

PLANNING STATEMENT

**ELM HOUSE
SOUTHEND ARTERIAL ROAD
HORNCHURCH
ESSEX
RM11 3UB**

Date of Statement: November 2025
Job Ref: 6378/DB



INTRODUCTION

This Planning Statement supports a full planning application for the **demolition of the existing building and construction of a new office building and storage building with associated storage yard, new car parking forecourt, and landscaping at Elm House, Southend Arterial Road, Hornchurch.**

The statement describes the site, the proposal, planning history, relevant policy, and demonstrates how the scheme responds positively to previous concerns, particularly regarding the Green Belt.

SITE & CONTEXT

The application site is a commercial property featuring a single-storey detached office building located along its western boundary, with a small enclosed yard in the south-west corner secured by a 2-metre high fence and gate. The remainder of the site comprises a surfaced car park. Access is gained directly from the westbound A127 Southend Arterial Road, and the site benefits from a layby running along its frontage. The office building was formerly a restaurant but was granted retrospective planning permission for a change of use on appeal in 2008.

To the west, the site adjoins Knoll Cottage, a detached bungalow separated by mature, dense trees, and a vehicle storage yard used for parking and storing catering lorries. To the east lies a large car sales and repair site adjacent to a former petrol filling station, now used for the sale and storage of timber buildings and sheds. To the south, open fields stretch out with scattered residential properties beyond. A public footpath runs along the eastern boundary of the site.

Elm House is currently occupied by a building contractor and includes surfaced parking for cars and small commercial vehicles. The entire site is situated within the Metropolitan Green Belt, is not listed, and falls outside any designated conservation area.



PROPOSED USE & OPERATION

The proposal seeks to:

- Demolish the existing Elm House building;
- Construct a new office building and a storage building on the same footprint and position as the existing building;
- Provide a new storage yard, car parking forecourt, and comprehensive landscaping.

Key design details:

- The new building footprint is identical to the existing Elm House;
- The building height will increase from 4.6m to 6.8m to accommodate a first floor, largely contained within the roof space to maintain a low-profile;
- The roof will be pitched and tiled, consistent with the existing style, and include two dormer windows on the front elevation and Velux windows elsewhere;
- External finishes will be brickwork to harmonise with local character;
- The building has been custom-designed to meet the operational needs of the current building contractor occupant;
- Existing dense tree planting along the western boundary, which screens the site from Knoll Cottage, will be retained and reinforced;
- The development will have no adverse impact on the amenity of Knoll Cottage or other neighbouring properties.

PLANNING HISTORY

A previous application (P1241.21) for demolition and redevelopment was refused due to:

- The site's Metropolitan Green Belt designation;
- The scheme failing to demonstrate very special circumstances or meet the exceptions set out in paragraph 149 of the NPPF;
- Concerns that the scale, height, and position of the proposed building were excessive and harmful to the openness of the Green Belt;
- The proposed building being materially larger, more prominent, and thus a disproportionate addition compared to the existing structure.

The officers considered the proposal to cause substantial harm to the Green Belt openness, contrary to London Plan Policy G2 and NPPF paragraphs 137-151.

RESPONSE TO PREVIOUS REFUSAL

The current proposal has been significantly revised to address all previous concerns:

- The **building footprint and position remain unchanged**, preventing any further encroachment or increased site coverage;
- The **height increase is limited to just over 2m**, primarily due to a first floor within the roof space, retaining the building's low-profile character;
- The **design and materials** are sympathetic to the local vernacular, minimising visual impact;
- The **dense western boundary trees** will be retained and supplemented to provide screening to neighbouring properties;
- The proposal will have **no material impact on neighbouring amenity**;
- Landscaping throughout the site has been enhanced to improve biodiversity and visual integration.

These measures ensure the scheme is **not materially larger or more prominent** than the existing building and mitigates any potential harm to the Green Belt's openness.

PLANNING POLICY CONTEXT

The proposal has been assessed against relevant policy including:

- **London Plan Policy G2**, which protects the Green Belt from inappropriate development;
- The **NPPF (Chapter 13)**, which presumes new buildings inappropriate except for specific exceptions under paragraph 149;
- Havering's **Local Plan policies** supporting economic development, design quality, and Green Belt protection.

PLANNING CONSIDERATION

Principle of Development

Elm House is an established B1 business site that obtained retrospective planning consent on appeal in March 2008 for a change of use from an A3 restaurant. The site currently comprises a detached single-storey building, an enclosed yard, and a large surfaced parking area. It is located alongside the Southend Arterial Road (A127) and is accessed via a slip road. Situated just south of the A127, outside the town of Romford, the site lies on a busy dual carriageway.

The site adjoins other commercial uses, including residential properties to the west, and a large car sales and repair site adjacent to a former petrol filling station now used for vehicle sales/repairs to the east. Open fields lie to the south, with scattered residential properties beyond, and a public footpath runs along the eastern boundary. The entire site is within the Metropolitan Green Belt, is not a listed building, and falls outside any conservation area.



The existing building was originally a restaurant but was converted to office use for Elm Site Services. However, the building is no longer fit for purpose given the company's operational needs. Despite this, the site is strategically located with excellent highway links, and Elm Site Services are keen to retain this location as an operational base.

The National Planning Policy Framework (NPPF) emphasises promoting economic growth and supporting existing businesses, stating that *“planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.”*

The London Plan projects that London’s total employment could increase on average by 49,000 jobs each year, reaching 6.9 million jobs by 2041. Havering’s Local Plan supports business growth, with Policy 19 committing to building a strong and prosperous economy in Havering.

Since gaining planning consent in 2008, Elm Site Services has grown significantly, now providing essential rail industry services, employing around 130 operatives, 10 office staff, and numerous subcontractors.

The proposed redevelopment aligns with government priorities for economic development and meets the three pillars of sustainable development:

- **Economic:** It enables Elm Site Services to remain and grow on a strategically located site, supporting local economic growth.
- **Social:** Retention of the established business secures jobs and improves the visual appearance of a key gateway site on Romford’s edge.
- **Environmental:** The development efficiently uses previously developed land in a sustainable location, with the new building designed to meet current regulations on sustainable construction and energy efficiency.

The NPPF supports sustainable development, and the redevelopment of this site to continue business use adheres to this presumption in favour.

Importantly, under paragraph 154(d) of the NPPF, replacement buildings in the Green Belt are permitted if they are in the same use and not materially larger than the building they replace. This proposal involves:

- A replacement building in the same use;
- An identical footprint with a modest height increase designed to respect the existing building’s scale;
- Therefore, it constitutes appropriate development within the Green Belt.

Green Belt

The application site is located within the Metropolitan Green Belt where the construction of new buildings is inappropriate development with the following exceptions, as laid out within the National Planning Policy Framework (amongst others):

- *the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
- *limited infilling in villages; and*
- *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.

The five purposes of the Green Belt are:

- a) to check the unrestricted sprawl of large built-up areas;*
- b) to prevent neighbouring towns merging into one another;*
- c) to assist in safeguarding the countryside from encroachment;*
- d) to preserve the setting and special character of historic towns; and*
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

The application site is an established B1 commercial site containing a building, yard and car park, along with several temporary structures. As such the site falls within the definition of previously developed (brownfield) land defined in Annex 2 of the Framework as “*land which is or was occupied by a permanent structure, including the curtilage of the developed land*”.

The previous proposal to replace the office building was dismissed on appeal solely due to the fact that “*the proposed building would be taller and larger in footprint and volume. There would also be an increase in floor space. Notably, the proposed building would be approximately 74 percent larger in volume, which would be a considerable change. In all respects, the proposed building would clearly be materially larger than the existing one. Therefore, the scheme does not fall within the paragraph 149(d) exception*”.

The Inspector also noted that “[the new building] *would extend across most of the width of the plot and be readily visible due to its size, especially from in front of the site. Further, the building would project much closer to and be more prominent from the footpath. Moreover, it would restrict views through the site from the A127 and the footpath to the trees and vegetation within the open green space. Similarly, it would also restrict views from the open green space to the verdant landscape beyond the A127*”.

Although the Planning Inspector gave significant weight to various circumstances (dealt with below), these did not clearly outweigh the harm that would have resulted from the previously proposed increase in scale of the building.

In order to address and overcome these concerns, a number of changes have been proposed.

The building footprint and position now remain unchanged, preventing any further encroachment or increased site coverage as a result of the proposal. The increase to enable expansion is now wholly limited to a height increase of 2m to enable the provision of a first floor within the roof space. This would afford the opportunity for the business to expand whilst retaining the building’s low-profile character, which accords with the National Planning Policy Frameworks support of using the airspace above existing premises to make more efficient use of land.

The proposed scheme would result in a limited increase in volume. It would be in the **same location as the existing building** and therefore will not extend any further across the width of the site, **would not be any closer to the footpath**, and would result in **no further restriction of views through the site**.

With regards to harm to the Green Belt, the Court Judgment *Turner v SSCLG (2015)* highlights that “*‘Openness’ is not defined in the NPPF. The inspector, at paragraph 11, described it as ‘essentially freedom from operational development’.* I agree with the Claimant that the

meaning of openness is freedom from any development, not just operational development... It is apparent from paragraph 79 of the NPPF that openness is an 'essential characteristic' of the Green Belt which the policy protects". This judgment goes on to state:

14. *The concept of "openness of the Green Belt" is not narrowly limited to the volumetric approach suggested by Mr Rudd. The word "openness" is open-textured and a number of factors are capable of being relevant when it comes to applying it to the particular facts of a specific case. Prominent among these will be factors relevant to how built up the Green Belt is now and how built up it would be if redevelopment occurs (in the context of which, volumetric matters may be a material concern, but are by no means the only one) and factors relevant to the visual impact on the aspect of openness which the Green Belt presents.*
15. *The question of visual impact is implicitly part of the concept of "openness of the Green Belt" as a matter of the natural meaning of the language used in para. 89 of the NPPF. I consider that this interpretation is also reinforced by the general guidance in paras. 79-81 of the NPPF, which introduce section 9 on the protection of Green Belt Land. There is an important visual dimension to checking "the unrestricted sprawl of large built-up areas" and the merging of neighbouring towns, as indeed the name "Green Belt" itself implies. Greenness is a visual quality: part of the idea of the Green Belt is that the eye and the spirit should be relieved from the prospect of unrelenting urban sprawl. Openness of aspect is a characteristic quality of the countryside, and "safeguarding the countryside from encroachment" includes preservation of that quality of openness. The preservation of "the setting ... of historic towns" obviously refers in a material way to their visual setting, for instance when seen from a distance across open fields. Again, the reference in para. 81 to planning positively "to retain and enhance landscapes, visual amenity and biodiversity" in the Green Belt makes it clear that the visual dimension of the Green Belt is an important part of the point of designating land as Green Belt.*
16. *The visual dimension of the openness of the Green Belt does not exhaust all relevant planning factors relating to visual impact when a proposal for development in the Green Belt comes up for consideration. For example, there may be harm to visual amenity for neighbouring properties arising from the proposed development which needs to be taken into account as well. But it does not follow from the fact that there may be other harms with a visual dimension apart from harm to the openness of the Green Belt that the concept of openness of the Green Belt has no visual dimension itself.*

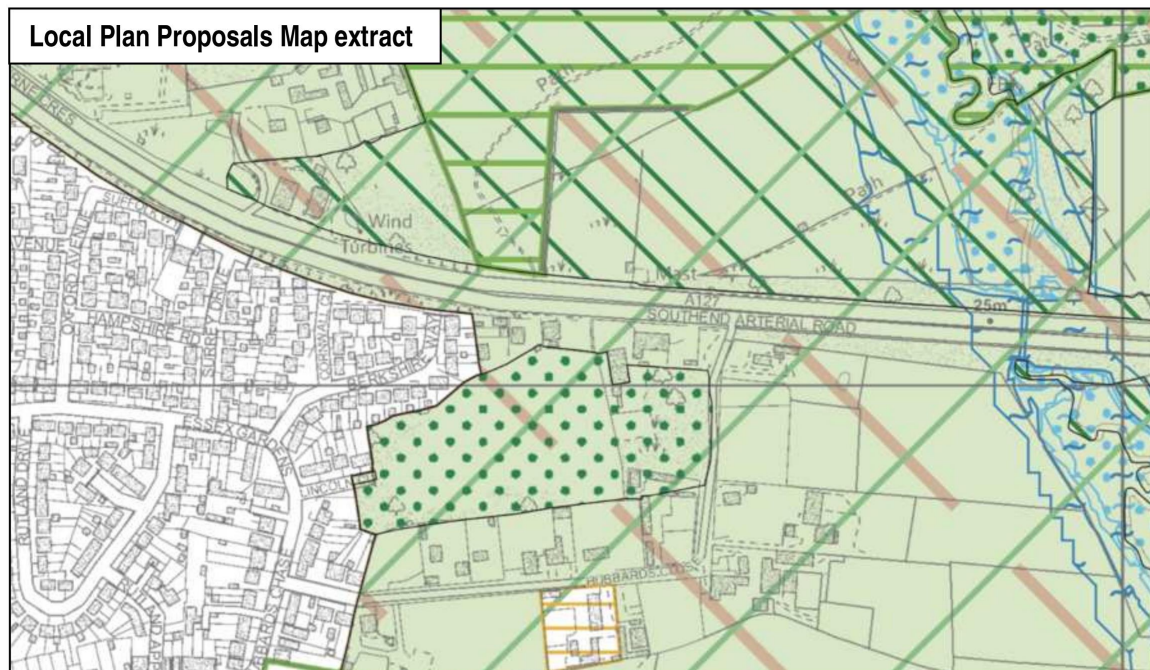
The above Court of Appeal decision clearly shows that there are a number of factors capable of being relevant when it comes to considering openness of the Green Belt, including how built up the Green Belt is at present and the views of the proposed works.

The below aerial photograph shows the site and immediate surrounding area. As can be seen the immediate neighbouring properties to the east is the former Moorings Garage site that contains a vacant petrol garage canopy and is now used for the storage and sale of timber sheds/buildings. Planning consent was granted on appeal dated 7th October 2016 (APP/B5480/W/16/3148191) for the continued use for the display and sale of timber buildings on this site.

To the immediate west of the site are residential properties, and the start of the urban area of Romford, which is outside of the designated Green Belt.

To the rear of the site is a recently permitted butchery known as Giggly Pig. Whilst used in connection with the wider piggery, the Officer report for this neighbouring scheme stated:

With regards to the modular unit [the butchery], similarly this would form a consideration through Para 149(a), in so far as that its purpose is ancillary to the main planning function of the site. Additionally, the Framework encourages decision makers to support a prosperous rural economy and requires authorities to ensure that decisions enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings.



Adjacent car sales/repair site



Adjacent car sales/repair site



Within the appeal decision letter regarding the Moorings Garage site (APP/B5480/W/16/3148191) the Planning Inspector stated:

10. *The appeal site is almost entirely hard surfaced and the canopy of the former petrol filling station remains in a central location within the site together with two single storey structures, a former sales kiosk and a small storage building located towards the southern side of the site. The surrounding landscape is predominately characterised by open fields screened by existing trees. There is no screening to the front of the site which is bounded by a brick wall and a pedestrian footway.*
11. *The 6 display sheds shown to be situated under the canopy would be visually contained within the existing structure and would not, therefore, affect the openness of the Green Belt. However, the 6 display sheds which are shown to be partially under the canopy and the 4 shown to be entirely outside of the canopy would result in structures where there were none when the site was in its former use as a petrol filling station. The additional structures by virtue of their physical mass and bulk would inevitably affect the openness of the Green Belt.*
12. *However, the majority of the display sheds would be either wholly or partially underneath the canopy and the remainder would be within the wider curtilage of the site which is well screened on the south and west boundaries. Consequently, I consider that the development would lead to only a limited loss of Green Belt openness. Furthermore, the loss of openness would be temporary and thus the essential characteristics of the openness and permanence of the Green Belt would not be compromised in the long term.*

As can be seen within the below photograph, the stationing of the sheds within this nearby site has a significantly level of visual impact on the openness and appearance of the Green Belt. Nonetheless the Planning Inspector concluded that “*the development would lead to only a limited loss of Green Belt openness*”. The current use of the site for vehicles sales and repairs is even more visually harmful and detrimental to openness.





Whilst the new building would be higher than that which it would replace, it is not considered that this would result in any additional harm to the character or appearance of the Green Belt in this commercial location on the outskirts of Romford.

This revised scheme would clearly not be materially larger, nor would it result in substantial harm to the openness of the Green Belt. Therefore, the proposal would meet an exception to inappropriate development within the Green Belt.

Although it is not considered that the proposal would constitute inappropriate development in the Green Belt, there are several other benefits of this scheme that weigh in favour of the development. These include the following:

- The proposal would secure the continued business use of this site, which would adhere to the Governments requirement to support sustainable economic growth (see below);
- The extension of the building would increase the employment base as it would not only retain existing employment but would also secure additional jobs on this site;
- The development would incorporate sustainable build techniques and renewable energy and would meet with the presumption in favour of sustainable development as laid out within the National Planning Policy Framework;
- The development would make more efficient use of Previously Developed Land; and
- The proposal would enhance the visual characteristics of the site, which would benefit the overall appearance and character of the area.

Due to the above list, and the matters that follow, it is considered that the development would provide additional benefits to the area that would clearly outweigh any possible identified harm from the slightly enlarged building on site.

Economic Benefits

The application site is occupied by Elm Site Services which is an established company that provides a range of building and civil engineering services on rail, commercial, industrial and domestic projects. The company has over 40 years of expertise in construction and specialist services and employs some 90 highly trained operatives, 15 office staff and a number of additional subcontractors (depending on contracts). The business also offers work experience opportunities to assist in young people obtaining a career within the industry. The company is supported by 30 fleet vehicles and is operated from the site.

Elm Site Services is an expanding company that has increased in scale, operation and staff numbers since the original consent for the use of this site as their main office was granted by the Planning Inspectorate in 2008.

The company has been awarded numerous contracts over the years for nationalised companies including Barclays Bank, Balfour Beatty, Metronet Alliance, Mansell Construction and London 2012, however the key factor in this increase in turnover is due to the increase in rail contracts obtained by Elm Site Services. Along with smaller contracts and frameworks the Company obtained the MTR Crossrail Contract, and the contract for all London Overground works for Arriva.

Local Plan policy 19 states that “*the Council is committed to building a strong and prosperous economy in Havering and will encourage and promote business growth*” and, amongst other measures, this would be achieved by:

- vi. Supporting development proposals that improve the physical appearance, attractiveness and competitiveness of employment areas;*
- vii. Supporting the sustainable growth and expansion of business and enterprise in rural areas.*

As highlighted above, the economic benefits associated with the appeal for the continued use for the display and sale of timber buildings on the nearby Moorings Garage site (APP/B5480/W/16/3148191) was a material consideration since the Inspector concluded that “*the use provides local employment and helps to support a local small business. The use also helps to support the appellant’s supplier. Consequently, the proposal is consistent with paragraph 18 of the Framework which states that the Government is committed securing economic growth in order to create jobs and prosperity. Moreover, there would be consistency with the economic dimension of sustainable development as set out at paragraph 7 of the Framework. I, therefore, attach great weight to the economic benefits of the proposal in my Decision*”.

Within the recent appeal for the application site the Planning Inspector also attributed significant weight to the economic benefits of the proposal, along with the other benefits identified:

- 13. The proposal would enable the continued operation of the business at the site, facilitate its growth and provide additional jobs, including work experience opportunities, in a location with good access to the strategic road network. I note that the Member of Parliament for Romford supports the proposal for these reasons. Moreover, Policy 19 of the Havering Local Plan, the London Plan and the Framework support the growth of local businesses, employment and the economy. The proposal would also make efficient use of previously developed land and the building would be sustainably constructed and energy efficient. Additionally, notwithstanding the harm to the Green Belt, the appearance of the site would be improved, and new landscaping could bring about biodiversity benefits. In addition, I have no reason to disagree with the claim that the existing building is no longer fit for purpose, albeit this does not justify the precise scale or form of the development proposed. Together, these considerations attract significant weight.**

Essential Infrastructure

One of the key roles of Elm Site Services is providing engineering services to the rail industries, from structural repairs to large scale projects. The company works in partnership with MTR Corporation and Arriva providing the best services across the UK railway infrastructure. It is therefore essential that the business remains in close proximity to London to ensure a good level of service is provided to these essential infrastructure companies.

The existing office building is not considered fit for purpose and does not enable the business to grow. This was previously accepted by the Planning Inspectorate, who stated “*I have no reason to disagree with the claim that the existing building is no longer fit for purpose*”. The failure to accommodate such growth may result in the relocation or possible closure of this essential business that may have a detrimental impact on the services available to the rail companies and could result in these services being sought from further afield, which would result in longer travel times and higher costs that would filter down to customer costs. This is against the Governments general aim in promoting sustainable transport options and should be given some weight in favour of the development.

Training

Alongside the significant employment provided by Elm Site Services the company offers work experience opportunities to assist in young people obtaining a career within the industry. This therefore provides significant educational and training benefits to the wider community and should be given some weight in favour of the development.

VSC balance:

Whilst the Planning Inspector did not conclude that the above benefits clearly outweighed the harm that would have resulted from the significantly larger previous scheme, this current proposal is for a far smaller scheme with much less harm to openness, whereas the benefits remain the same.

Therefore, it is considered that the balancing exercise in this latest application is that the ‘*significant weight*’ in favour of approval previously agreed by the Planning Inspector, against the limited harm that would result from the significantly smaller revised scheme, would lead to exceptional circumstances that clearly outweighing any identified harm.

Vehicle Access and Delivery Restrictions

The previous application raised concerns regarding the lack of an appropriate slip road with sufficient length and the high speeds on the adjacent dual carriageway (A127), which could pose hazards when accessing the highway from the site. Due to the absence of swept path analysis and vehicle tracking diagrams demonstrating safe manoeuvrability for larger vehicles, it is considered necessary to impose a planning condition restricting the size of delivery vehicles accessing the site.

The proposed restriction limits delivery vehicles to a maximum length of **8 metres**, as it has not been demonstrated that larger vehicles could safely enter, manoeuvre within, and exit the site without obstruction or safety risks. The current proposal fully acknowledges this and incorporates this condition to ensure highway safety and operational viability.

Flood Risk

The site lies within an area identified by the Environment Agency as being at **very low risk of flooding**. Nonetheless, to ensure that the proposals do not increase surface water runoff or groundwater flooding elsewhere within the Borough, it is proposed that a planning condition be imposed. This will require any new hardstanding to use **permeable (porous) surfacing materials** or alternatively that surface water runoff be effectively managed through soakaways or other sustainable drainage systems in accordance with **Local Plan Policy 32** and **London Plan Policy SI 13**.

Highway & Parking

The application site has a **PTAL rating of 0**, indicating very poor public transport accessibility. According to **London Plan Policy T6.2(c)**, car parking for B8 (storage or distribution) employment uses should reference office standards, which allow up to **1 parking space per 100sqm (GIA)**. Supporting paragraph 10.6.16 of this policy further advises that new office development should be located in areas accessible by public transport, walking, and cycling, with car parking provision kept to a minimum.

The current proposals include provision for **18 parking spaces**, incorporating **2 electric vehicle charging points** located near the front boundary of the site, which are fully supported in line with London Plan aspirations for sustainable transport.

Access remains unchanged from the A127, with improved parking and circulation proposed within the site.

Landscaping

A robust landscaping scheme will reinforce screening and biodiversity, including:

- Retained mature trees to the west;
- New native planting to soften views;
- Sustainable drainage and ecological enhancements.

Impact on Residential Amenity

Given the location of the site, the proposed building would not have any significant impact upon the amenities of the occupiers of the adjoining neighbours.

The **dense western boundary trees** will be retained and supplemented to provide continued screening to neighbouring properties.

Waste and Recycling Management

Given the office use of the building, the generation of waste and recycling materials is expected to be minimal. Refuse and recycling will be managed by regular collections from professional refuse contractors operating on a weekly contract.

To ensure compliance with local standards and accommodate any future operational needs, a planning condition can be imposed if necessary. This could require the submission and approval of details relating to **waste storage capacity and the design of the storage facility** to confirm they are suitable and do not detract from the site's appearance or function.

Cycle Storage

Cycle storage will be provided to the front of the property in a secure and covered enclosure, meeting **London Plan Policy T5 standards**. This encourages sustainable transport use and reduces dependence on private vehicles.

CONCLUSION

The revised proposal for Elm House presents a carefully considered, policy-compliant replacement building that respects the Green Belt's openness and character. It directly addresses the reasons for the previous refusal, demonstrating:

- The building is not materially larger, maintaining the existing footprint and modest height increase contained within the roof;
- The design complements the local context;
- Landscaping enhances screening and biodiversity;
- There is no harm to neighbour amenity.

In light of these factors, and the very special circumstances presented, the proposal would meet the exemptions to inappropriate development in the Green Belt and would not result in substantial harm to openness.

In this, and all other planning aspects, the proposal complies with the NPPF, London Plan Policy G2, and Havering Local Plan policies and therefore should be granted planning permission.