



Appeal Decision

Site visit made on 5 June 2020

by Stephen Wilkinson BA(Hons) BPI DipLA MBA MRTPI

an Inspector appointed by the Secretary of State

Decision date: 23 July 2020

Appeal Ref: APP/B5480/W/19/3243182

Land at Neopost House, South Street, Romford, RM1 2AR

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by GDL (Romford) Ltd against the decision of the Council of the London Borough of Havering.
 - The application Ref P0030.19, dated 7 January 2019, was refused by notice dated 14 June 2019.
 - The development proposed is erection of three blocks ranging from 5 to 8 storeys above deck level to provide 104 residential dwellings (Use Class C3) and erection of 6 residential dwellings (Use Class C3) to form an additional floor on Neopost House together with provision of private communal amenity areas at deck level and roof level of Neopost House, flexible D1 use (Use Class D1), associated car parking, cycle storage and refuse storage facilities and landscaping.
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Decision

1. The appeal is dismissed.

Procedural Matters

2. The Council's decision letter includes several small changes to the description of development which was originally included in the application form. As these were agreed with the applicant in advance of the date of issue I have revised the description and based my decision on this.
3. The appeal has been accompanied by a completed Unilateral Undertaking which includes both financial and non financial obligations. I consider this matter later in this letter.

Main Issues

4. The Council's 15 reasons for refusal are interlinked and I have summarised these into 6 main issues as follows:
 - its effect on the development potential of the adjoining site;
 - its effect on the living conditions of occupants of the appeal scheme by reason of the quality and extent of public and private amenity space, overlooking, legibility of main accesses to blocks B and C, security and boundary treatment, noise and air quality;
 - its effects on daylight and sunlight both within the scheme and on Neopost House;

- the number of single aspect units;
- the proposed mix of housing units, and
- whether the proposals provide adequate infrastructure directly required for this development.

Reasons

Policy Context

5. The development plan includes the Council's Core Strategy and Development Plan Policies (CSDPP) 2008 and the London Plan, Consolidated with Alterations since 2011 (the London Plan) 2016. In its decision the Council has relied on other documents including its emerging local plan, the Havering Local Plan 2016-2031 and the emerging London Plan. I accord the Council's emerging plan only limited weight given that it is unclear the level of objection and whether policies will be adopted in their current form. I accord policy D13 Noise, substantial weight as this is included in the 'intended to publish' draft of the London Plan and is not the subject of Ministerial Direction.
6. The Council's decision also draws upon supplementary planning guidance (SPG) for Residential Design (2010), the Mayor's Informal Play and Recreation SPG (2010) and Housing SPG (2016). I accord each of these moderate weight because they read as companion documents to the CSDPP and London Plan respectively.
7. For applications involving the provision of housing, the National Planning Policy Framework 2019 (the Framework), advises that where the results of the Housing Delivery Test (HDT), (a measure of housing delivery performance), have been substantially below requirements for the last 3 years there is a presumption in favour of sustainable development. The Council has identified that in 2018 its low HDT score was as a result of under reporting due to delays in receiving housing 'completions' information and should have been 73%. Based on the evidence before me I am satisfied that the Council has not under delivered housing supply below the HDT required by the Framework.
8. The Council's Housing Position Statement (HPS) demonstrates that by using both the Sedgfield and Liverpool methods of measuring delivery, a 5 year housing land supply (5YHLS) is available. I accept the Council's position that due to the London Plan's adoption within the last 5 years, its strategic housing allocation for the Borough should be used. This is in line with Planning Practice Guidance (PPG). Although the appellant questions the 5YHLS figures they have not provided any substantive evidence to support their view. On this basis, from the evidence before me, I am satisfied that the Council has demonstrated that it currently has a Framework compliant housing land supply. Accordingly, the 'tilted balance' is not engaged.

Design

9. The site is located about 1km from Romford town centre. Although there are several high-rise blocks around the centre, the site lies in an area which transitions to low rise development. The recently completed Vickers House residential development which has an outstanding second phase and the YMCA are outliers of large-scale development in the locality. Immediately to the east of the appeal site lies a B&Q retail store.

10. There are shortcomings in the scheme's detailed design and layout which are derived from the amount of development proposed on the site. In part, this is caused by the inclusion within the appeal site of parking spaces required for Neopost House which is currently being converted into 109 flats pursuant to a permission granted for office conversion through Prior Approval. When the number of units are included from this conversion with the appeal scheme, the combined effect on density is 320 units per hectare.
11. The site has a PTAL¹ rating of 3. Put succinctly London Plan policies allow for a greater amount of development with a commensurate reduction in the parking requirement for areas with a higher PTAL rating. The scheme's parking ratio of 0.52 has been applied to the whole site. This is not an excessive ratio, broadly in line with the adopted and emerging London Plan. The scheme includes the provision of 117 parking spaces designed to accommodate the requirements of the flats in Neopost House as well as the 110 flats included in the appeal scheme. When considered against the adopted London Plan's density matrix and taking into account the whole scheme the proposals would have an excessive density given its PTAL rating. Whilst the adopted London Plan suggests that density matrices provide only guidance and are not an 'absolute rule' informing decisions on development, when considered against the emerging Plan's 'design led approach', the scheme includes shortcomings which are a result of the site's overdevelopment and design.
12. In particular, the proximity of blocks B and C to the site's eastern boundary facing the B&Q store is indicative of a poor layout. This results in space being 'borrowed' which potentially sterilises the development potential of this neighbouring site. This problem is compounded by the location of balconies which extend to the site boundary. I recognise that in the absence of firm proposals, discussion on future development of a neighbouring site can be speculative. Despite its size, it is appropriate to ensure options are open for the beneficial use of this site to ensure future development and regeneration. Whilst the appellant cites several decisions of my Inspector colleagues where it would appear that similar concerns have been dismissed, I do not know the context of each of these appeals. However, in this case, the relationship of the proposed blocks to the site's eastern boundary would be unacceptable and furthermore, would affect the living conditions of its occupants, which I address in turn as part of the other main issues.
13. It is unclear how the proposed scheme would address its relationship to Havering Well Garden. Although the appellants make a reference to a double height colonnade it is unclear from the Design and Access statement how this physical relationship could be adequately addressed. This is an important consideration given how this site could benefit from the planning obligation included in the completed Undertaking submitted with the appeal.
14. Through adopted policies included in both the CSDPP and the London Plan there is a presumption that housing development should be of the highest quality, not just internally and externally but also in relation to its context. Although the scheme's parking ratio is acceptable it is the large number of flats proposed for the whole site that results in an unacceptable compromise to the overall scheme design. Accordingly, I conclude on this main issue that the design of the proposed scheme would fail to integrate appropriately with the

¹ PTAL – Public Transport Accessibility Level

site on its eastern edge and Havering Well Garden. This would not be in accordance with policies DC2 and DC61 of the CSDPP and policies 7 and 26 of the Councils emerging plan and policies 3.5, 7.6 and 7.15 of the London Plan.

Living conditions of future occupiers

a) Public amenity space

15. The scheme includes 1,702sqm of communal amenity space. This includes space for under 5s and shared space for older children and adults. This would be located primarily across the podium and would also include play space and gardens for the under 5s on the roofs of blocks B and C with space on the roof of Neopost House. Whilst the amount of play space meets the standards required in Guidance for the under 5s, space for children aged between 6-11 years, adolescents and adults is limited. This is significant given that there would be a large proportion of 2 and 3 bed flats capable of accommodating families.
16. The communal amenity space on the podium provided within the site would have to fulfil multiple functions accommodating different age groups with diverse needs, for example, games or passive recreation. The roof top play areas located on blocks B and C, which the appellants state would be available for all residents, are unlikely to be fully 'communal' given the secure access arrangements required for each block such that they would be more likely to function as private areas for the children living in each block.
17. Although 3 public open spaces, Grenfell Park, Park Lane and Havering Well Garden recreation grounds lie within 400m of the appeal site, access to Grenfell Park and the recreation ground at Park Lane would be constrained by either their location across a dual carriageway or the permeability of streets. Havering Well Garden could provide opportunities for play but its location on a busy dual carriageway would not be the most appropriate place for children's informal play due to noise and safety concerns. These constraints would undermine the actual value of financial contributions included in the Undertaking for these spaces.
18. Furthermore, the landscape strategy includes areas within the communal space required for planting to support biodiversity, which in turn would result in less space for children's recreation. In addition, as a secondary consideration, due to the proximity of Neopost House the podium space may accommodate the recreation needs of its residents, leading to further demands on this area.
19. Given these circumstances a planning condition requiring full details of the proposed spaces could not adequately address the fundamental issue that there is a lack of sufficient play and amenity space required to serve all groups of the appeal scheme.
20. While there are no locally adopted space standards to act as a guide to the amount and type of public amenity space required for development of the type proposed, for the reasons outlined above, other than in respect of the provision for the under 5s, the proposals are wanting in terms of both quantity and quality of communal amenity space.
21. The amount of open space within the scheme would offend Council policy DC21 of the CSDPP which requires adequate open space and leisure facilities to be provided within residential schemes. The proposed communal amenity space

does not comply with London Plan policy 3.6 which requires that children and young people have safe access to good quality, well designed and stimulating recreation opportunities. Additional provision supported through enhancements to local recreation facilities in Grenfell Park and Havering Well Garden would not adequately compensate for this deficit. Accordingly, the scheme would adversely impact on the living conditions of residents, contrary to policies DC21 and DC61 of the CSDPP and London Plan policies 3.5 and 3.6 which seek the provision of public amenity space of sufficient size and quality to account for the needs of children, disabled and older people.

b) Private amenity space

22. Overall the quantum of private amenity space across the whole scheme meets adopted standards and this is reflected in the amount of space for each flat. Those balconies facing the communal space above the podium would be unlikely to be subject to excessive noise given their proposed separation from the children's play spaces. Many family sized units are served by balconies and whilst not ideal they would, nonetheless, afford a reasonable amount of private amenity space for the type of accommodation proposed. I address other concerns regarding noise disturbance to some balconies in blocks A, B and C later in this letter.
23. On this basis, however, I am satisfied that the amount and the location of the private amenity space would accord with the standards 26 or 27 of the Mayoral Housing SPG and policy 7 of the emerging Local Plan.

c) Overlooking

24. Due to the angled flanks of blocks B and C they would be located at maximum of about 18m apart and these blocks would be located between 15-19m east of Neopost House. Whilst I accept that adherence to standardised separation distances is not in itself a guarantee of privacy, the proximity of these blocks would result in overlooking between windows serving habitable rooms. This would be particularly acute between windows in the north elevation of block B and southern elevation of block C. The orientation of the elevations and that flats would be dual aspect would not be sufficient to prevent overlooking given the proximity of the windows in question.
25. Similar poor relationships between windows serving habitable rooms and their balconies on the western elevations of blocks B and C and Neopost House would result in overlooking given the limited separation distances. This would be of concern given that the western elevation of block C would lie only about 15m away. Although the appellant has identified other schemes where similar distances have been accepted by the Council, I do not have the full details of these before me for comment.
26. Whilst the areas of private amenity space to the ground floor units in blocks B and C accord with adopted standards their depth would be insufficient to prevent overlooking from people using the podium walkways or using the area for recreation. A further problem would arise from the location of the access points from South Street which would involve visitors walking close to the windows serving habitable rooms in Neopost House. These units do not have any defensible space. Although this arrangement alone would not be sufficient to withhold planning permission, it is far from ideal and symptomatic of the cramped nature of the proposed development.

27. For these reasons, I conclude that the proposed relationship of the blocks B and C to each other and in turn their relationship with Neopost House would result in a loss of privacy and adversely impact on the living conditions of residents of these blocks. The scheme would therefore be contrary to policy 3.5 of the London Plan, Standard 28 of the SPG, policy DC61 of the CSDCP and policy 7 of the draft local plan.

d) Legibility of site entrances to blocks B and C

28. Pedestrian access into the site would be taken from several points. Access directly from Roneo Corner, at the south east corner of the site, would, due to the change in levels, lead directly onto the proposed podium area serving entrances to blocks B and C. This route would be legible and clear. In contrast visitors using the two access points from South Street would only see the main entrances to the blocks on ascending by either external stairs or stairs and/or lift accessed from beneath the podium. The fact that the entrances would be in alignment to the access points would not fully address their legibility. For example the northern access point includes a dogleg stairwell serving the podium area. Given the location of the site in relation to the town centre and Romford station these access points are likely to be well used. However, the lack of clear sight lines reflects poor legibility from these access points through the site.
29. Policy 3.5 and 7.4 of the London Plan and policy DC61 of the CSDPP and policies 7 and 26 of the emerging Local Plan require the highest standards of design for housing development to ensure that people feel comfortable with their surroundings. For these reasons, as stated above, I conclude that pedestrian access to the scheme from South Street does not comply with policy 3.5 and in that respect policy 7.4 of the London Plan, standard 8 of the Housing SPG, policy DC61 of the CSDPP and policies 7 and 26 of the emerging Local Plan.

e) Security and Boundary treatment

30. The scheme would include controlled access by gates and entry systems into the development and to each of the proposed blocks. This would reduce security concerns. I consider that the Council's objections to the proposed boundary treatment to the site's eastern and southern boundaries could be addressed through the imposition of a condition requiring further details, if I was minded to allow this appeal.
31. For these reasons, I conclude that the proposed scheme would not offend adopted London Plan policies 7.3, and in this respect 7.4, 7.5 and 7.6 which seek to ensure that all schemes adhere to the principles of Secured by Design and that accessibility does not compromise security.

f) Noise

32. The Council has identified several potential sources of noise disturbance which could affect the living conditions of future occupiers which I address in turn below.
33. I accept the appellant's findings that the impact of noise generated from the operation of the car park would be limited. This would be because of its location below the podium, which would shield noise and because most traffic movements would be during the morning and evening peaks when ambient

noise levels would be high as residents embark and return on journeys to work or school.

34. Whilst the use of the public amenity space above the podium would serve the diverse recreational needs of residents, it is unlikely given its limited area that there is sufficient space for active play involving large groups of children or youth. The use of the under 5s play areas would be restricted to those times of day when ambient noise levels would be higher and the consequently any effects of noise generated from this space on the living conditions of occupants of the surrounding flats would not be significant.
35. I have concerns over the effects of noise generated from both the operation of the service yard serving the B&Q store and from traffic on the A125. Regarding the former, noise generated would be from the regular pattern of HGV deliveries. I accept that the use of appropriate glazing, controlled through planning condition, could restrict the impact of this source of noise on the internal environment of the flats and that normal operations would be at times when ambient noise levels would be higher. However, this does not address the impact that this would have on the balconies, the sole area of private amenity space, serving flats in the eastern side of blocks B and C.
36. The impact would be most acute for occupants of the 3 person flats which face the access road and yard; these could be occupied by families. The appellant identifies that there would be only minimal differences between the resultant distances from the proposed blocks to the delivery yard when compared to properties on Clydesdale Road. However, these properties can be distinguished from the appeal site in that there is some separation between the boundaries of the site and the residential properties which enjoy gardens rather than a balcony as their area of private amenity space.
37. I have similar concerns over the impact of noise from traffic using the dual carriageway, the A125, which would adversely impact on the flats in the south elevation of block A. The appellant acknowledges that in a number of flats the external noise levels would be too high to allow for satisfactory internal ambient noise levels to be met if windows are open. This would require occupants to keep windows shut in order to create an acceptable living environment. I do not accept that other areas of amenity space within the scheme could adequately offer alternative amenity space.
38. The balconies provide the only areas of private amenity space for these flats and have been designed for sitting out as well as being used for less noise sensitive activities such as clothes drying. It is a reasonable assumption that the windows serving them would be opened to maximise natural light and ventilation during the summer months. They are an important feature which would allow space for private retreat but being located so close to a dual carriageway, noise levels would adversely affect the living conditions in these flats.
39. Running as a common thread throughout adopted and emerging policy is the recognition that the adverse impacts of excessive noise should be avoided or at least mitigated. In the context of the appeal scheme, whilst there are several sources of noise generated from within the scheme, these would be to acceptable levels and could in fact be 'self policed'. However, my concerns on this issue relate to the adverse impacts of noise on the balconies serving the flats which face the site's eastern and southern boundaries. Furthermore, for

flats in block A this problem would impact on the internal living environment of those which would face the A125. I do not consider that these matters could be effectively controlled through planning conditions. For these reasons, I conclude on this matter that the proposed scheme would be contrary to policy DC55 of the CSDPP, policies 3.5, 7.15 of the London Plan and D13 of the emerging London Plan and policies 7 and 26 of the emerging local plan.

g) Air Quality

40. Potential sources of air pollution include the customer car park serving the B&Q store and the car park contained beneath the podium. The Council has suggested that this matter could be addressed through the imposition of conditions. In the absence of clear evidence from the Council specifying its concerns in relation to the extent of the breach from adopted standards I consider, if I were minded to allow this appeal, that conditions could be used to mitigate the adverse impacts referred to.

Conclusions on Living Conditions

41. Taking into account all these matters in respect of this main issue, on balance, I conclude that it would fail adopted policies. I acknowledge that in respect of the extent of private amenity space, the scheme is in accordance with adopted policy. Other matters including the site's boundary treatment, security and air pollution could be addressed through the imposition of conditions. However, other matters within this main issue including the amount of public amenity space, legibility of entrances to blocks B and C, the extent of overlooking between blocks B and C and Neopost House, and the poor environment of a large number of balconies all point to significant concerns which highlight the site's overdevelopment. For these reasons considerable harm would result from the proposals. The scheme would offend policies DC21, DC55 DC61 of the CSDPP, the emerging policies 7 and 26 and, in those respects identified above policies 3.5, 3.6, 7.4, 7.6 and 7.15 of the London Plan and D13 of the emerging London Plan. The scheme would not adhere to adopted standards 8, 26, 27 and 28 of the Mayoral Housing SPG.

Daylight and Sunlight

42. This main issue relates to the amount of daylight and sunlight which would be received by the flats in Neopost House and those flats proposed in blocks A, B and C. Overall the resultant levels for daylight and sunlight are broadly within acceptable tolerances. Whilst there would be some infringements of the BRE standards for several flats, particularly in block C and Neopost House the degree of infringement is not sufficient to warrant significant concerns on this main issue.
43. Accordingly, on this main issue I conclude that the scheme would not conflict with policies DC61 of the CSDCP, and policy 7 of the emerging local plan and the standards 32 of the Housing SPG.

Single aspect flats

44. Across the scheme, 17 units would be single aspect and within block A there would be 9 units facing north. My main concern on this main issue relates to the fact that the proposed arrangement would reduce the quality of living conditions for residents and further, can result in unnecessary energy usage

through heating and lighting. The large proportion of single aspect units is symptomatic of the over development of this site.

45. Of those 17 units, 5 would be 2 bed 3/4 person flats, capable of providing accommodation for small families. Within the 17 units, 7 would be north facing. Single aspect units often have reduced sunlight and daylight and difficulties in cross ventilation. This would lead to the creation of unsatisfactory living conditions for families.
46. The appellant has, through the Energy Assessment, taken account of the 'cooling hierarchy' as suggested by Policy 5.9 of the London Plan. However, they acknowledge that because of the external noise levels, windows cannot be opened to allow natural ventilation and in turn some flats would require either a mechanically boosted ventilation or air conditioning system. Alternatively, windows could be left open overnight to ensure thermal comfort. Invariably the installation of some of these measures would result in energy intensive air conditioning leading.
47. For these reasons, I conclude on this main issue that the proposal fails policies 5.9 and in this respect policy 7.6 of the London Plan and policy 7 of the draft Local Plan and standard 29 and 36 of the Housing SPG in respect of energy saving and living conditions.

Mix of units

48. The scheme would fail the Council's preferred mix of units derived from its Objectively Assessed Need included in its HPS which identifies a requirement across the Borough for 3 bed units. The Council's priority requirement for social housing is from households, currently accommodated in overcrowded 3 person, 2 bed units which require additional bedrooms.
49. The scheme would comprise 33% of all units being 1 bed, 47% 2 bed and 20% 3 bed flats. This mix would broadly adhere to adopted policy DC3 included in the CSDPP which requires around 70% of all units to be 1 and 2 beds. The HPS identifies that the demand is for 3 bed units across all tenures. Policy 3.8 of the London Plan is an umbrella policy which allows boroughs to determine their preferred housing mix based on regional and sub regional evidence. Despite the degree of variance between the appeal scheme and the HPS, London Plan policies 3.4 and standard 12 allow a larger proportion of small sized units in areas with good transport accessibility. However, I do not consider that the extent of variance is so great as to markedly offend adopted policy in this instance. The majority of flats would be 2 or 3 bed units which would be considered as 'family' sized in the emerging London Plan.
50. I conclude on this main issue that the proposed mix of units provides an acceptable range and does not infringe adopted policy. Although policy 5 of the Council's emerging local plan seeks family accommodation in line with the HPS, given its status, I am giving only limited weight to this and accordingly the conflict with policy is reduced.

Infrastructure

51. The appellants have included a completed Unilateral Undertaking which includes both financial and non financial obligations. The former are included for education, play and amenity space in Grenfell Park and contributions for public realm improvements to Havering Well Garden public open space,

contribution to carbon emission off-set and a monitoring fee. Non financial contributions include 50% affordable units, restrictions on the purchase of parking permits and the establishment of a car club.

52. The Council has provided a compliance statement submitted under Regulation 122 of the Infrastructure Regulations 2010, as amended. The statement indicates that the planning obligations are compliant and in accordance with both London Plan and local policy. It acknowledges that since the recent adoption of its Regulation 123 Schedule which allows for education contributions these will not be required through the agreement. It is understood that the Regulations allow for this without a requirement for a newly executed Undertaking. The scheme would also be subject to the Mayor's Community Infrastructure Levy which came into effect on 1 April 2019. Apart from those terms which address affordable housing, I regard the Undertaking as meeting the tests of paragraph 56 of the Framework in being necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development.
53. Whilst the Undertaking is in compliance with both the Regulations and Framework the substantive investment included for play facilities would not adequately address the shortfall in provision included in the scheme for the reasons as stated above.

Other Matters

54. Interested parties have raised concerns on the development of the scheme, particularly on the location of block C, on their living conditions. Whilst I acknowledge these points, these concerns do not alter my decision.

Planning balance and conclusions

55. The proposed scheme includes many benefits. The site's location would involve the development of previously developed land in a location about 1 km from the centre of Romford and its development could reduce pressure for new housing sites in the Green Belt as identified by the HPS. The provision of 55 new market dwellings would go some way to addressing the Council's housing requirements. I accord the provision of 55 affordable dwellings, which is an amount above policy requirements, significant weight. There would be economic benefits arising from new construction jobs and from the potential spend of the scheme's occupants in local shops.
56. The proposed mix of units and their internal areas would adhere to adopted standards. Furthermore, the amount of play space for children of under 5 years would meet adopted standards and despite the density of the scheme, sunlight and daylight for the development would just be within appropriate tolerances. Other benefits would include the D1 flexible space which could accommodate uses designed to support the local community. Some of the Council's objections, such as those concerning the proposed treatment to both the site's eastern boundary and to South Street and security concerns, could be resolved through condition.
57. Whilst the measures included in the Undertaking would have some impact beyond the development I accord them neutral value as they are required to mitigate for the effects of the development. I have addressed the degree of

weight which I attach to the provision of affordable housing and new investment in new play facilities earlier in this letter.

58. Balanced against the benefits of the scheme are a range of issues which would lead to harm and are, at least in large part, a result of the site's overdevelopment. The scheme's density is clearly higher than the standard included in the London Plan's 'density matrix', and furthermore, for the reasons which I have referred to above would not be in keeping with the 'design led' approach included in the emerging London Plan. In part, this reflects the inclusion within the site area of Neopost House and the compromise made to accommodate sufficient parking for the converted building in addition to that for the proposed flats.
59. The scheme's overdevelopment is manifest in its relationship to land to the east of the site, and the range of matters which would result in adverse living conditions for occupants. These include an insufficient amount of public amenity space, a critical issue given the high proportion of flats with at least 2 bedrooms; the poor quality of private amenity space for many flats resulting from noise disturbance; limited separation distances resulting in overlooking between blocks within the scheme and with Neopost House; and a large proportion of single aspect flats which, would not provide acceptable living conditions for families and would also result in additional energy requirements.
60. Whilst regeneration schemes can sometimes be justified even when they offend policy, it is the number of failures and their extent which is unacceptable in this scheme. For these reasons, I do not consider that the scheme is of sufficient high quality as to warrant an exception, as could be allowed by policy 3.5 (D) of the London Plan.
61. Irrespective of the Council's 5 year housing land supply position and its HDT score, I believe that these issues far outweigh the benefits of the appeal proposal. I place substantial weight on the identified harm and associated conflict with policies 3.5, 3.6, 7.4, 7.6 and 7.15 of the adopted London Plan, D13 of the emerging London Plan, policies DC2, DC21, DC55 and DC61 of the CSDPP and policies 7 and 26 of the emerging Havering Plan as well as with the standards 8, 26, 27, 28, 29 and 36 of the Mayoral Housing SPG. Accordingly, I dismiss this appeal.

Stephen Wilkinson

INSPECTOR