

OFFICER REPORT FOR DECISION UNDER DELEGATED AUTHORITY

APPLICATION NO: P1227.25

WARD: Upminster **Date Received:** 17th September 2025

ADDRESS: Bush Farm, Bramble Lane
Upminster

PROPOSAL: 1x single storey detached dwelling and associated amenities following demolition of existing outbuilding

DRAWING NO(S): 890 Revision: A
891 Revision: A
892 Revision: A
Location Plan

RECOMMENDATION: It is recommended that **planning permission be REFUSED** for the reason(s) given at the end of the report

SITE DESCRIPTION

The application site relates to Bush Farm, Bramble Lane. The site features an existing store, is accessed from Bramble Lane to the south and is located within the Metropolitan Green Belt. It is not located within a conservation area nor does it contain any listed buildings.

DESCRIPTION OF PROPOSAL

Planning permission is sought for a 1x single storey detached dwelling and associated amenities following demolition of existing outbuilding.

RELEVANT HISTORY

P0119.25	Erection of one 4xbed detached half chalet dwelling with parking, landscaping and amenities following demolition of existing outbuilding/shed	
	Refuse	20-06-2025
P1668.24	Erection of one 4xbed detached dwelling with parking, landscaping and amenities following demolition of existing outbuilding/shed	
	Withdrawn - Invalid	27-01-2025
P1548.23	Erection of electric gates (Retrospective)	
	Apprv with cons	12-12-2023

P1930.19	Retrospective Two Storey rear extension Apprv with cons 03-07-2020
P0800.18	Double storey Rear extension with Hip profile roof and relocation of Garage. Apprv with cons 23-07-2018
P0042.95	Variation of Condition (iv) of permission 1232A/40620/203 (ES/HOR/1816/54) to allow retention of water areas (A) Apprv with cons 08-06-1995
P0043.95	Variation of conditions 6 and 7 of permission L/HOR/415/63 to allow retention of water areas (B) Apprv with cons 23-06-1995
P0044.95	Variation of condition 8 of planning permission P1553.89 for a modification in final levels (C) Apprv with cons 23-06-1995
P0051.95	Variation of Conditions 6 & 7 of permission ES/HOR/210/61 to allow retention of water areas (D) Apprv with cons 23-06-1995

CONSULTATIONS/REPRESENTATIONS

Notification letters were sent to surrounding neighbours. In addition, a site notice was displayed adjacent to the site and the application was advertised in the local press. No representations were received.

In addition, comments provided by the following stakeholders are summarised below:

- * Anglican Water - No response
- * Thames Water - No response
- * Essex and Suffolk Water - No response
- * LBH Street Naming and Numbering - No response
- * Ecology Officer - No objection subject to conditions
- * LBH Highways - No response
- * LBH Public Protection - Were planning permission to be granted, recommended conditions relating to gas proofing, ultra low NOx boilers and electric vehicle charging. No noise comments.
- * LBH Waste and Recycling - Waste and recycling sacks will need to be presented by 7am on the boundary of the property facing Bramble Lane on the scheduled collection day.
- * London Fire Brigade (Hydrant Officer) - Installation of one new fire hydrant required.

* London Fire Brigade (Fire Safety Commissioner) - No comments

RELEVANT POLICIES

National Planning Policy Framework (NPPF)

- 2. Achieving sustainable development
- 5. Delivering a sufficient supply of homes
- 9. Promoting sustainable transport
- 11. Making effective use of land
- 12. Achieving well-designed places
- 13. Protecting green belt land

Havering Local Plan (2016-2031)

- Policy 3 Housing supply
- Policy 4 Affordable Housing
- Policy 5 Housing mix
- Policy 7 Residential design and amenity
- Policy 10 Garden and Backland Development
- Policy 23 Transport Connections
- Policy 24 Parking provision and design
- Policy 26 Urban design
- Policy 27 Landscaping
- Policy 30 Biodiversity and Geodiversity
- Policy 32 Flood management
- Policy 34 Managing pollution
- Policy 35 Waste management

The London Plan (2021)

- Policy D4 Delivering good design
- Policy D5 Inclusive design
- Policy D6 Housing quality and standards
- Policy D7 Accessible housing
- Policy D11 Safety, security and resilience to emergency
- Policy D14 Noise
- Policy G2 London's green belt
- Policy G6 Biodiversity and access to nature
- Policy H1 Increasing housing supply
- Policy H4 Delivering affordable housing
- Policy H8 Loss of existing housing and estate redevelopment
- Policy SI 12 Flood risk management
- Policy SI 13 Sustainable drainage
- Policy T2 Healthy Streets
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling

- Policy T6 Car parking
- Policy T6.1 Residential parking
- Policy T7 Deliveries, servicing and construction

MAYORAL CIL IMPLICATIONS

Contributions would be required under CIL regulations.

The proposals would result in the formation of one new dwelling with a total of approximately 72.78 sqm of floor area, which is rounded up to 73 sqm. This would translate to a contribution of:

- MCIL (£25 per sqm) - £1,825
- HCIL (£125 per sqm) - £9,125

Each contribution would be subject to indexation.

STAFF COMMENTS

In accordance with the LPA's current criteria for site visits, an in-person site visit was not undertaken during the application process because one was not considered to be necessary.

The site and location plans do not accurately reflect the application site because in addition to the outbuilding shown on those plans, site photographs and Google 3D images show that there is a further outbuilding along the southern boundary of the application site, storage containers and a caravan within the site too.

In determining this application, site photographs provided during the application process, aerial images, Google 3D views and the submitted drawings were used to examine the proposal, the site and its constraints.

This application is a resubmission of a previously refused planning application P0119.25. The key issue in this case therefore is whether the revised proposal overcomes the previously stated concerns. The previous application was refused planning permission for the following reasons:

1. The site is within the Metropolitan Green Belt and the proposed development would not align fully with any of the exceptions set out in Section 13 of the NPPF and would therefore be inappropriate development. It would also result in a significant increase in the bulk, scale, massing and footprint compared to the existing outbuilding within the site, which would have a profound and material impact on the character and openness of the Green Belt. In the absence of any Very Special Circumstances which would outweigh the harm of inappropriateness and harm to openness, the proposed development is inappropriate development and unacceptable in principle contrary to the objectives of the NPPF and Policy G2 of the London Plan.

2. The proposed development, by reason of its inadequate internal floor to ceiling heights, would give rise to a poor quality development and substandard living conditions to the detriment of the amenity of the future occupiers, contrary to the provisions of Policy D6 of the London Plan and

Policy 7 of the Local Plan. There would also be conflict with paragraph 135(f) of the NPPF which requires developments to create places that have a high standard of amenity for future users.

3. Insufficient information has been submitted as part of the application for the ecological impacts of the proposed dwellings to be adequately assessed, contrary to Policies 10 and 30 of the Havering Local Plan and Policy G7 of the London Plan.

P0119.25 was the subject of an appeal which was dismissed by The Planning Inspectorate. The Inspector concluded that;

1. Regardless of whether the site is previously developed land, the proposal would substantially harm the openness of the Green Belt and would not fall within the exception in paragraph 154(g) of the Framework.

2. Due to the insufficient floor to ceiling heights, the proposed development would fail to provide the size of accommodation required by the LP and HLP and therefore that the proposed scheme would provide unacceptable living conditions for future occupants with particular regard to internal space.

3. It had not been demonstrated that the proposed development would not harm protected bats.

This application differs from the previously refused scheme in the following key areas:

1. Whereas the scheme proposed under P0119.25 was a 4B8P chalet bungalow measuring approximately 11m wide, 12.8m deep and 7.8m high with a gabled roof with a small two storey front projection, 2 x pitched roof front dormers and 1 x rear dormer with a catslide roof, the scheme proposed under this application is a 2B4P bungalow measuring about 9.2m wide and 10m deep at its maximum points, 5.26m high with a hipped roof. A preliminary ecological appraisal was also submitted as part of this application.

PRINCIPLE OF DEVELOPMENT

The National Planning Policy Framework 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 provision of additional accommodation is consistent with the NPPF and the objectives of the Havering Local Plan 2016-2031 which at Policy 3 is supportive of housing provision in sustainable locations. In addition the London Plan 2021 notes the pressing need for housing and the general requirement to improve housing choice, affordability and quality at Policy H1 whilst also acknowledging that development should optimise housing output subject to local context and character at Policy D1.

Housing Delivery Test results, found that the Council has seen a shortfall in the level of housing delivery compared to the housing requirement over the measured three years. Furthermore Havering cannot currently demonstrate a five year supply of deliverable housing sites, accordingly the tilted balance set out in Paragraph 11(d) of the NPPF as if the presumption in favour of sustainable development outlined in paragraph 11(d) of the National Planning Policy Framework (NPPF) has been engaged. Paragraph 11(d)(ii) requires an assessment of the proposal against the policies in the Framework taken as a whole or where the application of policies in the Framework

that protect areas or assets of particular importance provide a clear reason for refusing the development.

The proposal would trigger Policy 4 of the Local Plan due the site area (over 1000sqm) but given that the scheme only comprises of only one dwelling and not possible to split that into 35%, policy not considered relevant in this instance.

The main constraint is the siting of the proposals within the Metropolitan Green Belt.

GREEN BELT IMPLICATIONS

The application site lies within the Metropolitan Green Belt.

The Government attaches great importance to Green Belt land. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Paragraph 154 of the Framework states that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt.

A number of exceptions are given at Paragraph 154 but the LPA consider that the only potentially relevant section to the proposed development is Paragraph 154(g), which allows for limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.

However, the site is not regarded as representing infill development whilst in relation to Previously Developed Land (PDL), this is defined by the NPPF as "land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape."

The supporting statement states that "It is clear that the site comprises previously developed land and therefore paragraph 154(g) of the Framework applies". However, given site photographs submitted of the outbuilding show it is used for the storage of an agricultural vehicle, for the purposes of assessment, it is considered that the building to be demolished and the part of the site proposed to be developed cannot be regarded as PDL.

The supporting statement also argues that "The demolition of the existing 86m² outbuilding and the

replacement with a dwelling of equal impact would make use of a previously developed site. Any increase in volume across the frontage of the site would be offset by the reduction in built form across the depth of the site. The proposed scheme would follow the pattern of other development in the Green Belt and would therefore, in spatial terms, not cause substantial harm to the openness of the Green Belt". The LPA disagrees with this assessment however.

It is evidently clear that the proposal would result in a significant increase in the bulk, scale, massing and footprint compared to the relatively modest pitched roof tractor store that is currently in-situ. The existing store measures approximately 9m wide by 9.5m deep, approximately 2.9m high to the eaves rising to 3.7m at its maximum point. The proposed dwellinghouse would be deeper (10m) and wider (9.2m) and although would have a lower eaves height (2.4m) would be significantly higher at its maximum point (5.26m). The LPA consider this would have a substantial harmful impact on the openness of the Green Belt than the existing outbuilding. As such the proposals are inappropriate development.

Notwithstanding this, in the appeal of P0119.25, the Inspector was of the view that "The proposed house would be some distance from Bramble Lane. Although there are trees alongside the lane, the new building would be visible from the road through gaps in the vegetation, particularly in autumn and winter months when many trees are not in leaf. In addition, it would be evident from neighbouring land. As such, the proposal would also harm visual openness."

"The effect on openness is not only related to the size of the proposal but also its purpose and the intensity of its use. The introduction of a dwelling on the site would result in the creation of a garden and domestic paraphernalia. Further, the proposal would result in more people accessing the site and using the hardstanding for the manoeuvring, turning and parking of vehicles. Such features and activities would also unacceptably affect spatial and visual openness."

"Therefore, regardless of whether the site is previously developed land, the proposal would substantially harm the openness of the Green Belt and would not fall within the exception in paragraph 154(g) of the Framework."

Given these comments by the Inspector, officers are also of the view that the introduction of domestic paraphernalia and enclosure associated with the proposal would diminish the open character of the Green Belt. Even if the applicant were to use low level hedging/fencing this would not address the wider issue of encroaching into more open and undeveloped northern area of the site. Relevant classes of permitted development could be withdrawn in the event of approval to enable the LPA to control future development at the site however garden paraphernalia such as washing lines, outdoor garden furniture and children's play equipment resulting from normal domestic requirements of a family sized dwelling would likely still result from the occupation of the dwellings. Accordingly such a condition would likely not meet the tests of the Framework on the grounds of reasonableness. Furthermore, the proposal is for a 2B4P unit, something which would result in more people accessing the site and using the hardstanding for the manoeuvring, turning and parking of vehicles which would also unacceptably affect spatial and visual openness.

As the proposals are inappropriate development, failing to meet any of the exceptions in Paragraph 154, then it is necessary to assess the proposals against the criteria of Paragraph 155 of the NPPF. This paragraph states that the development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:

- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan
- b. There is a demonstrable unmet need for the type of development proposed
- c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework and,
- d. Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 below.

Whilst the proposed development is considered to comply with parts (a) and (b) of paragraph 155, in relation to part (c), the development would not be in a sustainable location due to the low PTAL rating (0) of the site and accordingly high reliance on personal transport.

As for Paragraph 155(d) and consideration of the 'Golden Rules' requirements set out at Paragraphs 156 and 157, the definition of major development given by the Framework in this case would be a site area of 0.5 ha or more, which the application site does not meet. The 'Golden Rules' set out at Paragraph 156/157 of the Framework therefore do not need to be applied.

In view of the above, it is for the applicant to show why permission should be granted. The NPPF advises that very special circumstances to justify inappropriate development will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations (Paragraph 153).

No very special circumstances have been provided to support the proposal. Therefore, in the absence of any very special circumstances to justify the proposed development, as the proposal would not meet any of the exceptions set out in paragraph 154 and as it would result in a significant increase to the bulk, scale and massing of the existing outbuilding in-situ at the site, the proposed dwelling is considered to be harmful to the character and openness of the Green Belt and therefore is inappropriate. The first refusal reason of P0119.25 has therefore not been overcome by the revised scheme.

DENSITY/SITE LAYOUT

Having applied the standards set out in Policy D6 of the London Plan to the proposals, the proposed dwelling would meet the required Gross Internal Area for a 2 storey 2B4P unit as well as with regards to bedroom sizes and storage. The proposed dwelling would be dual aspect and therefore, it is considered it would receive sufficient light and outlook. The overall extent of amenity area proposed for the new dwelling is also judged to be sufficient for the occupants of a 2B4P unit.

However, the floor-to-ceiling heights of the proposed dwelling (2.4m on both the ground and first floor) would not meet the minimum standard of 2.5m for at least 75% of the GIA of the dwelling.

As part of the appeal of the previous application, the Inspector supported the Council's view that the refused scheme would offer poor quality of accommodation for future residents stating that "The proposed dwelling would have standard 2.4m floor to ceiling heights for rooms on the ground and first floor, below the predominantly 2.5m room heights required by Policy D6. Therefore, whilst the

proposed dwelling would provide the required gross internal floor areas, due to the insufficient floor to ceiling heights it would fail to provide the size of accommodation required by the LP and HLP. Consequently, I conclude that the proposed scheme would provide unacceptable living conditions for future occupants, with particular regard to internal space. This would be contrary to Policy D6 of the LP and Policy 7 of the HLP where they seek a high quality living environment for residents of new developments, including minimum floor to ceiling heights."

Overall, therefore, it is considered that due to the floor-to-ceiling heights of the proposed dwelling, the scheme would result in a low quality design at the detriment of future occupants which would not provide quality living accommodation, contrary to planning policy and guidance. The second refusal reason of P0119.25 has therefore not been overcome by the revised scheme.

DESIGN/IMPACT ON STREET/GARDEN SCENE

Consideration has been given to the design of the proposed dwelling and its impacts of the character and appearance of the surrounding area.

The proposed dwelling would be an I-shaped bungalow measuring approximately 5.26m high and 9.2m wide and 10m deep at its maximum points with a hipped roof.

Notwithstanding the impact of the development on the Green Belt through openness, the design concept and massing of the dwelling in isolation of the in principle issues identified are not objectionable in the opinion of officers.

Officers are of the view that the design approach of the scheme would not result in the proposed dwelling being harmful to the character and appearance of the surrounding area.

IMPACT ON AMENITY

Consideration has been given to the impacts of the proposal on neighbouring amenity, particularly in terms of loss of light, outlook, sense of enclosure and loss of privacy.

The main impacts of the proposed development would be concentrated on the two storey dwelling to the north of the application site.

It is considered this property would be sufficiently separated from the proposed development such that the proposals would not harm the amenity of its occupants.

All other neighbouring occupants are deemed to be sufficiently separated from the proposals such that it would not harm their amenity.

HIGHWAY/PARKING

The Public Transport Accessibility Levels (PTAL) rating for the site is 0 which translates to the worst access to public transport. Policy 24 of the Local Plan indicates that 2 bedroom units situated within an outer London area with a PTAL of 0-1 should benefit from a minimum of 1 space per unit.

The submitted drawings show that two parking spaces are proposed within the site, which would comply with the policy.

REFUSE/RECYCLING

The submitted drawings do not show any refuse/recycling facilities within the curtilage of the proposed dwelling.

According to the agent, refuse truck drives up the entrance road to collect the bins for the house adjacent to the application site.

It is considered there would be sufficient space for refuse facilities within the site and this could be conditioned in the event of an approval.

CYCLE STORAGE

Although the submitted drawings do not show any cycle storage facilities within the site, it is considered there would be sufficient space for these facilities within the site and this could be conditioned in the event of an approval.

OTHER ISSUES

Biodiversity Net Gain (BNG)

The application form indicates that the proposed development would be self-build and for this reason would be exempt from BNG requirements.

A completed biodiversity metric calculation, showing the biodiversity value of the on-site habitat, was not submitted with this application.

The application form indicates that the buildings meet the definition of self-build or custom housebuilding as set out in section 1(A1) of the Self-build and Custom Housebuilding Act 2015.

The BNG statement submitted with the application indicates that on-site assessments and desk-based surveys were undertaken the results of which determined that there is no evidence of species listed in Schedule 2 of the Conservation of Habitats and Species Regulations 2017 at the site and therefore there are no reasonable grounds to believe that such species would be impacted by the development.

In order to qualify as self-build and custom housebuilding, for the purposes of the relevant BNG legislation, the development would need to comply with the definition contained in Section 1(A1) of the Self-Build and Custom Housebuilding Act 2015. This makes it clear that the new dwelling must be occupied by the person or persons responsible for carrying out or commissioning the building.

Furthermore, the national Planning Practice Guidance (the PPG) published by the Ministry of Housing, Communities and Local Government states that "In considering whether a home is a self-build or custom build home, relevant authorities must be satisfied that the initial owner of the home

will have primary input into its final design and layout ... Off-plan housing, homes purchased at the plan stage prior to construction and without input into the design and layout from the buyer, are not considered to meet the definition of self-build and custom housing."

Staff have taken into consideration the appeal of the planning application for 12 Ingrebourne Road, Rainham (application reference: P0915.24), where the Inspector was not satisfied that it had been demonstrated that the proposed scheme would be, or could be secured as, a self-build development and therefore could not benefit from the relevant exemption from the legal requirements relating to BNG. In that particular case, they commented that "... there is no indication as to who would be the occupier of the new dwelling, nor indeed whether their identity is yet known. There is also no indication that the occupier would be a person who has had a primary input to the design and layout. There is therefore no clear evidence that the development would be capable of meeting the definition of self-or custom-build housing."

Similarly, whilst the application form indicates the building would meet the definition of self-build or custom housebuilding, there is no supporting information to demonstrate how the proposed scheme would or could be secured as a self-build development. For example, there is no indication as to who would be the occupier of the new dwelling or whether the occupier would be a person who has had a primary input to the design and layout.

Therefore, it is considered that no clear evidence has been provided that the development would be capable of meeting the definition a self-build development and consequently how the development benefits from the relevant exemption from the legal requirements relating to BNG.

Ecology

A Preliminary Ecological Assessment was submitted as part of the application. This was reviewed by the ecology officer and they were satisfied that there was sufficient ecological information available to support determination of this application

The assessment concludes that the site is considered to be of low nature conservation value at a county or district level. It also states that the urban area of the site could provide a very limited habitat for breeding birds, as well as supporting a very limited habitat for invertebrates and that the proposal will encroach or disturb areas with very low biodiversity and as such will have a minimal impact.

The ecologist had no ecological objection subject to conditions and therefore it is not considered that the proposed development would harm ecology and wildlife within the site. The third refusal reason of P0119.25 is therefore deemed to have been overcome.

KEY ISSUES/CONCLUSIONS

On the 12th December 2024, the Government published the Housing Delivery Test result for 2023. The Housing Delivery Test Result for Havering for 2023 is 61%. In accordance with the NPPF the "Presumption" due to housing delivery therefore applies.

In terms of housing supply, based on the latest 2024 Housing Trajectory, Havering is able to demonstrate 3.4 years supply of deliverable housing sites. The Havering Local Plan was found

sound and adopted in 2021 in the absence of a five year land supply. The Inspector's report concluded:

"85. Ordinarily, the demonstration of a 5-year supply of deliverable housing land is a prerequisite of a sound plan in terms of the need to deliver a wide choice of homes. However, in the circumstances of this Plan, where the housing requirement has increased at a late stage in the examination, I ultimately conclude that the Plan, as proposed to be modified, is sound in this regard subject to an immediate review.

86. This is a pragmatic approach which is consistent with the findings of the Dacorum judgement. It aims to ensure that an adopted plan is put in place in the interim period before the update is adopted and the 5-year housing land supply situation is established."

The Council is committed to an update of the Local Plan and this is set out in the Council's Local Development Scheme. Therefore, in the meantime whilst the position with regard to housing supply is uncertain, the "Presumption" due to housing supply is applied.

The Presumption refers to the tilted balance set out in Paragraph 11(d) of the NPPF as if the presumption in favour of sustainable development outlined in paragraph 11(d) of the National Planning Policy Framework (NPPF) has been 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 strong 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. Fundamentally this means that planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole.

The proposed development would offer a modest contribution to housing supply and delivery and this would weigh in favour of the development.

However paragraph 153 requires consideration of the impacts of developments on the Green Belt and the Framework fundamentally at Section 13 seeks to oppose inappropriate development and preserve the Green Belt. Furthermore, paragraph 135(f) requires developments to create places that have a high standard of amenity for future users.

For the reasons outlined within the officers report the proposed development is unacceptable in regard to its resultant impacts on the Green Belt and would be inappropriate in principle. Furthermore, the quality of accommodation that would be provided for future occupants of the new dwelling is deemed unacceptable - All key aspects of sustainable development.

There is also a lack of information with the submission about how the proposals would be capable of meeting the definition of self-build and therefore how the development benefits from the relevant exemption from mandatory BNG requirements.

It is for the reasons given above that the Council maintains that the grounds for the refusal of the scheme are sufficiently strong and therefore that the adverse impacts of the scheme would

significantly and demonstrably outweigh its benefits.

Therefore, the proposal does not benefit from the presumption in favour of sustainable development set out in paragraph 11(d) of the NPPF.

The proposed development is therefore considered unacceptable and a REFUSAL is recommended.

RECOMMENDATION:

It is recommended that **planning permission be REFUSED** for the following reason(s)

1 Refusal non standard

The site is within the Metropolitan Green Belt and the proposed development would not align fully with any of the exceptions set out in Section 13 of the NPPF and would therefore be inappropriate development. It would also result in a significant increase in the bulk, scale and massing compared to the existing outbuilding within the site, which would have a profound and material impact on the character and openness of the Green Belt. In the absence of any Very Special Circumstances which would outweigh the harm of inappropriateness and harm to openness, the proposed development is inappropriate development and unacceptable in principle contrary to the objectives of the NPPF and Policy G2 of the London Plan.

2 Refusal non standard

The proposed development, by reason of its inadequate internal floor to ceiling heights, would give rise to a poor quality development and substandard living conditions to the detriment of the amenity of the future occupiers, contrary to the provisions of Policy D6 of the London Plan and Policy 7 of the Local Plan. There would also be conflict with paragraph 135(f) of the NPPF which requires developments to create places that have a high standard of amenity for future users.

3 Refusal non standard

Insufficient information has been provided to demonstrate that the proposed development would be capable of meeting the definition of a self-build development and consequently that the proposal would benefit from the relevant exemption from mandatory BNG requirements, contrary to Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act 1990.

INFORMATIVES

1 Refusal and CIL (enter amount)

The proposal, if granted planning permission on appeal, would be liable for the Mayor of London and Havering Community Infrastructure Levy (CIL). Based upon the information supplied with the application, the proposals would be liable for the following CIL contributions:

Mayoral CIL (MCIL2) contribution of £1,825 (x £25 per sqm).

Havering CIL (HCIL) contribution of £9,125 (x £125 per sqm).

Each contribution would be subject to indexation.

Further details with regard to CIL are available from the Council's website.

2 Refusal - No negotiation

Statement Required by Article 35 (2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015: Consideration was given to seeking amendments, but given conflict with adopted planning policy, notification of intended refusal and the reason for it was given to the agent in writing 28/11/2025.

Authorising Officer:

A handwritten signature in black ink, appearing to read 'Neil Goate', written in a cursive style.

Neil Goate

28th November 2025