This application seeks planning permission for the erection of 8 blocks of 20 modular flats, a substation, a new access road, 7 car parking spaces, a refuse store and cycle parking for 20 bikes. The 4 southernmost blocks would be 2 storeys in height and the 4 northern blocks would be 3 storeys.

As one of the Council’s Thames View Regeneration Sites, it has been designated as an infill housing development (reference SSA SM13 – Garage Site to the Rear of 75-77 Wivenhoe Road). This scheme is intended as temporary accommodation to house homeless households on the housing needs list before relocating these residents to more permanent housing elsewhere.

The application site is a cleared, overgrown and fenced off site with hard standing that previously accommodated garages and has an area of 0.1366 hectares. It is located to the south of the railway line and Mayes Brook and is surrounded by residential properties along Wivenhoe Road and Maybury Road.

The modular units would be arranged into eight blocks, comprising four two-storey buildings on the southern part and four three-storey buildings on the northern part of the site. Four covered metal external staircases would provide access to upper floors. All eight ground floor flats are designed to be fully wheelchair accessible.

The proposed design includes a metal clad finish with UPVC windows. It is recommended that further details on external materials are submitted through a planning condition.

Vehicle access will be reinstated from Wivenhoe Road and 7 parking spaces are proposed along the eastern boundary with 75-77 Wivenhoe Road (ratio of 0.35 spaces per unit). One of the spaces is designed to be for wheelchair users. The secure cycle storage along the southern boundary will have space for 20 bikes, equivalent to 1 space per flat.

Apart from the tarmac providing access to cars on the eastern side of the modular buildings, the site will have a new tarmac pathway between the two-storey and three-
storey blocks providing access to residents. Further permeable tarmac is proposed around the perimeters of the units, which would be available to the closest ground floor units. The site will be delineated by a 2.5 metre fence on the north and western boundaries, keeping the existing concrete fence on the southern and eastern boundaries. An access gate with a controlled entry system would be installed at the eastern boundary. It is recommended that a detailed soft and hard landscaping plan is submitted as part of a condition, ensuring that new trees are planted, along with other soft landscaping features.

The refuse store is located adjacent to the three-storey blocks along the northern boundary and the proposed sub-station and intake rooms will be located south of the vehicle entrance to the site, adjacent to the garden of 77 Wivenhoe Road.

It is recommended that the final Energy and Renewable Strategy is submitted as part of a planning condition.

Development of this site for 20 temporary modular homes would satisfy a number of the Borough’s and London Plan strategic objectives and policies: Strategic Objectives SO1, SO2, Policies CM1, CM2, CR1, CR2, CR4 and CP3 of the Core Strategy; Policies BR1, BR2, BR4, BR5, BR9, BR13, BR15, BC1, BC2, BC7, BP8, BP10 and BP11 of the Borough Wide Development Plan; and Policies 3.1, 3.3, 3.4, 3.8, 3.10, 3.13, 5.2, 5.3, 5.7, 5.9, 5.12, 5.13, 5.21, 6.9, 6.13 and 7.3 of the London Plan.

Permission is recommended subject to conditions detailed below.

Recommendation:

That the Planning Committee grant planning permission subject to the following conditions:

1. Time Limit

The development permitted shall be begun before the expiration of three years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 (as amended by Section 51 of the Planning and Compulsory Purchase Act 2004).

2. Approved Drawings

The development hereby permitted shall be carried out in accordance with the following approved plans:

Existing Site Location Plans and Surveys ref. 0-01 Rev-
Proposed Ground Floor Plan ref. BE0033.02 REV A
Proposed First Floor Plan ref. BE0033.03 REV A
Proposed Second Floor Plan ref. BE0033.04 REV A
Proposed Roof Plan ref. 0-05 Rev-
Proposed Elevations (A-A; B-B; C-C; D-D) ref. 0-10 Rev-
Proposed Elevations (E-E; F-F; G-G; H-H) ref. 0-11 Rev-
Proposed Elevations Detail (B-B; C-C) ref. 0-12 Rev-

Reason: For the avoidance of doubt and in the interests of proper planning.
3. Details of External Materials

Prior to commencement of above ground works details/samples of all materials to be used in the construction of the external surfaces including their colour and finish shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved materials.

Reason: Details of external materials are required prior to commencement of development because these have not been supplied already. These details are required in order to protect or enhance the character and amenity of the area in accordance with policies BP8 and BP11 of the Borough Wide Development Policies Development Plan Document.

4. Hard and Soft Landscaping

No development shall take place until a scheme of hard and soft landscaping for the site, including details of materials, species and a planting schedule have been submitted to and approved in writing by the Local Planning Authority. Specifically, a soft landscaping scheme should be detailed for: areas around the cycle storage, the areas annotated for soft landscaping along the western boundary, suitable buffer planting along the ground floor windows (particularly along the eastern elevation), and an appropriate tree planting scheme, including at least four new trees along the northern boundary at the entrance of the site.

The approved hard landscaping shall be carried out prior to the occupation of the development and thereafter permanently retained. The approved soft landscaping shall be carried out in the first planting and seeding seasons following the occupation of the buildings or completion of the development, whichever is the sooner. Any plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species unless the Local Planning Authority gives written consent to any variation.

Reason: To safeguard and improve the appearance of the area, where existing trees could be retained in the soft landscaping scheme, this information should be submitted pre-commencement of development in accordance with policy BP11 of the Borough Wide Development Policies Development Plan Document.

5. Boundary Treatment

Prior to the occupation of the development a plan indicating the position, design, materials and type of boundary treatment to be erected around the dwellings shall be submitted to and approved in writing by the Local Planning Authority. Measures shall include fences that are wildlife friendly with hedgehog gravel boards at the bottom. The areas to the rear and sides of the units should be sub-divided and delineated to provide private amenity space; details of these boundary treatments should be provided as part of this condition.

No part of the development shall be occupied until the approved boundary treatment has been constructed. The approved boundary treatment shall be retained unless the Local Planning Authority gives prior written approval for its removal.

Reason: To ensure the boundary treatment protects or enhances the character and
amenity of the area and to preserve and enhance the Borough’s natural environment in accordance with policy CR2 of the Core Strategy, policy BP11 of the Borough Wide Development Policies Development Plan Document and policy 7.19 of the London Plan.

6. Tree Protection
Before any works hereby permitted are commenced and until all such works are completed:
a) all trees to be retained within and adjacent to the boundary shall be protected by secure, stout exclusion fencing erected at a minimum distance equivalent to the branch spread of the trees and in accordance with BS.5837;
b) any works connected with the approved scheme within the branch spread of the trees shall be by hand only. No materials, supplies, plant or machinery shall be stored, parked or allowed access beneath the branch spread or within the exclusion fencing. Any trees that are damaged or felled during construction work must be replaced with semi mature trees of the same or similar species.
Reason: To ensure that retained trees are identified prior to the commencement of development and adequately protected during the construction phase in accordance with Policy CR2 of the Core Strategy and policies BR3 and BP11 of the Borough Wide Development Policies Development Plan Document and Section 197 of the Town and Country Planning Act 1990

7. Root Protection
No development shall be carried out until a method statement identifying the root protection areas of all trees on and around the site, and giving details of any works to be carried out within the root protection areas of the trees and the method to avoid damage to the trees during these works has been submitted to and approved in writing by the Local Planning Authority.
Reason: To ensure that retained trees are identified prior to the commencement of development and adequately protected during the construction phase in accordance with Policy CR2 of the Core Strategy and policies BR3 and BP11 of the Borough Wide Development Policies Development Plan Document and Section 197 of the Town and Country Planning Act 1990

8. Car Parking (Implementation)
The car parking areas, and electric charging point indicated on drawing No. BE0033.02 REV A; shall be constructed and marked out prior to the occupation of the development, and thereafter retained permanently for the accommodation of vehicles of occupiers and visitors to the premises and not used for any other purpose.
Reason: To ensure that sufficient off-street parking areas are provided and not to prejudice the free flow of traffic or conditions of general safety along the adjoining highway in accordance with policy BR9 of the Borough Wide Development Policies Development Plan Document.

9. Accessible Parking Bays
The accessible parking bay indicated on drawing No. BE0033.02 REV A; shall be clearly marked with a British Standard disabled symbol and permanently retained for the use of disabled persons and their vehicles and for no other purpose.

10. Cycle Parking (Implementation)
The cycle parking indicated on drawing No. BE0033.02 REV A; shall be implemented prior to the occupation of the development and thereafter retained permanently for the accommodation of bicycles of occupiers and visitors to the premises and not used for any other purpose.
Reason: In the interests of promoting cycling as a sustainable and non-polluting mode of transport and in accordance with policy BR11 of the Borough Wide Development Policies Development Plan Document.

11. Accessible Housing - M4 (2)
Before occupation the ground floor dwellings shall comply with Building Regulations Optional Requirement Approved Document M4(2) Category 2: Accessible and adaptable dwellings (2015 edition). Evidence of compliance shall be notified to the building control body appointed for the development in the appropriate Full Plans Application, or Building Notice, or Initial Notice to enable the building control body to check compliance.
Reason: To ensure that accessible housing is provided in accordance with policy 3.8 of the London Plan.

12. Accessible Housing - M4 (3)
The wheelchair unit (Unit 1) identified on the approved drawings shall be constructed to, or capable of easy adaptation to, Building Regulations Optional Requirement Approved Document M4(3) Category 3: (Wheelchair user dwellings) (2015 edition). Evidence of compliance shall be notified to the building control body appointed for the development in the appropriate Full Plans Application, or Building Notice, or Initial Notice to enable the building control body to check compliance.
Reason: To ensure that sufficient accessible housing is provided in accordance with policy 3.8 of the London Plan.

13. Energy and Overheating Strategy
Details of the proposed energy and overheating strategy shall be submitted to and approved in writing by the Local Planning Authority before the commencement of any work above ground level. The development hereby permitted shall achieve as a minimum a 35% reduction in carbon dioxide emissions over Part L of the Building Regulations (2013).
Reason: To ensure the proposed design and energy strategy is sustainable in accordance with Policy 5.2 and 5.3 of the London Plan and Policy BR2 of the Borough Wide Development Policies Development Plan Document.

14. Renewable Energy
Details of the proposed renewable energy generating equipment shall be submitted to and approved in writing by the Local Planning Authority before the commencement of any work above ground level. The equipment shall be installed before the development is occupied and shall be permanently maintained so as to provide energy for the development on a day-to-day basis for as long as the development remains.
Reason: In the interests of safeguarding the environment, to ensure that the development provides suitable renewable energy in accordance with policy BR2 of the Borough Wide Development Policies Development Plan Document and policies 5.2 and 5.7 of the London Plan.

15. Surface Water Drainage (Flooding)
No development shall commence until a Surface Water Drainage Scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development and impact on the adjoining Mayesbrook Site of Importance for Nature Conservation, has been submitted to and approved in writing by the Local Planning Authority. The Scheme shall subsequently be implemented in accordance with the approved details before the development is completed.
Reason: The suitability of the approved Drainage Scheme should be tested prior to commencement of development in order to reduce the risk of flooding and in accordance with policy BR4 of the Borough Wide Development Policies Development Plan Document and policy 5.13 of the London Plan.

16. Breeding Birds Survey
No vegetation or site clearance shall take place between March and September without the submission of a breeding birds survey and subsequent written approval of the Local
Planning Authority. The survey shall include a programme for implementation and mitigation measures where necessary and shall ensure a subsequent inspection is undertaken 2 days prior to commencement. The survey and inspections shall only be carried out by a suitably qualified investigating body acceptable to the Local Planning Authority. The development shall not be carried out otherwise than in accordance with the approved details.

Reason: The survey is required prior to commencement of the development to protect the ecology of the area as nesting birds may be present on the site and in accordance with policy CR2 of the Core Strategy, policy BR3 of the Borough Wide Development Policies Development Plan Document and policy 7.19 of the London Plan.

17. Construction Method Statement
No development shall take place until a Construction Method Statement has been submitted to, and approved in writing by, the Local Planning Authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall provide for:

i. the parking of vehicles of site operatives and visitors;
ii. details of access to the site;
iii. loading and unloading and the storage of plant and materials used in constructing the development;
iv. the erection and maintenance of security hoardings including decorative displays;
v. wheel washing facilities;
vi. measures to control the emission of noise, dust and dirt during construction;
vii. a scheme for recycling/disposing of waste resulting from demolition and construction works;
viii. measures to control the emission of dust, dirt and emissions to air during construction; such measures to accord with the guidance provided in the document “The Control of Dust and Emissions during construction and demolition”, Mayor of London, July 2014; including but not confined to, non-road mobile machinery (NRMM) requirements; and,
ix. details of a nominated developer/resident liaison representative with an address and contact telephone number to be circulated to those residents consulted on the application by the developer’s representatives. This person will act as first point of contact for residents who have any problems or questions related to the ongoing development.

Reason: The construction method statement is required prior to commencement of development in order to reduce the environmental impact of the construction and the impact on the amenities of neighbouring residents, and in accordance with policy BP8 of the Borough Wide Development Policies Development Plan Document.

18. Construction Hours
No deliveries, external running of plant and equipment or construction works, other than internal works not audible outside the site boundary, shall take place on the site other than between the hours of 0800 to 1800 on Monday to Friday and 0800 to 1300 on Saturday and not at all on Sundays, Public or Bank Holidays without the prior written permission of the Local Planning Authority.

Reason: To ensure that the proposed construction work does not cause undue nuisance and disturbance to neighbouring properties at unreasonable hours and in accordance with policy BP8 of the Borough Wide Development Policies Development Plan Document.

19. Construction Noise and Vibration Control
Construction work and associated activities are to be carried out in accordance with the
recommendations contained within British Standard 5228:2009, “Code of practice for noise and vibration control on construction and open sites” Parts 1 and 2. Reason: To minimise the transmission of noise and vibration and thereby safeguard the amenity of neighbouring residential occupiers and in accordance with policy BP8 of the Borough Wide Development Policies Development Plan Document.

20. Internal Acoustic Levels
Construction work shall not begin until full details of a scheme of acoustic protection of habitable rooms against railway noise has been submitted to and approved in writing by the Local Planning Authority. The scheme of acoustic protection shall be sufficient to secure internal noise levels no greater than:

- 35 dB LAeq in living rooms and bedrooms (07.00 hours to 23.00 hours) with windows closed and;
- 30 dB LAeq in bedrooms (23.00 hours to 07.00 hours) with windows closed.

Additionally, where the internal noise levels will exceed 40 dB LAeq in living rooms and bedrooms (07.00 hours to 23.00 hours) or 35dB LAeq in bedrooms (23:00- 07.00 with windows open the scheme of acoustic protection shall incorporate a ventilator system which is commensurate with the performance specification set out in Schedule 1 (paragraphs 6 and 7) of The Noise Insulation Regulations 1975 (as amended). The approved scheme shall be fully implemented before the first occupation of the dwelling to which it relates and shall be maintained at all times thereafter.

Reason: To maintain reasonable levels of protection for the occupiers of the development from external noise and in accordance with policy BP8 of the Borough Wide Development Policies Development Plan Document.

21. Noise from Plant
The rating level of noise from fixed plant installed pursuant to this permission shall not exceed the existing background noise level outside the window to any habitable room in residential accommodation in the vicinity. Any assessment of compliance with this condition shall be made according to the methodology and procedures presented in BS4142:2014.

Reason: In the interest of protecting neighbouring amenities in accordance with policies BR13, BP8 and BP11 of the Borough Wide Development Policies Development Plan Document.

22. External Lighting
The lighting of the development hereby permitted, is to be designed, installed and maintained so as to fully comply with The Association of Chief Police Officers - Secured by Design publication “Lighting Against Crime – A Guide for Crime Reduction Professionals”, ACPO SPD, January 2011. The design shall satisfy criteria to limit obtrusive light presented in Table 1, p25 of the guide, relating to Environmental Zone E3 – Medium district brightness areas - small town centre or urban locations.

Reason: In the interests of security and safety, to avoid light pollution and safeguard neighbouring amenity and in accordance with policy BP11 of the Borough Wide Development Policies Development Plan Document.

23. Land Contamination (Phase 2 Assessment)
A Phase 2 investigation and risk assessment, in addition to the Phase 1 assessment provided with the planning application, must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The contents of the scheme are subject to the approval in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report is subject to the approval in writing of the Local Planning Authority. The report of the findings must include:

i. a survey of the extent, scale and nature of contamination;
ii. an assessment of the potential risks to:
   i. human health,
   ii. property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes,
   iii. adjoining land,
   iv. groundwaters and surface waters,
   v. ecological systems,
   vi. archaeological sites and ancient monuments;
iii. an appraisal of remedial options, and proposal of the preferred option(s).
iv. This must be conducted in accordance with DEFRA and the Environment Agency’s ‘Model Procedures for the Management of Land Contamination, CLR 11’.

24. Land Contamination (Remediation Scheme)
A detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment must be prepared, and is subject to the approval in writing of the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

25. Implementation of Remediation Scheme
The approved remediation scheme must be carried out in accordance with its terms prior to the commencement of development other than that required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works.

26. Land Contamination (Unexpected)
In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of condition 24, and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of condition 25, which is subject to the approval in writing of the Local Planning Authority.
Reason for Conditions 24-27: Contamination must be identified prior to commencement of development to ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with policy BR5 of the Borough Wide Development Policies Development Plan Document and policy 5.21 of the London Plan.

27. Foundation Design (Shallow) (HS1)
Unless the maximum depth of any part of the foundations is less than two metres, details of the design of the foundations and other works proposed below existing ground level shall be submitted in writing prior to the start of construction and approved by the Local Planning Authority in consultation with HS1. Construction activity shall then be carried out in compliance with the approved details unless previously agreed in writing by the Local Planning Authority in consultation with HS1. Reason: Details are required prior to the commencement of development in order to reduce the impact to ground works in proximity to HighSpeed1, and to ensure that loads on, and settlement of, HighSpeed1 tunnels, structures, track and other infrastructure do not prejudice the safety or operation of HighSpeed1.
28. Site Investigations near HS1 (in tunnel)
Prior to the start of site investigations involving a borehole or trial pit deeper than one metre, details of the location and depth of site investigations including a method statement shall be submitted in writing and approved by the Local Planning Authority in consultation with HS1. This activity shall be carried out only in compliance with the approved details unless previously agreed in writing by the Local Planning Authority in consultation with HS1.
Reason: No such information has been provided and is required in order that the borehole or trial pit is at an acceptable vertical and horizontal distance from the tunnel such that it does not compromise the integrity, safety or operation of HighSpeed1.

29. Excavations (HS1)
Prior to the start of construction activity engineering details of the size, depth and proximity to HighSpeed1 of any excavations shall be submitted in writing to and approved by the Local Planning Authority in consultation with HS1. Excavations shall then be carried out in accordance with the approved details unless the Local Planning Authority in consultation with HS1 has previously agreed in writing to any change.
Reason: Details are required prior to the commencement of development in order to reduce the impact to ground works in proximity to HighSpeed1, and to ensure that the stability HighSpeed1 tunnels, structures, track and other infrastructure is not prejudiced.

30. Imposed Loads (HS1)
Prior to the start of construction, details of the size, loading and proximity to HighSpeed1 of additional ground loads such as stockpiles shall be submitted in writing and approved by the Local Planning Authority in consultation with HS1. Works shall be carried out in conformation with the approved details unless the Local Planning Authority in consultation with HS1 has previously agreed in writing to any change.
Reason: Details are required prior to the commencement of development in order to reduce the impact to ground works in proximity to HighSpeed1, and to ensure that the stability of HighSpeed1 tunnels, structures, track and other infrastructure is not prejudiced.

31. Vibration (HS1)
Prior to the start of construction details of the plant and equipment proposed which are likely to give rise to vibration (such as pile driving, demolition and vibro-compaction of the ground) together with predicted vibration levels, shall be submitted in writing and approved by the Local Planning Authority in consultation with HS1. Activities likely to cause vibration in the vicinity of HighSpeed1 infrastructure such that a peak particle velocity (PPV) of 5mm/s may be exceeded at the railway boundary will be subject to agreement in advance. Where activities could give rise to PPV of 5mm/s or greater, a vibration and settlement monitoring regime shall be submitted in writing to for approval by the Local Planning Authority in consultation with HS1. It shall be put in place prior to the start of works. HS1 shall be provided reasonable access to the results of monitoring.
Reason: Details are required prior to the commencement of development in order to reduce the impact to ground works in proximity to HighSpeed1, and to ensure that vibration does not prejudice safety, operation and structural integrity of HighSpeed1.

32. Finished Floor Levels
The development should be carried out in accordance with the submitted Flood Risk Assessment. The proposed finished floor levels should not be set below 2.5m AOD.
Reason: To prevent a risk to of flooding to properties at ground floor in accordance with Policy CR4 of the Core Strategy.

33. Air Quality Details
Details of mitigation or offsetting measures to meet the air quality neutral benchmarks are
to be submitted to and approved by the Local Planning Authority and are to be
implemented before the first occupation of the development hereby permitted.

Reason: To ensure that appropriate measures are taken to minimise the air quality
impacts of new development and in accordance with policy BR14 of the Borough Wide

| Contact Officer | Title: Senior Development Management Officer | Contact Details: Tel: 020 8227 2822 E-mail: suzanne.kimman@befirst.london |

1. Introduction and Description of Development

1.1 The application site comprises 0.1366 hectares with a rectangular shape and a
vehicular access from Wivenhoe Road. It is bounded by railway lines and the
Mayes Brook to the north, open space to the west, the rear of residential properties
along Maybury Road to the south and the rear of the residential properties at 75-77
Wivenhoe Road to the east. Garages were formerly situated on the site but since
demolition the site largely comprises hard standing and overgrown shrubbery.

1.2 The scheme proposes 20 two-bedroom modular flats, with car parking, cycle
spaces and refuse storage. The proposal has been developed in collaboration with
the Housing team at Be First for short-term accommodation that will house
homeless families before being housed more permanently.

1.3 Eight modular blocks are proposed in parallel to each other. At two storeys along
the southern boundary and three storeys along the northern boundary, the units are
laid out along the eastern and western aspects in their length.

2. Background

2.1 There is no relevant planning application history.

2.2 The site is not subject to a Tree Protection Order (TPO) and there are no statutory
heritage assets within the vicinity. It falls within the Tier 3 Barking Level and
Dagenham Marsh Archaeology Priority Area.

2.3 As the site is located to the south of Mayes Brook, the site is designated as Flood
Zone 3 on the Environmental Agency Flood Map. It therefore has a high probability
of flooding. The area around the site is also in Flood Zone 3 but it benefits from
flood defences. The area between the railway lines and the site's northern boundary
is designated as the Mayesbrook Site of Importance for Nature Conservation
(SINC).

2.4 The public transport accessibility level (PTAL) rating is 1b, where 1 is the lowest
and 6b is the highest. Nearby transport links include bus routes EL1 and EL2 (East
London Transit) with bus stops within 5 minutes' walk. These routes provide access
to Ilford, Barking Town Centre, Barking Riverside and Dagenham Dock.
3. Consultations

Adjoining Occupiers

3.1 62 neighbouring properties were consulted by individual letter. Site notices were posted in the vicinity of the application site, and a press notice was published in the Barking and Dagenham Post on 27 June 2018.

3.2 14 letters of objections, one neutral response letter and two petitions (with 13 signatures each) have been received. The responses have been summarised below.

Scale and Overlooking
- Scale of development; existing properties in the area are two storeys and the proposed development is at three storeys;
- Overbearing; it will reduce the 'open expanse of sky currently enjoyed';
- Overlooking of homes and rear gardens;

Structural integrity
- Concerns over the structural integrity of the modular building system due to vibration of the railway and the reclamation of the land;

Energy Usage
- Refers to a London Borough ceasing the modular design programme as a result of the costly heating bills;

Anti-Social Behaviour
- The western end of Wivenhoe Road has been experiencing social problems. The road was closed off following campaigning; the reasons included: drug taking and dealing, parties, alcohol consumption, violence including physical assaults and threatening, parking issues, sexual problems, general anti-social behaviour, gang issues, industrial-scale fly tipping. Concern these problems will return and be exacerbated with introduction of 20 flats and without CCTV monitoring and overlooking;
- Concern over the location of refuse; that it will encourage commercial fly tipping;
- Area is not being overlooked or monitored by CCTV;

Car Parking
- Existing parking problem on Wivenhoe Road due to lack of on-street spaces;
- Lack of car parking (7 spaces for 20 units and visitors), increasing on-street parking pressures which cannot be controlled;
- Change in the 'cul-de-sac way of life';

Sub-Station
- Noise and health and safety concerns for no. 77 Wivenhoe Road regarding the location of the sub-station;

Future Occupiers
- Lack of children's play space, resulting in children playing on-street;
- Concerns over the type of people to occupy the temporary units, their background, the number of people on the site and in the area, and that residents would not have a sense of ownership due to the temporary nature of residing.
Case officer comments:

The process for selecting who will live in these units is not a planning consideration. There is no evidence that the existing issues with anti-social behaviour will be exacerbated by the type of people to move into this development.

A House of Commons Library Standard Note: SN06151 “Electricity substations and health”, dated 6 December 2011 states “Electric field strength measurements close to local area substations indicate that electric field strengths are often below 1 volt per metre and this is attributed to the shielding provided by the metallic casing on components and cables, and to the enclosure walls. Only where overhead feeder lines occur, are electric fields likely to exceed a few volts per metre. The power frequency magnetic fields recorded around local area substations are much less than the ICNIRP (International Commission on Non-Ionising Radiation Protection) reference levels for public exposure of 100 microteslas and 5 kilovolts per metre, which are based on preventing well established biological effects.

As such there is no evidential basis to object to the location of the sub-station.

3.3 In summary, this committee report deals with the following issues in the sections below:

- Height of the development;
- Overlooking;
- Vibration and structural integrity;
- Lack of children’s play space;
- Inadequate parking and on-street parking pressure;
- Anti-social behaviour and safety;
- Location of refuse storage and sub-station.

Transport Development Management

3.4 The Transport Team does not have an objection, but made the following observations:

3.5 The site has a low PTAL rating of 1b and it would be desirable to have more parking. Due to the restriction of the site’s geometry, the Highways Team note that it would be difficult to add extra car parking spaces.

3.6 The team recommends that the road surface treatment promotes a shared surface use as the proposals do not have segregated access for pedestrians accessing the site.

3.7 The Team is satisfied the site can be accessed and serviced in an emergency, and that the refuse storage and collection point is accessible.

Environment Agency (EA)

3.8 The EA has no objections to the proposed development and request that the development is carried out in accordance with the submitted Flood Risk
Assessment (FRA). The proposed finished floor levels should not be set below 2.5m AOD.

**Thames Water**

3.9 With regard to waste water network and waste water process infrastructure capacity, Thames Water does not have any objection to the planning application, based on the information provided.

3.10 With regard to surface water drainage, Thames Water advises that if the developer follows the sequential approach to the disposal of surface water, they would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required.

**Environmental Health**

3.11 The Environmental Health Officer (EHO) responded to the noise, land contamination, light pollution and construction phase impact environmental protection issues:

**Noise**

3.12 The EHO considers the plant noise limit criteria as considered in the Noise Survey Report acceptable as they do not exceed the lowest measured existing background noise levels for the day and night-time periods. An appropriate condition has been recommended to secure this limit.

3.13 Habitable room windows facing the railway line to the north would not achieve the internal noise levels recommended in BS 8233:2014. Therefore, the EHO recommends that suitable acoustic treatment of appropriate double glazing coupled with acoustic trickle ventilation and mechanical ventilation (i.e. a MVHR unit) is used.

3.14 The EHO is satisfied that a profiled steel structure coupled with a 12mm Fire Line internal plasterboard lining will achieve a lesser, but still satisfactory degree of airborne sound insulation against the railway noise. The report presented acoustic calculations assuming a cavity brick construction coupled with Dryliner (12.5mm soundbloc plasterboard).

**Vibration**

3.15 The EHO provided advice regarding vibration following the comments raised by neighbouring residents on the perceived vibration from the nearby railway line (heavy goods vehicles and High Speed 1).

3.16 When comparing the scheme with the results of a Vibration Impact Assessment submitted in connection with a nearby planning application (ref: 18/00770/FUL – Mellish Close garages) which is situated at a distance of 13m from the railway, the EHO is satisfied that the proposed development will be significantly below the lowest observable effect criteria for day and night as it is situated around 30m from the closest rail. The EHO is also satisfied that the vibration from the passage of trains will not prejudice the structural integrity of the buildings.
Land Contamination

3.17 The EHO concurs that a Phase 2 Intrusive Investigation is required on the site, in line with the conclusion in the Phase 1 Risk Assessment.

Potential Light Pollution

3.18 The EHO requires that the scheme facilitates safe access, egress and movement within the site through suitable external lighting, in line with the guide published by the Association of Chief Police Officers to reduce crime. Residential amenity should be safeguarded and light pollution should be minimised.

Construction Phase Impacts

3.19 The EHO recommends a number of conditions to limit the hours of construction and to require mitigation measures for the impact of dust, noise and emissions.

3.20 In summary, the EHO does not raise any objection to the scheme and recommends that permission may be granted subject to suitable planning conditions for noise levels, land contamination, light pollution and construction impacts.

3.21 An addendum response from the EHO states that the transport impacts of the development would not meet the air quality neutral benchmarks and therefore mitigation will be necessary. This is the subject of a condition in the recommendation above.

High Speed 1 (HS1)

3.22 Network Rail (High Speed 1) proposes to include planning conditions to safeguard the High Speed 1 infrastructure.

Greater London Archaeology Advisory Service (GLAAS)

3.23 GLAAS advises that archaeological input is not required for this application. Remains of archaeological significance on that side of the railway line are deeply buried, as demonstrated by recent work at the Short Blue Public House just to the south. The modular housing proposed here is unlikely to have an impact at that depth.

Metropolitan Police

3.24 The Designing Out Crime Officer (DOCO) confirms that the recommendations provided as part of the pre-application advice have been incorporated into the planning submission.

4. Local Finance Considerations

4.1 As the proposed development is for 100% affordable housing, it qualifies for full Social Housing Relief under Section 49 of the Community Infrastructure Levy Regulations 2010 (as amended).
5. **Equalities Considerations**

5.1 The Equality Act 2010 requires the Council to advance equality of opportunity in the exercise of its functions. In this respect, the scheme has been designed such that seven of the ground floor units comply with the Building Regulations Part M4(2) ‘Accessible and adaptable dwellings’ standard, and Unit 1 to comply with Part M4 (3) ‘Wheelchair user dwellings’, enabling easier access for people with disabilities or impaired mobility. The units above will not be step-free and therefore will not comply with these standards.

6. **Analysis**

6.1 **The site context**

6.1.1 The application site is a cleared, overgrown and fenced off site that previously accommodated garages and has an area of 0.1366 hectares. It is located to the south of the railway line and is surrounded by residential properties along Wivenhoe Road and Maybury Road. The site is accessible via the cul-de-sac of the western part of Wivenhoe Road. Railway lines adjoin the site to the north and an open space to the west.

6.2 **Principle of the use**

6.2.1 The site is allocated for infill housing development, as one of the Council’s Thames View Regeneration Sites. Be First is bringing forward the site on behalf of LBBD.

6.2.2 The proposed units will be let through temporary accommodation licences, with rents at approximately 30% of the market rate. The total number of people in temporary accommodation in the borough is currently 1,748 (at 26th October). The Wivenhoe modular scheme would provide accommodation to those people who might live in private accommodation or bed and breakfasts. Households are expected to live in the scheme on a short-term basis before they are moved to more permanent residences. The scheme therefore proposes 100% affordable housing, to be managed by the London Borough of Barking and Dagenham.

6.2.3 The principle of affordable development for temporary accommodation is acceptable as it will provide a location for homeless families to be supported in the interim stage of rehousing. It would satisfy a number of the Borough’s and London Plan strategic objectives and policies; Strategic Objectives SO.1 and SO.2, Policies CM1 and CM2 of the Core Strategy; Policy BC1 of the Borough Wide Development Plan; and Policies 3.1, 3.4, 3.9 and 3.13 of the London Plan.

6.3 **Design**

6.3.1 Policies CM1 and CP3 of the Core Strategy and Policy BP11 of the Borough Wide Development Policies DPD set out the principles which should be applied to the design and layout of new development in order to avoid harm to the character of the local area.

*Scale and Height*
The surrounding residential dwellings are two storeys in height. The modular units would be arranged into eight blocks, extending to four two-storey blocks on the southern part and four three-storey blocks on the northern part of the site. The proposed lower scale is considered to relate appropriately to the two storey houses and the three-storey elements are sufficiently further away from neighbouring boundaries to maintain the character and amenity of the area.

Materials

The proposed design includes a metal finish with UPVC windows. The design is simple, functional and low in maintenance which focuses on providing homeless families a safe place to live temporarily. The flexible and adaptable nature of the scheme satisfies Policy BP11, providing the opportunity for future adaptation to the site layout and scale.

However, it is felt that more needs to be done to improve the visual appearance of the units. A condition is recommended to specify further details of the proposed external materials, which should include the colour and finish. It is expected that the façade treatment will address these concerns and soften the visual appearance of the modular units. Securing a good design will ensure compliance with Policy CP3.

Layout

The modular units would be arranged into eight blocks, with primarily east to west aspects. The northern units will also have outlook over the railway and an aspect south. The four metal external staircases will be covered and provide access to upper floors. The eight ground floor flats are designed to be fully wheelchair accessible. This complies with Core Strategy Policy CP3, proposing a safe and inclusive design that is accessible to its users.

Apart from the tarmac providing access to cars on the eastern side of the units, the site will have a new tarmac pathway between the two-storey and three-storey blocks providing access to residents. Further permeable tarmac is proposed around the perimeters of the modular units. The site will be delineated by a new 2.5 metre fence on the northern and western boundaries, keep the existing concrete fence along the southern and eastern boundaries, and a new access gate with a controlled entry system will be installed at the eastern side. It is acknowledged that a shared surface character may give a better appearance to this development. However, in view of the low number of car trips expected, it is considered that the proposed surface treatment would be safe and is acceptable.

The refuse store is located adjacent to the three-storey blocks along the northern boundary and the proposed sub-station and intake rooms will be located south of the vehicle entrance to the site, adjacent to the gardens of 75-77 Wivenhoe Road.

Existing issues around fly tipping and anti-social behaviour are likely to be exacerbated by the hoarding up of the site at the end of the cul-de-sac which does not have suitable security measures to monitor the area. It is considered that the development will improve the street scene and bring activity to this part of the road, increasing the level of natural surveillance. Pre-application discussions have been held with the Metropolitan Police and the Designing Out Crime Officer confirmed that their recommendations have been included in the design proposals. The site
will be managed by LBBD and any anti-social behaviour issues will be dealt with appropriately.

**Internal space standards**

6.3.9 The two-bedroom modular units are 44 m$^2$ each. This is below the London Plan and nationally described space standards of 61 m$^2$ for a 2-bedroom, 3-person unit. The units will have a single and double bedroom, a combined kitchen and lounge and shower room. Some storage space has been included in the bedrooms and kitchen area. As people will only be housed in these units for a temporary period of time, it is considered that the units will still provide the basic facilities for households. The housing need for this vulnerable group of people is considered to outweigh the requirement for larger units.

6.3.10 The second and third floors would be accessed by metal staircases and the landing level will be shared between two units each.

6.3.11 Seven of the ground floor flats will be configured as fully adaptable dwellings in line with Building Regulations Part M4 (2), where the double bedroom can accommodate the appropriate turning circles for wheelchair users. Unit 1 will be delivered in line with M4 (3) standards. Level access is provided from the car park, via the secure gate and a slope up to the landing area.

**External Amenity Space**

6.3.12 External amenity space is only provided for the ground floor flats who would have access to the space around the blocks. The upper flats will not have access to balconies or shared amenity space due to the limited space available on the site. No on-site play space is provided for children.

6.3.13 Whilst residents should have access to amenity space, it is considered that, on balance, in view of the temporary nature of residents, it is not necessary for these amenities to be provided on-site. Residents will be able to walk to Newlands Park (250 metres from the site). This park provides open space and play facilities for the neighbourhood. This arrangement is acceptable and meets the requirements of Policy BP5 of the Borough Wide Development Policies Development Plan Document and Policy 3.8 of the London Plan thereby ensuring a satisfactory standard of temporary accommodation.

6.4 **Amenity of Neighbouring Residents**

6.4.1 The closest neighbouring residential buildings to the site are the two-storey terraces at 75-77 Wivenhoe Road to the east and 121-129 Maybury Road to the south.

6.4.2 The initial proposal included primary windows facing south onto the Maybury Road properties. The concerns of overlooking have been addressed during the application by moving the first floor windows so that they now face eastwards and westwards.

6.4.3 Some overlooking to the gardens to the east will result from this development but it is considered that a distance of 12 metres from the boundary with the rear gardens is sufficient to avoid any significant overlooking and there would be a distance of
around 24 metres in total between the block and 75-77 Wivenhoe Road which is sufficient to maintain privacy.

6.4.4 As the units are located to the north of Maybury Road (at around 15 metres to the rear habitable room windows) and around 12 metres from the eastern site boundary, it is considered the development will not have a negative impact on the daylight and sunlight levels received by neighbouring residential properties and their gardens.

6.4.5 It is considered that the relationships between the proposed development and neighbouring buildings would result in an acceptable standard of residential amenity, privacy, daylighting and outlook for both existing neighbours in accordance with Policies BP8 and BP11 of the Borough Wide Development Policies DPD.

6.5 Transport

6.5.1 The application site has a poor Public Transport Accessibility Level rating of 1b. This means that the access to public transport is relatively low compared with other areas of the Borough: Upney and Becontree Underground Stations on the District line are the nearest railway stations, each at a 34-minute walk to the north. There are EL1 (Barking Reach to Ilford) and EL2 (Dagenham Dock to Becontree Heath) bus services operating along Bastable Avenue a 7-minute walk to the south. The Thames View schools complex is a 6-minute walk away and Newlands Park recreational area is to the south-east, which has an all-weather pitch and a toddler play area.

6.5.2 In terms of other sustainable modes of travel which will be available to any prospective occupiers of the development, the site is surrounded by a comprehensive network of footways and near to the local and London cycle networks (such as Cycle Superhighway 3 along the A13).

6.5.3 Policy BR9 of the Borough Wide Development Policies DPD follows the guidance set out in London Plan Policy 6.13 with respect to parking. The applicable maximum residential parking standard in the Parking Addendum of the London Plan for a two bedroom unit is less than 1 space.

6.5.4 It is acknowledged that there are some pressures for on-street parking spaces within the neighbourhood, however, car ownership levels are lower for short-term accommodation than that of more permanent residents. The Transport Statement confirms that for similar developments at Riverside House on Thames View and Brockelbank Lodge, car ownership is significantly less than average ownership levels, typically less than 25%. Sites that do provide parking rarely operate over 75% of their capacity.

6.5.5 Vehicle access will be reinstated from Wivenhoe Road and the current scheme proposes dedicated on-plot parking at a ratio of 0.35 and one cycle space per dwelling. The parking provision is therefore within the permitted range. The proposed provision of cycle and car parking is therefore considered to be acceptable.

7 Environmental Sustainability
7.1 Energy and Overheating

7.1.1 Policy BR1 requires all developments to meet high standards of sustainable design and construction. Policy BR2 requires major developments to demonstrate that heating, cooling and power systems have been chosen to minimise CO\textsubscript{2} emissions. Measures should include passive design, appropriate choice of materials and renewable energy. A minimum of 20% saving in CO\textsubscript{2} emissions should be achieved through on-site renewable generation.

7.1.2 An Energy Statement has been submitted with the application. It includes an assessment of the unit’s performance as well as an overheating assessment. The Statement demonstrated that the proposed modular units would achieve 49% CO\textsubscript{2} reductions through efficient building design. However, since the submission of the application, the applicant has confirmed that the type of modular unit will be supplied by a different manufacturer. The details regarding the energy performance and overheating of the units should therefore be reassessed and submitted.

7.1.3 The application should demonstrate that it has made every effort to reduce its carbon emissions on-site to at least 35% to comply with Policy CM1 of the Core Strategy and Policy 5.2 of the London Plan and provide a suitable living environment that will not substantially overheat in warm temperatures. The applicant will need to confirm details of the energy strategy via the submission of two conditions.

7.2 Flood Risk

7.2.1 The site is located in Flood Zone 3, with protection from flood defences. The site is therefore liable to flood, having a 1 in 100 or greater annual probability of flooding. The National Planning Policy Framework (NPPF) and Core Strategy Policy CR4 require development proposals in Flood Zone 3 to comply with the Sequential Test and, where appropriate, the Exception Test. This requires developments to be located firstly in areas at low risk of flooding, or if such sites are not available, in medium-risk areas, and only if no suitable alternative sites are available, then in areas at high risk of flooding.

7.2.2 The EA has been consulted on this application and does not object to the proposals. The scheme proposes to raise the ground floor units above a 1 in 1,000 year flood level of 2.5m Above Ordnance Datum (AOD) to ensure that the units would not flood. The hard standing area will be increased from 700 m\textsuperscript{2} to 1,000 m\textsuperscript{2} of roof area and hard standing on the proposed development. The proposals include permeable paving and a permavoid unit for attenuation of water (with a depth of 0.15m and storage capacity of 33 m\textsuperscript{3}). The unit is proposed to be located to the east of the modular units, under the car park and circulation space. Further assessment needs to be undertaken to determine whether surface water can infiltrate into the ground, therefore whether the permeable paving is suitable and whether the attenuation tank should discharge into the surface water sewage system. A condition is proposed requiring that the details of the surface water drainage scheme for the site be submitted for approval.

7.2.3 As this site is allocated for residential development in the Site Specific Allocations DPD, the site has been considered in environmental terms and has passed the appropriate tests to provide new housing.
7.3 Contamination

7.3.1 The Site Investigation Report states that the ground is made up of made ground overlain over alluvium and London Clay. It further states that there are no on-site sources of potential contamination. The potential off-site contamination sources include the railway line and various local industrial uses. The potential risks include risk to human health, a secondary A aquifer, the Mayes Brook, the proposed buildings and any ecosystems. The report recommends a quantitative risk assessment is undertaken on the site.

7.3.2 Appropriate conditions are recommended to deal with the potential contamination risk on-site and to surrounding receptors.

7.4 Ecology and Trees

7.4.1 Policy BR3 expects developments to follow a sequential approach to preserving and enhancing the natural environment. This includes, firstly, to retain, enhance or create features of nature conservation value and avoid harm; secondly, to mitigate for impacts to features of nature conservation value; and lastly, to compensate for the loss of features of nature conservation value.

7.4.2 A Preliminary Ecological Appraisal has been undertaken for the site. This identifies that the trees are highly likely to support breeding birds (including priority species in London), that there is a moderate likelihood that the European hedgehog uses the site, with a low likelihood for water voles and herpetofauna. No field signs of bats were observed, but there are records of bats foraging in the vicinity, likely along the brook. The species richness on the site is poor (24 taxa identified), with no rare species. The report makes reference to the presence of Japanese Knotweed and the butterfly bush.

7.4.3 The overgrown nature of the site contains predominantly self-seeded species along the site boundaries, the rest of the site is covered in tarmac or concrete. The Tree Report confirms that the trees on site are either Category C2 (trees of low quality with mainly landscape qualities) or U (unsuitable for retention) trees. Most trees show signs of damage at the base from growing in close proximity to the boundary fencing. The tree in the south-eastern corner of the site will be retained.

7.4.4 Two trees within the neighbouring sites are growing close to the boundary fence. It is likely that these trees would be impacted from the development; appropriate conditions have been proposed to protect the root protection areas and ensure suitable methods of construction are used on site.

7.4.5 It is considered that the site does not provide sufficient soft landscaping to mitigate for the loss of young and semi-mature trees that have developed on the site, adjacent to the SINC. In order to ensure the site offers a good level of biodiversity to link to neighbouring areas, increase natural drainage and create a greener environment for residents, it is recommended that a hard and soft landscaping plan is conditioned. It is expected that buffer planting is proposed to respect future residents’ privacy under ground floor windows. Furthermore, new tree planting should be proposed along the northern boundary with the SINC and further screening should be added along the eastern and southern boundaries with existing
neighbours. Mulch and shrubs should be further considered as part of the soft landscaping scheme.

8 Conclusion

8.1 The proposal provides much-needed temporary accommodation for homeless families at a low cost. This scheme will be delivered by Be First on behalf of LBBD. The 20 two-bedroom modular units will provide a meaningful place of residence for a brief period before residents are located to a more permanent home. The site provides 7 on-site parking spaces (including 1 wheelchair user space) and 20 secure cycle parking spaces.

8.2 The development will make a minor contribution to the housing targets for Barking and Dagenham and will provide specific short-term affordable housing. The scheme will bring a cleared site back into use, providing a better street environment.

8.3 This application has an officer recommendation for approval, subject to suitable conditions.

Background Papers

- Planning Application File

  Search 18/00650/FUL via [http://paplan.lbbd.gov.uk/online-applications/](http://paplan.lbbd.gov.uk/online-applications/)

- Local Plan Policy

  Core Strategy (2010):

  Strategic Objectives SO.1 and SO.2
  Policy CM1 General Principles for Development
  Policy CM2 Managing Housing Growth
  Policy CR1 Climate Change and Environmental Management
  Policy CR2 Preserving and Enhancing the Natural Environment
  Policy CR4 Flood Management
  Policy CP3 High Quality Built Environment


  Policy BR1 Environmental Building Standards
  Policy BR2 Energy and On-Site Renewables
  Policy BR3 Greening the Urban Environment
  Policy BR4 Water Resource Management
  Policy BR5 Contaminated Land
  Policy BR9 Parking
  Policy BR13 Noise Mitigation
  Policy BR15 Sustainable Waste Management
  Policy BC1 Delivering Affordable Housing
  Policy BC2 Accessible and Adaptable Housing
  Policy BC7 Crime Prevention
  Policy BP8 Protecting Residential Amenity
  Policy BP10 Housing Density
Policy BP11 Urban Design

London Borough of Barking and Dagenham: Community Infrastructure Levy Charging Schedule, October 2014

The London Plan (2016):

Policy 3.1 Ensuring Equal Life Chances For All
Policy 3.3 Increasing Housing Supply
Policy 3.4 Optimising Housing Potential
Policy 3.8 Housing Choice
Policy 3.10 Definition of Affordable Housing
Policy 3.13 Affordable Housing Thresholds
Policy 5.2 Minimising Carbon Dioxide Emissions
Policy 5.3 Sustainable Design and Construction
Policy 5.7 Renewable Energy
Policy 5.9 Overheating and Cooling
Policy 5.12 Flood Risk Management
Policy 5.13 Sustainable Drainage
Policy 5.21 Contaminated Land
Policy 6.9 Cycling
Policy 6.13 Parking
Policy 7.3 Designing Out Crime
Policy 7.14 Air Quality

Supplementary Planning Guidance ‘Housing’ (March 2016)
Supplementary Planning Guidance ‘Sustainable Design and Construction’ (April 2014)

National Guidance and Policy

Technical Housing Standards – Nationally Described Space Standard (March 2015)
National Planning Practice Guidance