mayor delivering at least 50 per cent affordable housing across their development programme, and 60 per cent in the case of strategic partners⁵¹

4) public sector land⁵² delivering at least 50 per cent affordable housing on each site and public sector landowners with agreements with the Mayor delivering at least 50 per cent affordable housing across their portfolio

5) industrial land appropriate for residential use in accordance with Policy E7 Industrial intensification, co-location and substitution, delivering at least 50 per cent affordable housing where the scheme would result in a net loss of industrial capacity.

Affordable housing should be provided on site. Affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional circumstances.

4.19 Housing size and mix is identified at **Policy H10** which seeks:

“Schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to:

- 1) robust local evidence of need where available or, where this is not available, the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment
- 2) the requirement to deliver mixed and inclusive neighbourhoods
- 3) the need to deliver a range of unit types at different price points across London
- 4) the mix of uses in the scheme
- 5) the range of tenures in the scheme
- 6) the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity
- 7) the aim to optimise housing potential on sites
- 8) the ability of new development to reduce pressure on conversion, sub-division and amalgamation of existing stock

9) the need for additional family housing and the role of one and two bed units in freeing up existing family housing.

B For low-cost rent, boroughs should provide guidance on the size of units required (by number of bedrooms) to ensure affordable housing meets identified needs. This guidance should take account of:

- 1) evidence of local housing needs, including the local housing register and the numbers and types of overcrowded and under-occupying households*
- 2) other criteria set out in Part A, including the strategic and local requirement for affordable family accommodation*
- 3) the impact of welfare reform*
- 4) the cost of delivering larger units and the availability of grant.”*

Havering Local Plan

- 4.20 It is submitted that the Havering Local Plan 2016-2031 Policies 7, 20, 23, 24, 26 and 34 are relevant to these redevelopment proposals and these are set out below.

Policy 7 - Residential design and amenity

Residential development should be of a high design quality that is inclusive and provides an attractive, safe and accessible living environment for new residents whilst ensuring that the amenity and quality of life of existing and future residents is not adversely impacted.

To protect the amenity of existing and future residents the Council will support developments that do not result in:

- i. Unacceptable overlooking or loss of privacy or outlook;*
- ii. Unacceptable loss of daylight and sunlight; and*
- iii. Unacceptable levels of noise, vibration and disturbance.*

To ensure a high quality living environment for residents of new developments, the Council will support residential developments that:

- iv. Meet the National Space Standards and the London Plan requirement for floor to ceiling heights;*
- v. Are sited and designed to maximise daylight and sunlight;*
- vi. Incorporate an appropriate level of high quality, usable green infrastructure and amenity space that is designed to be multi-functional and offer a range of environmental benefits and leisure and recreation opportunities;*
- vii. Provide both balconies and communal amenity space in flatted schemes; and*
- viii. Maximises the provision of dual aspect accommodation unless exceptional circumstances are demonstrated;*

In any development affordable and market housing will be expected to have the same external appearance and equivalent amenity in relation to views, daylight, noise and proximity to open space.

New developments should promote independent living by utilising designs which can allow for alterations to be made in the future. The Council will require 90% of new build housing to meet Building Regulation requirement M4(2) 'Accessible and Adaptable Dwellings', with the remaining 10 percent meeting Building Regulation requirement M4(3) 'Wheelchair User Dwellings'.

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The Council will support and encourage proposals which provide adaptations enabling residents to live independently and safely in their own homes.

Policy 20 - Loss of locally significant industrial sites and non-designated land

The Council will keep under review the provision of Locally Significant Industrial Sites (LSISs) and non-designated industrial land as part of its commitment to ensuring that Havering has a strong and prosperous economy.

The Council will only support the loss of non-designated industrial land and floorspace in Havering where it can be demonstrated that:

- i. The change of use from industrial employment uses will not lower the industrial capacity of the borough below that necessary to meet projected demand over the planning period as estimated by the most up to date Havering Employment Land Review;*
- ii. There is no market interest in the site following one year of continuous active marketing.*

In considering proposals for the loss of LSISs and non-designated industrial land, the Council will take into account the wider land-use objectives of the Local Plan because the release of land which is no longer needed for employment use may assist in securing these.

The Council will require the re-provision of non-designated industrial land where it is located within a wider area of commercial uses (such as retail) in the event of proposals being submitted for redevelopment of the wider area except in cases where this policy accepts their loss.

Policy 23 - Transport Connections

The Council will support and encourage developments in Havering in the locations that are most accessible by a range of transport options.

The Council supports development which ensures safe and efficient use of the highway and demonstrates that adverse impacts on the transport network are avoided or, where necessary, mitigated. Major planning applications will require a transport assessment in line with TfL's Transport Assessment Best Practice Guidance.

When bringing forward a planning application full Travel Plans or Travel Plan Statements will be required for development reaching certain thresholds as set out in Transport for London's (TfL) latest Guidance on Travel Plan requirements.

The Council will work with its partners, including developers, the Mayor of London and central government to improve transport infrastructure and the connectivity of the borough by:

- i. Maximising the development opportunities supported by Crossrail as well as the benefits for local businesses and residents;*
- ii. Lobbying for an increased train frequency and greater capacity on the Essex Thameside (C2C) line serving Rainham, Upminster and the proposed Beam Park stations;*
- iii. Lobbying for peak time 'fast' services serving Romford Station;*
- iv. Progressing improved north to south public transport connections in the borough, improving access to the Romford and Rainham and Beam Park Strategic Development Areas and Queens Hospital*
- v. Improving bus connections to/from key trip generators such as Queens Hospital;*
- vi. Enhancing strategic transport links across the borough;*

- vii. Improving road safety in the borough, especially in the vicinity of schools and KSI “hotspots”;
- viii. Providing residents with options to travel sustainably and enabling walking and cycling
- ix. Working with partners to provide sustainable access to key employment areas across the borough including Rainham Employment Area and Queens Hospital;
- x. Requiring new development to optimise sustainable access and other future transport connections, wherever applicable;
- xi. Tackling key congestion “hotspots” through remodelling of Gallows Corner and Romford Ring Road to improve motor vehicle traffic flow and improve air quality;
- xii. Promoting the benefits of active travel to schools, local businesses and developers and supporting the development, delivery and monitoring of school, residential and workplace travel plans;
- xiii. Ensuring good sustainable access between new developments and public transport interchanges in the borough to promote active travel;
- xiv. Supporting new developments that include shared use routes for people walking and cycling which lead to public open spaces and parks to promote active recreational activities;
- xv. Taking an active role in the A127 Corridor for Growth project through cross borough engagement with Essex County Council and seeking improvements to the A127 that will facilitate growth along this corridor; and
- xvi. Working with neighbouring authorities to better co-ordinate highway works.
- xvii. Working with partners including the port of London Authority to explore opportunities for utilising the River Thames for freight and passenger transport to reduce traffic congestion and support local businesses.

The Council will work positively with those who share its ambition to deliver these key transport infrastructure improvements and will support development proposals that are able to contribute to their delivery.

Policy 24 - Parking provision and design

London Plan maximums standards apply across the borough

In areas of the borough that have low public transport access (PTAL 0-1) where no improvements are planned, the minimum residential parking standards set out in Table 11 (below) will also apply:

Table 11 Minimum Parking – PTAL 0-1 (Outside of the Opportunity Areas)

1 Bedroom	2 bedrooms	3+ bedrooms
0.5 spaces per unit	1 space per unit	1.5 spaces per unit

In all areas, subject to the standards set out in Table 11 being met, the Council will support proposals that:

- i. Consider the location and layout of parking provision at the earliest stage and as an integral part of the design process;
- ii. Locate parking close to people’s homes and in areas with natural surveillance;
- iii. Provide intensive and durable planting in regular intervals that visually screens the continuity of car parking to the front of dwellings and provides a green street scene; and

iv. Include car club membership open to all and provide on-site car club parking spaces.

Where a development proposal would result in a net loss of car parking spaces the applicant will be required to robustly demonstrate that there is no need for these spaces.

Planning conditions and legal agreements may be used to restrict eligibility for on-street residential and commercial parking permits, irrespective of the amount of parking spaces provided off street as part of the development.

Parking provision in new shopping and leisure developments should serve the area/centre as a whole. It should not be reserved solely for use in connection with the development proposed and be provided as short stay parking.

Disabled parking and cycle parking should be located closest to town centres and the entrance to the facilities and should include provision for long and short stay use.

The Council will support development proposals that provide adequate off street servicing arrangements for commercial vehicles and general servicing.

Policy 26 - Urban design

The Council will promote high quality design that contributes to the creation of successful places in Havering by supporting development proposals that:

- i. Are informed by, respect and complement the distinctive qualities, identity, character and geographical features of the site and local area;*
- ii. Are of a high architectural quality and design;*
- iii. Provide creative, site specific design solutions;*
- iv. Respect, reinforce and complement the local street scene;*
- v. Provide active streets, good sight lines and natural surveillance;*
- vi. Are designed in accordance with the principles of Secured by Design;*
- vii. Respond to distinctive local building forms and patterns of development and respect the visual integrity and established scale, massing, rhythm of the building, frontages, group of buildings or the building line and height of the surrounding physical context;*
- viii. Fully integrate with neighbouring developments, existing path and circulation networks and patterns of activity particularly to accommodate active travel;*
- ix. Provide well-defined public realm with defensible private spaces;*
- x. Are built of high quality, durable, robust, low maintenance materials that integrate well with surrounding buildings;*
- xi. Provide a high standard of inclusive access for all members of the public;*
- xii. Demonstrate adequate on-going maintenance and management arrangements;*
- and*
- xiii. Make use of design competitions or other creative processes that can improve the design quality.*

The council will require development proposals of a strategic nature to be subject to Design Review.

Policy 34 - Managing pollution

The Council will support development proposals that:

- i. Do not unduly impact upon amenity, human health and safety and the natural environment by noise, dust, odour and light pollution, vibration and land contamination;*

- ii. Do not pose an unacceptable risk to the quality of the water catchment, groundwater or surface water; and
- iii. Optimise the design, layout and orientation of buildings and the use

5.0 Planning Issues

- 5.1 It is submitted that the key issues in terms of this submission are those matters relating to scale and design together with the quality of housing proposed, highway matters and impacts upon neighbouring land uses.

Land Use and the Principle of further dwellings

- 5.2 The principle of providing new housing within this highly sustainable site is generally supported at both national and local level, subject to the assessment of other material considerations.

- 5.3 The Framework reinforces the policy presumption in favour of development in sustainable locations by promoting the effective use of land in meeting the need for homes through supporting the development of under-utilised land.

- 5.4 In terms of policy and guidance, paragraph 124 of the NPPF identifies that planning policies and decisions should amongst other matters:

e) support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well- designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers."

- 5.5 At a local level the Development Plan also supports good quality housing development on sustainable sites such as this.

- 5.6 It is noted from the previous decision made by the LPA that even though this was refused there were no objections in principle to a change of land use from commercial to residential as set out in the extract from the supporting officer report below:

"The principle of residential use in this location has previously been regarded as acceptable. Whilst no compelling argument is made by the applicant in respect of Policy 20 of the Local Plan which seeks to resist the loss of non-designated industrial land it is evident that the historic use is somewhat anomalous in this location, given its relationship to surrounding land uses which are predominantly residential. As such and on balance its loss is not regarded as a barrier to the development proceeding."

- 5.7 The development proposed would thereby provide for further highly sustainable housing on this site in accord with the aims of p124 of the framework and development plan policy endorsed by the previous decision of the LPA in terms of matters of land use and on that basis, we submit that the proposed land use as six dwellings can be supported in principle as being in accord with the Framework and the development plan.**

Design & Townscape

- 5.8 Development requiring a high standard of design forms part of the backbone of the recently revised NPPF and also various policies within the development plan, including Policy also seek such key development matters.
- 5.9 This site is not located within a Conservation Area or within any particular area designated for architectural character or importance.
- 5.10 The amendments undertaken since the previous application result in the revised proposal seeks the demolition of the existing single storey warehouse buildings on site and the erection of 6 no. high quality two storey terraced houses.
- 5.11 The proposal includes policy complaint private amenity space, secured car parking, cycle parking, refuse storage and associated landscaping. Access to the site will be provided via the existing vehicular entry point with a dropped kerb, directly accessed from Grenfell Avenue.
- 5.12 Unlike the previous scheme the proposed residential building is positioned within the footprint of the existing warehouse building. The adjacent warehouse building to the north is demolished, to allow for a central courtyard that provides parking and associated landscaping. The central courtyard encourages community interaction.
- 5.13 Furthermore these revised proposals now comprises 6 no. high quality dwellings: 3 no. 2B3P and 4 no. 3B4P units. The units have been carefully positioned to respond to the site's context, boundary and orientation to ensure suitable levels of daylight/sunlight, outlook and privacy.
- 5.14 In terms of design features pitched roofs are introduced where necessary, making sure the impact on neighbouring properties is limited as much as possible. The kitchen and living rooms are situated at ground floor and are dual aspect. All dwellings have direct access to a private garden. All rooms on ground floor and first floor each meet or exceed technical space standards as set out in the National Space Standards, the London Plan and the Local Plan.
- 5.15 Section 3 of the DAS identifies the changes made and the design ethos now adopted for this revised scheme and we do not reiterate such matters again in this Planning Statement. In overview the revised proposals addresses the issues raised in the previous planning application on the site, focusing on reducing massing, improving the quality of external amenity, and maintaining the local character.
- 5.16 The conclusions of this section of the DAS summarise as follows:
- "This proposal effectively addresses the concerns raised in the previous planning application by reducing the built form's volume, improving external amenity quality, and preserving the local character. The design ensures a harmonious integration into the existing environment, providing a functional and aesthetically pleasing living space for future residents."*
- 5.17 On this basis of this detailed assessment the Applicant submits that the design approach adopted in terms of this scheme is entirely acceptable, and indeed it would constitute a high standard of design wholly in accordance with the design guidance of the NPPF and development plan policy and responding successfully to the previous refusal reasons in such regards.**

Highways & Transport

- 5.18 Given the urban location and highly sustainable nature of the site there would certainly not be a materially different number of movements as a result of the 6 residential units proposed to the commercial lawful use of the site.
- 5.19 **Given the permitted use of the site, the extant consent, and its sustainable urban nature the traffic generation from the site would not alter significantly and would not result in any detrimental impact upon highway safety.**
- 5.20 In terms of on-site car parking the guidance of the revised NPPF in matters of sustainable development, transport and car parking advises at paragraph 111 advises that if setting local parking standards for residential and non-residential development, policies should take into account:
- a) the accessibility of the development;
 - b) the type, mix and use of development;
 - c) the availability of and opportunities for public transport;
 - d) local car ownership levels; and
 - e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.
- 5.21 Paragraph 112 advises that maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.
- 5.22 In addition, paragraph 115 adds that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 5.23 Parking provision and matters of highway consideration are represented in Policies 23 and 24 of the Havering Local Plan 2016-2031. However, given the PTAL rating of 2, this engages the London Plan parking standards.
- 5.24 In such respects Table 10.3 of the London Plan advises for an “outer borough” that the maximum parking requirement should be up to 0.75 spaces for 1 and 2 bed dwellings and 1 space for larger units
- 5.25 The proposal comprises 6 dwellings made up of 1 x 1 bed, 4 x 2 bed and 1 x 3 bed and therefore the maximum parking requirement would be 4.75 spaces.
- 5.26 To comply with the applicable planning policies, a total of 7 car parking spaces are proposed, 6 of which are active electric car parking spaces and such would therefore provide for some visitor/overflow parking on site.
- 5.27 In addition short stay bicycle storage is provided for 6 no. bikes, and in addition bicycles can be stored in the private amenity space of each dwelling. A shared refuse storage accommodating 2 no. 1280 L recycling bins, 2 no. 1100 L general waste bins and 1 no. 360 L food waste bin is located near the site’s entrance. The

distance from the Grenfell Avenue to the refuse storage is 26m, allowing residents to wheel the bins to street level for easy waste collection.

5.28 We therefore respectfully submit that there are no material issues relating to the development proposed in terms of matters of transportation.

Impacts on Amenities of neighbouring buildings

- 5.29 Securing a good standard of amenity for all existing and future occupants of land and buildings is one of the core principles of the NPPF as set out in paragraph 135(f).
- 5.30 In addition Policy 7 of the Havering Local Plan 2016-2031 (HLP) states that planning permission will not be granted where the proposal results in unacceptable overshadowing, loss of sunlight/ daylight, overlooking or loss of privacy, noise, vibration and disturbance to existing and future residents.
- 5.31 This policy is also to be read in conjunction with Policy 26 however the objectives are reflected in Policy 34 also which states that development will not be permitted where it would unduly impact upon amenity, human health and safety and the natural environment by noise, dust, odour and light pollution, vibration and land contamination. Policy 10 of the HLP amongst other considerations requires that development not have a significant adverse impact on the amenity of existing and new occupants.
- 5.32 The development is bordered by commercial units to the north and residential broadly in all other directions at varying distances. The site is bounded by a block of flats to the west, and rear gardens of semi-detached or terraced houses to the north, east and south.
- 5.33 In terms of the relationship with Glendale Lodge and Nos 3-11 Grenfell Avenue the majority of windows are proposed at ground floor level. Within the roof, rooflights are utilised to provide light and ventilation to the upper floor bathrooms and the bathroom rooflights are positioned above eye level.
- 5.34 Given both the height and scale of the development proposed, together with the careful position of fenestration and the fact that a large building already exists on this part of the site it is submitted that these proposals would avoid any adverse impacts upon the residential amenities of these properties either in terms of loss of privacy, overbearing impacts or loss of daylight and sunlight.
- 5.35 In addition of course the removal of the lawful commercial use from the site and its replacement with an acceptable residential scheme would also improve the amenities of the residents of these units in terms of potential for noise and traffic generation.
- 5.36 To the rear of the site (east) exist dwellings fronting Upper Rainham Road which are separated from the site by elongated gardens. Distances between living room and bedroom windows is circa 32m.
- 5.37 Whilst upper floor habitable room windows are proposed in the elevation facing these properties it is submitted that due to the separation between existing and proposed dwellings that these revised proposals would avoid any adverse impacts on the amenities of these residential properties.

- 5.38 It is therefore submitted that there will be no adverse loss of residential amenity as a result of the proposed development and these proposals are as a result entirely compliant with the relevant development plan policies in such regards.

Quality of Accommodation Proposed

- 5.39 The NPPF provides that planning decisions should provide a high standard of amenity for future users.
- 5.40 The proposal presents the demolition of the existing single storey warehouse buildings on site and the erection of 6 no. high quality two storey terraced houses. The proposal includes policy compliant private amenity space, secured car parking, cycle parking, refuse storage and associated landscaping.
- 5.41 All of the proposed units would comply with the requirements of the NDSS as shown in the Table below

Unit no.	Unit type	G.I.A.	Amenity
1.	1b 2p	77m2	18m2
2.	2b 3p	79m2	24m2
3.	2b 3p	79m2	23m2
4.	2b 3p	79m2	23m2
5.	2b 3p	79m2	23m2
6.	3b 5p	92m2	32m2

- 5.42 The proposed building is positioned within the footprint of the existing warehouse building. The adjacent warehouse building to the north is demolished, to allow for a central courtyard that provides parking and associated landscaping and biodiversity net gain.
- 5.43 The Adopted 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.
- 5.44 The London Plan (2021) offers guidance on this matter in the sense that minimum standards are present in Policy D6. It states that where there are no higher local standards in the borough Development Plan Documents, a minimum of 5 sqm. of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm. should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m.

- 5.44 These standards are reflected in the Havering Local Plan 2016.2031 at Policy 7 which requires compliance with the space standards referenced above
- 5.45 The proposal provides private gardens with excellent quality for each dwelling and in addition the built form has been positioned within the existing warehouse footprint and massing, maintaining the architectural expression and local character.
- 5.46 Principal rooms are placed on the east elevation, offering excellent outlooks with a minimum separation distance of 32m between windows on adjacent terraces. Entrance doors and kitchens are positioned on the west elevation to reduce overlooking of adjacent properties.
- 5.47 Each property includes private rear gardens ranging from 18m² for a one-bedroom unit to 32m² for a three-bedroom house.
- 5.48 In terms of housing mix Policies 5 and 9 of the Local Plan prioritises family (3 bed units). The Policy requires that developers demonstrate how they have sought to maximise the provision of family housing within their schemes.
- 5.49 This amended scheme proposes a mix of sizes of units despite the constrained nature of the site including a one, two and three bedroom units. The Policy has preference for 2B4P units and such form the majority of housing type proposed and the proposals would also provide for a 3 bed family unit.
- 5.50 On the basis of the above it is submitted that these revised proposals provide for a policy compliant mix of housing types meeting the LPA's housing standards and parking and amenity space requirements.**
- 5.51 Finally turning to matters of affordable housing the scheme proposes a quantum of development which falls below the threshold for the consideration of affordable housing and as such the issue of affordable housing is not material to the determination of this application proposal

Other Matters

- 5.52 The site does not lie within an area of defined flood risk and in terms of land-use provides the opportunity to remove a relatively nonconforming commercial land-use in this predominantly residential area improving the amenity of the general location.
- 5.53 Turning to matters of ecology there are no suitable habitats on site and no areas of non-hard surfaced or built upon development and these proposals therefore provide the opportunity to create both private landscaped amenity areas together with some communal areas in such regards
- 5.54 In such regard the NPPF recognises that trees and landscaping can make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. These objectives are reflected in Havering Local Plan Policies 27 and 30.
- 5.55 This redevelopment proposals thereby provides an opportunity for greening this site in terms of areas of landscaping and private ground floor external amenity.**

6.0 Conclusions

- 6.1 It is submitted that this revised application scheme accords with the objectives of the NPPF, and also the Development Plan by promoting the effective use of an under-utilised and highly sustainable site by way of the redevelopment of this site to form 6 units in a mix of sizes.
- 6.2 Such a development in principle is fully in accord with the guidance of the framework seeking to make best use of previously developed land in sustainable locations to create further housing saving the necessity for development of greenfield land.
- 6.3 The proposal addresses the issues raised in the previous planning application on the site, focusing on reducing massing, improving the quality of external amenity, and maintaining the local character.
- 6.4 Nonetheless this revised scheme offers a dwelling mix which is appropriate for its context, and goes towards meeting the Council's current and future housing needs. It is submitted that the principle of residential development is acceptable, given the LPAs determination of the previous application, and indeed supported in this location.
- 6.5 This proposal utilises a high quality of design in context with the local area improving design character on this site and in addition the proposed development is of an appropriate scale, height and overall design and would not have a harmful impact on the amenities of the adjacent properties and the proposed flats have been designed to meet the Council's residential standards.
- 6.6 Given the sustainable nature of the site it is submitted that these proposals would avoid any adverse impacts on matters of highway safety and the overall scheme also offers good accessibility to public transport, public open space and shops and other services.
- 6.7 Support for these proposals can be demonstrated on sustainability grounds, in that it will make full and effective use of sustainable underused land with the built up area.
- 6.8 **On the basis of all of the above it is concluded that the development proposed is in accord with the development plan, would successfully use airspace surrounded by built form in order to create good quality residential accommodation in a highly sustainable location and would therefore be compliant with sustainable development of new housing and the relevant policies for such within the Development Plan.**