



# **PLANNING STATEMENT ON BEHALF OF THE UPMINSTER AND CRANHAM RESIDENTS' ASSOCIATION**

Outline Application for the Demolition of all Buildings and Structures  
on Site, and Redevelopment of the Site Providing  
up to 37 Residential Dwellings, Creation of a New Highway Access,  
Public Open Space and Landscaping and Related Infrastructure

Hall Lane Miniature Golf Course, Hall Lane, Upminster, RM14 1AU

**JANUARY 2020**

Our Ref: J003242

LPA Ref: P0248.19

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## 1.0 **INTRODUCTION**

- 1.1 Following the submission of amended plans, WS Planning & Architecture have been instructed to act on behalf of the Upminster and Cranham Residents' Association to support their remaining objections to the proposed development at Hall Lane Miniature Golf Course, Hall Lane, Upminster, RM14 1AU (LPA Ref: P0248.19).
- 1.2 Having followed the progress of the application over the last several months, I am aware that a revised scheme has been submitted by the Applicant, with amended plans published on the Council's website on 3<sup>rd</sup> January 2020. The proposal has been amended to comprise the demolition of all buildings and structures on site and the erection of up to 37 dwellings with a new highway access, open space and landscaping. The amendments include a reduction of 11 residential units, the removal of the flatted development element, the provision of public open space and children's play space, the retention of several trees, the provision of additional soft landscaping, the identification of biodiversity enhancement measures and enhancements to off-site open space.
- 1.3 The key points previously set out within our Planning Statement remain relevant and are as follows:
  1. The principle of the proposed development is not acceptable following the loss of open space;
  2. The proposal would fail to contribute to the visual character and appearance of the surrounding residential development;
  3. The development would fail to provide adequate provisions of on-site affordable housing;

4. The redevelopment would fail to provide a suitable mix of housing;
  5. The proposed development would adversely impact on neighbouring residential amenity;
  6. The proposal would adversely impact on the local highways network;
  7. The redevelopment would put considerable strain on local infrastructure;
  8. The proposed development would impact on local designated heritage assets and archaeology;
  9. The proposal incorporates the removal of several high quality trees and landscaping features to the detriment of the established character of the area;
  10. The impacts of the proposal on the ecology of the site remain undetermined.
- 1.4 The matters considered within our previous Planning Statement and this addendum each amount to a reason for refusal and collectively demonstrate that the proposed development is unacceptable.

## 2.0 **PRINCIPLE ISSUES AND CONSIDERATIONS**

- 2.1 The proposed development at Hall Lane Miniature Golf Course comprises the demolition of all existing buildings and structures on site, and the redevelopment of the site to provide up to 37 residential dwellings. The material planning considerations relevant to the proposal are discussed in turn below.

### **1. Principle of Development**

- 2.2 According to the London Borough of Havering Proposals Map, the application site is located in an area of Parks, Open Spaces, Playing Fields and Allotments. Therefore, in accordance with Policy DC18 of the London Borough of Havering Core Strategy and Development Control Policies DPD (2008), the Council will seek the retention and enhancement of all public open space and recreation, sports and leisure facilities that are in private and public ownership.
- 2.3 The revised proposal incorporates a reduction in the number of residential units proposed as well as a much reduced area of public open space (as opposed to none whatsoever) located to the east and west of the application site. However, despite this, the development of Hall Lane Miniature Golf Course remains contrary to national, regional and local planning policy guidance. The proposed development results in an unacceptable loss of open space, visual amenity and landscape character that currently contributes to the attractiveness of the local area.

### **2. Character and Design**

- 2.4 The revised proposal at Hall Lane Miniature Golf Course seeks the erection of up to 37 residential dwellings, comprising a mix of semi-

detached and detached dwellings. It is noted that the flatted development has been excluded from the proposal. Nevertheless, the proposed plot sizes remain notably smaller than those prevailing throughout the local area. The proposed development would therefore result in a cramped, overdevelopment of the site that disregards the appearance of the surrounding built environment and landscape setting. The proposal represents a large scale development that would detract from the established character of the local area, contrary to the Policy DC69 of the London Borough of Havering Core Strategy and Development Control Policies DPD (2008) and the guidance set out within the Hall Lane Policy Areas SPD (2009).

### **3. Lack of Affordable Housing**

- 2.5 In accordance with Policy H4 of the Draft New London Plan (2019), Policy DC6 of the London Borough of Havering Core Strategy and Development Control Policies DPD (2008) and the Homes for Londoners Affordable Housing and Viability SPG (2017), 50% of all new homes should be genuinely affordable. The Applicant previously offered the provision of 35% affordable housing through a payment in lieu to be invested in delivering affordable housing on other sites in the borough. In the Planning Statement Addendum prepared by SW Planning, the Applicant has stated that a separate affordable housing response will be forwarded under a separate cover. Therefore, at present, the lack of on-site affordable housing, and indeed the initial minimal financial contribution to off-site affordable housing, remains a major concern.

### **4. Housing Mix**

- 2.6 Policy DC2 of the London Borough of Havering Core Strategy and Development Control Policies DPD (2008) sets out the market housing

mix required to meet local and sub-regional housing needs. This is as follows:

Bedrooms				
1	2	3	4	5
24%	41%	34%	0	1%

- 2.7 The proposal has been amended to provide a total of 37 dwellings, removing the flatted development element and therefore incorporating the following indicative mix of market housing:

Bedrooms				
1	2	3	4	5
0%	0%	43%	43%	14%

- 2.8 The proposed housing mix does not accord with the local and regional housing need in which there is a substantial deficiency in 1-bedroom and 2-bedroom dwellings and a substantial over-provision of 4-bedroom and 5-bedroom dwellings.

## **5. Impact on Neighbouring Residential Amenity**

- 2.9 The application site is bounded by residential development on three sides where a large number of neighbouring properties benefit from having attractive views over the site. Therefore, notwithstanding the reduction in the number of units, the proposal would undoubtedly result in a loss of outlook and issues of overlooking for both future and existing residents. Furthermore, the proposed development would result in a substantial loss of privacy for existing residents, given the close proximity of the proposed dwellings in relation to the existing neighbouring properties.

- 2.10 The proposed development, by reason of its scale, mass and position, would appear overbearing, dominant and visually intrusive. The proposal would therefore detrimentally harm neighbouring residential amenity, contrary to national, regional and local planning policy.

## **6. Highways Implications**

- 2.11 In accordance with regional and local planning policy guidance, it is noted that larger residential developments should be located in areas of high public transport accessibility. The application site is located in an area ranging from PTAL 1a which indicates a poor level of public transport accessibility, to PTAL 4 which indicates a medium level of public transport accessibility. In terms of accessibility to local public transport links, the application site is not considered suitable for such large-scale development. It is likely that future residents would rely on the use of the private car in order to complete their necessary journeys where a total of 2 car parking spaces are proposed per house.
- 2.12 Transport Planning Practice (TPP) have prepared a Transport Statement Addendum for the purpose of the revised scheme. It is understood that the 48-unit scheme was expected to generate 23 two-way vehicle trips in both the AM peak hour and the PM peak hour. Whilst it is noted that the reduction in residential units is expected to have a lower impact on the local highways network, the resultant trip generation associated with the proposed development of up to 37 units has not been confirmed.
- 2.13 It is understood that up to 254 future residents will occupy the application site. Hence, the substantial increase in vehicular movements resulting from the proposed development would no doubt continue to increase traffic and put a strain on the local public transport and highways network.



## 7. Impact on Local Infrastructure

- 2.14 The proposed development has been revised to incorporate the erection of up to 37 new dwellings, consisting of 3-bedroom, 4-bedroom and 5-bedroom units. Despite the reduction in units, the proposal continues to present a substantial increase in residential units that would put enormous strain on the existing local infrastructure and near-by services. The occupation of the application site by 254 new residents would undoubtedly put strain on local services including the emergency services, health services, transport, public realm, community facilities, sports facilities, culture and heritage. Hence, the proposed development would remain incompatible with existing local infrastructure and services.

## 8. Impact on Local Heritage and Archaeology

- 2.15 During the course of the application, comments have been received from Historic England as there is archaeological and geoarchaeological interest in the application site. Therefore, the Applicant recognises that such investigation of the site would be appropriate to identify and manage impact on early prehistoric remains and wartime military archaeology. Whilst it is envisaged that this can be dealt with by condition, it is important that such investigations are undertaken as soon as possible. **At present, the impact of the proposed development on the local heritage assets and the archaeology of the site remains undetermined** and is therefore of concern, contrary to Policy CP18 of the London Borough of Havering Core Strategy and Development Control Policies DPD (2008).

## 9. Arboricultural Impact

- 2.16 An updated Arboricultural Impact Assessment has been prepared by Tamla Trees and confirms that the proposed development of up to 37 units

**would result in the removal of 34 trees and three small groups consisting of category A and category B trees**, as well as 19 individual and three small groups of category C trees and category U trees.

- 2.17 Therefore, despite attempts to preserve the existing tree cover to enhance landscaping features, the proposed development of up to 37 residential units would evidently result in a significant loss of trees, which would detrimentally impact the visual appearance of the site. The proposal is therefore contrary to Policy DC60 of the London Borough of Havering Core Strategy and Development Control Policies DPD (2008) that identifies the importance of protecting and retaining trees of nature conservation.

## **10. Impact on Ecology**

- 2.18 The original outline application was supported by a Preliminary Ecological Appraisal prepared by Middlemarch Environmental which identified that the site could have potential to accommodate bat roosts, within buildings and trees, badger sets, reptiles and great crested newts. Therefore, a Preliminary Bat Roost Assessment, Dusk Emergence and Dawn Re-Entry Bat Surveys, a Badger Survey, a Reptile Survey and a Great Crested Newt Habitat Suitability Index Assessment have been undertaken by Middlemarch Environmental.
- 2.19 The Bat Survey confirmed that bats have been observed using the treeline on the western side boundary for commuting and foraging. Thus, a lighting strategy should be designed, reviewed and implemented, yet no such strategy has been produced and the Applicant has stated that a detailed development scheme will be agreed through a reserved matters design and conditions submission. It is understood that all matters relating to Ecology should be resolved at this stage given the preservation and enhancement of local ecology is an integral part of any new development.

- 2.20 In addition, it is noted that if works have not commenced by August 2020, the bat roost assessment and bat surveys must be updated. Furthermore, if works have not commenced by June 2021, the reptile and great crested newt surveys should be updated.

### 3.0 **CONCLUSION**

- 3.1 The revised proposal seeks the demolition of all buildings and structures on site and the erection of up to 37 dwellings with a new highway access, open space and landscaping at Hall Lane Miniature Golf Course, Hall Lane, Upminster, RM14 1AU.
- 3.2 Despite the reduction in the number of residential units proposed and the amendments made to the layout of the site, the proposed development remains contrary to national, regional and local planning policy. By reason of its design, scale, mass and positioning, the proposal would harm the character and appearance of the local area and would detrimentally impact neighbouring residential amenity. The development would fail to provide a suitable mix of housing and continues to fail to provide adequate provisions for on-site affordable housing. The provision of 37 new dwellings would create adverse highways implications and would put enormous strain on the existing local infrastructure and near-by services. The proposed development would predominantly result in the loss of an attractive area of open space and would subsequently harm local heritage and archaeology as well as the existing trees, landscaping features and ecology.
- 3.3 The combined social, economic and environmental benefits of the proposed development are significantly and demonstrably outweighed by the substantial harm resulting from the proposed redevelopment. Therefore, on behalf of the Upminster and Cranham Residents' Association, I strongly urge the Council to refuse planning permission for the proposed development at Hall Lane. **If, however it is contemplated that permission be granted, it is considered that the application**

**should be referred to the Secretary of State as a departure from the  
Development Plan.**