



Appeal Decision

Inquiry held on 9 December 2025

Site visit made on 9 December 2025

by **Matthew Jones BA(Hons) MA MRTPI**

an Inspector appointed by the Secretary of State

Decision date: 21st January 2026

Appeal Ref: APP/B5480/W/25/3371323

Land to the south of St Mary's Lane, Upminster, RM14 2QH

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant [outline] planning permission.
 - The appeal is made by Mr Mike Hirsch (Enable Care) against the decision of the Council of the London Borough of Havering.
 - The application Ref is P0054.25.
 - The development proposed is erection of Acquired Brain Injury Unit with associated access, car and cycle parking, landscaping and infrastructure.
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Decision

1. The appeal is allowed and planning permission is granted for the erection of Acquired Brain Injury Unit with associated access, car and cycle parking, landscaping and infrastructure at Land to the south of St Mary's Lane, Upminster, RM14 2QH in accordance with the terms of the application, Ref P0054.25, subject to the conditions in the attached schedule.

Preliminary Matters

2. Before the Inquiry opened the appellant submitted a draft planning agreement (the UU) which seeks to secure carbon offsetting contributions. The completed version of the UU followed on after the Inquiry had closed. I return to the matter of the obligation it contains later in this decision.
3. On the Friday before the Inquiry opened, the Council wrote to me informing me that it no longer intended to defend the appeal. In a subsequent signed Statement of Common Ground, the Council confirmed the withdrawal of its evidence and adopted the position that planning permission should be granted.
4. Nonetheless, the Planning (Listed Buildings and Conservation Areas) Act 1990 (the Act) places certain responsibilities upon me as the decision maker, and interested parties have made various submissions in relation to the scheme.

Main Issues

5. On that basis, the main issues that fall to be considered are:
 - the effect of the proposal on the Cranham Conservation Area (the CA) and the settings of the listed buildings within it; and
 - whether the proposal would be inappropriate development in the Green Belt;

Reasons

Heritage

6. The appeal site is a rectangular field of rough grassland and disused hardstanding, bound by hedgerows and trees, to the south of St Mary's Lane on the outskirts of Upminster. The Coopers Company and Coborn School is to the west, with the school playing fields bounding the site to the west and south. Four detached houses are to the east, three of which are fairly new. The north side of St Mary's Lane is fronted by Twentieth Century housing defining the built edge of Upminster.
7. The historic hamlet of Cranham is a short distance to the south, accessed off St Mary's Lane via an intimate, treelined lane called The Chase. The CA incorporates Cranham but also extends widely across its surrounding environs, comprising the school, the playing fields, the Oglethorpe Primary School to the east of a railway line, and large fields of farmland. A Public Right of Way (PRoW) passes through this farmland and the centre of the hamlet on a west/east axis. Within the centre of the hamlet is the Grade II listed Church of All Saints (the Church), the spire of which is visible across the low and flat fields from parts of the surrounding area.
8. The significance of the CA lies principally in the historic and architectural interest of the residential, former agricultural, and ecclesiastical buildings which comprise its tightknit and interrelated built form, some of which have a direct or indirect association with General James Oglethorpe, a former resident of Cranham and the founder of what is now the modern US State of Georgia. The openness of the CA beyond the hamlet contributes to its significance by allowing the distant views which accentuate the legibility of Cranham as an isolated historic settlement. The views are also important to the setting of the Church, as they allow its status and primacy to be pronounced, and for it to accentuate the presence of the settlement.
9. However, the north part of the CA, including the appeal site, is on the urban fringe and has come to be influenced by the built form of the school and the modern housing around and within it. The boundaries screening the appeal site prevent clear views of Cranham, save for some glimpses of the Church spire. Given such, the site provides a modest, albeit positive, contribution to the significance of the CA and to the significance that the Church derives from its setting.
10. The proposal would obscure these views and reduce the openness of the CA as a whole, which would harm its significance. The extent of harm would be reduced by the reposeful nature of the proposed design, which features a series of separate low-profile buildings and the innovative use of interconnected sunken outside spaces, providing a sense of openness and permeability across the site. In the parlance of the National Planning Policy Framework (the Framework), the harm would be less than substantial, and at the low end of a sliding scale of that harm.
11. The effect on the setting of the Church would be similar. There are more important and sensitive vantages of the spire even elsewhere on St Mary's Lane, for instance from across the school accesses and playing fields. The most open and important views of the Church are from The Chase and to the east and west of Cranham, from the PRoW. From the PRoW the Church is highly prominent and seen within a significantly more well-preserved, agrarian setting. The proposal would be visible at a good distance and set against the immediate backdrop of Upminster from the PRoW to the extent that one's appreciation of the Church would be undiminished.

12. Given such, the development of the appeal site, in obstructing the limited and less important views of the spire through it, would cause less than substantial harm to the significance of the Church, at the lowest end of a sliding scale of that harm.
13. Paragraph 212 of the Framework explains that great weight should be given to the conservation of designated heritage assets. Paragraph 215 goes on to require decision makers to weigh any less than substantial harm to such an asset against the public benefits of the scheme. Here that exercise must take place in the context of s.66 and s.72 of the Act, which set a strong presumption against permission for a development that would cause harm to the setting of a listed building and/or fail to preserve or enhance the character or appearance of a Conservation Area.
14. In this case, the public health benefits associated with the provision of the proposed Acquired Brain Injury (ABI) Unit are compelling. ABI is the leading cause of death and disability for people aged under 40 in the UK. At the national level, the 2018 All-Party Parliamentary Group (APPG) 'Time for Change' report identified the number of available neurorehabilitation beds across the UK to be inadequate, service provision to be variable and, consequently, long-term outcomes for ABI survivors were found to be compromised. It identified a shortfall of 10,000 bed spaces. Last year's follow up Right to Rehab report published by the same APPG highlights that these inadequacies in neurorehabilitation have not been addressed.
15. Table 5.9 of the Council's need proof of evidence identifies a shortfall of bedspaces across northeast London¹ that is forecast to increase over the next ten years. Whilst the Council and appellant differ on the number of spaces needed in Havering at 45 and 53 respectively, both figures are less than the agreed level of theoretical supply (82 spaces), split between Havering Court and Queens Hospital, both in Romford.
16. However, this existing provision is not reliable for two key reasons: Havering Court cares for a wide range of neurological conditions, so in effect people with an ABI are in a significant competition for spaces at that care home. In treating only ABI patients who have suffered from a stroke, Queens Hospital indirectly excludes the around 60% of ABI patients who have acquired their injury in other ways. Given the nature of these facilities, and the absence of a dedicated ABI neurorehabilitation unit within Havering, there is no dependable supply of ABI beds in the local area.
17. The situation is brought into sharp focus by the evidence of Ms Goodwin. The email exchanges, which include correspondence from the North East London NHS Integrated Care Board, powerfully illustrate the day-to-day difficulties practitioners face trying to find beds for ABI patients in northeast London generally. In one case I heard, a London based patient had to be sent to Northamptonshire for care. Ms Goodwin's evidence also demonstrates the pressure this issue is placing on the NHS in terms of 'bed blocking' critical, acute hospital spaces for other patients.
18. The Marillac Neurological Care Centre in Brentwood has been operating with spare capacity for much of the 16 months up until October 2025, which goes against the grain of the other evidence relating to need, At the Inquiry it was put to me that this situation may relate more to that facility being rated as 'Requires Improvement' by the Care Quality Commission, rather than a lack of need for ABI spaces more generally. By comparison, the appellant's facility One Sewardstone Close has been operating at full capacity for the same period, to the extent it has a waiting list. It has a positive rating from the Care Quality Commission.

¹ Taken as the authority areas of Havering / Redbridge / Barking & Dagenham

19. Reference is also made to a care facility in Chigwell. I understand that this is a relatively new facility, and so the beneficial effect it will have on meeting the unmet need for spaces remains to be seen. Ultimately, the unmet need for ABI provision in Havering is evidenced in simple, unequivocal terms by Table 3.1 of the Council's proof. It shows that, of the current ABI patients native to Havering living within an institutional care setting, half of them have been placed outside of Havering.
20. Accordingly, the provision of a bespoke ABI facility in this location would be a substantial public benefit. The proposal is also likely to bring economic benefits insofar as it would expediate rehabilitation and therefore aid productivity. Furthermore, the facility would logically reduce the cost burden on NHS settings. In line with the Framework, I attribute significant weight to the high quality and innovative nature of the proposed design, which would raise the standard along St Mary's Lane. In my view, and mindful of my duties under the Act, the public benefits of the proposal present a clear and convincing justification for the respective less than substantial harms that would arise to the CA and to the setting of the Church.
21. There are three other Grade II listed buildings within Cranham. These are the i) Railed Tomb to West of the Church of All Saints ii) Cranham Hall and iii) Garden Walls at Cranham Hall. I must also pay special regard to the desirability of preserving the settings of these buildings. The setting of the tomb is principally related to its position relative to the Church. Likewise, the setting of the garden walls relates to the relationship to Cranham Hall itself, and Cranham Hall primarily draws significance from its relationship with the other buildings within the hamlet.
22. Records show that the appeal site was at one time a meadow in the same ownership as Cranham Hall. However, the site is now spatially and visually disconnected from the farmland that was also historically connected to Cranham Hall, and so this previous historical association can only really be understood at a desktop today. This record would continue to exist post development. Given then the lack of any intervisibility or compelling evidential association with the appeal site, the significance of these listed buildings would not be harmed by the proposal.
23. My conclusion on this main issue follows that the proposal would have an acceptable effect on the CA and the listed buildings within it. The proposal would accord with the design, landscape and heritage related aims of Policies 26, 27 and 28 of the Havering Local Plan 2016-2031 (adopted 2021) and the Framework.

Green Belt

24. The appeal site is in the Green Belt. The Framework states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and that the essential characteristics of Green Belts are their openness and their permanence. Paragraph 143 lists the various purposes of the Green Belt. Paragraph 153 goes on to state that inappropriate development is harmful to the Green Belt and should not be approved except in very special circumstances.
25. This is subject to a list of exceptions, which are set out within Paragraphs 154 and 155. Paragraph 155 introduces the concept of 'grey belt'. It says that development in the Green Belt should not be regarded as inappropriate where it would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area. This is providing there is a demonstrable unmet need for the development and that the site is in a sustainable location, with reference to Paragraphs 110 and 115 of the Framework.

26. Grey belt is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in Paragraph 143. Grey belt excludes land where the application of the policies relating to the areas or assets in footnote 7 to Paragraph 11 d) i) (except the Green belt) would provide a strong reason for refusing or restricting the development. Such assets include designated heritage assets.
27. Looking at the relevant purposes, the site is a logical gap between the school and its playing fields, and the housing to the east. The playing fields are in active use and restrict sprawl to the south. The appeal site is also physically contained by its boundary enclosures. As such, the site makes a moderate, not strong, contribution to checking the unrestricted sprawl of Upminster as a large built-up area. The Green Belt to the south is very expansive, and so site is not part of an area which prevents Upminster from merging with any neighbouring town. Given its modern history of significant residential expansion, not least the housing area to the north of the appeal site, Upminster is not an historic town. It follows that the site does not strongly contribute to any of the purposes relevant to whether the site is grey belt.
28. I see no reason why the scheme would prevent the Green Belt from supporting the regeneration of urban land within Havering. Given that the site relates more closely to Upminster than the open farmland to the south, the development would not significantly encroach into the Green Belt. Due also to the permeable nature of the proposed design, it is clear the development would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area.
29. I have already applied the policies in the Framework related to designated heritage assets and found that doing so does not provide a strong reason for refusing or indeed restricting the development. With reference to accessibility, I was able to travel to the site via public transport and then from the centre of Upminster on foot, and there is a bus service available from numerous stops along St Mary's Lane.
30. The interested party, ABI sufferer and Peer Support Worker, Mr Harding described the location of the proposed unit as 'ideal' at the Inquiry. This is because it would provide a geographical link between the acute healthcare settings closer to the central of London, and ABI patients based in Havering and those beyond the M25 in Essex. It is likely that the facility would reduce the need for longer distance travelling by ABI patients and their visiting family and friends. Given such, I regard the site to be in a sustainable location in the Framework's terms.
31. Drawing the above together, I conclude that the site is grey belt land and accordingly the proposal would not be inappropriate development in the Green Belt. In this respect, the proposal would accord with the relevant aims of Policy G2 of the London Plan and the Framework.

Other Matters

32. I have had full regard to the previous appeal decisions at the site. However, the design of the ABI Unit and the national policy landscape have significantly changed in the intervening period. This is to such an extent that the findings in those appeal decisions have had a limited influence on my assessment. That said they are useful insofar as they establish that the site history is not an impediment to the proposed development. An interested party has referred to Metropolitan Open Land, but as the site does not comprise such, the relevant policies do not apply. There is no substantive evidence that ABI patients would pose any particular risk to the public

in the area. Nor has any clear evidence been put to me that Upminster does not have the services and facilities to cope with future residents of the unit. It is more likely that visiting families and friends would access the town and add to its vitality. As a rehabilitation setting, the unit is unlikely to cause unacceptable noise effects.

33. Concern has also been raised about the proposal increasing competition for the already difficult recruitment of nurses and care assistants. However, this factor is not a decisive one within the context of the clear and unambiguous public health need for the proposed facility. For their part, I understand that the appellant does not find difficulty in recruiting or retaining staff at their existing facility. The Council is currently working on a new Local Plan. Given its nascent stage of preparation, it has held little sway in my decision. That the private view of occupants in properties to the north on St Mary's Lane would change is not a compelling planning matter.
34. The existing verge ensures that the site access would have sufficient visibility along St Mary's Lane. I observed St Mary's Lane during the school run. Whilst it was busy, I would not describe the highway conditions as severe or manifestly unsafe; the most pronounced effect was a degree of delay through queuing along the highway. Given these events are limited to the specific periods of the day, I do not consider that the likely traffic movements associated with the scheme would lead to an unacceptable, cumulative residual effect on the integrity of the network.
35. I am aware that it is likely that significant construction work may take place at the school in the coming years. However, the potential disruption that would be caused by concurrent construction work and the consequent impact upon the welfare of students can appropriately be managed through a Construction Method Statement, to be evaluated by the Council and secured by a condition. The same document could address the need to manage construction activity during the school run. With reference to alternative sites, as the scheme is acceptable on its own terms, there is no reasonable justification to require an assessment of alternative locations for it.

Planning Obligation

36. The UU would secure carbon offsetting payments to ensure accordance with the relevant sustainability objectives of the Local Plan. With Regulation 122 of the Community Infrastructure Levy Regulations (2010) in mind, I am satisfied that the obligation is necessary, directly, fairly and reasonably related in scale and kind to the development, and can be taken into consideration as part of the development.

Conditions

37. It is necessary to set out the approved plans in the interest of certainty. To ensure that the scheme's high-quality design is delivered, a condition is needed regarding agreement of the finish materials. Respective conditions will secure the details and delivery of all means of enclosure and the site landscaping for the same reason. A condition will ensure that the recommendations related to land contamination are adopted through the development. A condition will ensure the same in relation to the Fire Statement submitted with the scheme. With respect to public amenity and sustainability, conditions shall ensure the delivery of the waste storage, photovoltaic panels, electric vehicle charging points, and the cycle storage.
38. In the interest of the living conditions of neighbouring residents, the environment, and given the proximity to the school, and its future redevelopment, conditions are required to manage construction working times, work conditions, and logistics with

regard to offsite movements. The former can also address the need to control dust and other emissions during this phase. A separate condition shall address the need for ecological protection during construction. For obvious reasons these conditions must be discharged prior to the commencement of the development. Also with reference to the living conditions of existing residents, a condition is required to ensure that excess noise pollution is not generated by the development.

39. Given that this is a bespoke care facility with a vested interest in safety and with a responsibility to adhere to industry welfare and care standards, I am not convinced that a condition relating to site security passes the test of necessity. The scheme will, however, have to complete the Greater London Authority's Whole Life Cycle Carbon Assessment in the interest of the environment. For the same reason, respective conditions are necessary to ensure that the development sufficiently reduces waste and supports the circular economy, and to ensure that the scheme meets necessary energy efficiency standards in line with the London Plan.
40. The Council has put forward separate surface water drainage related conditions requesting further information. However, I consider that it is reasonable that a single condition requires adherence to and proof of delivery of the intended drainage strategy submitted with the appeal, and to which the lead flood authority has raised no objection. The site can feasibly connect to the sewer system, the responsibility for which lies with Anglian Water as the relevant statutory undertaker.
41. Whilst a Travel Plan accompanies the appeal, a further plan is required to ensure that the scheme fully complies with the relevant Transport for London Travel Plan Guidance. Similarly, due to shortcomings in the air quality evidence, a further document establishing how the scheme would be air quality neutral is required, and must be submitted prior to the commencement of the development. The suggested condition about level access would duplicate the Building Regulations as, I understand, would the condition requiring details of the proposed fire hydrant.
42. A condition is required to provide and retain the pedestrian visibility splays in the interest of highway safety. In the interest of ecology, a condition must be imposed to ensure compliance with the recommendations set out in the appellant's ecological evidence. Linked to that, a condition must ensure that any external lighting does not prejudice protected species. Conditions relating to Biodiversity Net Gain fail the test of necessity as the necessary controls are already imposed by statute. Lastly, given that the acceptability of the scheme turns on its specific contribution to addressing the pressing need for ABI care facilities, it follows that a condition must be imposed to ensure that the scheme fulfils that specific role.

Planning Balance and Conclusion

43. The proposal accords with the development plan when read as a whole and the other considerations before me do not indicate that I should make my decision other than in accordance with the development plan. For the reasons given above, and taking all other matters raised into account, I conclude that the appeal should be allowed.

Matthew Jones

INSPECTOR

APPEARANCES

FOR THE APPELLANT:

Jonathan Clay	Counsel, Instructed by Mike Hirsch of Enable Care
Rowan Clapp	Counsel
John Escott	Planning specialist
Dr Jonathan Edis	Heritage specialist
Andy Costa	Architect
Michael Hirsch	Appellant, Enable Care
Emma Hargreaves	Solicitor
Nicola Coveney	Managing Director, Enable Care,
Marie Goodwin	Practice Manager, Enable Care
Nigel Newton-Taylor	Need specialist

FOR THE LOCAL PLANNING AUTHORITY:

George Mackenzie	Counsel, Instructed by Legal Services, LBH
Andrea Ioannou	Senior Planning Lawyer, LBH
Simon Thelwell	Head of Strategic Development, LBH
Neil Goate	Team Leader, Strategic Applications, LBH
Habib Neshat	Deputy Team Leader, Development Management, LBH
Nick Ireland	Director, Icen Projects
Azizul Karim	Heritage specialist, Place Services, ECC

INTERESTED PARTIES:

Cllr Oscar Ford	Ward member
Dean Harding	Peer Support Worker and ABI sufferer

INQUIRY DOCUMENTS

ID1	Appellant's opening submissions
ID2	Council's attendance list
ID3	Appellant's attendance list
ID4	Submissions of Cllr Oscar Ford
ID5	Submissions on behalf of Coopers Company and Coborn School
ID6	Agreed noise condition
ID7	Appellant's closing submissions

Schedule of Conditions

- 1) The development hereby permitted shall begin not later than three years from the date of this decision.
- 2) The development hereby permitted shall be carried out in accordance with the following approved plans: 1084-00-P1, 1084-01-P1, 1084-11-P1, 1084-12-P1, 1084-02-P2, 1084-03-P2, 1084-04-P2, 1084-20-P2, 1084-21-P2, 1084-22-P2, 1084-23-P2, 1084-24-P2, 1084-25-P2, 1084-26-P2, 1084-27-P1, 1084-28-P1, 2586A5-LLA-ZZ-00-DR-L-0001 PO4, 2586A5-LLA-ZZ-GF-DR-L-001 PO1, 2586A5-LLA-ZZ-GF-DR-L-002 PO1, 2586A5-LLA-ZZ-GF-DR-L-003 PO1.
- 3) Before any of the development hereby permitted is commenced above damp proof course level, the written specification of all external finishes including wall, roof, window and fascia materials to be used in the construction of the building(s) shall be submitted to and approved in writing by the Local Planning Authority and thereafter the development shall be constructed with the approved materials.
- 4) Prior to any above ground works (other than demolition, site clearance and ground works), details of all means of enclosure shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details and retained thereafter in that form.
- 5) Prior to above ground works (other than site clearance and ground works) a scheme of hard and soft landscaping, which shall include indications of all existing trees and shrubs on the site, and details of any to be retained, together with measures for their protection in the course of development, shall be submitted to and agreed in writing by the Local Planning Authority.

All planting, seeding or turfing comprised within the scheme shall be carried out in the first planting season following completion of the development and any trees or plants which within a period of 5 years from completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species.
- 6) The scheme shall be implemented in accordance with the remediation measures and recommendations set out in the Phase 2 Geoenvironmental Assessment dated July 2024.
- 7) The scheme shall be implemented in accordance with the measures and recommendations set out in the Fire Statement dated July 2024.
- 8) No building shall be occupied until refuse and recycling facilities are provided in accordance with details which shall previously have been submitted to and approved in writing by the Local Planning Authority. The refuse and recycling facilities shall be permanently retained thereafter.
- 9) No building shall be occupied until the cycle storage, electric vehicular charging facilities and photovoltaic panels are provided in accordance with the approved plans. The cycle storage and charging facilities shall be retained thereafter.
- 10) All building operations in connection with the construction of external walls, roofs, foundations; site excavation or other external site works; works involving

the use of plant or machinery; the erection of scaffolding; the delivery of materials; the removal of materials and spoil from the site, and the playing of amplified music shall only take place between the hours of 8.00am and 6.00pm Monday to Friday, and between 8.00am and 1.00pm on Saturdays and not at all on Sundays and Bank Holidays/Public Holidays.

- 11) Prior to commencement of the development, a detailed Construction Logistics Plan shall be submitted to and approved in writing by the Local Planning Authority, which considers the impact of the development on the surrounding transport network. The plan shall be prepared in accordance with Transport for London's Construction Logistics Planning Guidance (Version v1.2, April 2021, or the most current version available). Once approved, the Construction Logistics Plan shall be fully implemented for the duration of any construction works.
- 12) No works shall take place until a Construction Method Statement is submitted to and approved in writing by the Local Planning Authority. The Construction Method Statement shall include details of:
- a) parking of vehicles of site personnel and visitors;
 - b) storage of plant and materials;
 - c) dust and emission management controls and procedures;
 - d) measures for minimising the impact of noise and ,if appropriate, vibration arising from construction activities;
 - e) scheme for security fencing/hoardings, depicting a readily visible 24-hour contact number for queries or emergencies;
 - f) details of disposal of waste arising from the construction programme, including final disposal points.
 - g) practical measures to manage potential disruption in relation to activity at the adjacent School;

The development shall be carried out in accordance with the Construction Method Statement.

- 13) Prior to commencement, a construction environmental management plan (CEMP: Biodiversity) shall be submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following.
- a) Risk assessment of potentially damaging construction activities.
 - b) Identification of "biodiversity protection zones".
 - c) Practical measures to avoid or reduce impacts during construction (may be provided as a set of method statements).
 - d) The location and timing of sensitive works to avoid harm to biodiversity features.
 - e) The times during construction when specialist ecologists need to be present on site to oversee works.
 - f) Responsible persons and lines of communication.

g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.

h) Use of protective fences, exclusion barriers and warning signs.

The approved CEMP shall be adhered to and implemented throughout the construction period.

- 14) Before the building(s) hereby permitted are first occupied, provision shall be made within the site for car parking spaces to be used in accordance with the drawings hereby approved. Thereafter this provision shall be made permanently available in association with the approved scheme.
- 15) Prior to the occupation of the development hereby approved noise mitigating measures shall be carried out to any associated fixed plant / machinery on site so that the Noise levels expressed as the equivalent continuous sound level LAeq (1 hour) when calculated at the boundary with the nearest noise sensitive premises shall not exceed LA90 -10dB and shall be retained permanently thereafter.
- 16) Prior to the occupation of the development, the post-construction tab of the Greater London Authority's Whole Life-Cycle Carbon Assessment template should be completed in line with the Greater London Authority's Whole Life-Cycle Carbon Assessment Guidance, and together with any supporting information, should be submitted to, and approved by the Local Planning Authority in writing.
- 17) Prior to the occupation of the development, a postconstruction monitoring report should be completed in line with the Greater London Authority's Circular Economy Statement Guidance and submitted to and approved in writing by the Local Planning Authority.
- 18) Within 30 days of the practical completion of the development, an updated Energy Statement shall be submitted to and approved in writing by the Local Planning Authority, reflecting the measures taken in practice in Be Lean, Be Clean and Be Green stages of the Energy hierarchy to reduce carbon emitted from the operation of a development and its services, as committed to in the design stage; and to identify whether an additional carbon offsetting contribution will be required to be paid.
- 19) No building hereby permitted shall be occupied until the drainage system for the site has been completed in accordance with the FRA and Drainage Strategy dated August 2024 and a Verification Report demonstrating that the approved measures have been fully implemented has been submitted to and approved by the Local Planning Authority in writing. The Verification Report must include as built drawings of the drainage systems including level information, and photographs of the completed drainage systems.
- 20) Prior to occupation of the development hereby approved, a Full Travel Plan for the Facility hereby approved, in accordance with Transport for London (TfL) Travel Plan Guidance, shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details and include
- a) Targets for sustainable travel arrangements.

b) Commitment to effective measures for the ongoing monitoring of the Travel Plan, which include:

- Compliant TRICS SAM monitoring surveys at baseline (within six months of occupation), years 1, 3 and 5 and monitoring reports.
- Updates to the Travel Plan to reflect and adjust to the outcomes of the monitoring.
- Commitment to delivering the Travel Plan objectives for a period of at least five years from first occupation of the development approved.
- Effective mechanisms to achieve the objectives of the Travel Plan

21) Prior to the commencement of the development hereby approved, an Air Quality Neutral Assessment shall be submitted to and agreed by the Local Planning Authority. The assessment shall detail;

- a) Calculations of the predicted building emissions and comparison against the Building Emission Benchmarks;
- b) Calculations of the predicted transport emissions and comparison against the Transport Emission Benchmarks;
- c) Mitigation (if required) or contribution to off-setting the development's emissions, taking into account the most up to date Defra's damage costs and relevant guidance on offsetting payments.

The use hereby permitted shall not commence until all measures identified in the Air Quality Neutral Assessment have been shown to be implemented to the satisfaction of the Local Planning Authority in writing.

22) Prior to the occupation of the development, the 2.1 by 2.1 metre pedestrian visibility splay on either side of the proposed access, set back to the boundary of the public footway, shall be provided. There should be no obstruction or object higher than 0.6 metres within the visibility splay.

23) All ecological mitigation measures and/or works shall be carried out in accordance with the details contained in the Ecological Impact Assessment Report (Geosphere Environmental, July 2024).

24) The premises shall be used as an Acquired Brain Injury Unit and for no other purpose, including any other purpose in Class C2, of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended) (or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification).