

SUPPLEMENTARY 1

PLANNING COMMITTEE

Monday, 30 November 2020

Agenda Item 4. Padnall Lake (Pages 1 - 13)

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Barking and Dagenham Council Planning Committee – Report Addendum		Date: 27 th November 2020
Application No:	20/01686/FULL	Ward: Chadwell Heath
Address:	Padnall Lake, Padnall Road, Romford, RM6 5ER	
Development:	‘Hybrid’ planning application seeking detailed planning permission for Phase 1 and outline planning permission for Phase 2, comprising: Outline Planning Permission (all matters reserved) for erection of buildings comprising up to 219 residential units (Use Class C3), up to 300 square metres (GEA) of flexible floorspace for residential use (Use Class C3) or non-residential use (Use Class D1), open space and public realm, means of pedestrian and vehicular access and circulation, car parking and cycle parking, and associated works; and Detailed planning permission for erection of buildings ranging between 3 and 6 storeys (Plots 1, 2 and 3) comprising 81 residential units (Use Class C3) and 181 sqm (GEA) of non-residential floorspace (Use Class D1), open space and public realm, parking and cycle parking, plant, other associated works; and associated infrastructure (Plot 4).	
Applicant:	London Borough of Barking and Dagenham	
<p>Summary:</p> <p>ADDENDUM</p> <p>This addendum covers the following four areas and should be read in conjunction with the published committee report</p> <ul style="list-style-type: none"> • Additional consultation responses have been received by Transport for London in conjunction with the GLA Stage 1 report • Additional representations have also been received in objection to the application. • An update to the heads of terms in relation to play space contributions and submission of a travel plan with monitoring. • Updates to 5 paragraphs within the officer report to reflect the above three points and to correct a formatting error. 		

TFL Consultation Response

As outlined in the published report officers have given regard to the initial response from TfL dated (4th November 2020) which gave regard to the increase in bus demand as a result of the proposed development. Officers have included within the heads of terms provision for a cash contribution is to be agreed subject to further consultation between the applicant and TfL.

A further representation was received from TfL post publication of the committee report on (23rd November 2020) This representation has made suggestions for a significant cash contribution without a detailed breakdown of costs. Further engagement with TfL is required on the contribution recognising the viability position on the scheme and the pressure on the public purse.

Officers therefore consider that notwithstanding the further response received by TfL on (23rd November 2020) that the initial wording of the head of term to be satisfactory to allow further engagement between parties. In the event that an agreement cannot be reached, Officers will report this matter back to committee for reconsideration.

In addition to the above, the TFL response required further alterations to the cycle parking details to Blocks 1 and 2 to be in line with 'Design Standard for Cycle Parking'. A minor amendment to accommodate the required changes has resulted in a marginal increase in open space retained at the site by 13sq.m. This minor change to this quantum of open space is not considered to alter the conclusions within the original report however has required updated documentation and plans. The updated documents and plans are detailed below:

In relation to the outline component :

Development Specification -Be First -November 2020

In relation to the Detailed component:

- Drawing Title : Phase 1 Site Ground Floor Plan – Drawing Number : BEF-PLB_HTA_A_P1_DR_0100-G – Dated : November 2020
- Drawing Title: Phase 1 Site Roof Plan - Drawing Number : BEF-PLB_HTA_A_P1_DR_0101-E Dated : November 2020
- Drawing Title : Phase 1 Site Sections & Elevations – Drawing Number : BEF-PLB_HTA_A_P1_DR_0150-E – Dated : November 2020
- Drawing Title : Block 1 Ground Plan – Drawing Number : BEF-PLB_HTA_A_01_DR_0200-G – Dated :November 2020
- Drawing Title : Block 1 First Floor Plan – Drawing Number : BEF-PLB_HTA_A_01_DR_0201-E –Dated : November 2020
- Drawing Title : Block 1 Building Section A – Drawing Number : BEF-PLB_HTA_A_01_DR_0250-B –Dated : November 2020
- Drawing Title: Block 1 Building Section B – Drawing Number : BEF-PLB_HTA_A_01_DR_0251-C –Dated : November 2020
- Drawing Title : Block 1 Building Section C – Drawing Number : BEF-PLB_HTA_A_01_DR_0252-C –Dated : November 2020
- Drawing Title : Block 1 Building Section D – Drawing Number : BEF-PLB_HTA_A_01_DR_0253-C –Dated : November 2020

- Drawing Title : Block 1 North Elevation – Drawing Number : BEF-PLB_HTA-A_01_DR_0270-D –Dated : November 2020
- Drawing Title : Block 1 North East Elevation – Drawing Number : BEF-PLB_HTA-A_01_DR_0271-D Dated : November 2020
- Drawing Title : Block 1 North West Elevation – Drawing Number : BEF-PLB_HTA-A_01_DR_0272-D- Dated : November 2020
- Drawing Title : Block 1 South West Elevation – Drawing Number : BEF-PLB_HTA-A_01_DR_0273-D- Dated : November 2020
- Drawing Title : Block 1 South East Elevation – Drawing Number : BEF-PLB_HTA-A_01_DR_0274-D- Dated : November 2020
- Drawing Title : Block 1 South Elevation – Drawing Number : BEF-PLB_HTA-A_01_DR_0275-D –Dated : November 2020
- Drawing Title : Block 1 East Elevation – Drawing Number : BEF-PLB_HTA-A_01_DR_0276-C –Dated : November 2020
- Drawing Title : Block 2 Ground Floor Plan – Drawing Number : BEF-PLB_HTA-A_02_DR_0200-G –Dated : November 2020
- Drawing Title : Block 2 First Floor Plan – Drawing Number : BEF-PLB_HTA-A_02_DR_0201-E –Dated : November 2020
- Drawing Title : Block 2 Building Section A – Drawing Number : BEF-PLB_HTA-A_02_DR_0250-B–Dated : November 2020
- Drawing Title : Block 2 North West Elevation – Drawing Number : BEF-PLB_HTA-A_02_DR_0270-D-Dated : November 2020
- Drawing Title : Block 2 South West Elevation – Drawing Number : BEF-PLB_HTA-A_02_DR_0271-D -Dated : November 2020
- Drawing Title : Soft Landscape Plan 2 of 3_Rev D – Drawing Number : BEF-PBL_HTA-L_DR-2911-C Dated: November 2020
- Drawing Title : Hard Landscape Plan 2 of 3_Rev D – Drawing Number : BEF-PBL-HTA-L-DR-2921-C- Dated : November 2020

Documentation

- BEF-PLB_HTA-A_DAS Addendum -Rev C HTA Design- November 2020
- Planning Statement Addendum – Be First – 27th November 2020
- Statement of Community Involvement -Be First – November 2020

Additional Representations –

Officers wish to make the committee aware that two additional neighbour representations have been received since the publication of the committee report.

Firstly, on behalf of the resident at 66 Billet Road in relation to the methodology adopted within the air quality assessment. The full representation has been included as an attachment to this addendum

The following officer assessment in relation to the above representation is to be inserted after paragraph 1.101:

1.101a Officers have considered the monitoring locations chosen and find these to represent the site and for the model verification are located adjacent to the A12, as is the proposed development. The similar characteristics between the site and monitoring locations means that the model provides a good representation of baseline concentrations and the need for on-site monitoring was not identified. Officers further note that the air

quality submissions have been appraised by LBBD Environmental Health and the GLA as part of the stage 1 referral process. Appropriate conditions have been recommended to control dust and emissions during the construction phase of the development and compliance with the approved air quality report. Furthermore, a cash contribution has been captured to accommodate forecasted emissions that will arise as a result of the increased trip generation. Taking the above into consideration, officers are satisfied that the methods and conclusions drawn from the air quality assessment are robust and in line with relevant regional and local policy guidance in ensuring that there would be no adverse impacts in relation to the air quality.

A second separate representation has been forwarded from a resident at 14 Arundel Gardens providing a copy of a consultation response provided by CPRE in relation to the Local Plan consultation which is at Regulation 19 stage. It is not a representation in relation to this application.

The proposed comments provided are a consultation response on the Local Plan however have made representations on the suitability of Padnall Lake for housing development. It was outlined in the representation that the resultant noise, pollution and should be considered as important green space. Officers give regard to paragraphs 1.10 and 1.11 of the committee report which places significant weight on the increase to biodiversity through planting (530% increase) and the landscape led nature of the proposal (Urban Greening Factor of 0.6) against a 0.4 expectation within London Plan) which make significant gains to the usability and quality of the existing open space for residents.

Whilst Officers have had careful regard to the additional two representations above, Officers consider their assessment and recommendation on these points remain unchanged from those published within the committee report.

Planning Obligations

Play space Contributions

The below wording has been included in the heads of terms to secure the payment prior to the commencement of the development.

- A sum of £50,000 to be paid **prior to commencement of development** to go towards child play space at Marks Gate recreation ground and St Chads Park.

Travel Plan

- Prior to first occupation to prepare and submit for approval a Travel Plan, designation of a Travel Plan Coordinator and Travel Plan Monitoring for a period not less than five years

Report Formatting

Please have regard to the five updates below:

Omit paragraph 1.3 from the published report and replace with:

Paragraph 1.3 - The London Plan - The Spatial Development Strategy for London (GLA, consolidated with alterations since 2011 and published March 2016) (LP) Policy 3.3 which outlines that there is a pressing need for more homes in London to meet need, allocating a strategic target of 12,355 homes in the London Borough of Barking and Dagenham between 2015 and 2025. Policies 3.5 and 3.8 also require that a genuine choice of new homes should be supported which are of the highest quality and of varying sizes and tenures in accordance with Local Development Frameworks. Residential developments should enhance the quality of local places and take account of the physical context, character, density, tenure and mix of the neighbouring environment and incorporate as a minimum the space standards outlined within table 3.3 and the more detailed requirements as outlined within the London Housing Supplementary Planning Guidance (SPG, GLA March 2016). Draft London Plan: The Spatial Development Strategy for Greater London (intend to publish version December 2019) (Draft London Plan) aims to deliver 'good growth', while significantly increasing housing delivery within its boundaries, with a renewed focus on delivery of affordable housing.

Omit paragraph 1.5 from the published report and replace with

Paragraph 1.5 - Officers acknowledge that the site has a site designation within the draft local plan which recognises the potential for the delivery of residential development. Officers therefore also consider the proposed development to accord with the wider strategic vision for this location in delivering a housing led development.

Officers acknowledge two inaccuracies within the published report at paragraphs 1.3 & 1.5 resulting from a formatting error and wish for the committee to have full regard to the replacement paragraphs above.

The following point of assessment to be added to the end of paragraph 1.10 of the published committee report

To add clarity to the policy position regarding the Site of Importance for Nature Conservation, Padnall Lake and surrounding open space were recommended for SINC status as part of the evidence base for the Local Plan Review in February 2017 but this recommendation has not been adopted or carried forwards given that no protected species or habitats were found. The proposed development presents a significant gain in biodiversity value across the wider site which has been achieved through a landscape led approach and officers therefor consider that there would be no adverse effects that arise as a result of the proposed development.

Omit paragraph 1.108 from the published report and replace with

Paragraph 1.108 - In response to this however it is considered that a head of term will be included to contribute to the provision of 1 car club space with free membership for residents for a period of 1 year and the implementation of a controlled parking zone.

Omit paragraph 1.101 from the published report and replace with

Paragraph 1.101 - Officers note that the proposed development has achieved air quality neutrality in terms of transport emissions however the building emissions were not originally met. The applicant has provided an updated air quality assessment which has considered all the relevant requirements which has outlined a number of mitigation measures including cycle parking spaces, electric vehicle charging points, one car club bay with any requirement for a second car club bay to be monitored through the Travel Plan and a comprehensive travel plan to encourage sustainable alternatives to driving. Moreover, a financial contribution has been calculated at £45,207.00 to contribute towards air quality. Officers have reflected this as a Head of term to be payable prior to the first occupation of residential units within Phase 1 of the development and to be used on site.

The above changes to paragraphs 1.108 & 1.101 are necessary to reflect the requirement for a comprehensive travel plan which is secured within the additional planning obligations set out in this addendum.

Recommendation:

1. The Officer recommendation remains unchanged.

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Air Quality Review V1 for 20/01686/FULL - Development Site at Padnall Lake, Padnall Road, Romford, RM6 5ER

Prepared by the Centre for Health Services Studies, 25/11/2020,
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Site	Development Site at Padnall Lake, Padnall Road, Romford, RM6 5E
Applicant	London Borough of Barking and Dagenham (LBBD)
Barking and Dagenham reference	20/01686/FULL

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1. Introduction

1. The Centre for Health Services Studies at the University of Kent has been commissioned by Marks Gate Padnall Views Action Group to provide an independent review of air quality and air quality assessments submitted in relation to the proposed development at Padnall Lake, Padnall Road, Romford (Barking and Dagenham planning application 20/01686/FULL [1]).
2. This document has been prepared by Professor Stephen Peckham and Dr Ashley Mills. Stephen is Professor of Health Policy and Director of the University of Kent's Centre for Health Services Studies and Professor of Health Policy at the London School of Hygiene and Tropical Medicine. He has been working with local residents groups, Parish Councils and voluntary groups on air quality issues in Kent and Essex to undertake air quality monitoring and support submissions to planning consultations.

3. Dr Ashley Mills is a published air quality expert with a doctorate in Systems Engineering. He has 16 years of experience of mathematical modeling of complex physical systems and statistical analysis of them.
4. The arguments set out here refer to the air quality report called “Padnall Lake Air Quality Assessment” produced by Ramboll Ltd on Behalf of Be First Ltd [2].

2. Summary

5. The developer has produced a minimal-effort model derived from two baseline data points which are not representative of the development area, taken from between 2 and 4km away, from sites with atypical characteristics and in discord with those of the development area. As the baseline data is not representative, this is not consistent with the requirements of the LBBB EHO.
6. The developer’s model is “verified” using only these two data points, producing a meaningless RMSE that provides no understanding of the real-world performance of the model across a variety of conditions and in the environment of the development itself.
7. On this basis, the development should not be considered until a model is presented that:
 - uses representative baseline data, which is likely to require additional local diffusion tube modeling for a period of one year in the area of the actual development
 - Is verified using multiple locations in the area of the actual development
8. Thus the planning application should be rejected as it stands since it is not possible to make an informed assessment of air quality using the information provided.

3. Criticisms of Air Quality Assessment

3.1. Baseline data is not representative

9. On page 2 of the developers AQA [2], the developer states, with respect to the air quality assessment scope and methodology, that:

“The proposed scope and methodology were approved by the LBBB EHO in an email on 16 March 2020 with the proviso that the baseline data for the assessment be representative.”

10. In Section 6.1.2 of the developer’s AQA, they specify which data is used for baseline verification, and describe two diffusion tubes located in the Borough of Havering. These are a triplicate: HAV13,14,15 and a site HAV39. These are described as being “between 2 and 3 km east of the site” (page 20, para 5), but their Table 6.1 on page 20 states that they are ~2.2km and ~3.5km from the site respectively so would more accurately be described as being between 2 and 4km from the site.

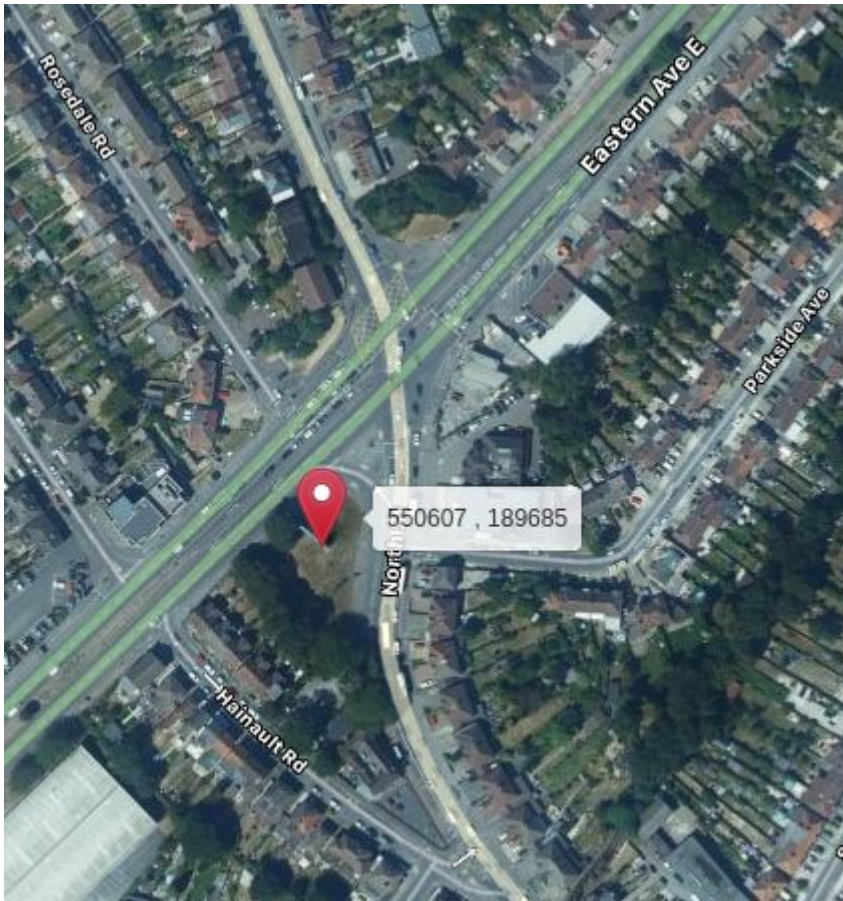
11. The images below show the aerial and streetview images for these diffusion tubes.



HAV39 Aerial



HAV39 Streetview



HAV 13,14,15 Aerial



HAV 13,14,15 aerial



HAV 13,14,15 Streetview

12. In Appendix 3 of the developers AQA, they outline the model verification procedure and state that the model is verified using two diffusion tubes located in the Borough of Havering. Both of these sites are quite atypical for Roadside sites, the first being not directly on the A12, and the second being in a green area set back far from the A12 and partially occluded

by trees from the road. From the perspective of the A12 they both set back considerably and it is a stretch to call these “roadside” in the context of the A12.

13. The facades of the new development onto the A12 on the other hand are much more characteristic of typical “roadside” locations and as such would be better represented by baseline data that reflects this.
14. Also we can see from the developer’s modeled road network figures A5.1 and A5.2 that the road characteristics of the verification sites are considerably different with the HAV 39 location being modeled between 72 and 28 kph, and the HAV13,14,15 location being modeled at 15kph. Whereas modeled receptors R1, R3, and R4 are all on a road with speeds between 15kph and 35kph.
15. Using a single adjustment factor and single model for such a wide variety of conditions is unlikely to produce an accurate model. This is backed up by LAQM.TG(16) [3] which states in section 7.524 that:

“In addition to the consideration of roadside and background sites during model verification, local authorities should also consider separating different types of locations when comparing modelling and monitoring. For example, modelling undertaken for roadside sites in urban areas may require a different adjustment to modelling undertaken for roadside sites near motorways or trunk roads in open settings.”
16. In summary, the two locations chosen as verification points for the model are not representative of the development site.

3.2. Model verification is inadequate

17. Appendix 3 of the developer’s AQA outlines the verification procedure followed for the air quality model.
18. The section proudly states that the model obtains an “(RMSE) with an error of $\pm 0.23 \mu\text{g}/\text{m}^3$ ($\pm 1\%$), i.e. well below the $\pm 10\%$ recommended by TG(16).”
19. However, this figure is meaningless because the model is verified with only two data points. It is always possible to fit a linear model exactly to two data points, algebraically and obtain zero error.
20. This gives no information as to how the model performs generally.
21. Given also that the verification sites are not representative of the development area, the results of the model should not be considered reliable or representative and should be discarded in their current form.

4. References

- [1] '20/01686/FULL - Padnall Lake residential development hybrid planning application', 20-Aug-2020. [Online]. Available: <https://online-befirst.lbbd.gov.uk/planning/index.html?fa=getApplication&id=26213>
- [2] Ramboll Ltd on behalf of Be First Ltd, 'Padnall Lake Air Quality Assessment', Aug. 2020 [Online]. Available: https://online-befirst.lbbd.gov.uk/planning/?fa=downloadDocument&id=211629&public_record_id=26213
- [3] 'Local Air Quality Management Technical Guidance (TG16)'. DEFRA, Feb-2018 [Online]. Available: <https://laqm.defra.gov.uk/technical-guidance/>. [Accessed: 03-Jun-2019]

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