Havering Local Plan
Regulation 22(1)(c) Consultation Statement
Annex 17
Regulation 19 Consultation -
Council Responses to Comments
<table>
<thead>
<tr>
<th>Consultee</th>
<th>Comment ID</th>
<th>Subject of comment</th>
<th>Proposed Modification</th>
<th>Council Response</th>
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<tbody>
<tr>
<td>Laura Stevens</td>
<td>LPREG19-4</td>
<td>Concerns about over-development in Romford</td>
<td>No modification proposed</td>
<td>The Outer North East London Strategic Housing Market Assessment 2016 indicates that there is a need for 1,366 new homes in Havering per annum. The Mayor of London sets minimum housing targets for each London Borough, for Havering this is 1,170 homes per annum. The Local Plan identifies Romford and Rainham and Beam Park as Strategic Development Areas which have the capacity to deliver a significant amount of new housing. Both areas have also been designated as Housing Zones by the Mayor of London.</td>
</tr>
<tr>
<td>Alison Heine</td>
<td>LPREG19-142</td>
<td>Concerns over Gypsy and Traveller need Assessment and the base data used. Modifications proposed</td>
<td>Policy 11 Gypsy and Traveller Accommodation i. Formalising seven existing private sites providing a maximum of 2270 pitches for Gypsies and Travellers. These sites are identified on the Proposals Map and the maximum number of pitches that will be permitted on each site is identified in paragraph 7.9.5; and Paragraph 7.9.1: The Havering Gypsy and Traveller Accommodation Assessment (GTAA) 20124 provides a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpersons accommodation in the borough up to 2031. The Assessment identifies a need for 2270 additional pitches for the Gypsy and Traveller households who meet the planning definition as set out in the National Planning Policy for Traveller Sites. Of the 2270 pitches needed, 2057 pitches are required within the first 5 year period of the Plan (2016 – 2021), and the remaining 213 pitches in the latter part of the plan period. No additional need has been identified for plots for Travelling Showpeople over the 15 year plan period (2016-2031). Paragraph 7.9.5: The sites are identified on the Proposals Map and are listed below. In order to provide firm controls and prevent further intensification, a maximum number of pitches will be permitted on each site as set out below:  - Tyas Stud Farm rear of Latchford Farm - maximum of 5 pitches  - Vinegar Hill - maximum of 12 pitches  - Hogbar Farm West - maximum of 34 pitches  - Ashlea View, Tomkyns Lane - maximum of 2 pitches  - Benskins Lane - maximum of 1012 pitches  - Fairhill Rise - maximum of 2 pitches  - Hogbar Farm East - maximum of 47 pitches  - Lower Bedfords Road - maximum of 3 pitches  - The Caravan Park, Putwell Bridge - maximum of 2 pitches  - Willow Tree Lodge - maximum of 3 additional pitches (1 pitch already has permanent planning permission)</td>
<td>The Council commissioned consultants ORS to undertake a Gypsy and Traveller Accommodation Assessment as part of the evidence base for the Havering Local Plan. This was published in 2017 alongside the Proposed Submission Local Plan as part of the Regulation 19 consultation. During and after the consultation a number of gypsy and traveller families (who had not been available or who had previously declined to be interviewed) contacted the Council so that their accommodation needs could be assessed. Further interviews were undertaken and a revised Gypsy and Traveller Accommodation Assessment (March 2018) has been prepared. The Council is proposing modifications to the Local Plan to enable the full identified need for gypsy and traveller pitches to be met. Please refer to the Gypsy and Traveller Accommodation Assessment (March 2018) and the Gypsy and Traveller Position Statement (March 2018) for further information.</td>
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</table>
Paragraph 7.9.8

Where further sites are proposed the Council will ensure that they are required to meet legitimate additional borough need. When considering applications for Gypsy and Traveller sites and Travelling Showpersons plots, the Council will take into account the policy criteria outlined in Policy 11 in addition to the requirements of National Policy.

Joanne Wood

LPREG19 - 6
Concern over Wind turbine placement
No modification proposed
The Council undertook the preparation of a Local Plan Wind Resource Study (2016) to support the preparation of the Local Plan in accordance with the requirements set out in the Ministerial Statement (HCWS42). The study identifies areas which are potentially suitable for wind turbines. Paragraphs 12.8.4-12.8.6 make clear that proposals must satisfy planning policy requirements and be able to demonstrate that they have addressed community concerns. Paragraph 12.8.4 is clear that the Council does not intend to bring forward proposals for wind turbines in any of its parks.

LPREG19 - 7
Concern over the impacts of development in the Borough
No modification proposed
The Outer North East London Strategic Housing Market Assessment 2016 indicates that there is a need for 1,366 new homes in Havering per annum. The Mayor of London sets minimum housing targets for each London Borough, for Havering this is 1,170 homes per annum. The Local Plan seeks to deliver a minimum of 17,550 new homes over a 15 year period within the existing built up area and without releasing green belt land for development.

The Local Plan identifies Romford and Rainham and Beam Park as Strategic Development Areas which have the capacity to deliver a significant amount of new housing. Both areas have also been designated as Housing Zones by the Mayor of London.

The Local Plan seeks to ensure that sufficient social infrastructure is delivered alongside new housing. This includes school places and health care facilities necessary for the quantum of proposed new development. The Local Plan is underpinned by a robust Infrastructure Delivery Plan (IDP).

LPREG19 - 5
Concern over Policy 24 Parking provision and design
No modification proposed
Generally, parking provision needs to be in accordance with the maximum parking standards in the London Plan.

The Council’s parking policy (policy 24) has been informed by a Residential Car Parking Standards study which has drawn together a range of evidence to help inform the car parking standards for the borough having regard to the particular circumstances in Havering.

Policy 24 recognises that as an outer London Borough for many residents there is a higher dependency on the car, compared to central and inner London where public transport provision is much more accessible. The policy seeks to recognise that many local journeys in Havering must be made by car because they are impractical to make by public transport. Although parts of Havering are well connected by public transport to destinations outside of the borough, many more local destinations do not have reasonable public transport access and this is reflected in the higher levels of car ownership and usage in Havering. In this regard Havering is typical of many other outer London boroughs.

For areas of low accessibility (PTAL 0-2), minimum parking standards have been set out and these are included in table 4 in policy 24.

The London Plan expects that in areas of good public transport accessibility (PTAL 5-6) in all parts of London developments should aim for significantly less than one space per unit. The Council considers that this does not adequately reflect the position in Havering regarding the practicalities of making journeys within the borough and the consequent ownership and usage levels of private cars.

For highly accessible parts of the borough (PTAL 5-6), the parking standards set out in Policy 24 recognise that a minimum parking standard of 0.5 spaces per unit is appropriate having regard to the particular circumstances involved.

The parking provision suggested by the respondent significantly exceeds what the London Plan would require.
and it is also more than the Council would require. The Council’s minimum provision (0.5 spaces per unit) aims to achieve a reasonable compromise between the London Plan standard and what the Council considers appropriate having regard to circumstances in the borough.

The management of car parking spaces in regard to their allocation to particular units and occupiers is outside the scope of the Local Plan and it is for the management companies of residential schemes and their occupiers to resolve.

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<th>Modification Proposed</th>
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<tr>
<td>LPREG19 - 9</td>
<td>Concern over wind turbine placement</td>
<td>No modification proposed</td>
<td>The preparation of the Local Plan regarding identification of sites with potential for wind turbines is in accord with the necessary requirements set out in the Ministerial Statement (HCWS42).</td>
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<tr>
<td>Christine Walker</td>
<td>Support for Green Belt Protection</td>
<td>No modification proposed</td>
<td>Support noted</td>
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<tr>
<td>S Tofts</td>
<td>Concern over car parking provision</td>
<td>No modification proposed</td>
<td>Generally, parking provision needs to be in accordance with the maximum parking standards in the London Plan. The Council’s parking policy (policy 24) has been informed by a Residential Car Parking Standards study which has drawn together a range of evidence to help inform the car parking standards for the borough having regard to the particular circumstances in Havering. Policy 24 recognises that as an outer London Borough for many residents there is a higher dependency on the car, compared to central and inner London where public transport provision is much more accessible. The policy seeks to recognise that many local journeys in Havering must be made by car because they are impractical to make by public transport. Although parts of Havering are well connected by public transport to destinations outside of the borough, many more local destinations do not have reasonable public transport access and this is reflected in the higher levels of car ownership and usage in Havering. In this regard Havering is typical of many other outer London boroughs. The Council recognises the importance of encouraging public transport use but is mindful of limitations of the existing public transport services for some local journeys in Havering. The provision of at last 0.5 spaces per unit is based on robust evidence and recognises the particular circumstances of travel in Havering. The Council will always seek to optimise the use of sites in development proposals but it has to recognise several issues and factors (including car parking provision) have to be taken into account.</td>
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<tr>
<td>LPREG19 - 2</td>
<td>Calls for stronger emphasis to be placed on Brownfield land for housing supply</td>
<td>Paragraph 5.1.11: Havering is one of London’s greenest boroughs with extensive open spaces and more than half of the borough designated as Metropolitan Green Belt as identified on the Proposals Map. The spatial strategy of the Local Plan is to optimise the use of brownfield land with suitable brownfield sites being developed first meeting the demand for new homes and business growth and to provide continued protection for Havering’s Green Belt and its most valuable open spaces. A Brownfield Land Register has been prepared which lists the brownfield sites that have the potential to be used for future housing in the borough. Policy 3 Housing Supply - Insert new clause: The delivery of new homes will also be achieved by: Supporting the reuse of brownfield sites when they become available</td>
<td>A brownfield register has been prepared and will be referenced in the proposed modifications. Additional text relating to brown field land proposed for in section 5.1.11 and Policy 3.</td>
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Calls for stronger emphasis to be placed on Brownfield land for housing supply

Refer to the Council’s response to comment LPREG19-2

Refer to the Council’s response to comment LPREG19-2

Adams Family

Concern over Havering’s future housing supply and calls for Green Belt release

No modification proposed

The Council’s Vision: Havering Making a Greater London seeks to provide new homes in Havering and, in appropriate cases, the Council takes a positive and proactive stance in dealing with prospective private developers wishing to bring forward housing schemes in recognition of the importance of securing timely and high quality housing delivery.

In line with the Vision, the Local Plan Spatial Strategy acknowledges that the delivery of new homes is critical to London’s well-being. It sets out how the Council has approached the important topic of making sure that enough new homes are provided.

Havering has undertaken a Strategic Market Assessment to support the preparation of the Local Plan. Havering forms part of both the London-wide housing market area and the outer north east London sub housing market area with the London Boroughs of Barking and Dagenham and Redbridge. In line with the requirements of the National Planning Policy Framework, the Council has worked with these authorities to prepare its Strategic Housing Market Assessment (SHMA).

The resultant Outer North East London SHMA indicates that Havering’s full objectively assessed housing need is for 25,200 new homes over the period 2011-2033 or 1,145 homes per annum.

Since the initial SHMA was undertaken, updated population projections have been published by the GLA. The updated population projections were reflected in an update (2017) of the SHMA which identified an increased housing need in Havering of 30,052 new homes over the same period (1,366 new homes per year).

The Council is making every effort to identify and bring forward suitable sites to exceed the current London Plan target and to meet housing need.

The Local Plan does not seek to constrain the number of new homes to come forward to 17,550 over the Plan period.

Further, the Council is aware that the current London Plan requires that boroughs should seek to close the gap between housing need (as assessed through a Strategic Housing Market Assessment) and supply.

The Council’s approach to providing new homes in the Havering Local Plan takes a balanced view about the importance of addressing housing requirements and securing sustainable development. Having undertaken recent studies to assess whether the Green Belt fulfils the roles identified in the National Planning Policy Framework, the Council is also committed to ensuring that the Green Belt is safeguarded. The Council has concluded that there are no exceptional circumstances to support releasing land from the Green Belt.

The Council’s commitment to the Green Belt is an important ‘driver’ in helping to secure new homes in Havering’s built up areas and through the important programmes being delivered through the Housing Zones and the Council’s estates regeneration programme (see below).

The Council’s strategy also recognises that the scope to accommodate growth in Havering will be dependent upon the provision of infrastructure especially that needed to provide effective and efficient movement within Havering as well as social and community infrastructure necessary for residents such as schools and health facilities. The Council has prepared an Infrastructure Delivery Plan to support the Havering Local Plan and to inform the consideration of housing proposals.

Throughout the Local Plan process, the Council has rigorously sought to identify all sources of potential housing supply that will secure sustainable development in order to ensure that Havering is taking every opportunity to secure the delivery of new homes. This approach has been implemented to enable the gap between the housing supply and demand to be reduced.
targets in the London Plan and the objectively assessed need requirement to be closed as far as is reasonably possible.

The Housing Position Statement which supports the Havering Local Plan explains the Council's approach to this in more detail. A element is that the Council considers that the certainty of securing housing delivery over the overall plan period must be taken into account against the numbers of units approved particularly in the initial years of the Local Plan being implemented.

It sets out that the Council considers that over the period of the plan to 2031, the potential overall supply of additional homes in Havering may exceed the minimum annual housing target of 1,170 new homes per year set out in the current London Plan.

In summary, the approach in the Local Plan that the Council will implement is based on:

- focussing the delivery of new homes in Havering's two housing Zones at Romford and Rainham and Beam Park. These two areas are identified in the Local Plan as Strategic Development Areas and have individual comprehensive policy frameworks to guide and steer their development to make sure that development provides high quality places with inclusive communities and the timely and effective provision of infrastructure
- supporting the intensification of twelve of its own existing housing estates through an ambitious regeneration programme that includes an experienced private sector development partner secured by means of a Joint Venture Limited Liability Partnership
- realising the housing opportunities that come forward on large sites outside of the Strategic Development Areas to provide opportunities for place-making and building communities. These include sites such as the former St Georges Hospital site in Hornchurch
- prioritising all land not designated for other planning purposes for new homes
- encouraging the effective use of land by re-using previously developed (brownfield) land and allocating a range of sustainable sites for housing development. The latter will be identified in the forthcoming Site Specific Allocations Local Plan

The Local Plan Housing Position Statement sets out in more detail the specific potential housing opportunities that will come forward for the two Housing Zones and the Council's twelve estates programme.

The Statement also includes details of sites which it is anticipated will be included in the forthcoming Site Specific Allocations Local Plan document which will reflect up to date capacity studies where appropriate.

Underpinning the Council's approach is a clear recognition of the importance of optimising the development potential of the sites in regard to their potential capacity whilst ensuring that they provide satisfactory residential environment for residents and maintaining the character and appearance of Havering. There is an emphasis on making sure the place-making role of new development is addressed and a focus on delivering places where communities can flourish and be cohesive and inclusive.

As a result of this approach, sufficient land has been identified to meet the minimum London Plan housing target for the first 10 years of the Local Plan if the delivery is taken over the 10 year period.

The Council considers that the greater certainty that is encompassed through the Housing Zones and the twelve estates programme should weigh heavily in their favour and help counter the potential numerical shortfall in housing delivery in the first five years.

The objector has raised concerns about the potential implications of Havering failing to meet its OAHN particularly in regard to the position with other London Boroughs and adjoining and nearby districts outside London.

Havering has engaged extensively with the GLA in the preparation of its Local Plan and this has included specific discussion about addressing housing.

The GLA has confirmed that London Boroughs are not required to demonstrate how any unmet need from their
own boroughs will be met in Other London Boroughs or adjoining districts. The preparation of the Havering Local Plan is not therefore required to address how any shortfall in this borough will be addressed within London or by adjoining / nearby local authorities.

The GLA has advised that the London Plan makes clear that London should be treated as a single housing market. The London Plan states that the Annual average housing supply monitoring targets set out in Table 3.1 are a minimum target for each borough. In order to meet local need and contribute to meeting strategic need each London borough is to seek to exceed this target through the measures set out in London Plan Policy 3.3E, paragraphs 3.19 and 3.19i of the Plan and Section 1 of the London Plan Housing SPG (2016).

The Housing SPG clarifies that this approach applies even where a borough has demonstrated it can exceed its local housing need. In preparing its Local Plan Havering (and Redbridge/Barking and Dagenham) will be expected to demonstrate it has sought to increase its housing supply in line with policy 3.3 of the London Plan and the Housing SPG in order to reduce the gap between local and strategic housing need and supply.

The Housing SPG 2016 notes that sensitivity testing during the development of the SHLAA showed that additional sources of housing such as higher density, housing led, mixed use development in accessible locations in Opportunity/Intensification Areas, town centres, surplus industrial land and other large sites could “fill” the gap between the minimum housing supply target and London’s identified need. This has been confirmed by monitoring which shows that collectively the boroughs have been approving sufficient capacity to address London-wide need.

The objector refers to the recent Government consultation ‘Planning for the right homes in the right places’. It is recognised that the approach set out in the consultation is now reflected in the draft National Planning Policy Framework published in March 2018.

The Government White Paper identified a housing ‘need’ figure for Havering of 1,821 new homes per year. It is noted that this figure is in a consultation document and has been derived from methodology that is not normally used in London.

The Council responded to the consultation identifying that there were strong concerns as to how this figure has been prepared and that it made no provision for the infrastructure to support the level of housing mentioned. It would also have a very detrimental impact on the open character and appearance of Havering. On this basis the Council considers that the figure identified by the Government is flawed, unachievable and unrealistic.

In preparing its Local Plan, the Council has engaged with other London Boroughs and adjoining districts. The details of these discussions are set out in the Duty to Cooperate statement. It is clear from the Duty to Cooperate engagement that adjoining local authorities are heavily engaged in their own Local Plan preparation including securing the necessary evidence to support this. This work will include the preparation of necessary SHMAs. It was not feasible and not desirable to ‘pause’ the preparation of the Havering Local Plan to enable all evidence base work (including SHMAs) to ‘catch up’ nor for this to be reflected in the Havering local Plan.

The Duty to Cooperate discussions have recognised that for most authorities involved in this process it will be extremely challenging for them to identify and deliver sites that will enable them to meet their own respective OAHN. It is therefore highly unlikely that these authorities will be willing to help meet unmet need arising in London.

The Duty to Cooperate Statement confirms that issues around the provision of housing have been explicitly discussed and explored between the authorities. It was recognised in this process that seeking to resolve this would be extremely challenging and delay the delivery of the respective local plan at a time when local authorities are being pressed by Government to ensure that they have up to date Local Plans in place.

The objector refers to the Council’s involvement in the GLA Strategic Housing Land Availability Assessment (SHLAA) process. The SHLA work was undertaken wholly in line with the GLA requirements and the outcome for Havering was agreed by the GLA.
The objector refers to the difficulties of delivering housing on brownfield sites such as availability, existing land values and abnormal costs such as contamination. These are well understood issues with brownfield sites. Nevertheless, the National Planning Policy Framework is unequivocal in its Core Principles (paragraph 17) that planning should ‘encourage the effective re-use of land by re-using land that has been previously developed (brownfield land), provided it is not of high environmental value’.

Additionally, the Council anticipates that because of the publication of the London Plan and the anticipated revision of the National Planning Policy Framework, it will be appropriate to bring forward an early review of the Havering Local Plan. This is likely to involve a further call for sites and this may yield further development opportunities.

The Council does not believe that there are ‘exceptional circumstances’ to warrant the release of Green Belt land to meet the Borough’s housing need. As stated in the Housing White Paper (page 21), the Government “seeks to maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.”

The Council has prepared two Green Belt Studies in 2016 and 2018. The first Green Belt Study was undertaken by the London Borough of Havering in association with PBA and Enderby Consultants. This study assessed the contribution that land within the Green Belt makes to the Green Belt purposes (as defined in para 80 of the NPPF). To aid the assessments, the Green Belt in the Borough was divided into 24 land parcels. A performance value was attributed to the parcels for each purpose, based on predefined criteria. The study found that all 24 parcels make a contribution to Green Belt purposes, with 19 of the 24 Green Belt parcels making a fundamental contribution to the Green Belt purposes. A further four parcels were found to make a high or moderate/high contribution and only one parcel was found to make a low contribution.

A second Green Belt Study was prepared by LUC in 2018. The aim of this study was to provide conclusions on the potential degree of harm that may occur if the sites (which had been submitted to the Council as part of the Regulation 19 Consultation) were released from the Green Belt. This took account of three elements: 1) the contribution of the sites to the NPPF Green Belt purposes, 2) the potential impact on the wider integrity of the Green Belt and 3) the strength of revised Green Belt boundaries that would remain if the site was to be released. Out of a total of 84 sites assessed (with a total area of 849ha):

- 46 sites (total area of 682ha, which is 80.3% of the total area of the 84 sites) rated as ‘high’ in terms of harm to Green Belt resulting from release.
- 21 sites (120ha, 14.1%) rated as ‘moderate-high’ in terms of harm to Green Belt resulting from release.
- 9 sites (24ha, 2.9%) rated as ‘moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (17ha, 2%) rated as ‘low-moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (6ha, 0.7%) rated as ‘low’ in terms of harm to Green Belt resulting from release.

The site proposed in this representation by the Adams Family (GB27) falls within parcel 4 of the Stage 1 Study. This Study concluded that the parcel makes a fundamental contribution to the Green Belt. The site was also assessed in the Stage 2 study and this Study concludes that releasing the site from the Green Belt would lead to a high degree of harm to the Green Belt. The reasons for this being:

- The site lies adjacent to the large built-up area of Havering but relates to the wider countryside – development would represent expansion of the large built-up area into the open countryside.
- The site forms a key section of Green Belt between the settlements of Rainham and South Hornchurch. The settlements are in close proximity (within 1km) and the release of the site could lead to the perception of narrowing the gap between them, especially when travelling between the settlements along New Road. It is acknowledged however that the settlements have already merged to the south.
- The site is rural in character and clearly displays the characteristics of the countryside, with limited urbanising influence from the adjacent road and settlement edge. Development of the site would lead to the encroachment of the countryside.
As the development of the site would lead to a degree of erosion of the separation of Rainham and South Hornchurch and would lead to encroachment on the remaining area of Green Belt between these settlements. The overall harm to the Green Belt resulting from release of this site would therefore be High.

Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 4 of the 13 sustainability criteria, and ‘green’ (signifying that the site could perform well in sustainability terms) in relation to 8 of the criteria.

Jane McCarthy  LPREG19 - 11  Support for Green Belt Protection  No modification proposed  Support noted

Barbara Holland-Davies  LPREG19 - 12  Support for Green Belt Protection  No modification proposed  Support noted

Shealagh White  LPREG19 - 13  Support for Green Belt Protection  No modification proposed  Support noted

Natalie Moore  LPREG19 - 16  Support for Green Belt Protection  No modification proposed  Support noted

Denise Chittock  LPREG19 - 15  Support for Green Belt Protection  No modification proposed  Support noted

Anonymous  LPREG19 - 14  Support for Green Belt Protection  No modification proposed  Support noted

Catherine Brownsword  LPREG19 - 17  Support for Green Belt Protection  No modification proposed  Support noted

National Grid  LPREG19 - 18  No comments to make  No modification proposed  Noted

National Grid Property  LPREG19 - 236  Calls for Romford SDA boundary change  Modification to Romford Strategic Development Area Boundary in Figure 2 and on the Proposals Map to include Sandgate close site.

LPREG19 - 237  Support for the approach to the delivery of new homes  No modification proposed  Support noted

LPREG19 - 238  Concern over flexibility and consequent effectiveness of the affordable housing tenure mix in policy 4. Modifications proposed to Policy 4 & 7.2.5  No modification proposed  

The National Planning Policy Framework requires Local Authorities to identify the size type, tenure and range of housing that is required in particular locations, reflecting local demand. The Outer North East London Strategic Housing Market Assessment and subsequent update for Havering identified two categories of need; those who can afford affordable housing for rent with housing benefit support and those who can afford affordable housing without housing benefit support and therefore require intermediate housing. In summary, the SHMA concludes that the vast majority of households in Havering can only afford social housing if they receive housing benefit. In light of these findings, the Council will seek a 70:30 tenure split between affordable rented and intermediate products. This is reflected in Policy 4 and paragraph 7.2.8.

With regards to the Mayor’s SPG and transparent approach to viability paragraph 7.2.5 states that the Council supports a transparent approach to viability in line with the Mayor’s draft affordable Housing SPG. This includes
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<tbody>
<tr>
<td>LPREG19 - 239</td>
<td>Support for the approach to housing mix</td>
</tr>
<tr>
<td>ADREG19 - 7</td>
<td>Proposals Map Changes Booklet</td>
</tr>
<tr>
<td>Luciana Bradshaw</td>
<td>Support for development of brownfield land for housing supply</td>
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<tr>
<td>Robert Wilkins</td>
<td>Concern over Landscaping policy. Additional Policy wording proposed re. BS8545:2014 to be included as part of S106 agreement</td>
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<tr>
<td>Port of London Authority</td>
<td>Objectives and Strategic Vision Additional strategic objective to be added Support greater use of the river Thames for freight and passenger transport</td>
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The GLA are responsible for the Safeguarding of Phoenix and Halfway Wharves in Havering. It is understood that the GLA are looking to undertake a safeguarding review and will be consulting on these proposals in the new year.

The Council does not consider it’s necessary to reference the safeguarded wharves in the Local Plan Strategy Objectives, as Objective 8 sufficiently covers infrastructure and the Safeguarded Wharves are included in the Proposals Map.

<p>|LPREG19 - 23 | Continued River Crossing engagement | No modification proposed | Comments concerning new river crossings are noted. As any future new river crossings are developed, TfL are expected to engage with all relevant stakeholders. |
|LPREG19 - 24 | Safeguarded wharves – Key Diagram | No modification proposed | The safeguarded wharves are included on the Proposals Map. The Council does not consider it necessary to include them on the key diagram. |
|LPREG19 - 27 | Encouraging greater use of the River for freight – Change sought to Policy 23 | Policy 23 Transport connections: Insert new clause after xvi. working with partners including the Port of London Authority to explore opportunities for utilising the River Thames for freight and passenger transport to reduce traffic congestion and support local businesses | Havering supports the Mayor’s aspiration contained in the Mayor’s Draft Transport Strategy (MTS) to utilise the river more for freight and passenger transport and Havering expressed this support when responding to MTS. A modification is proposed to Policy 23 to reflect Havering’s current position on utilising the river more for freight and passenger movements. Havering welcomed proposal 68 in the draft MTS for TfL and the Port of London Authority (PLA) to produce a London Passenger Pier Strategy to provide new piers and provide additional capacity at strategic piers. Havering would like to work with TfL and the PLA as this strategy is developed. Havering also requested in its response to the MTS that the Mayor amend proposal 69 to include a commitment to investigate the feasibility of passenger services being extended further east, including to Rainham. Proposal 90 in the MTS sets out the Mayor’s position on future east London River Crossings. Within this the Mayor has made it clear that further east London river crossings will only be considered once Silvertown Tunnel, Lower Thames Crossing and the DLR extension to Thamesmead have been delivered. Future east London river crossings will then only be considered if they meet a specific set of criteria. It is considered very unlikely that future east London river crossings beyond those stated above will be delivered during the lifetime of the Local Plan so it is not considered necessary to site these within Table 3. |
|LPREG19 - 28 | Calls for Green Infrastructure policy name change | No modification proposed | The definition of green infrastructure covers waterways, and this is sufficiently defined in paragraph 12.1.2. |
|LPREG19 - 29 | Calls for Nature Conservation policy map to include reference to Thames Corridor | Map 2 Havering Wildlife Corridors - include Thames Corridor as a wildlife corridor | Support noted. |
|LPREG19 - 30 | Supportive of Policy 31 on Rivers and River corridors but request for additional text | Policy 19 Business growth: Insert new clause: Working with the Port of London Authority (PLA) to explore opportunities to improve and develop wharf infrastructure and to explore increasing use of the River Thames for freight transport. | Support for Policy 31 is noted. Additional text has been added to Policies 19 and 31 to underline the importance of the two safeguarded wharves in Havering. Officers have recently met with the GLA and it is understood that a review of safeguarded Wharves along the River Thames is expected to be carried out in the near future which will be subject to public consultation. |</p>
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| LPREG19-31 | Greater consideration to be given to surface water flooding and runoff | Policy 31 Rivers and river corridors | ii. Contributes towards the enhancement and extension of a riverside path to enable local communities to enjoy the riverside providing that appropriate lifesaving equipment such as grabs chains, access ladders and life buoys are provided along the river edge. Havering has expressed support for increased use of the river for freight transport in its formal response to the draft Mayor’s Transport Strategy (MTS). Officers intend on meeting with the river freight team at TfL in early 2018 to discuss the potential for river freight transport in Havering.

LPREG19-32 | Policy 38: Mineral Extraction: PLA request consideration for the use of the River Thames for the transportation of materials as part of any submitted transport statement. | Policy 38 Mineral extraction | A Transport Statement or Transport Assessment will be required with all applications to determine the potential impacts the proposal may have on the road network and ensure reasonable contributions from the developers are received to maintain the roads. Full consideration should be given to the use of the River Thames for the transportation of any materials as part of any submitted transport statement. Modification proposed. |

LPREG19-26 | Supportive of Policy 19: Business Growth but amendment requested to recognise river for freight opportunities. | Refer to the Council’s response to comment REG19-27 and REG19-30 | Refer to the Council’s response to comment REG19-27 and REG19-30 |

LPREG19-25 | Calls to broaden definition of open space to include waterways | Policy 18 Open space, sports and recreation | Paragraph 8.7.2 In applying Policy 18, open space will encompass parks and gardens, natural and semi natural green spaces, amenity space, children’s play areas, allotments and cemeteries, churchyards and other burial grounds as defined in Havering’s Open Space Assessment and Standards Paper (2016). In addition, waterways are also included as open space recognising their sport, recreation and amenity value, consistent with the definition of open space in the NPPF. Leisure and Sports and recreation facilities encompass indoor sports halls, swimming pools, fitness centres, outdoor sports pitches, playing fields, tennis courts and bowling greens. |

Jodie Lancaster | Support for Green Belt Protection | No modification proposed | Support noted |

Scott Bird | Support for Green Belt | No modification proposed | Support noted |
<table>
<thead>
<tr>
<th>Name</th>
<th>LPREG19 - 37</th>
<th>Protection</th>
<th>No modification proposed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stephen Whiteman</td>
<td></td>
<td>Concerns over proposed development of borough on social infrastructure and the transport network</td>
<td>No modification proposed</td>
</tr>
</tbody>
</table>

The Outer North East London Strategic Housing Market Assessment 2016 indicates that there is a need for 1,366 new homes in Havering per annum. The Mayor of London sets minimum housing targets for each London Borough, for Havering this is 1,170 homes per annum. The Local Plan seeks to deliver a minimum of 17,550 new homes over a 15 year period within the existing built up area and without releasing green belt land for development.

The Local Plan identifies Romford and Rainham and Beam Park as Strategic Development Areas which have the capacity to deliver a significant amount of new housing. Both areas have also been designated as Housing Zones by the Mayor of London.

The Local Plan seeks to ensure that sufficient social infrastructure is delivered alongside new housing. This includes school places and health care facilities necessary for the quantum of proposed new development. The Local Plan is underpinned by a robust Infrastructure Delivery Plan (IDP).

The Council has also undertaken a Green Belt study as part of the evidence base for the Havering Local Plan. This was published in 2017 alongside the Proposed Submission Local Plan as part of the Regulation 19 consultation.

During and after the consultation a number of gypsy and traveller families (who had not been available or who had previously declined to be interviewed) contacted the Council so that their accommodation needs could be assessed. Further interviews were undertaken and a revised Gypsy and Traveller Accommodation Assessment (March 2018) has been prepared. The Council is proposing modifications to the Local Plan to enable the full identified need for gypsy and traveller pitches to be met.

Please refer to the Gypsy and Traveller Accommodation Assessment (March 2018) and the Gypsy and Traveller Position Statement (March 2018) for further information.

<table>
<thead>
<tr>
<th>Shirley Lewis</th>
<th>LPREG19 - 40</th>
<th>Green Belt Support</th>
<th>No modification proposed</th>
<th>Support noted</th>
</tr>
</thead>
</table>
| Nigel Teelan | LPREG19 - 38 | Concerns over Gypsy and Traveller Needs | Policy 11 Gypsy and Traveller Accommodation | The Council commissioned consultants ORS to undertake a Gypsy and Traveller Accommodation Assessment as part of the evidence base for the Havering Local Plan. This was published in 2017 alongside the Proposed Submission Local Plan as part of the Regulation 19 consultation.

During and after the consultation a number of gypsy and traveller families (who had not been available or who had previously declined to be interviewed) contacted the Council so that their accommodation needs could be assessed. Further interviews were undertaken and a revised Gypsy and Traveller Accommodation Assessment (March 2018) has been prepared. The Council is proposing modifications to the Local Plan to enable the full identified need for gypsy and traveller pitches to be met.

Please refer to the Gypsy and Traveller Accommodation Assessment (March 2018) and the Gypsy and Traveller Position Statement (March 2018) for further information. |

Policy 11 Gypsy and Traveller Accommodation

i. Formalising seven existing private sites providing a maximum of 2270 pitches for Gypsies and Travellers. These sites are identified on the Proposals Map and the maximum number of pitches that will be permitted on each site is identified in paragraph 7.9.5; and

Paragraph 7.9.1:

The Havering Gypsy and Traveller Accommodation Assessment (GTAA) 2012 provides a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpersons accommodation in the borough up to 2031. The Assessment identifies a need for 2270 additional pitches for the Gypsy and Traveller households who meet the planning definition as set out in the National Planning Policy for Traveller Sites. Of the 2270 pitches needed, 2607 pitches are required within the first 5 year period of the Plan (2016 – 2021), and the remaining 413 pitches in the latter part of the plan period. No additional need has been identified for plots for Travelling Showpeople over the 15 year plan period (2016-2031).

Paragraph 7.9.5:

The sites are identified on the Proposals Map and are listed below. In order to provide firm controls and prevent further intensification, a maximum number of pitches will be permitted on each site as set out below:

- Tyas Stud Farm rear of Latchford Farm - maximum of 5 pitches
- Vinegar Hill - maximum of 412 pitches
- Hogbar Farm West - maximum of 24 pitches
- Ashlea View, Tomkyns Lane - maximum of 2 pitches
<table>
<thead>
<tr>
<th>Location</th>
<th>Maximum Number of Pitches</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benskins Lane</td>
<td>10</td>
</tr>
<tr>
<td>Fairhill Rise</td>
<td>2</td>
</tr>
<tr>
<td>Hogbar Farm East</td>
<td>7</td>
</tr>
<tr>
<td>Lower Bedfords Road</td>
<td>3</td>
</tr>
<tr>
<td>The Caravan Park, Putwell Bridge</td>
<td>2</td>
</tr>
<tr>
<td>Willow Tree Lodge</td>
<td>3</td>
</tr>
<tr>
<td>Church Road</td>
<td>18</td>
</tr>
</tbody>
</table>

Paragraph 7.9.8

Where further sites are proposed the Council will ensure that they are required to meet legitimate additional borough need. When considering applications for Gypsy and Traveller sites and Travelling Showpersons plots, the Council will take into account the policy criteria outlined in Policy 11 in addition to the requirements of National Policy.

**Policy 11 Gypsy and Traveller Accommodation**

**i. Formalising seven existing private sites providing a maximum of 3370 pitches for Gypsies and Travellers.** These sites are identified on the Proposals Map and the maximum number of pitches that will be permitted on each site is identified in paragraph 7.9.5; and

Paragraph 7.9.1:

The Havering Gypsy and Traveller Accommodation Assessment (GTAA) 2017 provides a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpersons accommodation in the borough up to 2031. The Assessment identifies a need for 3370 additional pitches for the Gypsy and Traveller households who meet the planning definition as set out in the National Planning Policy for Traveller Sites. Of the 3370 pitches needed, 2657 pitches are required within the first 5 year period of the Plan (2016 – 2021), and the remaining 713 pitches in the latter part of the plan period. No additional need has been identified for plots for Travelling Showpeople over the 15 year plan period (2016-2031).

Paragraph 7.9.5:

The sites are identified on the Proposals Map and are listed below. In order to provide firm controls and prevent further intensification, a maximum number of pitches will be permitted on each site as set out below:

- Tyas Stud Farm rear of Latchford Farm - maximum of 5 pitches
- Vinegar Hill - maximum of 12 pitches
- Hogbar Farm West - maximum of 24 pitches
- Ashlea View, Tomkyns Lane - maximum of 2 pitches
- Benskins Lane - maximum of 1012 pitches
- Fairhill Rise - maximum of 2 pitches
- Hogbar Farm East - maximum of 47 pitches
- Lower Bedfords Road - maximum of 3 pitches
- The Caravan Park, Putwell Bridge - maximum of 2 pitches

The Council commissioned consultants ORS to undertake a Gypsy and Traveller Accommodation Assessment as part of the evidence base for the Havering Local Plan. This was published in 2017 alongside the Proposed Submission Local Plan as part of the Regulation 19 consultation.

During and after the consultation a number of gypsy and traveller families (who had not been available or who had previously declined to be interviewed) contacted the Council so that their accommodation needs could be assessed. Further interviews were undertaken and a revised Gypsy and Traveller Accommodation Assessment (March 2018) has been prepared. The Council is proposing modifications to the Local Plan to enable the full identified need for gypsy and traveller pitches to be met.

Please refer to the Gypsy and Traveller Accommodation Assessment (March 2018) and the Gypsy and Traveller Position Statement (March 2018) for further information.
| Andrew Nicholson | LREG19-39 | Concerns over redevelopment of Hornchurch sports Centre | No modification proposed | The existing uses of the field to the west of the car park can all be accommodated elsewhere within the Harrow Lodge Park, or at an alternative location. In the case of archery, discussions are ongoing with the archery club to secure a suitable alternative location. Dog walkers will still be able to walk their dogs on the field around the proposed new sports centre, as well as in the rest of Harrow Lodge Park. Joggers too will still be able to run on the field adjacent to the proposed new sports centre as well as the rest of Harrow Lodge Park.

The Council has considered the alternative location at the rear of the existing Centre for the proposed new centre, but have dismissed this for a number of reasons but primarily because of the ground levels.

Significant investment has been identified as being required through condition surveys of the existing sports centre. Leisure Management operators during the tendering for the current leisure management contract informed the Council that they would not want a contract longer than ten years if there was not to be a new Hornchurch Sports Centre. This is because of the age of the facilities, the investment required and the attractiveness of the facilities for discerning users.

The cost of a new sports centre would be met from the income the Council is receiving from the leisure management contractor operating the Council's Centres. Even with this investment, the Council is still making considerable savings through the current leisure management contract. This in turn means that those savings are not having to be found from other front line services.

The Council believe that the proposed location for a new Hornchurch Sports Centre is the best one. The centre would be in a central location with good access by public transport.

| David and Edna Murray | LREG19-41 | Calls for Green Belt release (not in relation to a specific site) | No modification proposed | The Outer North East London Strategic Housing Market Assessment 2016 indicates that there is a need for 1,366 new homes in Havering per annum. The Mayor of London sets minimum housing targets for each London Borough, and for Havering this is 1,170 homes per annum. The Local Plan identifies Romford and Rainham and Beam Park as Strategic Development Areas which have the capacity to deliver a significant amount of new housing. Both areas have also been designated as Housing Zones by the Mayor of London.

The Council does not believe that there are ‘exceptional circumstances’ to warrant the release of Green Belt land to meet the Borough’s housing need. As stated in the Housing White Paper (page 21), the Government “seeks to maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.”

The Council has prepared two Green Belt Studies in 2016 and 2018. The first Green Belt Study was undertaken by the London Borough of Havering in association with PBA and Enderby Consultants. This study assessed the contribution that land within the Green Belt makes to the Green Belt purposes (as defined in para 80 of the NPPF). To aid the assessments, the Green Belt in the Borough was divided into 24 land parcels. A performance value was attributed to the parcels for each purpose, based on predefined criteria. The study found that all 24 parcels make a contribution to Green Belt purposes, with 19 of the 24 Green Belt parcels making a fundamental contribution to the Green Belt purposes. A further four parcels were found to make a high or moderate/high contribution and only one parcel was found to make a low contribution.

- Willow Tree Lodge - maximum of 3 additional pitches (1 pitch already has permanent planning permission)
- Church Road - maximum of 18 pitches

Paragraph 7.9.8

Where further sites are proposed the Council will ensure that they are required to meet legitimate additional borough need. When considering applications for Gypsy and Traveller sites and Travelling Showpersons plots, the Council will take into account the policy criteria outlined in Policy 11 in addition to the requirements of National Policy.
A second Green Belt Study was prepared by LUC in 2018. The aim of this study was to provide conclusions on the potential degree of harm that may occur if the sites (which had been submitted to the Council as part of the Regulation 19 Consultation) were released from the Green Belt. This took account of three elements: 1) the contribution of the sites to the NPPF Green Belt purposes, 2) the potential impact on the wider integrity of the Green Belt and 3) the strength of revised Green Belt boundaries that would remain if the site was to be released. Out of a total of 84 sites assessed (with a total area of 849ha):

- 46 sites (total area of 682ha, which is 80.3% of the total area of the 84 sites) rated as 'high' in terms of harm to Green Belt resulting from release.
- 21 sites (24ha, 2.9%) rated as 'moderate-high' in terms of harm to Green Belt resulting from release.
- 9 sites (24ha, 2.9%) rated as 'moderate' in terms of harm to Green Belt resulting from release.
- 4 sites (17ha, 2%) rated as 'low-moderate' in terms of harm to Green Belt resulting from release.
- 4 sites (6ha, 0.7%) rated as 'low' in terms of harm to Green Belt resulting from release.

<table>
<thead>
<tr>
<th>LPREG19 - 42</th>
<th>Calls for Green Belt release (not in relation to a specific site)</th>
<th>No modification proposed</th>
<th>See response for LPREG19 – 41 above.</th>
</tr>
</thead>
<tbody>
<tr>
<td>LPREG19 - 43</td>
<td>Romford Masterplan</td>
<td>No modification proposed</td>
<td>Crossrail is specifically mentioned in the Proposed Submission version of the Local Plan. It will be a key factor in helping achieve the objectives for Romford set out in the Local Plan. The preparation of more detailed planning guidance for Romford is a Council priority however no specific dates have been set for consultation.</td>
</tr>
<tr>
<td>LPREG19 - 44</td>
<td>Concerns over Havering’s Housing Supply</td>
<td>No modification proposed</td>
<td>The Local Plan recognises that there is a significant need for new housing to meet both local need and sub regional housing need. To meet this need the Council has sought to identify additional capacity in order to close the gap between its allocated housing target and its Objectively Assessed Housing Need as set out in paragraphs 7.1.6 and 7.1.7.</td>
</tr>
<tr>
<td>LPREG19 - 45</td>
<td>Calls for Green Belt release (not in relation to a specific site)</td>
<td>No modification proposed</td>
<td>See response for LPREG19 – 41 above.</td>
</tr>
</tbody>
</table>

Kirsty Buckley LPREG19 - 173 Concern over Gypsy and Traveller Needs Policy 11 Gypsy and Traveller Accommodation

i. Formalising seven existing private sites providing a maximum of 2270 pitches for Gypsies and Travellers. These sites are identified on the Proposals Map and the maximum number of pitches that will be permitted on each site is identified in paragraph 7.9.5; and Paragraph 7.9.1:

The Havering Gypsy and Traveller Accommodation Assessment (GTAA) 2012 provides a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpersons accommodation in the borough up to 2031. The Assessment identifies a need for 2270 additional pitches for the Gypsy and Traveller households who meet the planning definition as set out in the National Planning Policy for Traveller Sites. Of the 2270 pitches needed, 2057 pitches are required within the first 5 year period of the Plan (2016 – 2021), and the remaining 213 pitches in the latter part of the plan period. No additional need has been identified for plots for Travelling Showpeople over the 15 year plan period (2016-2031).

Paragraph 7.9.5:
The sites are identified on the Proposals Map and are listed below. In order The Council commissioned consultants ORS to undertake a Gypsy and Traveller Accommodation Assessment as part of the evidence base for the Havering Local Plan. This was published in 2017 alongside the Proposed Submission Local Plan as part of the Regulation 19 consultation.

During and after the consultation a number of gypsy and traveller families (who had not been available or who had previously declined to be interviewed) contacted the Council so that their accommodation needs could be assessed. Further interviews were undertaken and a revised Gypsy and Traveller Accommodation Assessment (March 2018) has been prepared. The Council is proposing modifications to the Local Plan to enable the full identified need for gypsy and traveller pitches to be met. Please refer to the Gypsy and Traveller Accommodation Assessment (March 2018) and the Gypsy and Traveller Position Statement (March 2018) for further information.
to provide firm controls and prevent further intensification, a maximum number of pitches will be permitted on each site as set out below:

- Tyas Stud Farm rear of Latchford Farm - maximum of 5 pitches
- Vinegar Hill - maximum of 12 pitches
- Hogbar Farm West - maximum of 14 pitches
- Ashlea View, Tomkyns Lane - maximum of 2 pitches
- Benskins Lane - maximum of 12 pitches
- Fairhill Rise - maximum of 2 pitches
- Hogbar Farm East - maximum of 47 pitches
- Lower Bedfords Road - maximum of 3 pitches
- The Caravan Park, Putwell Bridge - maximum of 2 pitches
- Willow Tree Lodge - maximum of 3 additional pitches (1 pitch already has permanent planning permission)
- Church Road - maximum of 18 pitches

Paragraph 7.9.8

Where further sites are proposed the Council will ensure that they are required to meet legitimate additional borough need. When considering applications for Gypsy and Traveller sites and Travelling Showpersons plots, the Council will take into account the policy criteria outlined in Policy 11 in addition to the requirements of National Policy.

<table>
<thead>
<tr>
<th>Theatres Trust</th>
<th>LPREG19 - 46</th>
<th>Support for Policy 15</th>
<th>No modification proposed</th>
<th>Support noted</th>
</tr>
</thead>
<tbody>
<tr>
<td>Margaret Whippy</td>
<td>LPREG19 - 48</td>
<td>Supports some green belt release.</td>
<td>No modification proposed</td>
<td>A Strategic Housing Market Assessment (SHMA) has been prepared jointly with the London Boroughs of Barking and Dagenham and Redbridge as part of the evidence base for the Havering Local Plan in line with the requirements of the National Planning Policy Framework. The SHMA assesses housing need within the Outer North East London Housing Market Area (HMA). The Havering Local Plan contains policies on housing mix and tenure to ensure need is met. The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF.</td>
</tr>
<tr>
<td>Natural England</td>
<td>LPREG19 - 47</td>
<td>No comments</td>
<td>No modification proposed</td>
<td>Noted</td>
</tr>
</tbody>
</table>
| Dave Shepherd | LPREG19 - 94 | Concern over Gypsy and Traveller Needs | Policy 11 Gypsy and Traveller Accommodation  
1. Formalising seven existing private sites providing a maximum of 70 pitches for Gypsies and Travellers. These sites are identified on the Proposals Map and the maximum number of pitches that will be permitted on each site is identified in paragraph 7.9.5; and  
Paragraph 7.9.1:  
The Havering Gypsy and Traveller Accommodation Assessment (GTAA) 2017 provides a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpersons accommodation in the borough up to 2031. The Assessment identifies a need for 370 additional pitches for the Gypsy and Traveller households who meet the planning definition as set out in the National Planning Policy for Traveller Sites. Of the 370 pitches needed, 267 pitches are required within the first 5 year period of the Plan.  
The Council commissioned consultants ORS to undertake a Gypsy and Traveller Accommodation Assessment as part of the evidence base for the Havering Local Plan. This was published in 2017 alongside the Proposed Submission Local Plan as part of the Regulation 19 consultation. During and after the consultation a number of gypsy and traveller families (who had not been available or who had previously declined to be interviewed) contacted the Council so that their accommodation needs could be assessed. Further interviews were undertaken and a revised Gypsy and Traveller Accommodation Assessment (March 2018) has been prepared. The Council is proposing modifications to the Local Plan to enable the full identified need for gypsy and traveller pitches to be met. Please refer to the Gypsy and Traveller Accommodation Assessment (March 2018) and the Gypsy and Traveller Position Statement (March 2018) for further information. | Support noted |
[2016–2021], and the remaining 213 pitches in the latter part of the plan period. No additional need has been identified for plots for Travelling Showpeople over the 15 year plan period (2016-2031).

Paragraph 7.9.5:

The sites are identified on the Proposals Map and are listed below. In order to provide firm controls and prevent further intensification, a maximum number of pitches will be permitted on each site as set out below:

- Tyas Stud Farm rear of Latchford Farm - maximum of 5 pitches
- Vinegar Hill - maximum of 12 pitches
- Hogbar Farm West - maximum of 24 pitches
- Ashlea View, Tomkyns Lane - maximum of 2 pitches
- Benskins Lane - maximum of 12 pitches
- Fairhill Rise - maximum of 2 pitches
- Hogbar Farm East - maximum of 47 pitches
- Lower Bedfords Road - maximum of 3 pitches
- The Caravan Park, Putwell Bridge - maximum of 2 pitches
- Willow Tree Lodge - maximum of 3 additional pitches (1 pitch already has permanent planning permission)
- Church Road - maximum of 18 pitches

Paragraph 7.9.8

Where further sites are proposed the Council will ensure that they are required to meet legitimate additional borough need. When considering applications for Gypsy and Traveller sites and Travelling Showpersons plots, the Council will take into account the policy criteria outlined in Policy 11 in addition to the requirements of National Policy.
potential degree of harm that may occur if the sites (which had been submitted to the Council as part of the Regulation 19 Consultation) were released from the Green Belt. This took account of three elements: 1) the contribution of the sites to the NPPF Green Belt purposes, 2) the potential impact on the wider integrity of the Green Belt and 3) the strength of revised Green Belt boundaries that would remain if the site was to be released. Out of a total of 84 sites assessed (with a total area of 849ha):

- 46 sites (total area of 682ha, which is 80.3% of the total area of the 84 sites) rated as ‘high’ in terms of harm to Green Belt resulting from release.
- 21 sites (120ha, 14.1%) rated as ‘moderate-high’ in terms of harm to Green Belt resulting from release.
- 9 sites (24ha, 2.9%) rated as ‘moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (17ha, 2%) rated as ‘low-moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (6ha, 0.7%) rated as ‘low’ in terms of harm to Green Belt resulting from release.

The site proposed in this representation by the Cheale Family (GB75) falls within parcel 12 of the Stage 1 Study. This Study concluded that the parcel makes a fundamental contribution to the Green Belt. The site was also assessed in the Stage 2 study and this Study concludes that releasing the site from the Green Belt would lead to a moderate-high degree of harm to the Green Belt. The reasons for this being:

- The site lies adjacent to the large built-up area of Havering but relates to the wider countryside – development would represent expansion of the large built-up area into the open countryside.
- The site does not lie directly between two settlements that are being considered under Purpose 2 for this assessment.
- The site is rural in character and clearly displays the characteristics of the countryside, with limited urbanising influence from the adjacent road and settlement edge. Development of the site would lead to the encroachment of the countryside.

Development of the site would cause some degree of encroachment to the land to the north, east and south. The overall harm to the Green Belt resulting from release of this site would therefore be Moderate-High.

Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 4 of the 13 sustainability criteria, and ‘green’ (signifying that the site could perform well in sustainability terms) in relation to 6 of the criteria.

HHGL (Bunnings and Homebase)  
Homebase site  
Removal of the site from the Council’s housing supply as set out within the Housing Position Statement.

Further to this representation Council officers met with HHGL and their planning agents GR Planning on 28th November 2017. The Council recognises the importance of retaining businesses within the borough and welcomes the planned investment into the Homebase/Bunnings store. In light of the information received regarding HHGLs long term lease (10 years+) the Council consider it unlikely that this site will come forward for residential development in the first ten years of the Plan period and it is recommended that the site is removed from the Council’s housing supply as set out within the housing position statement. The potential for mixed use development of the site was discussed with HHGL but as a leaseholder rather than freeholder mixed use redevelopment does not feature in their plans for the site.

Whilst the Council values this employment use it does not consider it appropriate to refer to individual stores given the strategic nature of the Havering Local Plan.

NHS Redbridge CCG

<table>
<thead>
<tr>
<th>LPREG19-49 Support for Local Plan</th>
<th>No modification proposed</th>
<th>Support noted</th>
</tr>
</thead>
<tbody>
<tr>
<td>LPREG19-50 Support for joint working</td>
<td>No modification proposed</td>
<td>Noted</td>
</tr>
<tr>
<td>LPREG19-51 Support for promotion of healthy environments</td>
<td>No modification proposed</td>
<td>Support noted</td>
</tr>
<tr>
<td>LPREG19-52 Support for joint working</td>
<td>No modification proposed</td>
<td>Noted</td>
</tr>
</tbody>
</table>
This representation is from a Mr Barrie Stone. Mr Stone has submitted a representation principally in connection with the Bush Farm, Upminster site. This site is the subject of a proposal for its removal from the Green Belt (under reference GB39). In his representation, Mr Stone also refers to a number of other sites in the Green Belt and suggests that these be combined with the site in his own representation.

The response below addresses the issues linked to GB39 as well as the other sites to which he refers: GB10, GB29, GB32, GB59, GB65, GB78 and GB78.

The Outer North East London Strategic Housing Market Assessment 2016 indicates that there is a need for 1,366 new homes in Havering per annum. The Mayor of London sets minimum housing targets for each London Borough, and for Havering this is 1,170 homes per annum. The Local Plan identifies Romford and Rainham and Beam Park as Strategic Development Areas which have the capacity to deliver a significant amount of new housing. Both areas have also been designated as Housing Zones by the Mayor of London.

The Council does not believe that there are ‘exceptional circumstances’ to warrant the release of Green Belt land to meet the Borough’s housing need. As stated in the Housing White Paper (page 21), the Government “seeks to maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.”

The Council has prepared two Green Belt Studies in 2016 and 2018. The first Green Belt Study was undertaken by the London Borough of Havering in association with PBA and Enderby Consultants. This study assessed the contribution that land within the Green Belt makes to the Green Belt purposes (as defined in para 80 of the NPPF). To aid the assessments, the Green Belt in the Borough was divided into 24 land parcels. A performance value was attributed to the parcels for each purpose, based on predefined criteria. The study found that all 24 parcels make a contribution to Green Belt purposes, with 19 of the 24 Green Belt parcels making a fundamental contribution to the Green Belt purposes. A further four parcels were found to make a high or moderate/high contribution and only one parcel was found to make a low contribution.

A second Green Belt Study was prepared by LUC in 2018. The aim of this study was to provide conclusions on the potential degree of harm that may occur if the sites (which had been submitted to the Council as part of the Regulation 19 Consultation) were released from the Green Belt. This took account of three elements: 1) the contribution of the sites to the NPPF Green Belt purposes, 2) the potential impact on the wider integrity of the Green Belt and 3) the strength of revised Green Belt boundaries that would remain if the site was to be released. Out of a total of 84 sites assessed (with a total area of 849ha):

- 46 sites (total area of 682ha, which is 80.3% of the total area of the 84 sites) rated as ‘high’ in terms of harm to Green Belt resulting from release.
- 21 sites (120ha, 14.1%) rated as ‘moderate-high’ in terms of harm to Green Belt resulting from release.
- 9 sites (24ha, 2.9%) rated as ‘moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (17ha, 2%) rated as ‘low-moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (6ha, 0.7%) rated as ‘low’ in terms of harm to Green Belt resulting from release.

The representation submitted by Barrie Stone is focussed on Bush Farm (GB 39). The representation also identifies a number of other parcels which are also proposed for removal from the Green Belt.

The submitted representation form from Barrie Stone suggests that a number of land parcels are combined for a cohesive development. Specifically, it identifies a number of parcels of land as submitted for release from the Green Belt: GB10, GB29, GB32, GB59, GB65, GB78 and GB80 as well as his own proposal GB39.

The agglomerated site formed by these parcels falls within parcel 6 of the Stage 1 Study. This Study concluded that the parcel (Parcel 6) makes a fundamental contribution to the Green Belt.

GB39 (Bush Farm)

The site proposed by Barrie Stone (GB39) site was also assessed in the Stage 2 study and this Study concludes
that releasing the site from the Green Belt would lead to a high degree of harm to the Green Belt. The reasons for this being:

- Although the site is not adjacent to the large built-up area of Havering, it is in close proximity to it (approximately 450m). The Site relates to the wider countryside and therefore development would represent expansion of the large built-up area into the open countryside.
- The Site lies between the settlements of Upminster and South Ockendon to the southeast. The settlements are not in close proximity (over 3km away) therefore the release of the Site would not lead to any significant perception of narrowing the gap between them, although there would be narrowing of the gap between them.
- The Site is rural in character and clearly displays the characteristics of the countryside. Development of the Site would lead to the encroachment of the countryside.

The site is located approximately 450m from any existing Green Belt boundaries. If released, this would lead to the creation of new inset development with relatively weak boundaries. This would call into question the justification for retaining the remaining Green Belt land between the Site and the urban edge as it would become enclosed by development. The overall harm to the Green Belt resulting from release of this Site would therefore be high.

The Study also considered the other parcels identified in this representation and reached the following conclusions:

**GB10 (Great Sunnings Farm)**

The Study concluded that releasing the site from the Green Belt would lead to a high degree of harm to the Green Belt. The reasons for this being:

- The site lies in close proximity (within 50m) to the large built-up area of Havering but relates to the wider countryside – development would represent expansion of the large built-up area into the open countryside.
- The site lies between the settlements of Upminster and South Ockendon to the southeast. The settlements are not in close proximity (over 3km away) and the release of the site would not lead to any perception of narrowing the gap between them.
- The site is rural in character and clearly displays the characteristics of the countryside, with limited urbanising influence from the adjacent roads and settlement edge.

Development of the site would cause the neighbouring Green Belt land to the north to be enclosed by development on three sides. This would lead to a sense of encroachment, weakening its contribution to the Green Belt. The harm to the Green Belt resulting from release of this site would therefore be high.

Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 4 of the 13 sustainability criteria, and ‘green’ (signifying that the site could perform well in sustainability terms) in relation to 4 of the criteria.

**GB29 (Chapman’s Farm, Upminster)**

The Study concluded that releasing the site from the Green Belt would lead to a high degree of harm to the Green Belt. The reasons for this being:

- The site lies adjacent to the large built up area of Havering but relates strongly to the wider countryside. Development would represent significant expansion of the large built-up area into the open countryside.
- The site forms part of a critical gap between the settlements of Cranham and Emerson Park. Development within the site would lead to a narrowing of the gap between the settlements.
- The site is rural in character and clearly displays characteristics of the countryside. Development of the Site would lead to encroachment of the countryside.

Release of the site would lead to a sense of encroachment to land to the east, north of Cranham, as this area would be enclosed by development on two sides and the A127 to the north. Release would weaken the
Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 3 of the 13 sustainability criteria, and ‘green’ (signifying that the site could perform well in sustainability terms) in relation to 6 of the criteria.

**GB32 (Land north of Ockendon Road, Upminster)**

The Study concluded that releasing the site from the Green Belt would lead to a high degree of harm to the Green Belt. The reasons for this being:

- The site lies adjacent to the large built-up area of Havering and relates both to the wider countryside and the urban edge. The Site makes some contribution to limiting sprawl.
- The site lies between the settlements of Upminster and South Ockendon to the south east. The settlements are not in close proximity (over 3km away) with the barrier of the M25 lies between them. Release of the Site would not lead to any perception of narrowing the gap between them.
- The site is rural in character and displays the characteristics of the countryside, albeit with some urbanising influence from the adjacent road and settlement edge. Development of the Site would lead to some sense of encroachment of the countryside.

The site is relatively contained by the existing urban edge to the west, school to the north, Crematorium to the east and the B1421 road to the south. Release of the Site would not lead to any significant weakening of neighbouring Green Belt land. The harm to the Green Belt resulting from release of this Site would therefore be **Moderate**.

Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 3 of the 13 sustainability criteria, and ‘green’ (signifying that the site could perform well in sustainability terms) in relation to 6 of the criteria.

**GB59 (Bramble Farm, Bramble Lane, Upminster)**

The Study concluded that releasing the site from the Green Belt would lead to a high degree of harm to the Green Belt. The reasons for this being:

- The site does not lie adjacent to the large built-up area of Havering and is sufficiently distant from it (approximately 1.3km) to make no contribution to preventing urban sprawl.
- The site lies between the settlements of Upminster and South Ockendon to the southeast. The settlements are not in close proximity (over 3km away) and the release of the Site would not lead to any significant perception of narrowing the gap between them.
- The site is rural in character and clearly displays the characteristics of the countryside. Development of the Site would lead to the encroachment of the countryside.

The site is located more than 1.3km from any existing Green Belt boundaries. If released, this would lead to the creation of new inset development with relatively weak boundaries that would not represent a clear distinction between inset and washed over settlement. Release of the site could also affect the integrity of the surrounding Green Belt land, weakening its contribution to the Green Belt. The harm to the Green Belt resulting from release of this Site would therefore be **High**.

Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 7 of the 13 sustainability criteria, and ‘green’ (signifying that the site could perform well in sustainability terms) in relation to 5 of the criteria.
GB65 (Damyns Hall Aerodrome, Upminster)
The Study concluded that releasing the site from the Green Belt would lead to a high degree of harm to the Green Belt. The reasons for this being:

- The site makes no contribution to preventing sprawl because it does not lie adjacent to the large built up area and is sufficiently distant (1km) to make no contribution to preventing sprawl.
- The site forms part of the gap between Aveley and Rainham which are some 3.5km apart. The site lies between the two settlement and would lead to some perception of narrowing the gap between the settlements.
- The site is rural in character and clearly displays characteristics of the countryside. Development of this site would lead to encroachment of the countryside.

Release would lead to the creation of an inset area of development not linked to any existing settlement. It would also result in the creation of a weak Green Belt boundary and weaken the Green Belt contribution of neighbouring undeveloped land around the site by encroaching on the open countryside. The harm to the Green Belt resulting from release of this site would therefore be High.

Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 7 of the 13 sustainability criteria, and ‘green’ (signifying that the site could perform well in sustainability terms) in relation to 4 of the criteria.

GB78 (Harwood Livery, Upminster)
The Study concluded that releasing the site from the Green Belt would lead to a high degree of harm to the Green Belt. The reasons for this being:

- The site lies adjacent to large built up area of Havering but relates strongly to the wider countryside. Development would represent significant expansion of the large built up area into the open countryside.
- The site forms part of the gap between the settlements of Upminster and South Ockendon, however it is not of critical importance due to the distance between the settlements.
- The site is rural in character and clearly displays characteristics of the open countryside. There is little sense of urban encroachment and development of this Site would lead to significant encroachment of the countryside.

Release of the site would weaken contribution to purpose 1 and 3 of Green Belt land to the east between the Site and Sunnings Lane, due to its containment by development to the west and the north. The harm to the Green Belt resulting from release of this Site would therefore be High.

Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 5 of the 13 sustainability criteria, and ‘green’ (signifying that the site could perform well in sustainability terms) in relation to 6 of the criteria.

GB80 (Bush Farm, Bramble Lane, Upminster)
The Study concluded that releasing the site from the Green Belt would lead to a high degree of harm to the Green Belt. The reasons for this being:

- The site makes no contribution to preventing sprawl because it does not lie adjacent to the large built up area and is sufficiently distant from it (1.3km) to make no contribution sprawl.
- The site forms part of the gap between Upminster and South Ockendon but is not of critical importance to the separation of the two settlements.
- The site is rural in character and clearly displays characteristics of the countryside. Development of this Site would lead to the encroachment of the countryside.
Release of this site would create a new inset area of Green Belt within the countryside and its release would weaken the contribution of surrounding Green Belt land by encroaching on the open countryside. The harm to the Green Belt resulting from release of this Site would therefore be High.

Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 7 of the 13 sustainability criteria, and ‘green’ (signifying that the site could perform well in sustainability terms) in relation to 5 of the criteria.

Turning to the additional points that Mr Stone raises.

- the Local Plan includes ambitious proposals in Policy 23 Transport connections for strategic transport improvements to significantly improve transport connectivity in Havering.
- Policy 3 Housing supply fully recognises the importance of utilising “brownfield” land to assist in the delivery of new homes in Havering.
- the implications arising from a new Lower Thames Crossing will not be known until the final route is identified.

<table>
<thead>
<tr>
<th>Basildon Council</th>
<th>LPREG19 - 56</th>
<th>Soundness objection regarding Havering’s unmet housing need</th>
<th>Policy 3 Housing supply</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>New paragraph to be inserted between existing paragraphs 7.1.11 and 7.1.12.</td>
<td>The Housing Position Statement identifies specific deliverable and developable sites for the first 10 years of the Plan. The Council is committed to ensuring that there is a sufficient supply of housing over the 15 year plan period and beyond and will therefore undertake an early review of the Plan.</td>
</tr>
</tbody>
</table>

Further to this representation officers from Havering and the GLA attended the South Essex Authorities Duty to Co-operate meeting on 23rd October 2017 which was attended by officers from Basildon Council. This was followed by a meeting between officers from Basildon Council and Havering Council on 12th December 2017.

At the South Essex Authorities Duty to Co-operate meeting the GLA reconfirmed the London Plan policy position.

The London Plan makes clear that London should be treated as a single housing market. The London Plan states that the Annual average housing supply monitoring targets set out in Table 3.1 are a minimum target for each borough. In order to meet local need and contribute to meeting strategic need each London borough is to seek to identify additional capacity to close the gap between the identified housing need and supply. The GLA have confirmed that individual London boroughs are not expected to identify where any unmet need is going to be met either inside of London or outside.

With regards to the final 5 years of the Plan period, the Council is in agreement that it will need to review the Local Plan to ensure that a suitable housing supply is identified. An explicit commitment to an early review of the Plan is therefore proposed.

| LPREG19 - 60 | Calls for continuing engagement over Transport connections | No modification proposed | Comments in relation to continued engagement with Havering, the GLA and others in relation to transport connections are noted and welcome.

The importance of strategic transport linkages are fully understood and recognised by London Borough of Havering. It is appropriate for local planning authorities to address these issues through the preparation of their Local Plans and through engagement with their neighbours.

A Statement of Common Ground (SoCC) has been signed by Havering Essex CC and a number of Essex Authorities including Basildon agreeing to continue to work collaboratively on a number of strategic transport related matters linked to respective Local Plans.

Further to this representation officers from Havering attended the South Essex Authorities OIC meeting on 23rd October 2017 which was attended by officers from Basildon Council. This was followed by a meeting between officers from Basildon Council and Havering Council on 12th December 2017 where it was agreed that there were no outstanding transport issues which are not addressed by the Statement of Common Ground.

A meeting was held on Thursday 18th January for a further discussion on the A127 Growth Corridor. All south Essex Authorities including Basildon were invited to this meeting. The meeting included a briefing on progress TfL.
| Thames Water | LPREG19 - 61 | Support for Gypsy and Traveller Policy | No modification proposed | The Council has undertaken an up to date Gypsy and Traveller Needs Assessment and this has informed the proposed modifications to Policy |
| Rosie Brown | LPREG19 - 93 | Gypsy and Traveller Policy | Policy 11 Gypsy and Traveller Accommodation | The Council commissioned consultants ORS to undertake a Gypsy and Traveller Accommodation Assessment as part of the evidence base for the Havering Local Plan. This was published in 2017 alongside the Proposed Submission Local Plan as part of the Regulation 19 consultation. During and after the consultation a number of gypsy and traveller families (who had not been available or who had previously declined to be interviewed) contacted the Council so that their accommodation needs could be assessed. Further interviews were undertaken and a revised Gypsy and Traveller Accommodation Assessment (March 2018) has been prepared. The Council is proposing modifications to the Local Plan to enable the full identified need for gypsy and traveller pitches to be met. Please refer to the Gypsy and Traveller Accommodation Assessment (March 2018) and the Gypsy and Traveller Position Statement (March 2018) for further information. |

| LPREG19 - 57 | Support for Gypsy and Traveller Policy | No modification proposed | The Council has undertaken an up to date Gypsy and Traveller Needs Assessment and this has informed the proposed modifications to Policy |
| LPREG19 - 58 | Support for Gypsy and Traveller Policy | No modification proposed | See response to comment REG19-60 |
| LPREG19 - 59 | Industrial Land | No modification proposed | The Council has undertaken an employment land review to understand the requirements for the protection or release of industrial land. The Council has undertaken a review of this to ensure that it remains valid and an Addendum is included in the submitted evidence bas documents. Havering’s Local Plan recommendations in the Employment Land Review. The ELR advises that 19.5ha of industrial land previously designated for its local significance can be released from industrial employment uses. The land recommended for release comprises 2.7ha at Crow Lane (Romford Gas Works) 15.4ha at Rainham west and 1.4ha at Bridge Close. The de-designation of these sites will facilitate the delivery of new residential developments and make a significant contribution towards meeting the borough’s housing need. Safeguarding SILs and the remaining LSILs will ensure that there is sufficient capacity to meet projected demand for industrial land in the borough going forward over the plan period. Further to this representation a meeting was held between officers from Basildon Council and Havering Council on 12th December 2017 where it was agreed that there were no outstanding issues in relation to the approach to employment land set out in the Havering Local Plan. |

| LPREG19 - 61 | Support for Gypsy and Traveller Policy | Water and Sewerage | No modification proposed | The policy context for adequate waste water infrastructure is sufficiently covered by London Plan Policy 5.14 Water quality and wastewater infrastructure. The Council will continue to work with Thames Water during the preparation of the Site Specific Allocations Local Plan, which will identify specific development sites, and any revisions of the Infrastructure Delivery Plan to address the issues raised. |

| Thames Water | LPREG19 - 61 | Water and Sewerage | No modification proposed | The policy context for adequate waste water infrastructure is sufficiently covered by London Plan Policy 5.14 Water quality and wastewater infrastructure. The Council will continue to work with Thames Water during the preparation of the Site Specific Allocations Local Plan, which will identify specific development sites, and any revisions of the Infrastructure Delivery Plan to address the issues raised. |

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| Thames Water | LPREG19 - 61 | Water and Sewerage | No modification proposed | The policy context for adequate waste water infrastructure is sufficiently covered by London Plan Policy 5.14 Water quality and wastewater infrastructure. The Council will continue to work with Thames Water during the preparation of the Site Specific Allocations Local Plan, which will identify specific development sites, and any revisions of the Infrastructure Delivery Plan to address the issues raised. |

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Paragraph 7.9.5:
The sites are identified on the Proposals Map and are listed below. In order to provide firm controls and prevent further intensification, a maximum number of pitches will be permitted on each site as set out below:

- Tyas Stud Farm rear of Latchford Farm - maximum of 5 pitches
- Vinegar Hill - maximum of 12 pitches
- Hogbar Farm West - maximum of 24 pitches
- Ashlea View, Tomkyns Lane - maximum of 2 pitches
- Benskins Lane - maximum of 10 pitches
- Fairhill Rise - maximum of 2 pitches
- Hogbar Farm East - maximum of 7 pitches
- Lower Bedfords Road - maximum of 3 pitches
- The Caravan Park, Putwell Bridge - maximum of 2 pitches
- Willow Tree Lodge - maximum of 3 additional pitches (1 pitch already has permanent planning permission)
- Church Road - maximum of 18 pitches

Paragraph 7.9.8
Where further sites are proposed the Council will ensure that they are required to meet legitimate additional borough need. When considering applications for Gypsy and Traveller sites and Travelling Showpersons plots, the Council will take into account the policy criteria outlined in Policy 11 in addition to the requirements of National Policy.

<table>
<thead>
<tr>
<th>Lawrence Olawoagbo</th>
<th>LPREG19 - 62</th>
<th>Night Bus</th>
<th>No modification proposed</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>The Local Plan is a spatial plan steering future growth and sustainable development within the Borough of Havering. Its status as strategic document does not qualify it to consider the planning of the local bus network across the borough.</td>
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<td></td>
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<td>Decisions with regard to new bus routes is managed by TfL London Buses, who are responsible for planning routes, specifying service levels and monitoring service quality as part of its duty to delivering the Mayor’s Transport Strategy (MTS).</td>
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<td>As part of this commitment to the MTS, TfL does give priority to extending and redirecting bus routes to support London’s housing growth, and changing transport needs as part of its enhancement commitments to the London bus network.</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>New Bus service requests should be directed to <a href="mailto:CUSTOMERSERVICES@TFL.GOV.UK">CUSTOMERSERVICES@TFL.GOV.UK</a></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Frank Etman</th>
<th>LPREG19 - 63</th>
<th>Concerns over the impact of the Rainham and Beam Bark SDA</th>
<th>No modification proposed</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>The responsibility of upgrading Rainham Station itself is the train operating company C2C. In recent years the Council has undertaken works to support the area outside of the station known as Rainham Interchange. However no further work is planned at the present time.</td>
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<td>TfL have recently carried out a public consultation to re-route the Hornchurch to Lakeside 372 services via Rainham station which will improve station accessibility by bus.</td>
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<td>Part of the detailed design work currently taking place in relation to the A1306 Beam Parkway project includes traffic modelling work. This will assess the potential impact of the scheme on the local road network. This scheme will be a subject of public consultation later in 2018 when stakeholders will learn more about the impact of the scheme on the local area.</td>
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</table>
Historic England 

LPREG19 - 64 Heritage Assets

Policy 28 Heritage Assets

i. Proposals that seek to sustain or conserve and enhance the significance of heritage assets at risk in the borough.

Insert new clause after vi.

Well designed and high quality proposals which would not affect the significance of a heritage asset with archaeological interest, including the contribution made to significance by its setting;

vii. The maintenance of up to date Archaeological Priority Areas: Proposals affecting the significance of a heritage asset with archaeological interest, including the contribution to significance made by its setting,

- a. The proposals are supported by an appropriate assessment of the asset's significance;
- b. Any harm is minimised, clearly justified and necessary to achieve public benefits that are substantial enough to outweigh loss or harm to the asset's significance; and
- c. The significance of any asset or part of an asset to be lost is recorded and made publicly accessible.

Substantial harm to, or loss of, a Scheduled Monument or non-designated heritage asset with archaeological interest that is demonstrably of national importance, will only be considered in exceptional circumstances.

Where a development proposal is judged to cause harm then it will be assessed against the relevant test in the National Planning Policy Framework (NPPF) depending on whether the harm caused is substantial or less than substantial. Applications for planning permission that involve substantial harm or total loss of a designated heritage asset are wholly exceptional and will be considered as substantial harm and will be assessed against the tests laid out in paragraph 133 of the NPPF. Non-designated assets of archaeological interest that are demonstrably of national importance will be considered subject to the above policy.

Paragraph 11.3.5:

The borough's Conservation Areas each have their own special character and architectural and historic interest that contributes to their significance, which needs to be respected by new development within them, and within their setting. For example, the special interests and significance of the Gidea Park Conservation Area, with its individually architect designed 'Arts and Crafts' style Competition and Exhibition houses, are very different to that of Romford Conservation Area, which are based on its historic significance rather than a defined architectural character. Havering’s Conservation Areas all have Conservation Area Appraisals and Management Proposals which
identify the special interest of each area.

Split into two paragraphs:

Proposals for new and replacement buildings and features within a Conservation Area or its setting, will be expected to be of a high quality design. that responds to the important characteristics of the Conservation Area, and which will preserve, enhance or reveal its character and appearance, and significance. For this reason, the Council will not normally accept applications for outline planning permission within Conservation Areas or their setting, and demolition will only be considered where the building, or other element, fails to make a positive contribution to the character or appearance, and significance of the Conservation Area. Where the exercise of permitted development rights would erode the character or appearance of a Conservation Area, or other heritage asset, the Council will seek to sustain their significance, including the contribution to significance provided by their setting, through the use of Article 4 directions.

New paragraph to be inserted after 11.3.7:

Archaeological Priority Areas (APAs) are areas where there is significant known archaeological interest or potential for new discoveries. APAs are used to help highlight where development might affect heritage assets. The Greater London Archaeological Advisory Service are undertaking a review of the APAs across London. Havering’s APA review is scheduled for 2019.

LPREG19 - 65 Request for designated and non-designated heritage assets to be specifically referred to in Objective xiv.

Clause iii of Policy 28 explicitly refers to non-designated heritage assets. Therefore no modification is proposed in this regard.

LPREG19 - 66 Request for ‘preserving’ to be replaced with ‘conserving; in paragraph 5.1.1 and in the key features of the spatial strategy

Comments noted

LPREG19 - 67 Heritage No modification proposed

The support for the design and heritage section of Policy 1 Romford Strategic Development Area is noted. The forthcoming Masterplan for Romford will provide the opportunity to review heritage matters linked to Romford.

LPREG19 Recommends a No modification proposed

The Council consider that this is adequately covered by Policy 26 Urban Design

| 3 Strategic Objectives
| Amend Objective xiv. Proactively conserve, enhance, and ensure greater understanding of Havering’s designated and non-designated heritage assets, their settings and wider historic environment subject to viability |

| Section 5 Borough-wide Strategy for Growth
| Paragraph 5.1.1: Havering’s population is expected to grow to over 293,000 (1) over the next 15 years. The Strategy underpinning the Local Plan seeks to ensure that there is the necessary growth in homes, jobs and critical infrastructure to support and sustain new and existing communities whilst also preserving conserving and enhancing the borough’s most valuable assets and maintaining its long established and strongly supported character and appearance as an outer London suburban borough. Key Features of the Spatial Strategy • Preserving Conserving and enhancing the Havering’s rich heritage and historic environments. |

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LPREG19 - 67 Heritage No modification proposed

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LPREG19 Recommends a No modification proposed

The Council consider that this is adequately covered by Policy 26 Urban Design
| LPREG19 – 70 | Support for Policy 26 Urban Design. Request for designated heritage assets to be referenced in clause i. | No modification proposed | The support for the detail of this policy is noted. Designated heritage assets are encompassed within ‘identity and character of the site and local area’. |
| LPREG19 – 71 | Heritage Policy 28 Heritage Assets |  |

i. Proposals that seek to sustain or conserve and enhance the significance of heritage assets at risk in the borough.

Insert new clause after vi.

Well designed and high quality proposals which would not affect the significance of a heritage asset with archaeological interest, including the contribution made to significance by its setting;

vii. The maintenance of up to date Archaeological Priority Areas: Proposals affecting the significance of a heritage asset with archaeological interest, including the contribution to significance made by its setting, where:

a. The proposals are supported by an appropriate assessment of the asset’s significance;

b. Any harm is minimised, clearly justified and necessary to achieve public benefits that are substantial enough to outweigh loss or harm to the asset’s significance; and
c. The significance of any asset or part of an asset to be lost is recorded and made publicly accessible.

Substantial harm to, or loss of, a Scheduled Monument or non-designated heritage asset with archaeological interest that is demonstrably of national importance, will only be considered in exceptional circumstances.

Where a development proposal is judged to cause harm then it will be assessed against the relevant test in the National Planning Policy Framework (NPPF) depending on whether the harm caused is substantial or less than substantial. Applications for planning permission that involve substantial harm or total loss of a designated heritage asset are wholly exceptional and will be considered as substantial harm and will be assessed against the tests laid out in paragraph 133 of the NPPF. Non-designated assets of archaeological interest that are demonstrably of national importance will be considered subject to the above policy.

Paragraph 11.3.5:
The borough’s Conservation Areas each have their own special character and architectural and historic interest that contributes to their significance, which needs to be respected by new development within them, and within their setting. For example, the special interests and significance of the Gidea Park Conservation Area, with its individually architect designed ‘Arts and Crafts’ style Competition and Exhibition houses, are very different to that of Romford Conservation Area, which are based on its historic significance rather than a defined architectural character. Havering’s Conservation Areas all have Conservation Area Appraisals and Management Proposals which identify the special interest of each area.

Proposals for new and replacement buildings and features within a Conservation Area or its setting, will be expected to be of a high quality design that responds to the important characteristics of the Conservation Area, and which will preserve, enhance or reveal its character and appearance, and significance. For this reason, the Council will not normally accept applications for outline planning permission within Conservation Areas or their setting, and demolition will only be considered where the building, or other element, fails to make a positive contribution to the character or appearance, and significance of the Conservation Area. Where the exercise of permitted development rights would erode the character or appearance of a Conservation Area, or other heritage asset, the Council will seek to sustain their significance, including the contribution to significance provided by their setting, through the use of Article 4 directions.

New paragraph to be inserted after 11.3.7:

Archaeological Priority Areas (APAs) are areas where there is significant known archaeological interest or potential for new discoveries. APAs are used to help highlight where development might affect heritage assets. The Greater London Archaeological Advisory Service are undertaking a review of the APAs across London. Havering’s APA review is scheduled for 2019.

Paragraph A.3.32:

Havering has a diverse range of important heritage assets sites and areas. There are currently 6 Grade I and 15 Grade II* and over 100 Grade II listed buildings located within Havering, as well as 11 designated conservation areas at including; Corbets Tey, Cranham, Gidea Park, Havering-atte-Bower, Langtons, North Ockendon, RAF Hornchurch, Rainham, Romford, St Andrews and St Leonards and one listed garden – Upminster Court Gardens.

Paragraph A.3.34:

There is just one listed garden in Havering – Upminster Court Gardens. Havering currently has 10-11 sites on the Heritage at Risk Register, including Romford Conservation Area, 7 grade II and 2 grade II* listed buildings and just 1 scheduled monument, which can be found within the Romford conservation area.

Policy 28 provides adequate policy protection for conservation areas and listed buildings, however the Council agree that it is beneficial to specifically recognise these heritage assets within the Strategic Development Areas.
### Notes on Policy Changes

<table>
<thead>
<tr>
<th>Rochford Council</th>
<th>Concerns over Havering’s Housing Supply and Duty to Co-operate commitments</th>
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<tbody>
<tr>
<td>LPREG19 – 72</td>
<td>Policy 3 Housing supply</td>
</tr>
<tr>
<td></td>
<td>New paragraph to be inserted between existing paragraphs 7.1.11 and 7.1.12</td>
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<th>Romford Civic Society (Andrew Curtin)</th>
<th>Objectives</th>
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<tbody>
<tr>
<td>LPREG19 – 73</td>
<td>Section 3 Strategic Objectives</td>
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<tr>
<td></td>
<td>xv. Increase the quantity, quality and accessibility of Havering’s public open spaces and maintain and enhance biodiversity and geodiversity;</td>
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<tr>
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<tbody>
<tr>
<td>LPREG19 – 74</td>
<td>Modification to Policy 1 Romford Strategic Development Area</td>
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<tr>
<td></td>
<td>iv. Positively transforms the Market Place into a high quality civic space, accommodating a reconfigured....</td>
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<td></td>
<td>6.1.12 Market Place is one of Romford’s greatest assets and has potential to provide a key public civic space within the town centre.</td>
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<tr>
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<tbody>
<tr>
<td>LPREG19 – 75</td>
<td>Concern over amenity space in Romford following development</td>
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<tr>
<td></td>
<td>No modification proposed</td>
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<tr>
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<tbody>
<tr>
<td>LPREG19 – 76</td>
<td>Support for Policy 8: Houses in Multiple Occupation</td>
</tr>
<tr>
<td></td>
<td>No modification proposed</td>
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<tbody>
<tr>
<td>LPREG19 – 77</td>
<td>Support for Policy 23: Transport Connections - welcomes</td>
</tr>
<tr>
<td></td>
<td>No modification proposed</td>
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</table>

### Further Information

- Further to this representation officers from Havering and the GLA attended the South Essex Authorities DTC meeting on 23rd October 2017 which was attended by officers from Rochford Council. This was followed by a meeting between officers from Rochford Council and Havering Council on 20th February 2018.

- At the South Essex Authorities DTC meeting the GLA reconfirmed the London Plan policy position.

- The London Plan makes clear that London should be treated as a single housing market. The London Plan states that the Annual average housing supply monitoring targets set out in Table 3.1 are a minimum target for each borough. In order to meet local need and contribute to meeting strategic need each London borough is to seek to identify additional capacity to close the gap between the identified housing need and supply. The GLA have confirmed that individual London boroughs are not expected to identify where any unmet need is going to be met either inside of London or outside.

- With regards to the final 5 years of the Plan period, the Council is in agreement that it will need to review the Local Plan to ensure that a suitable housing supply is identified. An explicit commitment to an early review of the Plan is therefore proposed.

- Reference to Civic space in Market Place removed and replaced with reference to high quality space. Reference is made to the amount of required green space in the parks and open spaces assessment. Policy 28 Heritage assets states the importance of up to date Conservation Area Appraisals and Management Plans. Romford’s Conservation appraisal is being updated to recent latest guidance on the management of conservation area.

- Paragraphs 7.5.6 and 7.5.7 provides further guidance relating to the size of balconies and types of amenity space required. The Council do not consider it appropriate to set specific amenity space standards.

- The Council have recently been advised by TfL that their funding application under the Liveable Neighbourhoods programme for improving access into Romford town centre has been successful.

- In respect to community engagement the proposal will be informed by a comprehensive engagement strategy that, in addition to helping inform the final interventions, will build stronger relationships between the Council
Information about Romford Town Centre Accessibility Improvements (p62). Requires further clarity on how interest groups would be involved in the development of strategy.

Community engagement is vital to the success of the proposal and will focus on offering people the opportunity to get involved in the process and influence the design decisions around their local areas.

The detail of such engagement has yet to be confirmed.

Please note, Havering is committed to securing effective involvement of the community and other stakeholders with in major infrastructure proposals of the borough.

| LPREG19 | Support for Policy 26 - Urban Design. Calls for ref. to distinctive geographical features in Romford | Policy 26 Urban design
  |
  | i. Are informed by, respect and complement the distinctive qualities, identity, and character and geographical features of the site and local area; | Response – A Design Review Panel is an independent advisory body who provide expert advice on the design of development proposals to help ensure that development in the borough is of the highest quality.

Please also refer to the modifications proposed by the Council in response to REG19-363

| LPREG19 | Support for Policy 27 - Landscaping | No modification proposed
  |
  | Noted. The principles set out in Policy 30 Nature conservation also apply to Romford.

| LPREG19 | Support for Policy 28 - Heritage | No modification proposed
  |
  | Support noted

| LPREG19 | Calls for a Wildlife corridor through central Romford. | No modification proposed
  |
  | The Council has not identified the River Rom as a wildlife corridor as it is working with the Environment Agency and other partners to identify how the river can be enhanced. The Council consider it is too early to identify the River Rom as a wildlife corridor.

| LPREG19 | Overview | A.3.5 (add to the end of the paragraph)

New libraries have been opened in recent years in Harold Hill and Rainham.

The Havering Nature Conservation and Biodiversity Strategy is referenced in paragraph 12.2.2.

The Council will review if any new SPDs will be needed, in addition to the commitments set out in the Local Plan.


Public libraries are covered by policy 16 Social infrastructure, which links to the Infrastructure Delivery Plan which assesses the need across a range of infrastructure types including libraries.

| Jane Lee | Support for Green Belt protection. Concern regarding brownfield development | No modification proposed
  |
  | The Outer North East London Strategic Housing Market Assessment 2016 indicates that there is a need for 1,366 new homes in Havering per annum. The Mayor of London sets minimum housing targets for each London Borough, and for Havering this is 1,170 homes per annum. The Local Plan identifies Romford and Rainham and Beam Park as Strategic Development Areas which have the capacity to deliver a significant amount of new housing. Both areas have also been designated as Housing Zones by the Mayor of London.

The Council does not believe that there are ‘exceptional circumstances’ to warrant the release of Green Belt land to meet the Borough’s housing need. As stated in the Housing White Paper (page 21), the Government “seeks to maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.”

| Royal Mail Group | Support for Green Belt protection. Concern regarding brownfield development | No modification proposed
  |
  | Further to this representation a meeting was held with officers from Havering and Iceni Projects on behalf of their client the Royal Mail Group on 5th December 2017.

The Council values the role of the Royal Mail Group both in relation to the service they provide to residents and...
that the response was sent by Crushman and Wakefield on behalf of the Royal Mail Group but are now represented by Iceni Projects.

as a key employer offering local employment opportunities. Based on the information received from the Royal Mail Group in this representation and at the subsequent meeting it is clear that the mid-long term intention as far as Royal Mail Group is concerned is to retain the existing provision across the borough which includes Harold Hill Delivery Office (long term lease); Hornchurch, Upminster and Rainham Delivery Offices (all freehold) and Romford Crow Lane (leasehold).

In relation to the Romford Crow lane site, the Havering Employment Land Review recommends that this site should be retained as a Locally Significant Industrial Site. The ongoing need for the site as demonstrated by the Royal Mail Group further supports this recommendation and the policy approach within the Local Plan.

Your comments concerning the need for additional floor space being required at any Delivery Office, to provide adequate space to cater for the extra demand arising from the provision of new homes are also noted. In particular it is noted that Royal Mail Group say that for every 500 new homes, 1 additional postal walk is typically required and this needs to be reflected within the space provided in Sorting Office facilities. It is understood that each new postal walk requires an increase of circa 16 sq. m of Delivery Office floor space. This information has been incorporated into the Infrastructure Delivery Plan which is a supporting document for the Local Plan.

Linda Smith

LPREG19 - 125

Gypsy and Traveller Policy

Policy 11 Gypsy and Traveller Accommodation

i. Formalising seven existing private sites providing a maximum of 3370 pitches for Gypsies and Travellers. These sites are identified on the Proposals Map and the maximum number of pitches that will be permitted on each site is identified in paragraph 7.9.5; and

Paragraph 7.9.1:

The Havering Gypsy and Traveller Accommodation Assessment (GTAA) 2012 provides a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpersons accommodation in the borough up to 2031. The Assessment identifies a need for 3370 additional pitches for the Gypsy and Traveller households who meet the planning definition as set out in the National Planning Policy for Traveller Sites. Of the 3370 pitches needed, 3257 pitches are required within the first 5 year period of the Plan (2016 – 2021), and the remaining 413 pitches in the latter part of the plan period. No additional need has been identified for plots for Travelling Showpeople over the 15 year plan period (2016-2031).

Paragraph 7.9.5:

The sites are identified on the Proposals Map and are listed below. In order to provide firm controls and prevent further intensification, a maximum number of pitches will be permitted on each site as set out below:

- Tyas Stud Farm rear of Latchford Farm - maximum of 5 pitches
- Vinegar Hill - maximum of 612 pitches
- Hogbar Farm West - maximum of 45 pitches
- Ashlea View, Tomkyns Lane - maximum of 2 pitches
- Benskins Lane - maximum of 12 pitches
- Fairhill Rise - maximum of 2 pitches
- Hogbar Farm East - maximum of 47 pitches
- Lower Bedfords Road - maximum of 3 pitches
- The Caravan Park, Putwell Bridge - maximum of 2 pitches

The Council commissioned consultants ORS to undertake a Gypsy and Traveller Accommodation Assessment as part of the evidence base for the Havering Local Plan. This was published in 2017 alongside the Proposed Submission Local Plan as part of the Regulation 19 consultation.

During and after the consultation a number of gypsy and traveller families (who had not been available or who had previously declined to be interviewed) contacted the Council so that their accommodation needs could be assessed. Further interviews were undertaken and a revised Gypsy and Traveller Accommodation Assessment (March 2018) has been prepared. The Council is proposing modifications to the Local Plan to enable the full identified need for gypsy and traveller pitches to be met.

Please refer to the Gypsy and Traveller Accommodation Assessment (March 2018) and the Gypsy and Traveller Position Statement (March 2018) for further information.
<table>
<thead>
<tr>
<th>John Mitchell</th>
<th>LPREG19 - 126</th>
<th>Gypsy and Traveller Policy</th>
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</thead>
<tbody>
<tr>
<td>Policy 11 Gypsy and Traveller Accommodation</td>
<td></td>
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<tr>
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<tr>
<td>• Willow Tree Lodge - maximum of 3 additional pitches (1 pitch already has permanent planning permission)</td>
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<tr>
<td>• Church Road- maximum of 18 pitches</td>
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<tr>
<td>Paragraph 7.9.8</td>
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During and after the consultation a number of gypsy and traveller families (who had not been available or who had previously declined to be interviewed) contacted the Council so that their accommodation needs could be assessed. Further interviews were undertaken and a revised Gypsy and Traveller Accommodation Assessment (March 2018) has been prepared. The Council is proposing modifications to the Local Plan to enable the full identified need for gypsy and traveller pitches to be met.

Please refer to the Gypsy and Traveller Accommodation Assessment (March 2018) and the Gypsy and Traveller Position Statement (March 2018) for further information.
Where further sites are proposed the Council will ensure that they are required to meet legitimate additional borough need. When considering applications for Gypsy and Traveller sites and Travelling Showpersons plots, the Council will take into account the policy criteria outlined in Policy 11 in addition to the requirements of National Policy.

<table>
<thead>
<tr>
<th>Persimmon Homes Essex</th>
<th>Support for Policy 2: Rainham Strategic Development Area</th>
<th>No modification proposed</th>
<th>Support noted</th>
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<tbody>
<tr>
<td>LPREG19 - 423</td>
<td>Support for Policy 2: Rainham Strategic Development Area</td>
<td>No modification proposed</td>
<td>The Council’s Vision: Havering Making a Greater London seeks to provide new homes in Havering and, in appropriate cases, the Council takes a positive and proactive stance in dealing with prospective private developers wishing to bring forward housing schemes in recognition of the importance of securing timely and high quality housing delivery. In line with the Vision, the Local Plan Spatial Strategy acknowledges that the delivery of new homes is critical to London’s well-being. It sets out how the Council has approached the important topic of making sure that enough new homes are provided. Havering has undertaken a Strategic Market Assessment to support the preparation of the Local Plan. Havering forms part of both the London-wide housing market area and the outer north east London sub housing market area with the London Boroughs of Barking and Dagenham and Redbridge. In line with the requirements of the National Planning Policy Framework, the Council has worked with these authorities to prepare its Strategic Housing Market Assessment (SHMA). The resultant Outer North East London SHMA indicates that Havering's full objectively assessed housing need is for 25,200 new homes over the period 2011-2033 or 1,145 homes per annum. Since the initial SHMA was undertaken, updated population projections have been published by the GLA. The updated population projections were reflected in an update (2017) of the SHMA which identified an increased housing need in Havering of 30,052 new homes over the same period (1,366 new homes per year). The Council is making every effort to identify and bring forward suitable sites to exceed the current London Plan target and to meet housing need. The Local Plan does not seek to constrain the number of new homes to come forward to 17,550 over the Plan period. Further, the Council is aware that the current London Plan requires that boroughs should seek to close the gap between housing need (as assessed through a Strategic Housing Market Assessment) and supply. The Council’s approach to providing new homes in the Havering Local Plan takes a balanced view about the importance of addressing housing requirements and securing sustainable development. Having undertaken recent studies to assess whether the Green Belt fulfils the roles identified in the National Planning Policy Framework, the Council is also committed to ensuring that the Green Belt is safeguarded. The Council has concluded that there are no exceptional circumstances to support releasing land from the Green Belt. The Council’s commitment to the Green Belt is an important ‘driver’ in helping to secure new homes in Havering’s built up areas and through the important programmes being delivered through the Housing Zones and the Council’s estates regeneration programme (see below). The Council’s strategy also recognises that the scope to accommodate growth in Havering will be dependent upon the provision of infrastructure especially that needed to provide effective and efficient movement within Havering as well as social and community infrastructure necessary for residents such as schools and health facilities. The Council has prepared an Infrastructure Delivery Plan to support the Havering Local Plan and to...</td>
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</tbody>
</table>
Throughout the Local Plan process, the Council has rigorously sought to identify all sources of potential housing supply that will secure sustainable development in order to ensure that Havering is taking every opportunity to secure the delivery of new homes. This approach has been implemented to enable the gap between the housing targets in the London Plan and the objectively assessed need requirement to be closed as far as is reasonably possible.

The Housing Position Statement which supports the Havering Local Plan explains the Council’s approach to this in more detail. A key element is that the Council considers that the certainty of securing housing delivery over the overall plan period must be taken into account against the numbers of units approved particularly in the initial years of the Local Plan being implemented.

It sets out that the Council considers that over the period of the plan to 2031, the potential overall supply of additional homes in Havering may exceed the minimum annual housing target of 1,170 new homes per year set out in the current London Plan.

In summary, the approach in the Local Plan that the Council will implement is based on:

- focussing the delivery of new homes in Havering’s two housing Zones at Romford and Rainham and Beam Park. These two areas are identified in the Local Plan as Strategic Development Areas and have individual comprehensive policy frameworks to guide and steer their development to make sure that development provides high quality places with inclusive communities and the timely and effective provision of infrastructure
- supporting the intensification of twelve of its own existing housing estates through an ambitious regeneration programme that includes an experienced private sector development partner secured by means of a Joint Venture Limited Liability Partnership
- realising the housing opportunities that come forward on large sites outside of the Strategic Development Areas to provide opportunities for place-making and building communities. These include sites such as the former St Georges Hospital site in Hornchurch
- prioritising all land not designated for other planning purposes for new homes
- encouraging the effective use of land by re-using previously developed (brownfield) land and allocating a range of sustainable sites for housing development. The latter will be identified in the forthcoming Site Specific Allocations Local Plan

The Local Plan Housing Position Statement sets out in more detail the specific potential housing opportunities that will come forward for the two Housing Zones and the Council’s twelve estates programme.

The Housing Position Statement identifies specific deliverable and developable sites for the first 10 years of the Plan. The Council is committed to ensuring that there is a sufficient supply of housing over the 15 year plan period and beyond and will therefore undertake an early review of the Plan.

The Statement also includes details of sites which it is anticipated will be included in the forthcoming Site Specific Allocations Local Plan document which will reflect up to date capacity studies where appropriate.

Underpinning the Council’s approach is a clear recognition of the importance of optimising the development potential of the sites in regard to their potential capacity whilst ensuring that they provide satisfactory residential environment for residents and maintaining the character and appearance of Havering. There is an emphasis on making sure the place-making role of new development is addressed and a focus on delivering places where communities can flourish and be cohesive and inclusive.

As a result of this approach, sufficient land has been identified to meet the minimum London Plan housing target for the first 10 years of the Local Plan if the delivery is taken over the 10 year period.

The Council considers that the greater certainty that is encompassed through the Housing Zones and the twelve estates programme should weigh heavily in their favour and help counter the potential numerical shortfall in housing delivery in the first five years.
The objector has raised concerns about the potential implications of Havering failing to meet its OAHN particularly in regard to the position with other London Boroughs and adjoining and nearby districts outside London.

Havering has engaged extensively with the GLA in the preparation of its Local Plan and this has included specific discussion about addressing housing.

The GLA has confirmed that London Boroughs are not required to demonstrate how any unmet need from their own boroughs will be met in Other London Boroughs or adjoining districts. The preparation of the Havering Local Plan is not therefore required to address how any shortfall in this borough will be addressed within London or by adjoining / nearby local authorities.

The GLA has advised that the London Plan makes clear that London should be treated as a single housing market. The London Plan states that the Annual average housing supply monitoring targets set out in Table 3.1 are a minimum target for each borough. In order to meet local need and contribute to meeting strategic need each London borough is to seek to exceed this target through the measures set out in London Plan Policy 3.3E, paragraphs 3.19 and 3.19i of the Plan and Section 1 of the London Plan Housing SPG (2016).

The Housing SPG clarifies that the London Plan applies even where a borough has demonstrated it can exceed its local housing need. In preparing its Local Plan Havering (and Redbridge/Barking and Dagenham) will be expected to demonstrate it has sought to increase its housing supply in line with policy 3.3 of the London Plan and the Housing SPG in order to reduce the gap between local and strategic housing need and supply.

The Housing SPG 2016 notes that sensitivity testing during the development of the SHLAA showed that additional sources of housing such as higher density, housing led, mixed use development in accessible locations in Opportunity/Intensification Areas, town centres, surplus industrial land and other large sites could ‘fill’ the gap between the minimum housing supply target and London’s identified need. This has been confirmed by monitoring which shows that collectively the boroughs have been approving sufficient capacity to address London-wide need.

The objector refers to the recent Government consultation ‘Planning for the right homes in the right places’ which identified a housing ‘need’ figure for Havering of 1,821 new homes per year. It is noted that this figure is in a consultation document and has been derived from methodology that is not normally used in London. It is recognised that the approach set out in the consultation is now reflected in the draft National Planning Policy Framework published in March 2018.

The Council responded to the consultation identifying that there were strong concerns as to how this figure has been prepared and that it made no provision for the infrastructure to support the level of housing mentioned. It would also have a very detrimental impact on the appearance and open character of Havering. On this basis the Council considers that the figure identified by the Government is flawed, unachievable and unrealistic.

In preparing its Local Plan, the Council has engaged with other London Boroughs and adjoining districts. The details of these discussions are set out in the Duty to Cooperate statement. It is clear from the Duty to Cooperate engagement that adjoining local authorities are heavily engaged in their own Local Plan preparation including securing the necessary evidence to support this. This work will include the preparation of necessary SHMAs. It was not feasible and not desirable to ‘pause’ the preparation of the Havering Local Plan to enable all evidence base work (including SHMAs) to ‘catch up’ nor for this to be reflected in the Havering local Plan.

The Duty to Cooperate discussions have recognised that for most authorities involved in this process it will be extremely challenging for them to identify and deliver sites that will enable them to meet their own respective OAHN. It is therefore highly unlikely that these authorities will be willing to help meet unmet need arising in London.

The Duty to Cooperate Statement confirms that issues around the provision of housing have been explicitly discussed and explored between the authorities including the authorities identified by the objector: Brentwood, Basildon, Epping Forest, Thurrock and Chelmsford. It was recognised in this process that seeking to resolve this
would be extremely challenging and delay the delivery of the respective local plan at a time when local authorities re being pressed by Government to ensure that they have up to date Local Plans in place. Section 4.2 Housing need and delivery / Table 4.1 sets out full details of the engagement that has taken place between Havering and other stakeholders regarding housing. Table A.4 summarises the engagement with other local authorities and identifies if there are any outstanding issues between Havering and the specific authorities. Housing is only an unresolved issue for Essex County Council and the local authorities for Rochford, Basildon and Thurrock.

Additionally, the Council anticipates that because of the publication of the London Plan and the anticipated revision of the National Planning Policy Framework, it will be appropriate to bring forward an early review of the Havering Local Plan. This is likely to involve a further call for sites and this may yield further development opportunities.

| Calls for modification to wording in the Affordable Housing Policy (Policy 4) | No Modification proposed | The wording of Policy 4 is consistent with the Mayor of London’s Affordable Housing and Viability SPG 2017 and is supported by the GLA’s Regulation 19 consultation response. |
| Calls for modification to wording in the Housing Mix Policy (Policy 5) | Policy 5 Housing mix | The Council will support development proposals that provide a mix of dwelling types, sizes and tenures. All housing schemes should include a proportion of family sized homes and reflect the recommended housing mix identified in Table 2 unless When considering the mix of dwelling sizes appropriate for a particular development proposal, the Council will have regard to it can be robustly demonstrated that a variation to the mix in Table 2 is justified having regard to individual site circumstances including location, site constraints, viability and the achievement of mixed and balanced communities. Where proposals are seeking to provide retirement, sheltered or extra care housing, the Council recognises that there may be a need for greater flexibility with regard the mix of units to be provided within Developments and the housing mix as set out in table 2 does not apply to such proposals particularly in achieving the provision of 3 bedroom units. |
| Concerns over Havering’s Housing Supply | No modification proposed | See response to LPREG19-424 which addresses issues inked to meeting OAN, the extent to which other boroughs may meet unmet need in Havering and how the Duty to Cooperate responsibility has been discharged. |
| Scott Properties | Green Belt Site | No modification proposed | The Outer North East London Strategic Housing Market Assessment 2016 indicates that there is a need for 1,366 new homes in Havering per annum. The Mayor of London sets minimum housing targets for each London Borough, and for Havering this is 1,170 homes per annum. The Local Plan identifies Romford and Rainham and Beam Park as Strategic Development Areas which have the capacity to deliver a significant amount of new housing. Both areas have also been designated as Housing Zones by the Mayor of London.

The Council does not believe that there are ‘exceptional circumstances’ to warrant the release of Green Belt land to meet the Borough’s housing need. As stated in the Housing White Paper (page 21), the Government “seeks to maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.”

The Council has prepared two Green Belt Studies in 2016 and 2018. The first Green Belt Study was undertaken by the London Borough of Havering in association with PBA and Enderby Consultants. This study assessed the...
contribution that land within the Green Belt makes to the Green Belt purposes (as defined in para 80 of the NPPF). To aid the assessments, the Green Belt in the Borough was divided into 24 land parcels. A performance value was attributed to the parcels for each purpose, based on predefined criteria. The study found that all 24 parcels make a contribution to Green Belt purposes, with 19 of the 24 Green Belt parcels making a fundamental contribution to the Green Belt purposes. A further four parcels were found to make a high or moderate/high contribution and only one parcel was found to make a low contribution.

A second Green Belt Study was prepared by LUC in 2018. The aim of this study was to provide conclusions on the potential degree of harm that may occur if the sites (which had been submitted to the Council as part of the Regulation 19 Consultation) were released from the Green Belt. This took account of three elements: 1) the contribution of the sites to the NPPF Green Belt purposes, 2) the potential impact on the wider integrity of the Green Belt and 3) the strength of revised Green Belt boundaries that would remain if the site was to be released. Out of a total of 84 sites assessed (with a total area of 849ha):

- 46 sites (total area of 682ha, which is 80.3% of the total area of the 84 sites) rated as 'high' in terms of harm to Green Belt resulting from release.
- 21 sites (120ha, 14.1%) rated as 'moderate-high' in terms of harm to Green Belt resulting from release.
- 9 sites (24ha, 2.9%) rated as 'moderate' in terms of harm to Green Belt resulting from release.
- 4 sites (17ha, 2%) rated as 'low-moderate' in terms of harm to Green Belt resulting from release.
- 4 sites (6ha, 0.7%) rated as 'low' in terms of harm to Green Belt resulting from release.

The site proposed in this representation by Scott Properties (GB72) falls within parcel 20 of the Stage 1 Study. This Study concluded that the parcel makes a fundamental contribution to the Green Belt. The site was also assessed in the Stage 2 study and this Study concludes that releasing the site from the Green Belt would lead to a high degree of harm to the Green Belt. The reasons for this being:

- The site lies adjacent to the large built-up area of Havering but relates strongly to the wider countryside – development would represent significant expansion of the large built-up area into the open countryside.
- The site lies between Collier Row and Hainault. As such, development of the Site would lead to the erosion of part of the gap between the settlements although this may not be perceptible.
- The site is rural in character and clearly displays the characteristics of the countryside. Development of the Site would lead to encroachment of the countryside.

Release of this site would weaken the contribution of adjacent Green Belt land to the north and west and would lead to a less coherent Green Belt boundary. The overall harm to the Green Belt resulting from release of this Site would therefore be High.

Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 3 of the 13 sustainability criteria, and ‘green’ (signifying that the site could perform well in sustainability terms) in relation to 7 of the criteria.

<table>
<thead>
<tr>
<th>LPREG19 - 89</th>
<th>Green Belt Site</th>
<th>No modification proposed</th>
<th>See response to LPREG19 – 87 above.</th>
</tr>
</thead>
<tbody>
<tr>
<td>LPREG19 - 88</td>
<td>Green Belt Site</td>
<td>No modification proposed</td>
<td>See response to LPREG19 – 87 above.</td>
</tr>
<tr>
<td>ADREG19 - 2</td>
<td>Sustainability Appraisal - Concerns over Havering’s Housing Supply to meet OAN</td>
<td>No modification proposed</td>
<td>The Sustainability Appraisal has to provide the appropriate level of detail respective to the Local Plan. Due to its strategic nature and because the Local Plan does not propose site allocations, the Sustainability Appraisal has not sought to assess individual sites. The Council has prepared additional evidence to support the Submission of the Local Plan which assesses the performance of potential Green Belt sites against the NPPF purposes as well as their performance against a range of wider criteria, including accessibility. The findings of the Stage 2 Green Belt assessment support the spatial strategy of the Local Plan, by demonstrating that harm would be done to the Green Belt by releasing the majority of the sites, including land at</td>
</tr>
<tr>
<td>Peter Pryke</td>
<td>LPREG19-92</td>
<td>Green Belt Site</td>
<td>No modification proposed</td>
</tr>
<tr>
<td>-------------</td>
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</tr>
</tbody>
</table>

The Outer North East London Strategic Housing Market Assessment 2016 indicates that there is a need for 1,366 new homes in Havering per annum. The Mayor of London sets minimum housing targets for each London Borough, and for Havering this is 1,170 homes per annum. The Local Plan identifies Romford and Rainham and Bearm Park as Strategic Development Areas which have the capacity to deliver a significant amount of new housing. Both areas have also been designated as Housing Zones by the Mayor of London.

The Council does not believe that there are ‘exceptional circumstances’ to warrant the release of Green Belt land to meet the Borough’s housing need. As stated in the Housing White Paper (page 21), the Government “seeks to maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.”

The Council has prepared two Green Belt Studies in 2016 and 2018. The first Green Belt Study was undertaken by the London Borough of Havering in association with PBA and Enderby Consultants. This study assessed the contribution that land within the Green Belt makes to the Green Belt purposes (as defined in para 80 of the NPPF). To aid the assessments, the Green Belt in the Borough was divided into 24 land parcels. A performance value was attributed to the parcels for each purpose, based on predefined criteria. The study found that all 24 parcels make a contribution to Green Belt purposes, with 19 of the 24 Green Belt parcels making a fundamental contribution to the Green Belt purposes. A further four parcels were found to make a high or moderate/high contribution and only one parcel was found to make a low contribution.

A second Green Belt Study was prepared by LUC in 2018. The aim of this study was to provide conclusions on the potential degree of harm that may occur if the sites (which had been submitted to the Council as part of the Regulation 19 Consultation) were released from the Green Belt. This took account of three elements: 1) the contribution of the sites to the NPPF Green Belt purposes, 2) the potential impact on the wider integrity of the Green Belt and 3) the strength of revised Green Belt boundaries that would remain if the site was to be released. Out of a total of 84 sites assessed (with a total area of 849ha):

- 46 sites (total area of 682ha, which is 80.3% of the total area of the 84 sites) rated as ‘high’ in terms of harm to Green Belt resulting from release.
- 21 sites (120ha, 14.1%) rated as ‘moderate-high’ in terms of harm to Green Belt resulting from release.
- 9 sites (24ha, 2.9%) rated as ‘moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (17ha, 2%) rated as ‘low-moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (6ha, 0.7%) rated as ‘low’ in terms of harm to Green Belt resulting from release.

The site proposed in this representation by Peter Pryke (GB74) falls within parcel 12 of the Stage 1 Study. This Study concluded that the parcel makes a fundamental contribution to the Green Belt. The site was also assessed in the Stage 2 study and this Study concludes that releasing the site from the Green Belt would lead to a high degree of harm to the Green Belt. The reasons for this being:

- The site is small and located approximately 350m away from the large built-up area of Havering, therefore it makes limited contribution to preventing urban sprawl.
- The site does not lie directly between two settlements that are being considered under Purpose 2 for this assessment.
- The site is rural in character and clearly displays the characteristics of the countryside. Development of the Site would lead to the encroachment of the countryside.

As the site is located approximately 350m from any existing Green Belt boundaries. If released, this would lead to the creation of new inset development with weak boundaries unrelated to the existing settlement edge. The overall harm to the Green Belt resulting from release of this site would therefore be High.

Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 5 of the 13 sustainability criteria, and ‘green’
<table>
<thead>
<tr>
<th>Reference</th>
<th>Description</th>
<th>Action</th>
</tr>
</thead>
</table>
| Havering Arts Council | LPREG19 - 85  
Support for Policy 15 - Culture and Creativity | No modification proposed | Noted |
| CBRE Global Investors | LPREG19 - 99  
Support for Policy 1 – Romford Strategic Development Area | No modification proposed | Support noted |
| | LPREG19 - 100  
Concerns over LB Havering's ability to meet OAHN & consideration to be given to housing capacities from brownfield mixed use sites | No modification proposed | Policy 3 identifies that a minimum of 5,300 units will be delivered on large sites in Romford SDA. It also goes on to say that a minimum of 2,790 homes will be delivered on small sites across the borough. The policy does not seek to restrict residential development on small sites in Romford SDA and sets out a positive strategy for housing delivery. |
| | LPREG19 - 101  
Concerns over Housing Mix policy in relation to locational constraints | Policy 5 Housing Mix  
The Council will support development proposals that provide a mix of dwelling types, sizes and tenures. All housing schemes should include a proportion of family sized homes and reflect the recommended housing mix identified in Table 2 unless; When considering the mix of dwelling sizes appropriate for a particular development proposal, the Council will have regard to it can be robustly demonstrated that a variation to the mix in Table 2 is justified having regard to individual site circumstances including location, site constraints, viability and the achievement of mixed and balanced communities. Where proposals are seeking to provide retirement, sheltered or extra care housing, the Council recognises that there may be a need for greater flexibility with regard the mix of units to be provided within Developments and the housing mix as set out in table 2 does not apply to such proposals particularly in achieving the provision of 3 bedroom units. | |
| | LPREG19 - 102  
Support in principle for Policy 19 - Business Growth, request employment floorspace demand and market signals to be included in clause iv. | Policy 19 Business growth  
v. Requiring large scale residential proposals within Romford Town Centre to incorporate high quality, flexible business space, subject to viability, up-to-date employment floorspace demand and market signals; | |
| | LPREG19 - 103  
Request for greater flexibility in | Modification to Policy 21 Affordable workspace  
The Council will promote opportunities for start-up and small and medium | |
| relation to Affordable workspace provisions | enterprises by expecting major commercial and mixed-use schemes to provide a minimum of 10% 20% of its floorspace as affordable workspace within the borough’s network of town centres, Strategic Industrial Locations and Locally Significant Industrial Sites. |
| Support text | The intention of securing and operating affordable workspace in Havering is to use it as a mechanism to strengthen local growth sectors and enable local people to thrive. Havering’s entrepreneurial businesses play an essential role in the local economy. The Council is committed to supporting these organisations and recognises that affordable workspace is a means to do so. |
| Paragraph 9.3.1: | The provision and preservation of affordable and suitable workspaces that can easily be sub-divided for different uses will increase the opportunities for small business which are essential to Havering’s economic vitality and a catalyst for regeneration. |
| New paragraph: | The Council intends to use affordable workspace as a key driver to support a flourishing local economy, and the provision and preservation of affordable and suitable workspaces that can easily be sub-divided for different uses will increase the opportunities for small business which are essential to |
Havering’s economic vitality and a catalyst for regeneration.

Paragraph 9.3.3:

Cost and size are the two primary variables to consider in defining affordable workspace, and these are both influenced by the type of workspace to be provided – which in turn is related to the occupant that the space will be marketed towards, usually determined by the economic clusters in the locality.

Cost

An affordable workspace is a workspace provided where rent and service charges, excluding business support services, are less than 80% on average at least 20% less than comparable local market rates for a 5 year lease term per occupant for the duration of a lease (although it is noted that, for some sectors and locations, much reduced rents may be needed to render them affordable to target occupiers). While a level of 80% of local market rates may be acceptable in some cases, the Council’s preference is for a sliding scale of 60% of local markets rates from years 1 to 2; 80% from years 3 to 5; and 90% thereafter, subject to negotiation. A sliding scale is preferred as it will allow a larger rent relief during the initial stages of a company’s development which will reduce as a company grows and is likely to be able to pay higher rents. This will also enable a more seamless transition to market level rent at the end of the lease period.

As aforementioned, what is defined as ‘affordable’ will vary depending on the location and the type of workspace provided. Rents alone vary considerably across the borough. Furthermore rents can rise considerably in a short space of time.

Size

An affordable workspace unit may be stand-alone premises or a component of a larger workspace area. To maximise flexibility the Council encourages developments that comprise a large area of floorspace to be managed as a series of smaller ‘units’. However, this creates complexity in determining whether a proposal meets policy requirements. Where the micro/small floorspace component is provided as a single floorplate, the applicant must demonstrate that the design of the development is orientated towards the operational needs of small businesses. It is acknowledged that a ‘unit’ may be a physical entity, or a component of a larger floor area.

Type

Local market analysis has identified key growth sectors1 which the Council seek to strengthen. These include:

- Construction
- Creative & Digital
- Logistics

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1 These priority sectors will change over time to reflect the needs of the local economy.
The type of workspace to be provided will be dependent on a number of factors. Where affordable workspace is being provided, early discussions between the applicant and the Council are essential to:

a) determine the size of the affordable element of the workspace;

b) decide which industries are suitable to market the workspace too; and

help partner the applicant with the most appropriate Workspace Provider – to facilitate the design and planned management of the space.

**Paragraph 9.3.4**

Major developments should provide a minimum of 10% of total gross commercial floorspace as affordable workspace for a minimum of 5 years, subject to viability. In a redevelopment scheme, the Council will require the re-provision of low value employment floorspace reliant on less than market-level rent to ensure existing businesses are not displaced, unless it can be demonstrated to the Council’s satisfaction that the site is no longer suitable for the provision of similar uses.

**New paragraphs after 9.3.4:**

The proportion of affordable workspace to be provided within specific schemes will be addressed on a site specific, case-by-case basis, taking into account the cost of development.

Where genuinely exceptional circumstances can be demonstrated to the Council that the provision of affordable workspace on-site is either inappropriate, or would have an unacceptable impact on the viability of a scheme, financial contributions will be sought to secure equivalent provision off-site.

Off-site provision will be achieved by the Council:

- bringing redundant properties into use;
- working in partnership with a stakeholder to secure improvements to existing workspaces, or providing additional workspace;
- offering alternative interventions/activities that support start-up/small businesses such as business support.

The off-site contribution will be negotiated on a case by case, cost per sq ft basis. This will also be dependent on the outcomes of a viability assessment and discussions with the Council.

**Paragraph 9.3.5**

...At the planning application stage an agreed Workspace Provider must be
identified along with a submitted proposal for assessment by the Council which details the agreement with the Workspace Provider for managing the workspace to an agreed specification; detailing the potential management arrangements and rents to be charged for a minimum of 5 years.

Applicants will be required to demonstrate likely lease terms for target sectors, and where appropriate make provision for short-term, flexible ‘all-in’ and ‘meanwhile’ leases, and where relevant letting space on a per-desk rather than per-square-foot basis.

Paragraph 9.3.6:

The design of workspace for small and micro enterprises will vary, depending on the end occupier or sector. New business space should be flexible. In general however, applicants should demonstrate that the workspace incorporates flexible internal arrangements with good natural light, suitable subdivision and configuration for new uses and activities. The proposal should incorporate flexible design features to provide adaptability for a range of uses and occupants.

Basic fit-out should be provided to a level beyond shell and core to include:

- toilets
- super-fast broadband connections where appropriate;
- meeting room facilities, flexible desk arrangement, flexible space for events; shared space and facilities such as communal breakout space, kitchen areas, toilets, bike storage, etc;
- good standard of insulation to mitigate any overspill from future alternative uses in the building, grouping of services;
- plumbing, electrics, cabling, and communications infrastructure;
- light industrial or maker spaces have physical needs for greater floor-to-ceiling heights and service access to accommodate larger equipment and deliveries.

On specific projects other issues may need to be considered, such as the co-ordination of fire alarm provision, access control arrangements, landscaping design, and mobile phone signal strength.

Glossary

Definition of Affordable Workspace

For the purpose of Policy 21, Affordable Workspace means: Flexible workspace which is let to a Workspace Provider and which will allow for occupation by the end users in one or more sectors on terms:

- substantially below market levels of rents and charges when compared with an equivalent letting of the space and facilities on the open market; and
- at a rate comparable with similar facilities available in Havering or (if sufficient comparator premises do not exist in the borough)
Across London as a whole; and at rates which mean that occupation is feasible to a large number of small/start-up businesses in the relevant sector(s).

For the purpose of Policy 21, Flexible Workspace means: Managed, commercial premises, particularly suitable for small/start-up businesses and which are divided into a collection of small units held by occupiers on a short-term, easy-in, easy-out basis and with communally-shared services, facilities and support for the entrepreneurial activities of the occupiers.

| LPREG19 - 98 | 28-36 Eastern Road, Romford (HCL House) | No modification proposed | Support noted.
The Council recognises that this site within the Romford Strategic Development Area can contribute to the delivery of new Housing in Romford. The site is not detailed within the Housing Position Statement as it is .13ha in size and therefore falls within the small sites category – consistent with the approach taken in the GLA SHLAA. However, the Council would like to engage further with CBRE Global Investors through the preparation of the Site Specific Allocations Local Plan and more detailed policy guidance for Romford. |

| David Brown | LPREG19 - 190 | Gypsy and Traveller Policy | Policy 11 Gypsy and Traveller Accommodation
i. Formalising seven existing private sites providing a maximum of 3370 pitches for Gypsies and Travellers. These sites are identified on the Proposals Map and the maximum number of pitches that will be permitted on each site is identified in paragraph 7.9.5; and

Paragraph 7.9.1:
The Havering Gypsy and Traveller Accommodation Assessment (GTAA) 2018 provides a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpersons accommodation in the borough up to 2031. The Assessment identifies a need for 3370 additional pitches for the Gypsy and Traveller households who meet the planning definition as set out in the National Planning Policy for Traveller Sites. Of the 3370 pitches needed, 2657 pitches are required within the first 5 year period of the Plan (2016 – 2021), and the remaining 713 pitches in the latter part of the plan period. No additional need has been identified for plots for Travelling Showpeople over the 15 year plan period (2016-2031).

Paragraph 7.9.5:
The sites are identified on the Proposals Map and are listed below. In order to provide firm controls and prevent further intensification, a maximum number of pitches will be permitted on each site as set out below:

- Tyas Stud Farm rear of Latchford Farm - maximum of 5 pitches
- Vinegar Hill - maximum of 12 pitches
- Hogbar Farm West - maximum of 44 pitches
- Ashlea View, Tomkyns Lane - maximum of 2 pitches
- Benskins Lane - maximum of 12 pitches
- Fairhill Rise - maximum of 2 pitches
- Hogbar Farm East - maximum of 47 pitches

Please refer to the Gypsy and Traveller Accommodation Assessment (March 2018) and the Gypsy and Traveller Position Statement (March 2018) for further information. | The Council commissioned consultants ORS to undertake a Gypsy and Traveller Accommodation Assessment as part of the evidence base for the Havering Local Plan. This was published in 2017 alongside the Proposed Submission Local Plan as part of the Regulation 19 consultation. During and after the consultation a number of gypsy and traveller families (who had not been available or who had previously declined to be interviewed) contacted the Council so that their accommodation needs could be assessed. Further interviews were undertaken and a revised Gypsy and Traveller Accommodation Assessment (March 2018) has been prepared. The Council is proposing modifications to the Local Plan to enable the full identified need for gypsy and traveller pitches to be met. |
• Lower Bedfords Road - maximum of 13 pitches
• The Caravan Park, Putwell Bridge - maximum of 2 pitches
• Willow Tree Lodge - maximum of 3 additional pitches (1 pitch already has permanent planning permission)
• Church Road - maximum of 18 pitches

Paragraph 7.9.8
Where further sites are proposed the Council will ensure that they are required to meet legitimate additional borough need. When considering applications for Gypsy and Traveller sites and Travelling Showpersons plots, the Council will take into account the policy criteria outlined in Policy 11 in addition to the requirements of National Policy.

<table>
<thead>
<tr>
<th>Kathleen Brown</th>
<th>LPREG19 - 191</th>
<th>Gypsy and Traveller Policy</th>
<th>Policy 11 Gypsy and Traveller Accommodation</th>
</tr>
</thead>
<tbody>
<tr>
<td>i. Formalising seven existing private sites providing a maximum of 3370 pitches for Gypsies and Travellers. These sites are identified on the Proposals Map and the maximum number of pitches that will be permitted on each site is identified in paragraph 7.9.5; and</td>
<td></td>
<td></td>
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</tbody>
</table>

Paragraph 7.9.1:
The Havering Gypsy and Traveller Accommodation Assessment (GTAA) 2012 provides a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpersons accommodation in the borough up to 2031. The Assessment identifies a need for 2270 additional pitches for the Gypsy and Traveller households who meet the planning definition as set out in the National Planning Policy for Traveller Sites. Of the 2270 pitches needed, 2657 pitches are required within the first 5 year period of the Plan (2016 – 2021), and the remaining 213 pitches in the latter part of the plan period. No additional need has been identified for plots for Travelling Showpeople over the 15 year plan period (2016-2031).

Paragraph 7.9.5:
The sites are identified on the Proposals Map and are listed below. In order to provide firm controls and prevent further intensification, a maximum number of pitches will be permitted on each site as set out below:

• Tyas Stud Farm rear of Latchford Farm - maximum of 5 pitches
• Vinegar Hill - maximum of 12 pitches
• Hogbar Farm West - maximum of 14 pitches
• Ashlea View, Tomkyns Lane - maximum of 2 pitches
• Benskins Lane - maximum of 12 pitches
• Fairhill Rise - maximum of 2 pitches
• Hogbar Farm East - maximum of 47 pitches
• Lower Bedfords Road - maximum of 3 pitches
• The Caravan Park, Putwell Bridge - maximum of 2 pitches
• Willow Tree Lodge - maximum of 3 additional pitches (1 pitch already has permanent planning permission)
• Church Road - maximum of 18 pitches

The Council commissioned consultants ORS to undertake a Gypsy and Traveller Accommodation Assessment as part of the evidence base for the Havering Local Plan. This was published in 2017 alongside the Proposed Submission Local Plan as part of the Regulation 19 consultation. During and after the consultation a number of gypsy and traveller families (who had not been available or who had previously declined to be interviewed) contacted the Council so that their accommodation needs could be assessed. Further interviews were undertaken and a revised Gypsy and Traveller Accommodation Assessment (March 2018) has been prepared. The Council is proposing modifications to the Local Plan to enable the full identified need for gypsy and traveller pitches to be met.

Please refer to the Gypsy and Traveller Accommodation Assessment (March 2018) and the Gypsy and Traveller Position Statement (March 2018) for further information.
Paragraph 7.9.8
Where further sites are proposed the Council will ensure that they are required to meet legitimate additional borough need. When considering applications for Gypsy and Traveller sites and Travelling Showpersons plots, the Council will take into account the policy criteria outlined in Policy 11 in addition to the requirements of National Policy.

Mary Clarke  
LPREG19 - 194  
Gypsy and Traveller Policy

Policy 11 Gypsy and Traveller Accommodation

i. Formalising seven existing private sites providing a maximum of 70 pitches for Gypsies and Travellers. These sites are identified on the Proposals Map and the maximum number of pitches that will be permitted on each site is identified in paragraph 7.9.5; and

Paragraph 7.9.1:
The Havering Gypsy and Traveller Accommodation Assessment (GTAA) 2012 provides a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpersons accommodation in the borough up to 2031. The Assessment identifies a need for 70 additional pitches for the Gypsy and Traveller households who meet the planning definition as set out in the National Planning Policy for Traveller Sites. Of the 70 pitches needed, 57 pitches are required within the first 5 year period of the Plan (2016 – 2021), and the remaining 7 pitches in the latter part of the plan period. No additional need has been identified for plots for Travelling Showpeople over the 15 year plan period (2016-2031).

Paragraph 7.9.5:
The sites are identified on the Proposals Map and are listed below. In order to provide firm controls and prevent further intensification, a maximum number of pitches will be permitted on each site as set out below:

- Tyas Stud Farm rear of Latchford Farm - maximum of 5 pitches
- Vinegar Hill - maximum of 12 pitches
- Hogbar Farm West - maximum of 14 pitches
- Ashlea View, Tomkyns Lane - maximum of 2 pitches
- Benskins Lane - maximum of 12 pitches
- Fairhill Rise - maximum of 2 pitches
- Hogbar Farm East - maximum of 7 pitches
- Lower Bedfords Road - maximum of 3 pitches
- The Caravan Park, Putwell Bridge - maximum of 2 pitches
- Willow Tree Lodge - maximum of 3 additional pitches (1 pitch already has permanent planning permission)
- Church Road - maximum of 18 pitches

Paragraph 7.9.8
Where further sites are proposed the Council will ensure that they are required to meet legitimate additional borough need. When considering applications for Gypsy and Traveller sites and Travelling Showpersons plots,
the Council will take into account the policy criteria outlined in Policy 11 in addition to the requirements of National Policy.

<table>
<thead>
<tr>
<th>Havering Friends of the Earth</th>
<th>LPREG19 - 105</th>
<th>Support for brownfield sites and re-use of existing buildings</th>
<th>No modification proposed</th>
<th>Noted</th>
</tr>
</thead>
<tbody>
<tr>
<td>LPREG19 - 104</td>
<td>Green infrastructure</td>
<td>No modification proposed</td>
<td>Noted.</td>
<td></td>
</tr>
<tr>
<td>LPREG19 - 107</td>
<td>Green infrastructure</td>
<td>No modification proposed</td>
<td>The Havering Nature Conservation and Biodiversity Strategy (2014) provides a commitment and strategy to enhance SSSIs by the safeguarding of these sites and the linking up of habitats. Specific measures are dependent on the specific characteristics of the SSSIs, which are referenced in this strategy. Developers are expected to work with existing partnerships to enhance green infrastructure in the borough, as set out in Policy 29 Green infrastructure. Relevant plans and frameworks from partners are referenced in paragraph 12.1.4.</td>
<td></td>
</tr>
<tr>
<td>LPREG19 - 108</td>
<td>Concern over Backland/Garden development</td>
<td>No modification proposed</td>
<td>Comment noted.</td>
<td></td>
</tr>
<tr>
<td>LPREG19 - 109</td>
<td>Support for Policy 12 – Healthy Communities and Policy 23 Transport Connections - Walking and Cycling</td>
<td>No modification proposed</td>
<td>Each year Havering receives funding from TfL through the Local Implementation Plan (LIP) mechanism which is a major funding source from TfL to support local transport schemes and initiatives throughout the borough. The LIP programme will allow the Council to continue to support a number of schemes and initiatives that encourage walking and cycling such as the STAR’s programme, which encourages accredited schools eligible to apply for small grants to support programmes to help promote safe, sustainable, active travel and cycling programmes. Havering through the LIP programme offers free cycle training to anyone that lives, works, or studies, in Havering, all year round. Havering offers grants to businesses that wish to promote active travel at the workplace. A formalised series of walking activities is offered to the residents by the Council’s Sports Development team and walking challenges are organised for large organisations such as the Council and schools in an effort to get staff more active. All of these activities are in support of, and in line with, the Mayors Draft Transport Strategy and Healthy Streets agenda. The Council will continue to work closely with schools across the borough to deliver and monitor their School Travel Plans which set out activities that a school will undertake to encourage pupils to travel sustainably to/from school. Table 3 in the Local Plan sets out key transport schemes to be delivered and this includes delivery of the Beam Parkway Major scheme which involves transformational change of the A1306 between Dovers Corner and the borough boundary. This will include Pocket Parks, play areas, new crossing points and shared use paths along the entire route to support the Rainham and Beam Park Housing Zone. This scheme is currently going through the detailed design process. Havering has also recently received funding from Transport for London to undertake some feasibility work.</td>
<td></td>
</tr>
<tr>
<td>LPREG19 - 110</td>
<td>Increase numbers of allotments</td>
<td>No modification proposed</td>
<td>Policy 18 Open space, sports and recreation supports the continued use and expansion of allotments.</td>
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<tr>
<td>LPREG19 - 111</td>
<td>Support for Policy 23 – Transport Connections</td>
<td>No modification proposed</td>
<td>Comments on Policy 23 are noted. Havering is progressing development proposals funded by Transport for London (TfL) to deliver transformational change along the A1306 New Road in Rainham between Dovers Corner and the borough boundary to support the Rainham and Beam Park Housing Zone. This will include cycle paths along the entire route. This scheme will be subject to public consultation in 2018. The Council is also beginning to look at opportunities to improve access into Romford town centre to support the Romford Housing Zone as a result of being allocated funding from TfL’s Liveable Neighbourhoods programme. Delivering cycle paths in the borough is largely dependent on funding the Council receives from TfL. There are no plans currently to extend interrupted cycle paths in the borough due to limited funding. It is the responsibility of the Police to enforce 20 mph speed limit locations in the borough. The Council receives funding from TfL through the Local Implementation Plan mechanism and is a major source of funding for transport schemes and projects in Havering. Schemes funded through the LIP to support sustainable and active travel include supporting Havering’s School Travel Plan Programme where over 55 schools use their School Travel Plans very actively in delivering activities to encourage pupils and parents to travel to/from school more sustainably. Walking buses would usually be the responsibility of the school in combination with the parent/carer community.</td>
<td></td>
</tr>
<tr>
<td>LPREG19 - 112</td>
<td>Support for Policy 24 – Parking provision and design, but concerns raised over policy wording in relation to parking standards vs the London Plan</td>
<td>No modification proposed</td>
<td>The proposed submission version Local Plan outlines the importance of striking an appropriate balance between meeting essential parking needs of the development site whilst neither acting as a discouragement to using public transport nor adding to demand for on-street parking.</td>
<td></td>
</tr>
<tr>
<td>LPREG19 - 113</td>
<td>Support for paragraph 11.1.8</td>
<td>No modification proposed</td>
<td>Support noted</td>
<td></td>
</tr>
<tr>
<td>LPREG19 - 114</td>
<td>Support for paragraph 12.1.3 – green infrastructure</td>
<td>No modification proposed</td>
<td>Support noted</td>
<td></td>
</tr>
<tr>
<td>LPREG19 - 115</td>
<td>Support for Policy 30 – Nature Conservation</td>
<td>No modification proposed</td>
<td>Noted. The Council takes the ecological impacts of development very seriously. With regards to Mardyke Farm, this is a very old restoration scheme where the original planning conditions were not as robust as they would be today. More recent extraction and infilling proposals have planning conditions attached regarding the quality of restoration and ecological mitigation.</td>
<td></td>
</tr>
<tr>
<td>LPREG19 - 116</td>
<td>Pollution and poor water quality</td>
<td>No modification proposed</td>
<td>Noted. This requirement is set out in the Water Framework Directive. The Council is working with the Environment Agency and partners to improve the ecological status of rivers as soon as possible.</td>
<td></td>
</tr>
<tr>
<td>LPREG19 - 117</td>
<td>Request for Air Quality Action</td>
<td>No modification proposed</td>
<td>The Cabinet approved public consultation on a draft Air Quality Action Plan (AQAP) at its meeting on December 13 2017. The draft AQAP sets out the projects, policies and initiatives Havering Council and its partners propose</td>
<td></td>
</tr>
<tr>
<td>LPREG19 - 118</td>
<td>Support for Policy 36 - Low Carbon design, decentralised energy and renewable energy however concerns raised over potential wind turbine placement</td>
<td>No modification proposed</td>
<td>The Council undertook the preparation of a Local Plan Wind Resource Study (2016) to support the preparation of the Local Plan in accordance with the requirements set out in the Ministerial Statement (HCWS42). The study identifies areas which are potentially suitable for wind turbines. Paragraphs 12.8.4-12.8.6 make clear that proposals must satisfy planning policy requirements and be able to demonstrate that they have addressed community concerns.</td>
<td></td>
</tr>
<tr>
<td>LPREG19 - 119</td>
<td>Policy 38. Mineral Extraction – concerns regarding wildlife</td>
<td>No modification proposed</td>
<td>Noted. Policy 38 seeks to protect the natural environment when determining applications for mineral extraction.</td>
<td></td>
</tr>
<tr>
<td>LPREG19 - 120</td>
<td>Concern over Councils ability to monitor indicators</td>
<td>No modification proposed</td>
<td>The Council is required to prepare and publish an Authority Monitoring Report (AMR) which monitors the extent to which the policies set out in the Local Plan are being achieved. The Council is confident that it will be able to collect the data for each of the monitoring indicators set out in the Plan.</td>
<td></td>
</tr>
<tr>
<td>LPREG19 – 106</td>
<td>Romford Strategic Development Area</td>
<td>No modification proposed</td>
<td>New development in Romford will provide the opportunity to integrate new green/ open spaces as well as contributing to a greener Romford. The market place in Romford is a key public space that can be enhanced. Active travel and how this will be achieved is detailed in Policy 23 Transport connections. Havering has recently been allocated funding from TfL to begin to progress feasibility work looking at improving access into Romford town centre from the western side of the Romford Ring Road. Further details on what would be done to junctions to facilitate this will be borne out once the feasibility work is developed.</td>
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</tr>
<tr>
<td>ADREG19 - 3</td>
<td>Sustainability Appraisal</td>
<td>No modification proposed</td>
<td>1.4 - Comment regarding the importance of the SA process has been noted. Table 1.2 - Support for the SA Framework has been noted. 4 - Support for the preferred spatial strategy has been noted. 6 - Support for the reasons for choosing the preferred spatial strategy has been noted. 5 - Support noted. Enhancing the productivity of agricultural land is beyond the remit of the Local Plan, although continued protection is given to this land through continued Green Belt designation. 8.3.1 - Comment noted. The Local Plan policies on biodiversity, green infrastructure and landscaping seek to ensure that appropriate consideration is given to habitats and species and ecological connections in new developments. The nature conservation policy in the Local Plan provides a strong protection to SSSIs. The principle will be to avoid impacts, and mitigate where needed. 8.4.1 – Comments noted. The Transport Connections policy in the Local Plan sets out measures to promote sustainable modes of transport.</td>
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</tbody>
</table>
Air quality is an important issue for the Council which is also being addressed outside of the Local Plan through the Air Quality Action Plan.

The Local Plan provides an updated strategy for Havering’s town centres in the Town Centre Development policy, seeking to keep town centres vibrant and viable.

Baseline information – Comments noted. The borough’s car ownership levels and the impact of transport on air quality are recognised in the Local Plan.

Waste – Policy 35 On-site waste management sets out measures to promote recycling and provide on-site waste management. Waste is covered separately in the Joint Waste Development Plan.

Robert Montague

| LPREG19 - 196 | Calls for Mardyke Farm to be designated as open space and SINC | No modification proposed | Restoration of the Mardyke Farm site (previously worked for minerals and now the subject of restoration) is progressing. It would be inappropriate to identify the site as Public Open Space since it is privately owned land which the public do not have access to. The site owners have not indicated any intention to make the site available for recreational purposes. |
| LPREG19 - 214 | Village Greens | No modification proposed | Designation of land as a Village Green falls outside the scope of the Local Plan and would need to be done under the appropriate legislation. How information on Village Greens is held by the Council also falls outside the scope of the Local Plan. |
| LPREG19 - 215 | Village Greens | No modification proposed | Designation of land as a Village Green falls outside the scope of the Local Plan and would need to be done under the appropriate legislation. |

Transport for London

| LPREG19 – 122 | Support for vision and strategic objectives | No modification proposed | Support noted |
| LPREG19 - 123 | Encouraging growth around Crossrail development | No modification proposed | Noted |
| LPREG19 - 124 | Concerns over Residential Car Parking standards | No modification proposed | Generally, parking provision needs to be in accordance with the maximum parking standards in the London Plan. |

Support noted

Concerns over Residential Car Parking standards

| Policy 24 recognises that as an outer London Borough for many residents there is a higher dependency on the car, compared to central and inner London where public transport provision is much more accessible. The policy seeks to recognise that many local journeys in Havering must be made by car because they are impractical to make by public transport. Although parts of Havering are well connected by public transport to destinations outside of the borough, many more local destinations do not have reasonable public transport access and this is reflected in the higher levels of car ownership and usage in Havering. In this regard Havering is typical of many other outer London boroughs. |

The current London Plan recognises that in Outer London boroughs in areas of low public transport accessibility, residents’ dependency on cars should be taken into account when considering parking standards. Furthermore paragraph 6.42i states that such standards could include minima, and that higher levels of provision than are set out in Table 6.2 of the London Plan would be permitted, where appropriate.

For areas of low accessibility (PTAL 0-2), minimum parking standards have been set out and these are included in table 4 in Policy 24. These minimum standards are consistent with para 6.42i of the London Plan.
The London Plan expects that in areas of good public transport accessibility (PTAL 5-6) in all parts of London developments should aim for significantly less than one space per unit. The Council considers that this does not adequately reflect the position in Havering regarding the practicalities of making journeys within the borough and the consequent ownership and usage levels of private cars.

For highly accessible parts of the borough (PTAL 5-6), the parking standards set out in Policy 24 recognise that a minimum parking standard of 0.5 spaces per unit is appropriate having regard to the particular circumstances involved.

<table>
<thead>
<tr>
<th>LPREG19 - 121</th>
<th>Concerns over minimum Parking standards</th>
<th>No modification proposed</th>
</tr>
</thead>
<tbody>
<tr>
<td>It is noted that the respondent’s comments represent an officer level view from Transport for London Planning Team and that they have been made on a “without prejudice” basis. Comments given to LPREG19-124 also apply to this response which has been made by the same respondent.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Chelmsford City Council</th>
<th>LPREG19 - 91</th>
<th>Support for the Local Plan and Spatial Strategy</th>
<th>No modification proposed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Support Noted</td>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>Cemex UK</th>
<th>LPREG19 - 403</th>
<th>Green Belt Site</th>
<th>No modification proposed</th>
</tr>
</thead>
</table>
| The Outer North East London Strategic Housing Market Assessment 2016 indicates that there is a need for 1,366 new homes in Havering per annum. The Mayor of London sets minimum housing targets for each London Borough, and for Havering this is 1,170 homes per annum. The Local Plan identifies Romford and Rainham and Beam Park as Strategic Development Areas which have the capacity to deliver a significant amount of new housing. Both areas have also been designated as Housing Zones by the Mayor of London.

The Council does not believe that there are ‘exceptional circumstances’ to warrant the release of Green Belt land to meet the Borough’s housing need. As stated in the Housing White Paper (page 21), the Government “seeks to maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.”

The Council has prepared two Green Belt Studies in 2016 and 2018. The first Green Belt Study was undertaken by the London Borough of Havering in association with PBA and Enderby Consultants. This study assessed the contribution that land within the Green Belt makes to the Green Belt purposes (as defined in para 80 of the NPPF). To aid the assessments, the Green Belt in the Borough was divided into 24 land parcels. A performance value was attributed to the parcels for each purpose, based on predefined criteria. The study found that all 24 parcels make a contribution to Green Belt purposes, with 19 of the 24 Green Belt parcels making a fundamental contribution to the Green Belt purposes. A further four parcels were found to make a high or moderate/high contribution and only one parcel was found to make a low contribution.

A second Green Belt Study was prepared by LUC in 2018. The aim of this study was to provide conclusions on the potential degree of harm that may occur if the sites (which had been submitted to the Council as part of the Regulation 19 Consultation) were released from the Green Belt. This took account of three elements: 1) the contribution of the sites to the NPPF Green Belt purposes, 2) the potential impact on the wider integrity of the Green Belt and 3) the strength of revised Green Belt boundaries that would remain if the site was to be released. Out of a total of 84 sites assessed (with a total area of 849ha):

- 46 sites (total area of 682ha, which is 80.3% of the total area of the 84 sites) rated as ‘high’ in terms of harm to Green Belt resulting from release.
- 21 sites (120ha, 14.1%) rated as ‘moderate-high’ in terms of harm to Green Belt resulting from release.
- 9 sites (24ha, 2.9%) rated as ‘moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (17ha, 2%) rated as ‘low’ in terms of harm to Green Belt resulting from release.
- 4 sites (6ha, 0.7%) rated as ‘low’ in terms of harm to Green Belt resulting from release.

The site proposed in this representation by Cemex UK (GB82) falls within parcel 2 of the Stage 1 Study. This Study concluded that the parcel makes a fundamental contribution to the Green Belt. The site was also assessed in the Stage 2 study and this Study concludes that releasing the site from the Green Belt would lead to a
The reasons for this being

- The site lies adjacent to the large built-up area of Havering but relates to the wider countryside – development would represent expansion of the large built-up area into the open countryside.
- The site lies between the settlements of Rainham and Purfleet and Rainham and Aveley to the south east (Note: Aveley is not defined as a Purpose 2 settlement for the purpose of this assessment). The settlements are not in close proximity (over 3km away) and the release of the Site would not lead to any significant perception of narrowing the gap between them.
- The site is rural in character and displays the characteristics of the countryside, with some limited urbanising influence from the adjacent roads, railway lines and settlement edge. Development of the Site would lead to the encroachment of the countryside.

Development within the site, would lead to some sense of encroachment on the adjacent Green Belt area to the north east and south east. However the Site is bounded to the north by Wennington Road and to south west by the railway lines and A13. Land beyond the railway lines to the South East is open land but it is not designated as Green Belt. The harm to the Green Belt resulting from release of this site is therefore assessed overall as Moderate.

Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 4 of the 13 sustainability criteria, and ‘green’ (signifying that the site could perform well in sustainability terms) in relation to 4 of the criteria.

LPREG19 - 404 Objection to the Plan on grounds of failure to plan for sufficient housing

No modification proposed

The Council’s Vision: Havering Making a Greater London seeks to provide new homes in Havering and, in appropriate cases, the Council takes a positive and proactive stance in dealing with prospective private developers wishing to bring forward housing schemes in recognition of the importance of securing timely and high quality housing delivery.

In line with the Vision, the Local Plan Spatial Strategy acknowledges that the delivery of new homes is critical to London’s well-being. It sets out how the Council has approached the important topic of making sure that enough new homes are provided.

Havering has undertaken a Strategic Market Assessment to support the preparation of the Local Plan. Havering forms part of both the London-wide housing market area and the outer north east London sub housing market area with the London Boroughs of Barking and Dagenham and Redbridge. In line with the requirements of the National Planning Policy Framework, the Council has worked with these authorities to prepare its Strategic Housing Market Assessment (SHMA).

The resultant Outer North East London SHMA indicates that Havering’s full objectively assessed housing need is for 25,200 new homes over the period 2011-2033 or 1,145 homes per annum. Since the initial SHMA was undertaken, updated population projections have been published by the GLA. The updated population projections were reflected in an update (2017) of the SHMA which identified an increased housing need in Havering of 30,052 new homes over the same period (1,366 new homes per year).

The Council is making every effort to identify and bring forward suitable sites to exceed the current London Plan target and to meet housing need.

The Local Plan does not seek to constrain the number of new homes to come forward to 17,550 over the Plan period.

Further, the Council is aware that the current London Plan requires that boroughs should seek to close the gap between housing need (as assessed through a Strategic Housing Market Assessment) and supply.

The Council’s approach to providing new homes in the Havering Local Plan takes a balanced view about the importance of addressing housing requirements and securing sustainable development. Having undertaken
recent studies to assess whether the Green Belt fulfils the roles identified in the National Planning Policy Framework, the Council is also committed to ensuring that the Green Belt is safeguarded. The Council has concluded that there are no exceptional circumstances to support releasing land from the Green Belt. Details of the studies can be found in the evidence base supporting the Havering Local Plan.

The Council’s commitment to the Green Belt is an important ‘driver’ in helping to secure new homes in Havering’s built up areas and through the important programmes being delivered through the Housing Zones and the Council’s estates regeneration programme (see below).

The Council’s strategy also recognises that the scope to accommodate growth in Havering will be dependent upon the provision of infrastructure especially that needed to provide effective and efficient movement within Havering as well as social and community infrastructure necessary for residents such as schools and health facilities. The Council has prepared an Infrastructure Delivery Plan to support the Havering Local Plan and to inform the consideration of housing proposals.

Throughout the Local Plan process, the Council has rigorously sought to identify all sources of potential housing supply that will secure sustainable development in order to ensure that Havering is taking every opportunity to secure the delivery of new homes. This approach has been implemented to enable the gap between the housing targets in the London Plan and the objectively assessed need requirement to be closed as far as is reasonably possible.

The Housing Position Statement which supports the Havering Local Plan explains the Council’s approach to this in more detail. A element is that the Council considers that the certainty of securing housing delivery over the overall plan period must be taken into account against the numbers of units approved particularly in the initial years of the Local Plan being implemented. It sets out that the Council considers that over the period of the plan to 2031, the potential overall supply of additional homes in Havering may exceed the minimum annual housing target of 1,170 new homes per year set out in the current London Plan.

In summary, the approach in the Local Plan that the Council will implement is based on:

- focussing the delivery of new homes in Havering’s two housing Zones at Romford and Rainham and Beam Park. These two areas are identified in the Local Plan as Strategic Development Areas and have individual comprehensive policy frameworks to guide and steer their development to make sure that development provides high quality places with inclusive communities and the timely and effective provision of infrastructure
- supporting the intensification of twelve of its own existing housing estates through an ambitious regeneration programme that includes an experienced private sector development partner secured by means of a Joint Venture Limited Liability Partnership
- realising the housing opportunities that come forward on large sites outside of the Strategic Development Areas to provide opportunities for place-making and building communities. These include sites such as the former St Georges Hospital site in Hornchurch
- prioritising all land not designated for other planning purposes for new homes
- encouraging the effective use of land by re-using previously developed (brownfield) land and allocating a range of sustainable sites for housing development. The latter will be identified in the forthcoming Site Specific Allocations Local Plan

The Local Plan Housing Position Statement sets out in more detail the specific potential housing opportunities that will come forward for the two Housing Zones and the Council’s twelve estates programme.

The Housing Position Statement identifies specific deliverable and developable sites for the first 10 years of the Plan. The Council is committed to ensuring that there is a sufficient supply of housing over the 15 year plan period and beyond and will therefore undertake an early review of the Plan.

The Statement also includes details of sites which it is anticipated will be included in the forthcoming Site Specific Allocations Local Plan document which will reflect up to date capacity studies where appropriate.
Underpinning the Council’s approach is a clear recognition of the importance of optimising the development potential of the sites in regard to their potential capacity whilst ensuring that they provide satisfactory residential environment for residents and maintaining the character and appearance of Havering. There is an emphasis on making sure the place-making role of new development is addressed and a focus on delivering places where communities can flourish and be cohesive and inclusive.

As a result of this approach, sufficient land has been identified to meet the minimum London Plan housing target for the first 10 years of the Local Plan if the delivery is taken over the 10 year period.

The Council considers that the greater certainty that is encompassed through the Housing Zones and the twelve estates programme should weigh heavily in their favour and help counter the potential numerical shortfall in housing delivery in the first five years.

The objector has raised concerns about the potential implications of Havering failing to meet its OAHN particularly in regard to the position with other London Boroughs and adjoining and nearby districts outside London.

Havering has engaged extensively with the GLA in the preparation of its Local Plan and this has included specific discussion about addressing housing.

The GLA has confirmed that London Boroughs are not required to demonstrate how any unmet need from their own boroughs will be met in Other London Boroughs or adjoining districts. The preparation of the Havering Local Plan is not therefore required to address how any shortfall in this borough will be addressed within London or by adjoining / nearby local authorities.

The GLA has advised that the London Plan makes clear that London should be treated as a single housing market. The London Plan states that the Annual average housing supply monitoring targets set out in Table 3.1 are a minimum target for each borough. In order to meet local need and contribute to meeting strategic need each London borough is to seek to exceed this target through the measures set out in London Plan Policy 3.3E, paragraphs 3.19 and 3.19i of the Plan and Section 1 of the London Plan Housing SPG (2016).

The Housing SPG clarifies that this approach applies even where a borough has demonstrated it can exceed its local housing need. In preparing its Local Plan Havering (and Redbridge/Barking and Dagenham) will be expected to demonstrate it has sought to increase its housing supply in line with policy 3.3 of the London Plan and the Housing SPG in order to reduce the gap between local and strategic housing need and supply.

The Housing SPG 2016 notes that sensitivity testing during the development of the SHLAA showed that additional sources of housing such as higher density, housing led, mixed use development in accessible locations in Opportunity/Intensification Areas, town centres, surplus industrial land and other large sites could ‘fill’ the gap between the minimum housing supply target and London’s identified need. This has been confirmed by monitoring which shows that collectively the boroughs have been approving sufficient capacity to address London-wide need.

The objector refers to the recent Government consultation ‘Planning for the right homes in the right places’. It is recognised that the approach set out in the consultation is now reflected in the draft National Planning Policy Framework published in March 2018.

The Government White Paper consultation identified a housing ‘need’ figure for Havering of 1,821 new homes per year. It is noted that this figure is in a consultation document and has been derived from methodology that is not normally used in London. It is recognised that the approach set out in the consultation is now reflected in the draft National Planning Policy Framework published in March 2018.

The Council responded to the consultation identifying that there were strong concerns as to how this figure has been prepared and that it made no provision for the infrastructure to support the level of housing mentioned. It would also have a very detrimental impact on the character and appearance of Havering. On this basis the
Council considers that the figure identified by the Government is flawed, unachievable and unrealistic.

The objector refers to the Council’s involvement in the GLA Strategic Housing Land Availability Assessment (SHLAA) process. The SHLAA work was undertaken wholly in line with the GLA requirements and the outcome for Havering was agreed by the GLA.

The objector refers to the difficulties of delivering housing on brownfield sites such as availability, existing land values and abnormal costs such as contamination. These are well understood issues with brownfield sites. Nevertheless, the National Planning Policy Framework is unequivocal in its Core Principles (paragraph 17) that planning should ‘encourage the effective re-use of land by re-using land that has been previously developed (brownfield land), provided it is not of high environmental value’.

Additionally, the Council anticipates that because of the publication of the London Plan and the anticipated revision of the National Planning Policy Framework, it will be appropriate to bring forward an early review of the Havering Local Plan. This is likely to involve a further call for sites and this may yield further development opportunities.

<table>
<thead>
<tr>
<th>LPREG19 - 405</th>
<th>Objection to the Plan on grounds of failure to plan for sufficient housing</th>
<th>No modification proposed</th>
<th>The objection is exactly the same as LPREG-404. Please refer to the response for LPREG-404.</th>
</tr>
</thead>
<tbody>
<tr>
<td>LPREG19 - 406</td>
<td>Calls for Green Belt release to satisfy housing requirements</td>
<td>No modification proposed</td>
<td>See response to LPREG19-403 above.</td>
</tr>
<tr>
<td>LPREG19 - 407</td>
<td>Objection to paragraph 7.1.12 on Green Belt. Calls for Green Belt release</td>
<td>No modification proposed</td>
<td>See response to LPREG19-403 above.</td>
</tr>
<tr>
<td>LPREG19 - 408</td>
<td>Objection to the use of the London Plan housing figure of 1,170 and calls for inclusion of the latest SHMA figure of 1,366 to address OAHN</td>
<td>No modification proposed</td>
<td>The issues raised in this objection are also raised in LPREG19-404 and LPREG405. Please see the response comments to those.</td>
</tr>
</tbody>
</table>

**Linda Jane Brown**

LPREG19 - 95  Gypsy and Traveller Policy

Policy 11 Gypsy and Traveller Accommodation

i. Formalising seven existing private sites providing a maximum of 70 pitches for Gypsies and Travellers. These sites are identified on the Proposals Map and the maximum number of pitches that will be permitted on each site is identified in paragraph 7.9.5; and

Paragraph 7.9.1:

The Havering Gypsy and Traveller Accommodation Assessment (GTAA) 2018 provides a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpersons accommodation in the borough up to

The Council commissioned consultants ORS to undertake a Gypsy and Traveller Accommodation Assessment as part of the evidence base for the Havering Local Plan. This was published in 2017 alongside the Proposed Submission Local Plan as part of the Regulation 19 consultation.

During and after the consultation a number of gypsy and traveller families (who had not been available or who had previously declined to be interviewed) contacted the Council so that their accommodation needs could be assessed. Further interviews were undertaken and a revised Gypsy and Traveller Accommodation Assessment (March 2018) has been prepared. The Council is proposing modifications to the Local Plan to enable the full identified need for gypsy and traveller pitches to be met.

Please refer to the Gypsy and Traveller Accommodation Assessment (March 2018) and the Gypsy and Traveller Position Statement (March 2018) for further information.
2031. The Assessment identifies a need for 2270 additional pitches for the Gypsy and Traveller households who meet the planning definition as set out in the National Planning Policy for Traveller Sites. Of the 2270 pitches needed, 2257 pitches are required within the first 5 year period of the Plan (2016 – 2021), and the remaining 13 pitches in the latter part of the plan period. No additional need has been identified for plots for Travelling Showpeople over the 15 year plan period (2016-2031).

Paragraph 7.9.5:
The sites are identified on the Proposals Map and are listed below. In order to provide firm controls and prevent further intensification, a maximum number of pitches will be permitted on each site as set out below:

- Tyas Stud Farm rear of Latchford Farm - maximum of 5 pitches
- Vinegar Hill - maximum of 412 pitches
- Hogbar Farm West - maximum of 24 pitches
- Ashlea View, Tomkyns Lane - maximum of 2 pitches
- Benskins Lane - maximum of 412 pitches
- Fairhill Rise - maximum of 2 pitches
- Hogbar Farm East - maximum of 47 pitches
- Lower Bedfords Road - maximum of 3 pitches
- The Caravan Park, Putwell Bridge - maximum of 2 pitches
- Willow Tree Lodge - maximum of 3 additional pitches (1 pitch already has permanent planning permission)
- Church Road - maximum of 18 pitches

Paragraph 7.9.8
Where further sites are proposed the Council will ensure that they are required to meet legitimate additional borough need. When considering applications for Gypsy and Traveller sites and Travelling Showpersons plots, the Council will take into account the policy criteria outlined in Policy 11 in addition to the requirements of National Policy.

<table>
<thead>
<tr>
<th>Deborah Templeman</th>
<th>LPREG19 - 195</th>
<th>Culture and Arts facilities in Romford</th>
<th>No modification proposed</th>
<th>Noted, these facilities are considered as Main Town Centre Uses with the National Planning Policy Framework and would be subject to Policy 13.</th>
</tr>
</thead>
<tbody>
<tr>
<td>London Wildlife Trust</td>
<td>LPREG19 - 143</td>
<td>Support for Havering's corporate vision</td>
<td>No modification proposed</td>
<td>Support noted</td>
</tr>
<tr>
<td>LPREG19 - 144</td>
<td>Calls to increase the prominence of Havering’s ecological fabric within the Vision</td>
<td>Section 2 Vision for Havering</td>
<td>The topics in the Local Plan vision in section 2.2 are not set out in any particular order of priority. Policy 29 Green infrastructure further underlines that Havering is one of London’s greenest boroughs. Proposed changes to paragraph 2.2.17 accepted. Proposed changes to paragraph 2.2.18 declined, as specific policies state how this will be achieved (eg Policy 29 Green infrastructure). Proposed changes to paragraph 2.2.19 accepted.</td>
<td></td>
</tr>
<tr>
<td>LPREG19 - 145</td>
<td>Support for Strategic Objectives</td>
<td>No modification proposed</td>
<td>Support noted</td>
<td></td>
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<td></td>
<td>appropriate aggregate landbank needed to support construction whilst ensuring that the individual and cumulative impacts of extraction are minimised, and that sites are restored at the earliest opportunity to a high standard, to contribute to the borough’s environmental and social well-being.</td>
<td></td>
<td>Green Belt Policy is set out in the NPPF and London Plan and has not been repeated in the Havering Local Plan.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>LPREG19 - 146</th>
<th>Borough wide strategy for growth</th>
<th>Section 5 Borough-wide strategy for growth</th>
<th>5.1.11 Support noted.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Protecting and enhancing the Green Belt and Havering’s open spaces and ecological assets;</td>
<td></td>
<td>Green Belt Policy is set out in the NPPF and London Plan and has not been repeated in the Havering Local Plan</td>
</tr>
<tr>
<td></td>
<td></td>
<td>5.1.12 Support noted.</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>Box: Key features of the spatial strategy - Proposed change accepted.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>LPREG19 - 147</th>
<th>Policy 1 – Romford Strategic Development Area</th>
<th>Policy 1 Romford Strategic Development Area</th>
<th>Policy 1: Support noted. Changes made to paragraph 6.1.17 to strengthen points raised.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Paragraph 6.1.17 (to add at the end):</td>
<td>In addition, the Council will seek enhancements to the biodiversity value and water quality of the river in line with the requirements of Policy 31.</td>
<td>6.1.13 Support noted.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>6.1.17 Changes to policy made to reflect points raised.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>LPREG19 - 148</th>
<th>Support in general for the Rainham and Beam Park Strategic Development Area Policy (Policy 2)</th>
<th>No modification proposed</th>
<th>Support noted.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>This is sufficiently covered by Policies 29 and 31.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>LPREG19 - 149</th>
<th>Support for Green Belt protection</th>
<th>No modification proposed</th>
<th>Support noted.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Green Belt Policy is set out in the NPPF and London Plan and has not been repeated in the Havering Local Plan</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>LPREG19 - 150</th>
<th>General Support for Policy 7 - Residential design and amenity however calls for amendment of wording for objective ‘VII’.</th>
<th>Policy 7 Residential design and amenity</th>
<th>Suggestions have been incorporated to strengthen the links between Policy 7 Residential design and amenity, Policy 27 Landscaping, and Policy 29 Green infrastructure.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Paragraph 7.5.5:</td>
<td>High quality green infrastructure and amenity space provides many benefits in terms of opportunities for recreation and leisure, and enhancing quality of life through improved health, reduced stress levels, child development through play spaces and interaction with the natural environment.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>LPREG19 - 152</th>
<th>Support for Gypsy and Traveller Policy</th>
<th>No modification proposed</th>
<th>Support noted</th>
</tr>
</thead>
</table>

| LPREG19 - 153 | Support for Healthy | No modification proposed | Support noted |
| LPREG19 - 151 | Concerns over the impact of Garden & backland development on bio-diversity in the borough | Policy 10 Garden and backland development  
vi. Designated designated designated  
vi. Do not result in adverse impacts on green infrastructure and biodiversity that cannot be effectively mitigated. | Suggested amendment had been accepted, which strengthens the policy position set out in paragraph 7.8.3. |
| LPREG19 - 154 | Support for Policy 18- Open Space, Sports and recreation | No modification proposed | Support noted.  
Green Belt is already sufficiently covered by objective xvi, in the vision in paragraph 2.2.17 and in the spatial strategy in paragraph 5.1.11.  
Although the Openness of the Green Belt is one of its characteristics, Green Belt is not an open space designation. Green Belt policy is sufficiently covered by the NPPF and the London Plan.  
The Open Space Assessment and Standards Paper (2016), which is a supporting document to the Local Plan, addresses the different typologies of open space in more detail, which are referenced in paragraph 8.7.2. |
| LPREG19 - 155 | Support the principles of Policy 23. | No modification proposed | Support for Policy 23 and comments noted.  
The Council has plans to deliver transformational change to the road layout along the A1306 between Dovers Corner and borough boundary including Marsh Way bridge (2km in length). This will include implementation of Pocket Parks, play areas, new crossing points and shared use paths along the entire route to support the Rainham and Beam Park Housing Zone. This scheme is currently going through the detailed design process through funding from TfL.  
The scheme will be subject to a public consultation in 2018 and Officers would be happy to meet with colleagues from Friends of the Earth to ensure that their concerns in relation to biodiversity habitats and disturbance sensitive species are addressed.  
Table 3 Havering transport schemes provides a detailed overview of transport schemes and transport aspirations for Havering. |
| LPREG19 - 158 | Support for Policy 28, request for natural heritage to be referred to in the support text. | No modification proposed | The support for the policy is noted.  
Paragraph 11.3.7 refers to non-designated heritage assets that contribute to the character and distinctiveness of the borough’s historic environment and natural heritage features such as Dagnam Park already fall within this. |
Paragraph 11.2.7  
Landscaping schemes should demonstrate a commitment to promoting biodiversity, having regard to the Havering Nature Conservation and Biodiversity Strategy (2014). | Support noted. |
| LPREG19 - 156 | Request for green infrastructure and biodiversity to be referred to in policy 26 | No modification proposed | Biodiversity and Green Infrastructure are sufficiently covered in Policies 27 Landscaping, 29 Green Infrastructure and 30 Nature Conservation. |
| LPREG19 - 159 | Support for Policy 29- Green Infrastructure | Policy 29 Green Infrastructure  
Paragraph 12.1.1  
Green infrastructure is a network of green spaces and natural features that provide multiple benefits for the environment, economy and community. The benefits of green infrastructure include enhancing biodiversity, alleviating flood risk, providing opportunities for recreation, physical activity and education. Defined as a network of green spaces and features such as street trees and green roofs that is planned, designed and managed to provide a range of benefits, including: recreation and amenity, healthy living, reducing flooding, improving air quality, cooling the urban environment, encouraging walking and cycling, and enhancing biodiversity and ecological resilience(1).  

(1) All London Green Grid Supplementary Planning Guidance, Mayor of London 2012 | Support noted. The recommended definition of green infrastructure has been incorporated, for consistency with the Mayor’s SPG and to provide a more comprehensive definition. |
| LPREG19 - 161 | Support for Policy 31- Rivers and river corridors | No modification proposed | Support noted |
| LPREG19 - 162 | Support for Policy 32- Flood management | Policy 32 Flood Management  
Insert new paragraph after paragraph 12.4.8:  
The Council recognises that flood management measures can support biodiversity, and thereby contribute to the objectives of Policy 30. Developers are expected to seek to integrate such measures into the wider green infrastructure network in line with Policy 29. | Support noted. An additional paragraph has been included which links with the appropriate policies. |
<p>| LPREG19 - 163 | Support for Policy 33- Air Quality | No modification proposed | |</p>
<table>
<thead>
<tr>
<th>LPREG19 - 160</th>
<th>Support for Policy 30: Nature conservation. Calls for further commitment to Havering’s ecological fabric</th>
<th>Policy 30 Nature Conservation Paragraph 12.2.6 ... London Wildlife Sites Board ...</th>
<th>Support noted. SINCs and SSSIs will be shown on the adopted Proposals Map as set out in the Proposals Map Changes Booklet. Correction regarding London Wildlife Sites Board accepted. The Local Plan contains a positive approach to biodiversity, which follows a strategic approach in line with the NPPF. The compensation of biodiversity loss is already covered in paragraph 12.2.9. The Open Space Assessment and Standards Paper (2016) asessed natural and semi-natural green space as part of the open space typologies. This concluded that Havering is already covered by large amounts of existing natural and semi-natural greenspace. The Local Plan sets out a positive approach towards wildlife, particularly through its wildlife corridors.</th>
</tr>
</thead>
<tbody>
<tr>
<td>LPREG19 - 165</td>
<td>Support for Policy 36 however it is noted there is no reference to solar energy in light of possible solar park siting in the Borough</td>
<td>No modification proposed</td>
<td>Paragraph 12.8.1 sets out the Council’s commitment to renewable energy. Proposals for solar parks will be assessed in line with this. The Council undertook feasibility studies into the scope for developing its own solar park proposals in 2015/17. It has concluded that the business model for these does not support taking such proposals forward at the present time.</td>
</tr>
<tr>
<td>LPREG19 - 164</td>
<td>Support for Policy 32- Managing Pollution</td>
<td>Policy 32 Managing pollution Paragraph 12.6.4 (to add to the end) ... Applicants are also encouraged to consider guidance from the Bat Conservation Trust to minimise the impact of artificial lighting on wildlife (footnote: Bat Conservation Trust, 2014. Artificial lighting and wildlife; Interim Guidance: Recommendations to help minimise the impact artificial lighting. See: <a href="http://www.bats.org.uk/pages/bats_and_lighting.html">www.bats.org.uk/pages/bats_and_lighting.html</a>)</td>
<td>Support noted</td>
</tr>
<tr>
<td>LPREG19 - 166</td>
<td>Support for Policy 38: Mineral Extraction</td>
<td>No modification proposed</td>
<td>Support noted</td>
</tr>
<tr>
<td>LPREG19 - 167</td>
<td>Support for Section 14- Delivery &amp; Implementation</td>
<td>No modification proposed</td>
<td>Support noted</td>
</tr>
<tr>
<td>LPREG19 - 168</td>
<td>Calls for an indicative list of all SINCs to be</td>
<td>No modification proposed</td>
<td>Support noted. SINCs and other nature conservation sites will be displayed on the Proposals Map when adopted. Revisions to</td>
</tr>
<tr>
<td>Code</td>
<td>Description</td>
<td>Notes</td>
<td>Definition of green infrastructure is provided by the NPPF and London Plan and does not need to be repeated. The definition of SINCs is provided in paragraph 12.2.6 and the London Plan.</td>
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<tr>
<td>LPREG19 -</td>
<td>Calls for Glossary additions of SINCs &amp; Green Infrastructure</td>
<td>No modification proposed.</td>
<td>The Council recognises the importance of protecting and enhancing habitats and ecological networks throughout the Local Plan. Through the Green Infrastructure policy, the Council is setting out a strategy to deliver a network of multifunctional green spaces which will contribute to an enhancement of the borough’s ecological networks. In addition, the Green Belt will continue to be protected from development.</td>
</tr>
<tr>
<td>169</td>
<td></td>
<td></td>
<td>Comments noted.</td>
</tr>
<tr>
<td>ADREG19 -</td>
<td>Sustainability Appraisal</td>
<td>No modification proposed.</td>
<td>Comments noted.</td>
</tr>
<tr>
<td>5</td>
<td></td>
<td></td>
<td>The Council recognises the importance of protecting and enhancing habitats and ecological networks throughout the Local Plan. Through the Green Infrastructure policy, the Council is setting out a strategy to deliver a network of multifunctional green spaces which will contribute to an enhancement of the borough’s ecological networks. In addition, the Green Belt will continue to be protected from development.</td>
</tr>
<tr>
<td>ADREG19 -</td>
<td>Support for SINC designations in the Proposals Map Changes Booklet</td>
<td>No modification proposed.</td>
<td>Support noted.</td>
</tr>
<tr>
<td>6</td>
<td></td>
<td></td>
<td>Support noted.</td>
</tr>
<tr>
<td>Kitty and</td>
<td>Policy 11 Gypsy and Traveller Accommodation</td>
<td>Policy 11 Gypsy and Traveller Accommodation</td>
<td>The Council commissioned consultants ORS to undertake a Gypsy and Traveller Accommodation Assessment as part of the evidence base for the Havering Local Plan. This was published in 2017 alongside the Proposed Submission Local Plan as part of the Regulation 19 consultation. During and after the consultation a number of gypsy and traveller families (who had not been available or who had previously declined to be interviewed) contacted the Council so that their accommodation needs could be assessed. Further interviews were undertaken and a revised Gypsy and Traveller Accommodation Assessment (March 2018) has been prepared. The Council is proposing modifications to the Local Plan to enable the full identified need for gypsy and traveller pitches to be met. Please refer to the Gypsy and Traveller Accommodation Assessment (March 2018) and the Gypsy and Traveller Position Statement (March 2018) for further information.</td>
</tr>
<tr>
<td>Thomas</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Brown</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>LPREG19 -</td>
<td>Gypsy and Traveller Policy</td>
<td>Policy 11 Gypsy and Traveller Accommodation</td>
<td>The Council commissioned consultants ORS to undertake a Gypsy and Traveller Accommodation Assessment as part of the evidence base for the Havering Local Plan. This was published in 2017 alongside the Proposed Submission Local Plan as part of the Regulation 19 consultation. During and after the consultation a number of gypsy and traveller families (who had not been available or who had previously declined to be interviewed) contacted the Council so that their accommodation needs could be assessed. Further interviews were undertaken and a revised Gypsy and Traveller Accommodation Assessment (March 2018) has been prepared. The Council is proposing modifications to the Local Plan to enable the full identified need for gypsy and traveller pitches to be met. Please refer to the Gypsy and Traveller Accommodation Assessment (March 2018) and the Gypsy and Traveller Position Statement (March 2018) for further information.</td>
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<td>192</td>
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### Policy 11 Gypsy and Traveller Accommodation

1. **Formalising seven existing private sites providing a maximum of 2270 pitches for Gypsies and Travellers. These sites are identified on the Proposals Map and the maximum number of pitches that will be permitted on each site is identified in paragraph 7.9.5; and**

   **Paragraph 7.9.1:**

   The Havering Gypsy and Traveller Accommodation Assessment (GTAA) 2012 provides a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpersons accommodation in the borough up to 2031. The Assessment identifies a need for 2270 additional pitches for the Gypsy and Traveller households who meet the planning definition as set out in the National Planning Policy for Traveller Sites. Of the 2270 pitches needed, 2657 pitches are required within the first 5 year period of the Plan (2016 – 2021), and the remaining 213 pitches in the latter part of the plan period. No additional need has been identified for plots for Travelling Showpeople over the 15 year plan period (2016-2031).

   **Paragraph 7.9.5:**

   The sites are identified on the Proposals Map and are listed below. In order to provide firm controls and prevent further intensification, a maximum number of pitches will be permitted on each site as set out below:

   - Tyas Stud Farm rear of Latchford Farm - maximum of 5 pitches
   - Vinegar Hill - maximum of 12 pitches
   - Hogbar Farm West - maximum of 34 pitches
   - Ashlea View, Tomkyns Lane - maximum of 2 pitches
   - Benskins Lane - maximum of 12 pitches
   - Fairhill Rise - maximum of 2 pitches
Paragraph 7.9.8
Where further sites are proposed the Council will ensure that they are required to meet legitimate additional borough need. When considering applications for Gypsy and Traveller sites and Travelling Showpersons plots, the Council will take into account the policy criteria outlined in Policy 11 in addition to the requirements of National Policy.

Charles Brown
LPREG19-193
Gypsy and Traveller Policy

Policy 11 Gypsy and Traveller Accommodation

i. Formalling seven existing private sites providing a maximum of 2370 pitches for Gypsies and Travellers. These sites are identified on the Proposals Map and the maximum number of pitches that will be permitted on each site is identified in paragraph 7.9.5; and

Paragraph 7.9.1:

The Havering Gypsy and Traveller Accommodation Assessment (GTAA) 2012 provides a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpersons accommodation in the borough up to 2031. The Assessment identifies a need for 3370 additional pitches for the Gypsy and Traveller households who meet the planning definition as set out in the National Planning Policy for Traveller Sites. Of the 3370 pitches needed, 2657 pitches are required within the first 5 year period of the Plan (2016 – 2021), and the remaining 713 pitches in the latter part of the plan period. No additional need has been identified for plots for Travelling Showpeople over the 15 year plan period (2016-2031).

Paragraph 7.9.5:

The sites are identified on the Proposals Map and are listed below. In order to provide firm controls and prevent further intensification, a maximum number of pitches will be permitted on each site as set out below:

- Tyas Stud Farm rear of Latchford Farm - maximum of 5 pitches
- Vinegar Hill - maximum of 12 pitches
- Hogbar Farm West - maximum of 47 pitches
- Ashlea View, Tomkyns Lane - maximum of 2 pitches
- Benskins Lane - maximum of 12 pitches
- Fairhill Rise - maximum of 2 pitches
- Hogbar Farm East - maximum of 47 pitches
- Lower Bedfords Road - maximum of 3 pitches
- The Caravan Park, Putwell Bridge - maximum of 2 pitches
- Willow Tree Lodge - maximum of 3 additional pitches (1 pitch already has permanent planning permission)

The Council commissioned consultants ORS to undertake a Gypsy and Traveller Accommodation Assessment as part of the evidence base for the Havering Local Plan. This was published in 2017 alongside the Proposed Submission Local Plan as part of the Regulation 19 consultation.

During and after the consultation a number of gypsy and traveller families (who had not been available or who had previously declined to be interviewed) contacted the Council so that their accommodation needs could be assessed. Further interviews were undertaken and a revised Gypsy and Traveller Accommodation Assessment (March 2018) has been prepared. The Council is proposing modifications to the Local Plan to enable the full identified need for gypsy and traveller pitches to be met.

Please refer to the Gypsy and Traveller Accommodation Assessment (March 2018) and the Gypsy and Traveller Position Statement (March 2018) for further information.
- Church Road - maximum of 18 pitches

Paragraph 7.9.8

Where further sites are proposed the Council will ensure that they are required to meet legitimate additional borough need. When considering applications for Gypsy and Traveller sites and Travelling Showpersons plots, the Council will take into account the policy criteria outlined in Policy 11 in addition to the requirements of National Policy.

<table>
<thead>
<tr>
<th>Cornerstone Property Assets</th>
<th>LPREG19 - 202</th>
<th>Concern over Havering’s housing supply</th>
<th>No modification proposed</th>
</tr>
</thead>
</table>

The Council’s Vision: Havering Making a Greater London seeks to provide new homes in Havering and, in appropriate cases, the Council takes a positive and proactive stance in dealing with prospective private developers wishing to bring forward housing schemes in recognition of the importance of securing timely and high quality housing delivery.

In line with the Vision, the Local Plan Spatial Strategy acknowledges that the delivery of new homes is critical to London’s well-being. It sets out how the Council has approached the important topic of making sure that enough new homes are provided.

Havering has undertaken a Strategic Market Assessment to support the preparation of the Local Plan. Havering forms part of both the London-wide housing market area and the outer north east London sub housing market area with the London Boroughs of Barking and Dagenham and Redbridge. In line with the requirements of the National Planning Policy Framework, the Council has worked with these authorities to prepare its Strategic Housing Market Assessment (SHMA).

The resultant Outer North East London SHMA indicates that Havering’s full objectively assessed housing need is for 25,200 new homes over the period 2011-2033 or 1,145 homes per annum.

Since the initial SHMA was undertaken, updated population projections have been published by the GLA. The updated population projections were reflected in an update (2017) of the SHMA which identified an increased housing need in Havering of 30,052 new homes over the same period (1,366 new homes per year).

The Council is making every effort to identify and bring forward suitable sites to exceed the current London Plan target and to meet housing need.

The Local Plan does not seek to constrain the number of new homes to come forward to 17,550 over the Plan period.

Further, the Council is aware that the current London Plan requires that boroughs should seek to close the gap between housing need (a assessed through a Strategic Housing Market Assessment) and supply.

The Council’s approach to providing new homes in the Havering Local Plan takes a balanced view about the importance of addressing housing requirements and securing sustainable development. Having undertaken recent studies to assess whether the Green Belt fulfils the roles identified in the National Planning Policy Framework, the Council is also committed to ensuring that the Green Belt is safeguarded. The Council has concluded that there are no exceptional circumstances to support releasing land from the Green Belt.

The Council’s commitment to the Green Belt is an important ‘driver’ in helping to secure new homes in Havering’s built up areas and through the important programmes being delivered through the Housing Zones and the Council’s estates regeneration programme (see below).

The Council’s strategy also recognises that the scope to accommodate growth in Havering will be dependent upon the provision of infrastructure especially that needed to provide effective and efficient movement within Havering as well as social and community infrastructure necessary for residents such as schools and health facilities. The Council has prepared an Infrastructure Delivery Plan to support the Havering Local Plan and to inform the consideration of housing proposals.
Throughout the Local Plan process, the Council has rigorously sought to identify all sources of potential housing supply that will secure sustainable development in order to ensure that Havering is taking every opportunity to secure the delivery of new homes. This approach has been implemented to enable the gap between the housing targets in the London Plan and the objectively assessed need requirement to be closed as far as is reasonably possible.

The Housing Position Statement which supports the Havering Local Plan explains the Council’s approach to this in more detail. A element is that the Council considers that the certainty of securing housing delivery over the overall plan period must be taken into account against the numbers of units approved particularly in the initial years of the Local Plan being implemented.

It sets out that the Council considers that over the period of the plan to 2031, the potential overall supply of additional homes in Havering may exceed the minimum annual housing target of 1,170 new homes per year set out in the current London Plan.

In summary, the approach in the Local Plan that the Council will implement is based on:

- Focussing the delivery of new homes in Havering’s two housing Zones at Romford and Rainham and Beam Park. These two areas are identified in the Local Plan as Strategic Development Areas and have individual comprehensive policy frameworks to guide and steer their development to make sure that development provides high quality places with inclusive communities and the timely and effective provision of infrastructure.
- Supporting the intensification of twelve of its own existing housing estates through an ambitious regeneration programme that includes an experienced private sector development partner secured by means of a Joint Venture Limited Liability Partnership.
- Realising the housing opportunities that come forward on large sites outside of the Strategic Development Areas to provide opportunities for place-making and building communities. These include sites such as the former St Georges Hospital site in Hornchurch.
- Prioritising all land not designated for other planning purposes for new homes.
- Encouraging the effective use of land by re-using previously developed (brownfield) land and allocating a range of sustainable sites for housing development. The latter will be identified in the forthcoming Site Specific Allocations Local Plan.

The Local Plan Housing Position Statement sets out in more detail the specific potential housing opportunities that will come forward for the two Housing Zones and the Council’s twelve estates programme.

The Housing Position Statement identifies specific deliverable and developable sites for the first 10 years of the Plan. The Council is committed to ensuring that there is a sufficient supply of housing over the 15 year plan period and beyond and will therefore undertake an early review of the Plan.

The Statement also includes details of sites which it is anticipated will be included in the forthcoming Site Specific Allocations Local Plan document which will reflect up to date capacity studies where appropriate.

Underpinning the Council’s approach is a clear recognition of the importance of optimising the development potential of the sites in regard to their potential capacity whilst ensuring that they provide satisfactory residential environment for residents and maintaining the character and appearance of Havering. There is an emphasis on making sure the place-making role of new development is addressed and a focus on delivering places where communities can flourish and be cohesive and inclusive.

As a result of this approach, sufficient land has been identified to meet the minimum London Plan housing target for the first 10 years of the Local Plan if the delivery is taken over the 10 year period.

The Council considers that the greater certainty that is encompassed through the Housing Zones and the twelve estates programme should weigh heavily in their favour and help counter the potential numerical shortfall in housing delivery in the first five years.
<table>
<thead>
<tr>
<th>LPREG19 - 203</th>
<th>Calls for a greater review of the Green Belt</th>
<th>No modification proposed</th>
<th>See response to LPREG19 - 204 below.</th>
</tr>
</thead>
<tbody>
<tr>
<td>LPREG19 – 204</td>
<td>Green Belt Site</td>
<td>No modification proposed</td>
<td>The Outer North East London Strategic Housing Market Assessment 2016 indicates that there is a need for 1,366 new homes in Havering per annum. The Mayor of London sets minimum housing targets for each London Borough, and for Havering this is 1,170 homes per annum. The Local Plan identifies Romford and Rainham and Beam Park as Strategic Development Areas which have the capacity to deliver a significant amount of new housing. Both areas have also been designated as Housing Zones by the Mayor of London. The Council does not believe that there are ‘exceptional circumstances’ to warrant the release of Green Belt land to meet the Borough’s housing need. As stated in the Housing White Paper (page 21), the Government “seeks to maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.” The Council has prepared two Green Belt Studies in 2016 and 2018. The first Green Belt Study was undertaken by the London Borough of Havering in association with PBA and Enderby Consultants. This study assessed the contribution that land within the Green Belt makes to the Green Belt purposes (as defined in para 80 of the NPPF). To aid the assessments, the Green Belt in the Borough was divided into 24 land parcels. A performance value was attributed to the parcels for each purpose, based on predefined criteria. The study found that all 24 parcels make a contribution to Green Belt purposes, with 19 of the 24 Green Belt parcels making a fundamental contribution to the Green Belt purposes. A further four parcels were found to make a high or moderate/high contribution and only one parcel was found to make a low contribution. A second Green Belt Study was prepared by LUC in 2018. The aim of this study was to provide conclusions on the potential degree of harm that may occur if the sites (which had been submitted to the Council as part of the Regulation 19 Consultation) were released from the Green Belt. This took account of three elements: 1) the contribution of the sites to the NPPF Green Belt purposes, 2) the potential impact on the wider integrity of the Green Belt and 3) the strength of revised Green Belt boundaries that would remain if the site was to be released. Out of a total of 84 sites assessed (with a total area of 849ha): 46 sites (total area of 682ha, which is 80.3% of the total area of the 84 sites) rated as ‘high’ in terms of harm to Green Belt resulting from release. 21 sites (120ha, 14.1%) rated as ‘moderate-high’ in terms of harm to Green Belt resulting from release. 9 sites (24ha, 2.5%) rated as ‘moderate’ in terms of harm to Green Belt resulting from release. 4 sites (17ha, 2%) rated as ‘low-moderate’ in terms of harm to Green Belt resulting from release. 4 sites (6ha, 0.7%) rated as ‘low’ in terms of harm to Green Belt resulting from release. The site proposed in this representation by Cornerstone Property Assets Ltd (GB64) falls within parcel 23 of the Stage 1 Study. This Study concluded that the parcel makes a low contribution to the Green Belt. The site was also assessed in the Stage 2 study and this Study concludes that releasing the site from the Green Belt would lead to a moderate degree of harm to the Green Belt. The reasons for this being: The Site’s contribution to preventing urban sprawl is negligible, due to the extent of its containment by settlements that form part of the large, built-up area, and urbanising influences mean that there is little sense of this area forming part of the countryside. The Site’s east-west extent forms more than a third of the strip of Green Belt, less than 270m wide in total, that separates Chadwell Heath from Romford. The small Site, although largely open, is contained between transport routes, Crow Lane and the railway, from which there is little perception of a settlement gap. The urbanising influences both within and adjacent to the Site mean that there is little sense of this area forming part of the countryside and therefore it plays no role safeguarding the countryside from encroachment.</td>
</tr>
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</table>
This Site does have sensitivity in terms of its strategic role as part of the wider Green Belt. Crow Lane and the railway would form clear alternative boundaries, but release of the Site would in practice all but remove connectivity between Green Belt to the north and south. There would be little distinction between a new boundary on the eastern edge of the Site and the commercial development in the remaining strip of Green Belt to the east, so the already very limited contribution of that land to Green Belt purposes would be weakened further. If Chadwell Heath and Romford were to become contiguous in one place, then the contribution of adjacent Green Belt land, particularly to the south, to maintaining settlement separation would subsequently be weakened. The harm to the Green Belt resulting from release of this Site is therefore assessed overall as moderate.

Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 3 of the 13 sustainability criteria, and ‘green’ (signifying that the site could perform well in sustainability terms) in relation to 7 of the criteria.

The Council’s Vision: Havering Making a Greater London seeks to provide new homes in Havering and, in appropriate cases, the Council takes a positive and proactive stance in dealing with prospective private developers wishing to bring forward housing schemes in recognition of the importance of securing timely and high quality housing delivery.

In line with the Vision, the Local Plan Spatial Strategy acknowledges that the delivery of new homes is critical to London’s well-being. It sets out how the Council has approached the important topic of making sure that enough new homes are provided.

Havering has undertaken a Strategic Market Assessment to support the preparation of the Local Plan. Havering forms part of both the London-wide housing market area and the outer north east London sub housing market area with the London Boroughs of Barking and Dagenham and Redbridge. In line with the requirements of the National Planning Policy Framework, the Council has worked with these authorities to prepare its Strategic Housing Market Assessment (SHMA).

The resultant Outer North East London SHMA indicates that Havering’s full objectively assessed housing need is for 25,200 new homes over the period 2011-2033 or 1,145 homes per annum. Since the initial SHMA was undertaken, updated population projections have been published by the GLA. The updated population projections were reflected in an update (2017) of the SHMA which identified an increased housing need in Havering of 30,052 new homes over the same period (1,366 new homes per year).

The Council is making every effort to identify and bring forward suitable sites to exceed the current London Plan target and to meet housing need.

The Local Plan does not seek to constrain the number of new homes to come forward to 17,550 over the Plan period.

Further, the Council is aware that the current London Plan requires that boroughs should seek to close the gap between housing need (a assessed through a Strategic Housing Market Assessment) and supply.

The Council’s approach to providing new homes in the Havering Local Plan takes a balanced view about the importance of addressing housing requirements and securing sustainable development. Having undertaken recent studies to assess whether the Green Belt fulfils the roles identified in the National Planning Policy Framework, the Council is also committed to ensuring that the Green Belt is safeguarded. The Council has concluded that there are no exceptional circumstances to support releasing land from the Green Belt.

The Council’s commitment to the Green Belt is an important ‘driver’ in helping to secure new homes in Havering’s built up areas and through the important programmes being delivered through the Housing Zones and the Council’s estates regeneration programme (see below).
The Council’s strategy also recognises that the scope to accommodate growth in Havering will be dependent upon the provision of infrastructure especially that needed to provide effective and efficient movement within Havering as well as social and community infrastructure necessary for residents such as schools and health facilities. The Council has prepared an Infrastructure Delivery Plan to support the Havering Local Plan and to inform the consideration of housing proposals.

Throughout the Local Plan process, the Council has rigorously sought to identify all sources of potential housing supply that will secure sustainable development in order to ensure that Havering is taking every opportunity to secure the delivery of new homes. This approach has been implemented to enable the gap between the housing targets in the London Plan and the objectively assessed need requirement to be closed as far as is reasonably possible.

The Housing Position Statement which supports the Havering Local Plan explains the Council’s approach to this in more detail. A element is that the Council considers that the certainty of securing housing delivery over the overall plan period must be taken into account against the numbers of units approved particularly in the initial years of the Local Plan being implemented.

It sets out that the Council considers that over the period of the plan to 2031, the potential overall supply of additional homes in Havering may exceed the minimum annual housing target of 1,170 new homes per year set out in the current London Plan.

In summary, the approach in the Local Plan that the Council will implement is based on:

- focussing the delivery of new homes in Havering’s two housing Zones at Romford and Rainham and Beam Park. These two areas are identified in the Local Plan as Strategic Development Areas and have individual comprehensive policy frameworks to guide and steer their development to make sure that development provides high quality places with inclusive communities and the timely and effective provision of infrastructure
- supporting the intensification of twelve of its own existing housing estates through an ambitious regeneration programme that includes an experienced private sector development partner secured by means of a Joint Venture Limited Liability Partnership
- realising the housing opportunities that come forward on large sites outside of the Strategic Development Areas to provide opportunities for place-making and building communities. These include sites such as the former St Georges Hospital site in Hornchurch
- prioritising all land not designated for other planning purposes for new homes
- encouraging the effective use of land by re-using previously developed (brownfield) land and allocating a range of sustainable sites for housing development The latter will be identified in the forthcoming Site Specific Allocations Local Plan

The Local Plan Housing Position Statement sets out in more detail the specific potential housing opportunities that will come forward for the two Housing Zones and the Council’s twelve estates programme.

The Housing Position Statement identifies specific deliverable and developable sites for the first 10 years of the Plan. The Council is committed to ensuring that there is a sufficient supply of housing over the 15 year plan period and beyond and will therefore undertake an early review of the Plan.

The Statement also includes details of sites which it is anticipated will be included in the forthcoming Site Specific Allocations Local Plan document which will reflect up to date capacity studies where appropriate.

Underpinning the Council’s approach is a clear recognition of the importance of optimising the development potential of the sites in regard to their potential capacity whilst ensuring that they provide satisfactory residential environment for residents and maintaining the character and appearance of Havering. There is an emphasis on making sure the place-making role of new development is addressed and a focus on delivering places where communities can flourish and be cohesive and inclusive.

As a result of this approach, sufficient land has been identified to meet the minimum London Plan housing target for the first 10 years of the Local Plan if the delivery is taken over the 10 year period.
The Council considers that the greater certainty that is encompassed through the Housing Zones and the twelve estates programme should weigh heavily in their favour and help counter the potential numerical shortfall in housing delivery in the first five years.

The objector has raised concerns about the potential implications of Havering failing to meet its OAHN particularly in regard to the position with other London Boroughs and adjoining and nearby districts outside London.

Havering has engaged extensively with the GLA in the preparation of its Local Plan and this has included specific discussion about addressing housing.

The GLA has confirmed that London Boroughs are not required to demonstrate how any unmet need from their own boroughs will be met in Other London Boroughs or adjoining districts. The preparation of the Havering Local Plan is not therefore required to address how any shortfall in this borough will be addressed within London or by adjoining / nearby local authorities.

The GLA has advised that the London Plan makes clear that London should be treated as a single housing market. The London Plan states that the Annual average housing supply monitoring targets set out in Table 3.1 are a minimum target for each borough. In order to meet local need and contribute to meeting strategic need each London borough is to seek to exceed this target through the measures set out in London Plan Policy 3.3E, paragraphs 3.19 and 3.19i of the Plan and Section 1 of the London Plan Housing SPG (2016).

The Housing SPG clarifies that this approach applies even where a borough has demonstrated it can exceed its local housing need. In preparing its Local Plan Havering (and Redbridge/Barking and Dagenham) will be expected to demonstrate it has sought to increase its housing supply in line with policy 3.3 of the London Plan and the Housing SPG in order to reduce the gap between local and strategic housing need and supply.

The Housing SPG 2016 notes that sensitivity testing during the development of the SHLAA showed that additional sources of housing such as higher density, housing led, mixed use development in accessible locations in Opportunity/Intensification Areas, town centres, surplus industrial land and other large sites could ‘fill’ the gap between the minimum housing supply target and London’s identified need. This has been confirmed by monitoring which shows that collectively the boroughs have been approving sufficient capacity to address London-wide need.

The objector refers to the recent Government consultation ‘Planning for the right homes in the right places’. It is recognised that the approach set out in the consultation is now reflected in the draft National Planning Policy Framework published in March 2018.

The Government White Paper consultation identified a housing ‘need’ figure for Havering of 1,821 new homes per year. It is noted that this figure is in a consultation document and has been derived from methodology that is not normally used in London. It is recognised that the approach set out in the consultation is now reflected in the draft National Planning Policy Framework published in March 2018.

The Council responded to the consultation identifying that there were strong concerns as to how this figure has been prepared and that it made no provision for the infrastructure to support the level of housing mentioned. It would also have a very detrimental impact on the open character and appearance of Havering. On this basis the Council considers that the figure identified by the Government is flawed, unachievable and unrealistic.

In preparing its Local Plan, the Council has engaged with other London Boroughs and adjoining districts. The details of these discussions are set out in the Duty to Cooperate statement. It is clear from the Duty to Cooperate engagement that adjoining local authorities are heavily engaged in their own Local Plan preparation including securing the necessary evidence to support this. This work will include the preparation of necessary SHMAs. It was not feasible and not desirable to ‘pause’ the preparation of the Havering Local Plan to enable all evidence base work (including SHMAs) to ‘catch up’ nor for this to be reflected in the
Havering local Plan.
The Duty to Cooperate discussions have recognised that for most authorities involved in this process it will be extremely challenging for them to identify and deliver sites that will enable them to meet their own respective OAHN. It is therefore highly unlikely that these authorities will be willing to help meet unmet need arising in London.

The Duty to Cooperate Statement confirms that issues around the provision of housing have been explicitly discussed and explored between the authorities. It was recognised in this process that seeking to resolve this would be extremely challenging and delay the delivery of the respective local plan at a time when local authorities re being pressed by Government to ensure that they have up to date Local Plans in place.

The Council does not believe that there are ‘exceptional circumstances’ to warrant the release of Green Belt land to meet the Borough’s housing need. As stated in the Housing White Paper (page 21), the Government “seeks to maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.”

The Council has prepared two Green Belt Studies in 2016 and 2018. The first Green Belt Study was undertaken by the London Borough of Havering in association with PBA and Enderby Consultants. This study assessed the contribution that land within the Green Belt makes to the Green Belt purposes (as defined in para 80 of the NPPF). To aid the assessments, the Green Belt in the Borough was divided into 24 land parcels. A performance value was attributed to the parcels for each purpose, based on predefined criteria. The study found that all 24 parcels make a contribution to Green Belt purposes, with 19 of the 24 Green Belt parcels making a fundamental contribution to the Green Belt purposes. A further four parcels were found to make a high or moderate/high contribution and only one parcel was found to make a low contribution.

A second Green Belt Study was prepared by LUC in 2018. The aim of this study was to provide conclusions on the potential degree of harm that may occur if the sites (which had been submitted to the Council as part of the Regulation 19 Consultation) were released from the Green Belt. This took account of three elements: 1) the contribution of the sites to the NPPF Green Belt purposes, 2) the potential impact on the wider integrity of the Green Belt and 3) the strength of revised Green Belt boundaries that would remain if the site was to be released.

Out of a total of 84 sites assessed (with a total area of 849ha):

- 46 sites (total area of 682ha, which is 80.3% of the total area of the 84 sites) rated as ‘high’ in terms of harm to Green Belt resulting from release.
- 21 sites (120ha, 14.1%) rated as ‘moderate-high’ in terms of harm to Green Belt resulting from release.
- 9 sites (24ha, 2.9%) rated as ‘moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (17ha, 2%) rated as ‘low-moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (6ha, 0.7%) rated as ‘low’ in terms of harm to Green Belt resulting from release.

The site proposed in this representation by Thomas Bates and Son Ltd (GB1) falls within parcel 13 of the Stage 1 Study. This Study concluded that the parcel makes a fundamental contribution to the Green Belt. The site was also assessed in the Stage 2 study and this Study concludes that releasing the site from the Green Belt would lead to a high degree of harm to the Green Belt. The reasons for this being:

- The site lies adjacent to the large built-up area of Havering but relates to the wider countryside – development would represent expansion of the large built-up area into the open countryside.
- The site lies between the settlements of Emerson Park and Cranham to the east. The settlements are in close proximity (within 1km) and the release of the Site could lead to the perception of narrowing the gap between them.
- The site is rural in character and clearly displays the characteristics of the countryside, with limited urbanising influence from the adjacent roads and settlement edge. Development of the Site would lead to the encroachment of the countryside.

Development of the site would cause the neighbouring Green Belt land to the north to be enclosed by
development on three sides and would limit its performance in physically and visually separating the settlements of Emerson Park and Cranham. This would lead to a sense of encroachment and lead to a visual and physical narrowing of the gap between the two settlements, weakening the land’s contribution to the Green Belt. The overall harm to the Green Belt resulting from release of this Site would therefore be High.

Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 5 of the 13 sustainability criteria, and ‘green’ (signifying that the site could perform well in sustainability terms) in relation to 4 of the criteria.

The representation comments that the Council has not published any draft versions of the Havering Local Plan. The Council has taken the opportunity as set out in the Regulations and PPG to progress from initial consultation on the Local Plan in 2015 to pre-submission version of its Local Plan in the interests of delivering its Local Plan effectively and efficiently. The Council strongly considers that it has prepared the Havering Local Plan in line with the requirements.

The representation comments that the evidence base to the Havering Local Plan is out of date. The Council has taken the opportunity to review the evidence base documents and is submitting revised items where necessary (such as the Infrastructure Delivery Plan, a Gypsies and Traveller Needs Assessment, the Employment Land Review and the Retail and Leisure Study).

Crest Nicholson
LPREG19-206
Green Belt Site and Local Plan approach
No modification proposed

The Council's Vision: Havering Making a Greater London seeks to provide new homes in Havering and, in appropriate cases, the Council takes a positive and proactive stance in dealing with prospective private developers wishing to bring forward housing schemes in recognition of the importance of securing timely and high quality housing delivery.

In line with the Vision, the Local Plan Spatial Strategy acknowledges that the delivery of new homes is critical to London's well-being. It sets out how the Council has approached the important topic of making sure that enough new homes are provided.

Havering has undertaken a Strategic Market Assessment to support the preparation of the Local Plan. Havering forms part of both the London-wide housing market area and the outer north east London sub housing market area with the London Boroughs of Barking and Dagenham and Redbridge. In line with the requirements of the National Planning Policy Framework, the Council has worked with these authorities to prepare its Strategic Housing Market Assessment (SHMA).

The resultant Outer North East London SHMA indicates that Havering's full objectively assessed housing need is for 25,200 new homes over the period 2011-2033 or 1,145 homes per annum. Since the initial SHMA was undertaken, updated population projections have been published by the GLA. The updated population projections were reflected in an update (2017) of the SHMA which identified an increased housing need in Havering of 30,052 new homes over the same period (1,366 new homes per year).

The Council is making every effort to identify and bring forward suitable sites to exceed the current London Plan target and to meet housing need.

The Local Plan does not seek to constrain the number of new homes to come forward to 17,550 over the Plan period.

Further, the Council is aware that the current London Plan requires that boroughs should seek to close the gap between housing need (as assessed through a Strategic Housing Market Assessment) and supply.

The Council’s approach to providing new homes in the Havering Local Plan takes a balanced view about the importance of addressing housing requirements and securing sustainable development. Having undertaken
recent studies to assess whether the Green Belt fulfils the roles identified in the National Planning Policy Framework, the Council is also committed to ensuring that the Green Belt is safeguarded. The Council has concluded that there are no exceptional circumstances to support releasing land from the Green Belt.

The Council’s commitment to the Green Belt is an important ‘driver’ in helping to secure new homes in Havering’s built up areas and through the important programmes being delivered through the Housing Zones and the Council’s estates regeneration programme (see below).

The Council’s strategy also recognises that the scope to accommodate growth in Havering will be dependent upon the provision of infrastructure especially that needed to provide effective and efficient movement within Havering as well as social and community infrastructure necessary for residents such as schools and health facilities. The Council has prepared an Infrastructure Delivery Plan to support the Havering Local Plan and to inform the consideration of housing proposals.

Throughout the Local Plan process, the Council has rigorously sought to identify all sources of potential housing supply that will secure sustainable development in order to ensure that Havering is taking every opportunity to secure the delivery of new homes. This approach has been implemented to enable the gap between the housing targets in the London Plan and the objectively assessed need requirement to be closed as far as is reasonably possible.

The Housing Position Statement which supports the Havering Local Plan explains the Council’s approach to this in more detail. A element is that the Council considers that the certainty of securing housing delivery over the overall plan period must be taken into account against the numbers of units approved particularly in the initial years of the Local Plan being implemented.

It sets out that the Council considers that over the period of the plan to 2031, the potential overall supply of additional homes in Havering may exceed the minimum annual housing target of 1,170 new homes per year set out in the current London Plan.

In summary, the approach in the Local Plan that the Council will implement is based on:

- focussing the delivery of new homes in Havering’s two housing Zones at Romford and Rainham and Beam Park. These two areas are identified in the Local Plan as Strategic Development Areas and have individual comprehensive policy frameworks to guide and steer their development to make sure that development provides high quality places with inclusive communities and the timely and effective provision of infrastructure
- supporting the intensification of twelve of its own existing housing estates through an ambitious regeneration programme that includes an experienced private sector development partner secured by means of a Joint Venture Limited Liability Partnership
- realising the housing opportunities that come forward on large sites outside of the Strategic Development Areas to provide opportunities for place-making and building communities. These include sites such as the former St Georges Hospital site in Hornchurch
- prioritising all land not designated for other planning purposes for new homes
- encouraging the effective use of land by re-using previously developed (brownfield) land and allocating a range of sustainable sites for housing development The latter will be identified in the forthcoming Site Specific Allocations Local Plan

The Local Plan Housing Position Statement sets out in more detail the specific potential housing opportunities that will come forward for the two Housing Zones and the Council’s twelve estates programme.

The Housing Position Statement identifies specific deliverable and developable sites for the first 10 years of the Plan. The Council is committed to ensuring that there is a sufficient supply of housing over the 15 year plan period and beyond and will therefore undertake an early review of the Plan.

The Statement also includes details of sites which it is anticipated will be included in the forthcoming Site Specific Allocations Local Plan document which will reflect up to date capacity studies where appropriate.

Underpinning the Council’s approach is a clear recognition of the importance of optimising the development
potential of the sites in regard to their potential capacity whilst ensuring that they provide satisfactory residential environment for residents and maintaining the character and appearance of Havering. There is an emphasis on making sure the place-making role of new development is addressed and a focus on delivering places where communities can flourish and be cohesive and inclusive.

**As a result of this approach, sufficient land has been identified to meet the minimum London Plan housing target for the first 10 years of the Local Plan if the delivery is taken over the 10 year period.**

The Council considers that the greater certainty that is encompassed through the Housing Zones and the twelve estates programme should weigh heavily in their favour and help counter the potential numerical shortfall in housing delivery in the first five years.

The objector has raised concerns about the potential implications of Havering failing to meet its OAHN particularly in regard to the position with other London Boroughs and adjoining and nearby districts outside London.

Havering has engaged extensively with the GLA in the preparation of its Local Plan and this has included specific discussion about addressing housing.

The GLA has confirmed that London Boroughs are not required to demonstrate how any unmet need from their own boroughs will be met in Other London Boroughs or adjoining districts. The preparation of the Havering Local Plan is not therefore required to address how any shortfall in this borough will be addressed within London or by adjoining / nearby local authorities.

The GLA has advised that the London Plan makes clear that London should be treated as a single housing market. The London Plan states that the Annual average housing supply monitoring targets set out in Table 3.1 are a minimum target for each borough. In order to meet local need and contribute to meeting strategic need each London borough is to see to exceed this target through the measures set out in London Plan Policy 3.3E, paragraphs 3.19 and 3.19i of the Plan and Section 1 of the London Plan Housing SPG (2016).

The Housing SPG clarifies that this approach applies even where a borough has demonstrated it can exceed its local housing need. In preparing its Local Plan Havering (and Redbridge/Barking and Dagenham) will be expected to demonstrate it has sought to increase its housing supply in line with policy 3.3 of the London Plan and the Housing SPG in order to reduce the gap between local and strategic housing need and supply.

The Housing SPG 2016 notes that sensitivity testing during the development of the SHLAA showed that additional sources of housing such as higher density, housing led, mixed use development in accessible locations in Opportunity/Intensification Areas, town centres, surplus industrial land and other large sites could ‘fill’ the gap between the minimum housing supply target and London’s identified need. This has been confirmed by monitoring which shows that collectively the boroughs have been approving sufficient capacity to address London-wide need.

The objector refers to the recent Government consultation ‘Planning for the right homes in the right places’. It is recognised that the approach set out in the consultation is now reflected in the draft National Planning Policy Framework published in March 2018.

The Government White Paper consultation identified a housing ‘need’ figure for Havering of 1,821 new homes per year. It is noted that this figure is in a consultation document and has been derived from methodology that is not normally used in London.

The Council responded to the consultation identifying that there were strong concerns as to how this figure has been prepared and that it made no provision for the infrastructure to support the level of housing mentioned. It would also have a very detrimental impact on the open character and appearance of Havering. On this basis the Council considers that the figure identified by the Government is flawed, unachievable and unrealistic.
In preparing its Local Plan, the Council has engaged with other London Boroughs and adjoining districts. The details of these discussions are set out in the Duty to Cooperate statement. It is clear from the Duty to Cooperate engagement that adjoining local authorities are heavily engaged in their own Local Plan preparation including securing the necessary evidence to support this. This work will include the preparation of necessary SHMAs. It was not feasible and not desirable to ‘pause’ the preparation of the Havering Local Plan to enable all evidence base work (including SHMAs) to ‘catch up’ nor for this to be reflected in the Havering Local Plan.

The Duty to Cooperate discussions have recognised that for most authorities involved in this process it will be extremely challenging for them to identify and deliver sites that will enable them to meet their own respective OAHN. It is therefore highly unlikely that these authorities will be willing to help meet unmet need arising in London.

The Duty to Co-operate Statement confirms that issues around the provision of housing have been explicitly discussed and explored between the authorities. It was recognised in this process that seeking to resolve this would be extremely challenging and delay the delivery of the respective local plan at a time when local authorities are being pressed by Government to ensure that they have up to date Local Plans in place.

The representation does not appear to identify any specific site for proposed development but comments extensively on the Green Belt and how the Council has approached its work on this aspect of the Local Plan.

The Council does not believe that there are ‘exceptional circumstances’ to warrant the release of Green Belt land to meet the Borough’s housing need. As stated in the Housing White Paper (page 21), the Government “seeks to maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.”

The Council has prepared two Green Belt Studies in 2016 and 2018. The first Green Belt Study was undertaken by the London Borough of Havering in association with PBA and Enderby Consultants. Crest Nicholson have provided a review of this study as part of their representation which included a recommendation that a Stage 2 study needed to be undertaken. The Council Commissioned LUC to prepare a Stage 2 study.

The aim of this study was to provide conclusions on the potential degree of harm that may occur if the sites (which had been submitted to the Council as part of the Regulation 19 Consultation) were released from the Green Belt. This took account of three elements: 1) the contribution of the sites to the NPPF Green Belt purposes, 2) the potential impact on the wider integrity of the Green Belt and 3) the strength of revised Green Belt boundaries that would remain if the site was to be released. Out of a total of 84 sites assessed (with a total area of 849ha):

- 46 sites (total area of 682ha, which is 80.3% of the total area of the 84 sites) rated as ‘high’ in terms of harm to Green Belt resulting from release.
- 21 sites (120ha, 14.1%) rated as ‘moderate-high’ in terms of harm to Green Belt resulting from release.
- 9 sites (24ha, 2.9%) rated as ‘moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (17ha, 2%) rated as ‘low-moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (6ha, 0.7%) rated as ‘low’ in terms of harm to Green Belt resulting from release.

The representation also comments that the Council has not published any draft versions of the Havering Local Plan. The Council has taken the opportunity as set out in the Regulations and PPG to progress from initial consultation on the Local Plan in 2015 to pre-submission version of its Local Plan in the interests of delivering its Local Plan effectively and efficiently. The Council strongly considers that it has prepared the Havering Local Plan in line with the requirements.

The representation also comments that the evidence base to the Havering Local Plan is out of date. It is inevitable that some parts of the evidence base that are prepared during the preparation of the Local Plan will and The Council has taken the opportunity to review the evidence base documents and is submitting revised items where necessary (such as the Infrastructure Delivery Plan, a Gypsy and Traveller Needs Assessment, the
<table>
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<th>Vivienne Edwards</th>
<th>LPREG19 - 207</th>
<th>Seven main concerns relating to the overall strategy of the Local Plan</th>
<th>No modification proposed</th>
<th>The Local Plan takes a balanced view about transport provision and use. Policy 23 Transport Connections sets out the Council’s policies to improve public transport connectivity and provide residents with alternative options to travel other than the car. Policy 23 includes commitments to enhancing the use and convenience of public transport across the borough which is line with the Mayor of London’s approach. It also includes commitments to promoting the benefits of active travel. These initiatives will assist in reducing the dependence on the use of private cars. However, the Council has to recognise that some journeys in the borough are very difficult to make without a private car (such as many north-south connections). It is for this reason that Havering has high levels of private car ownership and use. The Local Plan includes commitments to improving north – south connectivity by means of enhanced public transport provision such as a tram or light rail system and the Council is currently undertaking feasibility work on this with the support of Transport for London. Policy 23 includes a commitment to developing cycling and walking routes. A key element of the Local Plan is to ensure that new development respects and enhances the established character and appearance of the borough. The Local Plan includes commitments to recognising the significance and value of Havering’s heritage assets in Policy 28 Heritage Assets. The Council will keep under review existing Conservation Areas and develop management plans for these. Additionally, it will keep under review the scope for establishing new Conservation Areas. The Local Plan seeks to ensure that all new development has a satisfactory relationship with existing uses and communities. The Council will use planning conditions and other regulatory tools to ensure that development(s) do not have adverse impacts in regard to environmental traffic implications. The evidence bas for new homes is set out in the Strategic Housing Market Assessment (SHMA). The need for new infrastructure to support growth in Havering is set out in the Infrastructure Delivery Plan (IDP). The cumulative implications of developments are considered through the development management regime. The London Plan includes a policy regarding the use of land for food (Policy 7.22 Land for food) and does not need to be repeated in the Havering Local Plan. Proposals that come forward through the Self Build Register will be subject to normal development management processes and procedures and this will include appropriate notification to neighbours to provide them with the opportunity to review proposals and comment on them.</th>
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<tr>
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<td>LPREG19 - 399</td>
<td>Concerns over the Plans soundness due to the boroughs inability to meet its OAHN and DTC commitments</td>
<td>No modification proposed</td>
<td>The Outer North East London Strategic Housing Market Assessment 2016 indicates that there is a need for 1,366 new homes in Havering per annum. The Mayor of London sets minimum housing targets for each London Borough, and for Havering this is 1,170 homes per annum. The Local Plan identifies Romford and Rainham and Beam Park as Strategic Development Areas which have the capacity to deliver a significant amount of new housing. Both areas have also been designated as Housing Zones by the Mayor of London. The Council does not believe that there are ‘exceptional circumstances’ to warrant the release of Green Belt land to meet the Borough’s housing need. As stated in the Housing White Paper (page 21), the Government “seeks to maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.”</td>
</tr>
<tr>
<td>LPREG19 - 400</td>
<td>Concerns over proposed affordable housing</td>
<td>No modification proposed</td>
<td>The wording of policy 4 is consistent with the Mayor of London’s Affordable Housing and Viability SPG 2017 and is supported by the GLA’s Regulation 19 consultation response. Development proposals that do not meet the 35% threshold will be subject to a viability assessment to determine the level of provision that is viable. This is clearly set out in the second paragraph of policy 4.</td>
<td></td>
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</tbody>
</table>
The Local Plan addresses the requirements of Policy 3.8 Housing Choice in the London Plan and specifically the requirement in paragraph 3.50C that boroughs should demonstrate in their strategies and plans how they have addressed the local expression of strategic needs including through targets and performance indicators.

In line with this, paragraph 7.4.6 identifies indicative annual benchmark provision for additional specialist older persons accommodation which is set out in the London Plan. The figure of 185 units per year for Havering is identified in Annex A5 Table A5.1 of the current London Plan. It would be inappropriate for the Local Plan to have a presumption in favour of particular types of development if relevant targets were not achieved. The Local Plan will be kept under review and targets such as this will be considered in the annual Authority Monitoring Report.

The Council’s Vision - Havering Making a Greater London seeks to provide new homes in Havering and, in appropriate cases, the Council takes a positive and proactive stance in dealing with prospective private developers wishing to bring forward housing schemes in recognition of the importance of securing timely and high quality housing delivery.

In line with the Vision, the Local Plan Spatial Strategy acknowledges that the delivery of new homes is critical to London’s well-being. It sets out how the Council has approached the important topic of making sure that enough new homes are provided.

Havering has undertaken a Strategic Market Assessment to support the preparation of the Local Plan. Havering forms part of both the London-wide housing market area and the outer north east London sub housing market area with the London Boroughs of Barking and Dagenham and Redbridge. In line with the requirements of the National Planning Policy Framework, the Council has worked with these authorities to prepare its Strategic Housing Market Assessment (SHMA).

The resultant Outer North East London SHMA indicates that Havering’s full objectively assessed housing need is for 25,200 new homes over the period 2011-2033 or 1,145 homes per annum. Since the initial SHMA was undertaken, updated population projections have been published by the GLA. The updated population projections were reflected in an update (2017) of the SHMA which identified an increased housing need in Havering of 30,052 new homes over the same period (1,366 new homes per year).

It is noted that the objector considers that the Outer London SHMA – Update for Havering is generally robust.

The Council is making every effort to identify and bring forward suitable sites to exceed the current London Plan target and to meet housing need.

The Local Plan does not seek to constrain the number of new homes to come forward to 17,550 over the Plan period.

Further, the Council is aware that the current London Plan requires that boroughs should seek to close the gap between housing need (a assessed through a Strategic Housing Market Assessment) and supply.

The Council’s approach to providing new homes in the Havering Local Plan takes a balanced view about the importance of addressing housing requirements and securing sustainable development. Having undertaken recent studies to assess whether the Green Belt fulfils the roles identified in the National Planning Policy Framework, the Council is also committed to ensuring that the Green Belt is safeguarded. The Council has concluded that there are no exceptional circumstances to support releasing land from the Green Belt.

The Council’s commitment to the Green Belt is an important ‘driver’ in helping to secure new homes in Havering’s built up areas and through the important programmes being delivered through the Housing Zones and the Council’s estates regeneration programme (see below).

The Council’s strategy also recognises that the scope to accommodate growth in Havering will be dependent upon the provision of infrastructure especially that needed to provide effective and efficient movement within Havering as well as social and community infrastructure necessary for residents such as schools and health
facilities. The Council has prepared an Infrastructure Delivery Plan to support the Havering Local Plan and to inform the consideration of housing proposals.

Throughout the Local Plan process, the Council has rigorously sought to identify all sources of potential housing supply that will secure sustainable development in order to ensure that Havering is taking every opportunity to secure the delivery of new homes. This approach has been implemented to enable the gap between the housing targets in the London Plan and the objectively assessed need requirement to be closed as far as is reasonably possible.

The Housing Position Statement which supports the Havering Local Plan explains the Council’s approach to this in more detail. A element is that the Council considers that the certainty of securing housing delivery over the overall plan period must be taken into account against the numbers of units approved particularly in the initial years of the Local Plan being implemented.

It sets out that the Council considers that over the period of the plan to 2031, the potential overall supply of additional homes in Havering may exceed the minimum annual housing target of 1,170 new homes per year set out in the current London Plan.

In summary, the approach in the Local Plan that the Council will implement is based on:

- focussing the delivery of new homes in Havering’s two housing Zones at Romford and Rainham and Beam Park. These two areas are identified in the Local Plan as Strategic Development Areas and have individual comprehensive policy frameworks to guide and steer their development to make sure that development provides high quality places with inclusive communities and the timely and effective provision of infrastructure;
- supporting the intensification of twelve of its own existing housing estates through an ambitious regeneration programme that includes an experienced private sector development partner secured by means of a Joint Venture Limited Liability Partnership;
- realising the housing opportunities that come forward on large sites outside of the Strategic Development Areas to provide opportunities for place-making and building communities. These include sites such as the former St Georges Hospital site in Hornchurch;
- prioritising all land not designated for other planning purposes for new homes;
- encouraging the effective use of land by re-using previously developed (brownfield) land and allocating a range of sustainable sites for housing development. The latter will be identified in the forthcoming Site Specific Allocations Local Plan.

The Local Plan Housing Position Statement sets out in more detail the specific potential housing opportunities that will come forward for the two Housing Zones and the Council’s twelve estates programme.

The Housing Position Statement identifies specific deliverable and developable sites for the first 10 years of the Plan. The Council is committed to ensuring that there is a sufficient supply of housing over the 15 year plan period and beyond and will therefore undertake an early review of the Plan.

The Statement also includes details of sites which it is anticipated will be included in the forthcoming Site Specific Allocations Local Plan document which will reflect up to date capacity studies where appropriate.

Underpinning the Council’s approach is a clear recognition of the importance of optimising the development potential of the sites in regard to their potential capacity whilst ensuring that they provide satisfactory residential environment for residents and maintaining the character and appearance of Havering. There is an emphasis on making sure the place-making role of new development is addressed and a focus on delivering places where communities can flourish and be cohesive and inclusive.

As a result of this approach, sufficient land has been identified to meet the minimum London Plan housing target for the first 10 years of the Local Plan if the delivery is taken over the 10 year period.

The Council considers that the greater certainty that is encompassed through the Housing Zones and the twelve
estates programme should weigh heavily in their favour and help counter the potential numerical shortfall in housing delivery in the first five years.

Additionally, the Council anticipates that because of the publication of the London Plan and the anticipated revision of the National Planning Policy Framework, it will be appropriate to bring forward an early review of the Havering Local Plan. This is likely to involve a further call for sites and this may yield further development opportunities.

<table>
<thead>
<tr>
<th>LPREG19 - 402</th>
<th>Replacement of ref. to the Lifetime Home standard</th>
<th>Modification to Policy 7 Residential Design and Amenity Standards and Lifetime Neighbourhoods</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Paragraph 7.5.3 Developments will be expected to deliver ‘lifetime’ homes and ‘lifetime’ neighbourhoods reflecting the six principles relating to access, services and amenities, built and natural environments, social network and well-being, and housing. By developing homes which are adaptable to change based on the needs of residents, it will facilitate greater pride and sense of community.</td>
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<td></td>
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<td>Modification to Glossary - Lifetime Home Standards: Lifetime Homes are ordinary homes designed to incorporate 16 design criteria that can be universally applied to new homes at minimal cost. Each design feature adds to the comfort and convenience of the home and supports the changing needs of individuals and families at different stages of life.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Taylor Wimpey Strategic Land</th>
<th>LPREG19 - 209</th>
<th>Green Belt Site</th>
<th>No modification proposed</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>The Outer North East London Strategic Housing Market Assessment 2016 indicates that there is a need for 1,366 new homes in Havering per annum. The Mayor of London sets minimum housing targets for each London Borough, and for Havering this is 1,170 homes per annum. The Local Plan identifies Romford and Rainham and Beam Park as Strategic Development Areas which have the capacity to deliver a significant amount of new housing. Both areas have also been designated as Housing Zones by the Mayor of London.</td>
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<td></td>
<td>The Council does not believe that there are ‘exceptional circumstances’ to warrant the release of Green Belt land to meet the Borough’s housing need. As stated in the Housing White Paper (page 21), the Government “seeks to maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.”</td>
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<td></td>
<td>The Council has prepared two Green Belt Studies in 2016 and 2018. The first Green Belt Study was undertaken by the London Borough of Havering in association with PBA and Enderby Consultants. This study assessed the contribution that land within the Green Belt makes to the Green Belt purposes (as defined in para 80 of the NPPF). To aid the assessments, the Green Belt in the Borough was divided into 24 land parcels. A performance value was attributed to the parcels for each purpose, based on predefined criteria. The study found that all 24 parcels make a contribution to Green Belt purposes, with 19 of the 24 Green Belt parcels making a fundamental contribution to the Green Belt purposes. A further four parcels were found to make a high or moderate/high contribution and only one parcel was found to make a low contribution.</td>
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<td></td>
<td>A second Green Belt Study was prepared by LUC in 2018. The aim of this study was to provide conclusions on the potential degree of harm that may occur if the sites (which had been submitted to the Council as part of the Regulation 19 Consultation) were released from the Green Belt. This took account of three elements: 1) the contribution of the sites to the NPPF Green Belt purposes, 2) the potential impact on the wider integrity of the Green Belt and 3) the strength of revised Green Belt boundaries that would remain if the site was to be released. Out of a total of 84 sites assessed (with a total area of 849ha):</td>
<td></td>
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</tbody>
</table>
- 46 sites (total area of 682ha, which is 80.3% of the total area of the 84 sites) rated as ‘high’ in terms of harm to Green Belt resulting from release.
- 21 sites (120ha, 14.1%) rated as ‘moderate-high’ in terms of harm to Green Belt resulting from release.
- 9 sites (24ha, 2.9%) rated as ‘moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (17ha, 2%) rated as ‘low-moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (6ha, 0.7%) rated as ‘low’ in terms of harm to Green Belt resulting from release.

The site proposed in this representation by Taylor Wimpey (GB79) falls within parcel 4 of the Stage 1 Study. This Study concluded that the parcel makes a fundamental contribution to the Green Belt. The site was also assessed in the Stage 2 study and this Study concludes that releasing the site from the Green Belt would lead to a high degree of harm to the Green Belt. The reasons for this being:

- The Site lies adjacent to the large built-up area of Havering but relates to the wider countryside – development would represent expansion of the large built-up area into the open countryside.
- The Site forms part of the Green Belt gap that separates the settlements of Upminster and Rainham. Release of the Site would lead to physical narrowing of the gap between them.
- The Site is rural in character and clearly displays the characteristics of the countryside, with limited urbanising influence from the adjacent roads, settlement edge and onsite development. Development of the Site would lead to the encroachment of the countryside.
- Development of the Site would also cause the neighbouring Green Belt land to the northwest to be enclosed by development on three sides. The overall harm to the Green Belt resulting from release of this Site would therefore be High.

Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 4 of the 13 sustainability criteria, and ‘green’ (signifying that the site could perform well in sustainability terms) in relation to 9 of the criteria.

| LPREG19 - 395 | Green Belt Site | No modification proposed | See response to LPREG19 -209 above. |
| LPREG19 - 396 | Green Belt Site | No modification proposed | See response to LPREG19 -209 above. |
| LPREG19 - 397 | Green Belt Site | No modification proposed | See response to LPREG19 -209 above. |
| LPREG19 - 398 | Modification proposed to support increased public access to new outdoor sport facilities within the Green Belt | No modification proposed | As part of any application for a new outdoor sports facility in the green belt, the accessibility of a scheme would be assessed. |
| ADREG19 -10 | Sustainability Appraisal | No modification proposed | The Council’s Objectively Assessed Housing Need is based on up-to-date evidence. No changes are therefore needed. |

Table 4.2 For the purposes of generating the fourth and fifth options, a hypothetical figure of 1,360 was used with respect to the number of houses that might conceivably be accommodated on land released from the Green Belt. This figure was based on professional planning judgement, taking into account a number of factors, including the need to release sufficient land to provide for associated infrastructure development as well as the likelihood that any release of Green Belt would not take place until at least the middle part of the plan period and would be unlikely to deliver more than ~250-300 homes per year (bearing in mind the options only cover the first ten years of the plan period). The figure is further supported by the findings of the Phase 2 Green Belt Study, which indicates that lower scoring previously developed sites in the Green Belt have a similar capacity to
the figure evaluated through the options. Both Rainham and Beam Park and Romford have been granted Housing Zone funding. The Council is working actively with landowners and developers to bring forward sites in these areas. The Council is therefore confident that focusing development in these areas is available, suitable and achievable.

The Council has prepared additional evidence to support the Submission of the Local Plan which assesses the performance of the Green Belt sites against the NPPF purposes as well as their sustainability performance, including accessibility.

The findings of the Stage 2 Green Belt assessment support the spatial strategy of the Local Plan, by showing that harm would be done to the Green Belt by releasing the majority of the sites, including Little Gaynes Lane. Please refer to the Council’s response comment LPREG19 -209.

### CPRE London

<table>
<thead>
<tr>
<th>LPREG19 - 374</th>
<th>Modification proposed to Parking provision and design policy</th>
<th>No modification proposed.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>The Council’s parking policy (policy 24) has been informed by a Residential Car Parking Standards study which has drawn together a range of evidence to help inform the car parking standards for the borough having regard to the particular circumstances in Havering. Policy 24 recognises that as an outer London Borough for many residents there is a higher dependency on the car, compared to central and inner London where public transport provision is much more accessible. The policy seeks to recognise that many local journeys in Havering must be made by car because they are impractical to make by public transport. Although parts of Havering are well connected by public transport to destinations outside of the borough, many more local destinations do not have reasonable public transport access and this is reflected in the higher levels of car ownership and usage in Havering. In this regard Havering is typical of many other outer London boroughs. The Council recognises the importance of encouraging public transport use and Policy 23 states that new developments will be required to optimise sustainable access and other transport connections, where applicable. The policy goes on to state that new developments will provide an opportunity for the Council to seek financial contributions that can improve public transport access. The Council however is mindful of limitations of the existing public transport services for some local journeys in Havering.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>LPREG19 - 375</th>
<th>Concerns over Havering’s Housing supply</th>
<th>No modification proposed</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>The Local Plan Spatial Strategy acknowledges that the delivery of new homes is critical to London’s well-being. It sets out how the Council has approached the important topic of making sure that enough new homes are provided. Section 7 Successful Places to Live outlines how the Local Plan will ensure that enough homes are delivered for Havering and confirms that over the Plan Period, at least 17,550 new homes will be built in Havering. The Housing Position Statement identifies housing delivery in Havering over the period 2004/05-2016/17. Table 3.1 shows that the yearly average for this period has been around 560 new units per year. The Havering Local Plan has to respond to the National Planning Policy Framework and London Plan in identifying its sites for housing and annual targets for the delivery of homes. The London Plan identifies an annual target for Havering of 1,170 new homes per year. Havering’s Local Plan has to be in general conformity with the London Plan and will be found ‘unsound’ if it does not allocate adequate sites for housing. The objector refers to the recent Government consultation Planning for the right homes in the right places. This identified a housing need figure of 1,821 new homes per year (considerably greater than the figure that Havering has identified in its Local Plan and supporting Strategic Housing Market Assessment SHMA). The Council has objected very robustly to the Government consultation on the basis that the methodology used</td>
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</table>
to establish the figure of 1,821 new homes per year is flawed and unrealistic. It would contribute to the erosion of the established character and appearance of Havering and would not provide the necessary supporting infrastructure.

See response to LPREG19 -209 above.

The Council commissioned consultants ORS to undertake a Gypsy and Traveller Accommodation Assessment as part of the evidence base for the Havering Local Plan. This was published in 2017 alongside the Proposed Submission Local Plan as part of the Regulation 19 consultation.

During and after the consultation a number of gypsy and traveller families (who had not been available or who had previously declined to be interviewed) contacted the Council so that their accommodation needs could be assessed. Further interviews were undertaken and a revised Gypsy and Traveller Accommodation Assessment (March 2018) has been prepared. The Council is proposing modifications to the Local Plan to enable the full identified need for gypsy and traveller pitches to be met.

Please refer to the Gypsy and Traveller Accommodation Assessment (March 2018) and the Gypsy and Traveller Position Statement (March 2018) for further information.
| LPREG19 - 372 | Concerns over Muslim Burial Space  
Policy 16 Social Infrastructure  
Paragraph 8.5.7 | 1. Capacity at Rainham Jewish Cemetery – All remaining capacity at Rainham cemetery is available for multi faith burials, meaning there is capacity for all faiths. The Council is therefore justified to refer to this capacity in the Infrastructure Delivery Plan, although it is not included within capacity calculations.  
2. Site allocation of Oak Farm – The Havering Local Plan does not contain site allocations. The Council will prepare a separate Site Specific Allocations Local Plan, for which consideration will be given to all sites across a range of uses. The allocation of Oak Farm is therefore outside of the remit of the Local Plan.  
3. Capacity figures of Elmbridge Road site – The figures included in the Infrastructure Delivery Plan were based on the then latest available data. These figures have been revised following the 2016 Peter Mitchell Report.  
4. Wording of paragraph 8.5.7 – Amendment is proposed to allow for burial provision based on up-to-date evidence. |
| Ptarmigan Land | LPREG19 - 212 | Green Belt Site  
No modification proposed | The Outer North East London Strategic Housing Market Assessment 2016 indicates that there is a need for 1,366 new homes in Havering per annum. The Mayor of London sets minimum housing targets for each London Borough, and for Havering this is 1,170 homes per annum. The Local Plan identifies Romford and Rainham and Beam Park as Strategic Development Areas which have the capacity to deliver a significant amount of new housing. Both areas have also been designated as Housing Zones by the Mayor of London.  
The Council does not believe that there are ‘exceptional circumstances’ to warrant the release of Green Belt land to meet the Borough’s housing need. As stated in the Housing White Paper (page 21), the Government “seeks to maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.”  
The Council has prepared two Green Belt Studies in 2016 and 2018. The first Green Belt Study was undertaken by the London Borough of Havering in association with PBA and Enderby Consultants. This study assessed the contribution that land within the Green Belt makes to the Green Belt purposes (as defined in para 80 of the NPPF). To aid the assessments, the Green Belt in the Borough was divided into 24 land parcels. A performance value was attributed to the parcels for each purpose, based on predefined criteria. The study found that all 24 parcels make a contribution to Green Belt purposes, with 19 of the 24 Green Belt parcels making a fundamental contribution to the Green Belt purposes. A further four parcels were found to make a high or moderate/high contribution and only one parcel was found to make a low contribution.  
A second Green Belt Study was prepared by LUC in 2018. The aim of this study was to provide conclusions on the potential degree of harm that may occur if the sites (which had been submitted to the Council as part of the Regulation 19 Consultation) were released from the Green Belt. This took account of three elements: 1) the contribution of the sites to the NPPF Green Belt purposes, 2) the potential impact on the wider integrity of the Green Belt and 3) the strength of revised Green Belt boundaries that would remain if the site was to be released. Out of a total of 84 sites assessed (with a total area of 849ha):  
- 46 sites (total area of 682ha, which is 80.3% of the total area of the 84 sites) rated as ‘high’ in terms of harm to Green Belt resulting from release.  
- 21 sites (120ha, 14.1%) rated as ‘moderate-high’ in terms of harm to Green Belt resulting from release.  
- 9 sites (24ha, 2.9%) rated as ‘moderate’ in terms of harm to Green Belt resulting from release.  
- 4 sites (17ha, 2%) rated as ‘low-moderate’ in terms of harm to Green Belt resulting from release.  
- 4 sites (6ha, 0.7%) rated as ‘low’ in terms of harm to Green Belt resulting from release.  
The site proposed in this representation by Ptarmigan Land (GB44) falls within parcel 17 of the Stage 1 Study. This Study concluded that the parcel makes a fundamental contribution to the Green Belt. The site was also assessed in the Stage 2 study and this Study concludes that releasing the site from the Green Belt would lead to moderate-high degree of harm to the Green Belt. The reasons for this being:  
- The site lies adjacent to the large built-up area of Havering but is related strongly to the wider |
The site lies between the settlements of Collier Row and Harold Hill. Development within the Site would lead to the erosion of part of the gap between the settlements.

- There is some sense of encroachment within the Site as a result of the residential dwelling, stationary caravans and corrugated metal structures but the urbanising influences are limited and the Site is open and the Green Belt is preventing further encroachment of the countryside.

- Release of this site would weaken the contribution of adjacent Green Belt land to the north, south and east. The overall harm to the Green Belt resulting from release of this site would therefore be Moderate-High.

Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as 'red' (signifying that the site could perform poorly in sustainability terms) in relation to 3 of the 13 sustainability criteria, and 'green' (signifying that the site could perform well in sustainability terms) in relation to 6 of the criteria.

### GLA

<table>
<thead>
<tr>
<th>GLA</th>
<th>Concerns over Car parking standards</th>
<th>No modification proposed</th>
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</thead>
<tbody>
<tr>
<td>GLA</td>
<td>The Council’s parking policy (policy 24) has been informed by a Residential Car Parking Standards study which has drawn together a range of evidence to help inform the car parking standards for the borough having regard to the particular circumstances in Havering.</td>
<td></td>
</tr>
<tr>
<td>GLA</td>
<td>Policy 24 recognises that as an outer London Borough, for many residents there is a higher dependency on the car, compared to central and inner London where public transport provision is much more accessible. The policy seeks to recognise that many local journeys in Havering must be made by car because they are impractical to make by public transport. Although parts of Havering are well connected by public transport to destinations outside of the borough, many more local destinations do not have reasonable public transport access and this is reflected in the higher levels of car ownership and usage in Havering. In this regard Havering is typical of many other outer London boroughs.</td>
<td></td>
</tr>
<tr>
<td>GLA</td>
<td>The current London Plan recognises that in Outer London boroughs in areas of low public transport accessibility, residents' dependency on cars should be taken into account when considering parking standards.</td>
<td></td>
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<tr>
<td>GLA</td>
<td>Furthermore paragraph 6.42i states that such standards could include minima, and that higher levels of provision than are set out in Table 6.2 of the London Plan would be permitted, where appropriate.</td>
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</tr>
<tr>
<td>GLA</td>
<td>For areas of low accessibility (PTAL 0-2), minimum parking standards have been set out which are consistent with para 6.42i of the London Plan.</td>
<td></td>
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<tr>
<td>GLA</td>
<td>The London Plan expects that in areas of good public transport accessibility (PTAL 5-6) in all parts of London developments should aim for significantly less than one space per unit. The Council considers that this does not adequately reflect the position in Havering regarding the practicalities of making journeys within the borough and the consequent ownership and usage levels of private cars.</td>
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<thead>
<tr>
<th>LPREG19 - 414</th>
<th>Support for Havering’s Spatial Strategy</th>
<th>No modification proposed</th>
</tr>
</thead>
<tbody>
<tr>
<td>LPREG19 - 414</td>
<td>Support noted</td>
<td></td>
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<table>
<thead>
<tr>
<th>LPREG19 - 415</th>
<th>Housing Supply</th>
<th>Policy 3 Housing supply</th>
</tr>
</thead>
<tbody>
<tr>
<td>LPREG19 - 415</td>
<td>The delivery of new homes will also be achieved by:</td>
<td></td>
</tr>
<tr>
<td>LPREG19 - 415</td>
<td>Insert new bullet point between viii. and ix.</td>
<td></td>
</tr>
<tr>
<td>LPREG19 - 415</td>
<td>New ix:</td>
<td></td>
</tr>
<tr>
<td>LPREG19 - 415</td>
<td>Supporting residential development proposals around stations where it is compatible with the design and character of the local area. Major development proposals around stations will be subject to design review.</td>
<td></td>
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</tbody>
</table>

84
<table>
<thead>
<tr>
<th>Reference</th>
<th>Policy Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>LPREG19 - 416</strong>&lt;br&gt;Affordable housing</td>
<td>Policy 4 Affordable Housing&lt;br&gt;Paragraph 7.2.2&lt;br&gt;The Outer North East London SHMA estimates that of the 30,052 new homes needed in Havering over the period 2011-2033, 35% (10,520) of these are required to be affordable. The Council, therefore, considers it appropriate to seek at least 35% affordable housing from new developments. This is also consistent with the London Plan and the Mayor’s Draft Affordable Housing and Viability Supplementary Planning Guidance (2016), (2017) which includes a long term strategic aim for 50% of new homes to be affordable and a 35% threshold approach as detailed in paragraph 7.2.4</td>
</tr>
<tr>
<td><strong>LPREG19 - 417</strong>&lt;br&gt;Ceiling heights</td>
<td>Policy 7 Residential Design and Amenity&lt;br&gt; iv. Meet the National Space Standards and the London Plan requirement for floor to ceiling heights of 2.5m</td>
</tr>
<tr>
<td><strong>LPREG19 - 418</strong>&lt;br&gt;Support for Havering’s Business Growth Policy</td>
<td>No modification proposed&lt;br&gt;Support noted, please refer to the modifications proposed in response to LPREG19 - 103</td>
</tr>
<tr>
<td><strong>LPREG19 - 419</strong>&lt;br&gt;Support for Havering’s Town Centre development Policy</td>
<td>No modification proposed&lt;br&gt;Support noted</td>
</tr>
<tr>
<td><strong>LPREG19 - 420</strong>&lt;br&gt;Culture</td>
<td>Modification to Policy 15 Culture and creativity&lt;br&gt;Insert new paragraph between existing paragraphs 8.4.2 and 8.4.3.&lt;br&gt;Havering is identified by the Mayor of London’s in the Thames Estuary Production Corridor, which seeks to develop facilities for artistic and creative production from Eastern London to Southend. The Thames Estuary Production Corridor vision document already identifies Rainham’s Centre for Engineering and Manufacturing Excellence as contributing to the production corridor of creative industries.</td>
</tr>
<tr>
<td><strong>LPREG19 - 421</strong>&lt;br&gt;Green belt</td>
<td>No modification proposed&lt;br&gt;Support noted</td>
</tr>
<tr>
<td>Francie Dooley</td>
<td>LPREG19 - 127&lt;br&gt;Gypsy and Traveller Policy</td>
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<td>Francie Dooley</td>
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(2016 – 2021), and the remaining 213 pitches in the latter part of the plan period. No additional need has been identified for plots for Travelling Showpeople over the 15 year plan period (2016-2031).

Paragraph 7.9.5:

The sites are identified on the Proposals Map and are listed below. In order to provide firm controls and prevent further intensification, a maximum number of pitches will be permitted on each site as set out below:

- Tyas Stud Farm rear of Latchford Farm - maximum of 5 pitches
- Vinegar Hill - maximum of 12 pitches
- Hogbar Farm West - maximum of 14 pitches
- Ashlea View, Tomkyns Lane - maximum of 2 pitches
- Benskins Lane - maximum of 12 pitches
- Fairhill Rise - maximum of 2 pitches
- Hogbar Farm East - maximum of 17 pitches
- Lower Bedfords Road - maximum of 3 pitches
- The Caravan Park, Putwell Bridge - maximum of 2 pitches
- Willow Tree Lodge - maximum of 3 additional pitches (1 pitch already has permanent planning permission)
- Church Road - maximum of 18 pitches

Paragraph 7.9.8

Where further sites are proposed the Council will ensure that they are required to meet legitimate additional borough need. When considering applications for Gypsy and Traveller sites and Travelling Showpersons plots, the Council will take into account the policy criteria outlined in Policy 11 in addition to the requirements of National Policy.

Carebase

| Carebase LPREG19 - 128 | Green belt site / Care Home | No modification proposed |

The Outer North East London Strategic Housing Market Assessment 2016 indicates that there is a need for 1,366 new homes in Havering per annum. The Mayor of London sets minimum housing targets for each London Borough, and for Havering this is 1,170 homes per annum. The Local Plan identifies Romford and Rainham and Beam Park as Strategic Development Areas which have the capacity to deliver a significant amount of new housing. Both areas have also been designated as Housing Zones by the Mayor of London.

The Council does not believe that there are ‘exceptional circumstances’ to warrant the release of Green Belt land to meet the Borough’s housing need. As stated in the Housing White Paper (page 21), the Government “seeks to maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.”

The Council has prepared two Green Belt Studies in 2016 and 2018. The first Green Belt Study was undertaken by the London Borough of Havering in association with PBA and Enderby Consultants. This study assessed the contribution that land within the Green Belt makes to the Green Belt purposes (as defined in para 80 of the NPPF). To aid the assessments, the Green Belt in the Borough was divided into 24 land parcels. A performance value was attributed to the parcels for each purpose, based on predefined criteria. The study found that all 24 parcels make a contribution to Green Belt purposes, with 19 of the 24 Green Belt parcels making a fundamental contribution to the Green Belt purposes. A further four parcels were found to make a high or moderate/high contribution and only one parcel was found to make a low contribution.

A second Green Belt Study was prepared by LUC in 2018. The aim of this study was to provide conclusions on the
potential degree of harm that may occur if the sites (which had been submitted to the Council as part of the Regulation 19 Consultation) were released from the Green Belt. This took account of three elements: 1) the contribution of the sites to the NPPF Green Belt purposes, 2) the potential impact on the wider integrity of the Green Belt and 3) the strength of revised Green Belt boundaries that would remain if the site was to be released. Out of a total of 84 sites assessed (with a total area of 849ha):

- 46 sites (total area of 682ha, which is 80.3% of the total area of the 84 sites) rated as ‘high’ in terms of harm to Green Belt resulting from release.
- 21 sites (120ha, 14.1%) rated as ‘moderate-high’ in terms of harm to Green Belt resulting from release.
- 9 sites (24ha, 2.9%) rated as ‘moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (17ha, 2%) rated as ‘low/moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (6ha, 0.7%) rated as ‘low’ in terms of harm to Green Belt resulting from release.

The site proposed in this representation by Carebase (GB885) falls within parcel 6 of the Stage 1 Study. This Study concluded that the parcel makes a fundamental contribution to the Green Belt. The site was also assessed in the Stage 2 study and this Study concludes that releasing the site from the Green Belt would lead to a moderate-high degree of harm to the Green Belt. The reasons for this being:

- The site lies adjacent to the large built-up area of Havering. The Site makes a limited contribution to preventing sprawl as it is enclosed by residential development to the east and school buildings to the south-west and therefore there is already a perception of sprawl and encroachment.
- The site plays a negligible role in the preventing the merging or erosion of the physical gap between Upminster and South Ockendon.
- The site is open and undeveloped, however, the urbanising influences adjacent to the Site and presence of playing fields to the south means that there is limited sense of this area forming part of the countryside and therefore it plays a limited role safeguarding the countryside from encroachment.

Release of this site would however weaken the contribution to the Green Belt of land to the east, west and to a lesser extent the south due to a lack of distinction and separating features from the school site and properties to the east, this would thereby call into question their Green Belt status and could result in a weakening of the overall Green Belt in the area. The overall harm to the Green Belt would therefore be moderate-high. Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 4 of the 13 sustainability criteria, and ‘green’ (signifying that the site could perform well in sustainability terms) in relation to 8 of the criteria.

### Hollybrook

| LPREG19 - 388 | Concerns over Policy 20 - Loss of Industrial Land | Modification proposed to Policy 20 Loss of industrial land | Amend policy title to: Loss of locally significant industrial sites and non-designated land

The Council will keep under review the provision of Locally Significant Industrial Sites (LSISs) and non-designated industrial land as part of its commitment to ensuring that Havering has a strong and prosperous economy

The Council will only support the loss of non-designated industrial land

| ADREG19-4 | Proposals Map Changes Booklet | No modification proposed | See response to comments LPREG 19-128 - LPREG19-130 |
and floorspace in Havering where it can be demonstrated that:

The change of use from industrial employment uses will not lower the industrial capacity of the borough below that necessary to meet projected demand over the planning period as estimated by the most up to date Havering Employment Land Review;

The existing employment land use causes unacceptable detrimental effects, that cannot be mitigated, on the amenity of nearby residential areas; and

There is no market interest in the site following one year of continuous active marketing.

Additional text in policy headline:

In considering proposals for the loss of LSISs and non-designated industrial land, the Council will take into account the wider land-use objectives of the Local Plan because the release of land which is no longer needed for employment use may assist in securing these.

The Council will require the re-provision of non-designated industrial land where it is located within a wider area of commercial uses (such as retail) in the event of proposals being submitted for redevelopment of the wider area except in cases where this policy accepts their loss.

Changes to explanatory text:

9.2.1 Locally Significant Industrial Sites (LSISs) are of local significance for industry and warehousing. Non-designated industrial land and floorspace comprises land and floor space last used for employment use or land and floorspace which is currently in employment use but does not lie within the area identified and safeguarded as a Strategic Industrial Location (SIL) or a Locally Significant Industrial Site (LSIS).

9.2.2 The underlying purpose of Policy 20 is to protect and where possible enhance the employment potential of the existing non safeguarded employment land and floorspace. The policy provides some flexibility which aims to recognise individual site characteristics and allow some very limited loss of employment land and floor space where significant unacceptable detrimental effects on amenity of nearby residential uses and no market interest are clearly demonstrated. The policy thrust is therefore to ensure that not too much industrial land and floorspace is released as this could hinder the long term economic prospects of the borough.

Replacement paragraph 9.2.2

In line with the focus on a strong economy in Havering, the purpose of Policy 20 is to protect and where possible enhance the employment potential of the existing Locally Significant Industrial Sites and non-designated employment land and floorspace.

New paragraph 9.2.3

Although the focus of Policy 20 is to seek to protect Locally Significant Industrial Sites and non-designated industrial land, the Council recognises
that the policy should provide for some flexibility in the extent to which industrial land is safeguarded. Providing this scope for some flexibility is important because the Council recognises that in Havering there is considerable pressure to accommodate a range of important land uses including housing and infrastructure as well as industrial / employment. In taking this approach, the Council will always carefully consider up to date evidence as to how the proposed change of use from industrial / employment uses will impact on the overall industrial capacity of Havering over the Plan Period. It will also examine information arising from the marketing of the site to ensure that the site / land is genuinely surplus to employment requirements.

9.2.4 As already noted in Policy 19 on Business Growth, the Havering Employment Land Review (ELR) (2015) identified 19.5 hectares of land previously designated for its local significance and an additional 4-5ha from non-designated employment uses to be released over the Plan period making the overall amount of employment land to be released not greater than 24 hectares to be released from designated industrial employment use to enable wider regeneration benefits. The ELR further advised that an additional 4 to 5 hectares of employment land could be released from other non-designated sites over the Plan Period, making the overall amount of employment land to be released not greater than 25 hectares. To allow for a loss bigger than the recommended 24 hectares benchmark would undermine Havering’s economic development objectives. Companies seeking to expand or start a business in Havering in the future may not have sufficient land or business premises to do so. There are approximately 50 hectares of non-designated industrial sites remaining in the borough. These generally perform well as employment areas, meeting the needs of local businesses. By resisting further erosion of this type of employment land and floorspace this policy is seeking to maintain business land and spaces for local business.

Renumber paragraphs 9.2.4 and 9.2.5 as 9.2.5 and 9.2.6, respectively.

Add new paragraph:

9.2.7 Some non-designated industrial land and floorspace is located within larger sites that include other uses such as retail. The Council recognises that in such cases redevelopment of the overall site may provide an important opportunity to secure a more advantageous distribution and allocation of land uses having regard to factors such as the characteristics of the site and its surroundings. In such cases, the Council will expect the wider redevelopment proposal to make suitable re-provision for the non-designated industrial land where the policy requires that it is retained. Any subsequent proposals for the loss of the non-designated land will be assessed against the policy requirements in order to ensure that there is no incremental loss of industrial land over the Plan Period.

LPREG19 - 390 | Objection to Affordable Housing Policy
---|---
No modification proposed

The threshold requirement of Policy 4 Affordable Housing is consistent with the London Plan (Policy 3.13 Affordable Housing Thresholds) which requires affordable housing to be provided on sites which have a capacity to provide 10 or more homes.
The requirement that affordable homes be provided on sites with an area of more than 1,000 sqm reflects that market housing in Havering is unaffordable for many people. It recognises that the Council is committed to securing the highest levels of affordable housing contributions to help address this.

The tenure mix requirements of Policy 4 take account of the findings in the Strategic Housing Market Assessment Update for Havering (SHMA) which identified a necessary tenure split of 80:20 (social affordable rent:intermediate provision). The requirement in the policy acknowledges that circumstances in Havering will make it challenging to secure the full 80:20 split and was prepared to be in line with emerging GLA policy. It also reflects the Council’s own analysis of household incomes. The Council will monitor progress towards this and will keep the issue under review.

The wording of policy 4 is consistent with the Mayor of London’s Affordable Housing and Viability SPG 2017 and is supported by the GLA’s Regulation 19 consultation response. Development proposals that do not meet the 35% threshold will be subject to a viability assessment to determine the level of provision that is viable. This is clearly set out in the second paragraph of policy 4.

The Council acknowledges that requiring schemes to be of high quality may impact on viability but it is essential that all housing schemes seek to provide a high standard of residential amenity and create high quality places. It would be inappropriate to exclude affordable housing from the Council’s objectives of ensuring that all schemes should deliver high quality buildings and places.

It would be inappropriate to exclude policy compliant schemes from the review mechanism as the Council’s intention is to maximise the opportunities for affordable homes to be provided and this provides the opportunity for schemes to be reviewed to assist in that. The London Plan Policy 3.12 Negotiating Affordable Housing on Individual private residential and mixed use schemes includes provision for review of schemes prior to implementation and supports boroughs taking a rigorous approach to evaluation (para 3.71).

It is not appropriate to require only multi-phase schemes to be subject to review mechanisms.

The reference to engagement with Registered Providers in paragraph 7.2.6 reflects that Registered Providers with their finances and operating models are in a much better place to increase the level of affordable housing provided by such developments (either with grant or not). Early engagement, allows them to agree certain parameters with the developers such as values, purchase prices, design, public realm etc and this can contribute to securing a better scheme.

Objection to part ix of the Residential Design and Amenity Policy

Modification to Policy 7 Residential Design and Amenity

ix. Maximises the provision of dual aspect accommodation unless exceptional circumstances are demonstrated;

Insert a new additional paragraph between paragraphs 7.5.4 and 7.5.5.

New paragraph 7.5.4:

New development in Havering should be of a high quality and offer a good quality living environment for residents. Dual aspect accommodation offers a range of benefits such as better daylight, a greater chance of direct sunlight for longer periods, natural cross ventilation, mitigating pollution, offering a choice of views, greater flexibility and adaptability. In line with the Mayor’s Housing SPG 2016 developments should minimise the number of single aspect dwellings Single aspect dwellings that are north facing, or exposed to noise levels above which significant adverse effects on health and quality of life occur, or which contain three or more bedrooms should be avoided.
| LPREG19 - 393 | Objection to proposed car parking standards (Policy 24) | No modification proposed. | The Council will always seek to optimise the use of sites in development proposals but it has to recognise several issues and factors (including car parking provision) have to be taken into account.

The Council’s parking policy (Policy 24) has been informed by a Residential Car Parking Standards study which has drawn together a range of evidence to help inform the car parking standards for the borough having regard to the particular circumstances in Havering.

Policy 24 recognises that as an outer London Borough for many residents there is a higher dependency on the car, compared to central and inner London where public transport provision is much more accessible. The policy seeks to recognise that many local journeys in Havering must be made by car because they are impractical to make by public transport. Although parts of Havering are well connected by public transport to destinations outside of the borough, many more local destinations do not have reasonable public transport access and this is reflected in the higher levels of car ownership and usage in Havering. In this regard Havering is typical of many other outer London boroughs.

The London Plan expects that in areas of good public transport accessibility (PTAL 5-6) in all parts of London developments should aim for significantly less than one space per unit. The Council considers that this does not adequately reflect the position in Havering regarding the practicalities of making journeys within the borough and the consequent ownership and usage levels of private cars.

For highly accessible parts of the borough (PTAL 5-6), the parking standards set out in Policy 24 recognise that a minimum parking standard of 0.5 spaces per unit is appropriate having regard to the particular circumstances involved.

| LPREG19 - 394 | Calls for the definition of "Local labour" to be outlined within Policy 22 Skills & Training | Modification to Policy 22 Skills and training  
New paragraph 9.4.7  
For the purpose of Policy 22 'Local' refers to the location of permanent operation of business or location of resident’s home being within the London Borough of Havering | The support for Policy 3 is noted particularly the support for part (vii) which seeks to prioritise non designated land for housing when it becomes available.

The Housing Position Statement sets out the delivery of housing from 2004/05 to 2016/17. It confirms that the average annual delivery over this period is some 560 new units per year.

Havering acknowledges that this falls short of the current annual monitoring target set out in the London Plan(1,170 new homes per year) and that there is a cumulative shortfall.

| LPREG19 - 389 | Concerns over Havering’s future Housing supply | No modification proposed | The support for Policy 3 is noted particularly the support for part (vii) which seeks to prioritise non designated land for housing when it becomes available.

The Housing Position Statement sets out the delivery of housing from 2004/05 to 2016/17. It confirms that the average annual delivery over this period is some 560 new units per year.

Havering acknowledges that this falls short of the current annual monitoring target set out in the London Plan(1,170 new homes per year) and that there is a cumulative shortfall.
The Housing Position Statement shows that delivery has exceeded the target in 5 years and under delivered in 8 years. It notes that Havering’s delivery record is characterised by a mixture of over and under delivery which is reflective of the peaks and troughs of the housing market cycle. Several years of under delivery were immediately after the 2008 financial crisis and the subsequent recession that followed. As this has passed, the delivery of new homes has increased and has moved in a positive direction. Havering considers that the past under delivery is not persistent but linked to cyclical fluctuations linked to wider economic cycles.

Most of the cumulative under delivery has taken place between 2010 and 2013. These were years in which the building of residential properties across the UK was at low levels because of the wider economic situation. The Housing Position Statement explains that Havering had a record of cumulative over delivery against its housing targets until 2011/12. Havering considers that the cumulative under delivery can be considered as representative of a short period of very low delivery rather than persistent under delivery.

The Housing Position Statement shows that housing delivery has stepped up considerably since 2013/14. This reflects a greater focus on securing delivery in recent years.

It has been reflected in the Council’s Local Plan Spatial Strategy which acknowledges that the delivery of new homes is critical to London’s success. Through the preparation of the Havering Local Plan the Council is making every effort to identify and bring forward suitable sites for new homes. In doing this it takes a balanced view about the importance of providing new homes and securing sustainable developments. It places a high priority on place-making and providing the setting for inclusive and cohesive communities. It looks to maintain and enhance the character and appearance of Havering.

The Housing Position Statement identifies specific deliverable and developable sites for the first 10 years of the Plan. The Council is committed to ensuring that there is a sufficient supply of housing over the 15 year plan period and beyond and will therefore undertake an early review of the Plan.

The Council is confident that the delivery of new homes will escalate over the Plan Period when regard is had to several key elements of housing coming forward:

- The delivery of two Housing Zones in Romford and Rainham and Beam Park
- The intensification of twelve of its own housing estates through an ambitious regeneration programme that now includes an experienced private sector development partner secured by means of a Joint Venture Limited Liability Partnership
- Realising opportunities that come forward on large sites such as St Georges Hospital in Hornchurch
- Prioritising all non-designated land for housing
- Encouraging the effective use of land by re-using previously developed (brownfield) land

Further details on the quantum of development that are expected to come forward through these are identified in the Annexes to the Housing Position Statement.

Additionally, the Council has committed to the preparation of a Site Specific Allocations Local Plan and this will identify a range of sustainable sites for housing development.

The proposed modification provides greater clarification on the flexibility provided in the application of Policy 5. The Council still consider it appropriate to seek a mix which reflects the needs identified in the Outer North East London Strategic Housing Market Assessment 2016.
Where proposals are seeking to provide retirement, sheltered or extra care housing, the Council recognises that there may be a need for greater flexibility with regard to the mix of units to be provided within Developments and the housing mix as set out in Table 2 does not apply to such proposals, particularly in achieving the provision of 3 bedroom units.

ADREG19-13 Proposals Map Changes Booklet
Proposals Map Changes Booklet to be amended to:
- extend the boundary of the Strategic Development Area to include the land to the west of Sandgate Close
- boundary of Locally Significant Industrial Site to exclude the Crow Lane East and West sites in line with the Employment Land Review

WYG LPREG19-131 Green belt site
No modification proposed

The Council’s Vision: Havering Making a Greater London seeks to provide new homes in Havering and, in appropriate cases, the Council takes a positive and proactive stance in dealing with prospective private developers wishing to bring forward housing schemes in recognition of the importance of securing timely and high quality housing delivery.

In line with the Vision, the Local Plan Spatial Strategy acknowledges that the delivery of new homes is critical to London’s well-being. It sets out how the Council has approached the important topic of making sure that enough new homes are provided.

Havering has undertaken a Strategic Market Assessment to support the preparation of the Local Plan. Havering forms part of both the London-wide housing market area and the outer north east London sub housing market area with the London Boroughs of Barking and Dagenham and Redbridge. In line with the requirements of the National Planning Policy Framework, the Council has worked with these authorities to prepare its Strategic Housing Market Assessment (SHMA).

The resultant Outer North East London SHMA indicates that Havering’s full objectively assessed housing need is for 25,200 new homes over the period 2011-2033 or 1,145 homes per annum. Since the initial SHMA was undertaken, updated population projections have been published by the GLA. The updated population projections were reflected in an update (2017) of the SHMA which identified an increased housing need in Havering of 30,052 new homes over the same period (1,366 new homes per year).

The Council is making every effort to identify and bring forward suitable sites to exceed the current London Plan target and to meet housing need.

The Local Plan does not seek to constrain the number of new homes to come forward to 17,550 over the Plan period.

Further, the Council is aware that the current London Plan requires that boroughs should seek to close the gap between housing need (as assessed through a Strategic Housing Market Assessment) and supply.

The Council’s approach to providing new homes in the Havering Local Plan takes a balanced view about the importance of addressing housing requirements and securing sustainable development. Having undertaken recent studies to assess whether the Green Belt fulfils the roles identified in the National Planning Policy Framework, the Council is also committed to ensuring that the Green Belt is safeguarded. The Council has concluded that there are no exceptional circumstances to support releasing land from the Green Belt.

The Council’s commitment to the Green Belt is an important ‘driver’ in helping to secure new homes in Havering’s built up areas and through the important programmes being delivered through the Housing Zones and the Council’s estates regeneration programme (see below).

The Council’s strategy also recognises that the scope to accommodate growth in Havering will be dependent upon the provision of infrastructure especially that needed to provide effective and efficient movement within...
Havering as well as social and community infrastructure necessary for residents such as schools and health facilities. The Council has prepared an Infrastructure Delivery Plan to support the Havering Local Plan and to inform the consideration of housing proposals.

Throughout the Local Plan process, the Council has rigorously sought to identify all sources of potential housing supply that will secure sustainable development in order to ensure that Havering is taking every opportunity to secure the delivery of new homes. This approach has been implemented to enable the gap between the housing targets in the London Plan and the objectively assessed need requirement to be closed as far as is reasonably possible.

The Housing Position Statement which supports the Havering Local Plan explains the Council’s approach to this in more detail. A element is that the Council considers that the certainty of securing housing delivery over the overall plan period must be taken into account against the numbers of units approved particularly in the initial years of the Local Plan being implemented.

It sets out that the Council considers that over the period of the plan to 2031, the potential overall supply of additional homes in Havering may exceed the minimum annual housing target of 1,170 new homes per year set out in the current London Plan.

In summary, the approach in the Local Plan that the Council will implement is based on:

- focussing the delivery of new homes in Havering’s two housing Zones at Romford and Rainham and Beam Park. These two areas are identified in the Local Plan as Strategic Development Areas and have individual comprehensive policy frameworks to guide and steer their development to make sure that development provides high quality places with inclusive communities and the timely and effective provision of infrastructure.
- supporting the intensification of twelve of its own existing housing estates through an ambitious regeneration programme that includes an experienced private sector development partner secured by means of a Joint Venture Limited Liability Partnership.
- realising the housing opportunities that come forward on large sites outside of the Strategic Development Areas to provide opportunities for place-making and building communities. These include sites such as the former St Georges Hospital site in Hornchurch.
- prioritising all land not designated for other planning purposes for new homes.
- encouraging the effective use of land by re-using previously developed (brownfield) land and allocating a range of sustainable sites for housing development. The latter will be identified in the forthcoming Site Specific Allocations Local Plan.

The Local Plan Housing Position Statement sets out in more detail the specific potential housing opportunities that will come forward for the two Housing Zones and the Council’s twelve estates programme.

The Housing Position Statement identifies specific deliverable and developable sites for the first 10 years of the Plan. The Council is committed to ensuring that there is a sufficient supply of housing over the 15 year plan period and beyond and will therefore undertake an early review of the Plan.

The Statement also includes details of sites which it is anticipated will be included in the forthcoming Site Specific Allocations Local Plan document which will reflect up to date capacity studies where appropriate.

Underpinning the Council’s approach is a clear recognition of the importance of optimising the development potential of the sites in regard to their potential capacity whilst ensuring that they provide satisfactory residential environment for residents and maintaining the character and appearance of Havering. There is an emphasis on making sure the place-making role of new development is addressed and a focus on delivering places where communities can flourish and be cohesive and inclusive.

As a result of this approach, sufficient land has been identified to meet the minimum London Plan housing target for the first 10 years of the Local Plan if the delivery is taken over the 10 year period.

The Council considers that the greater certainty that is encompassed through the Housing Zones and the twelve
estates programme should weigh heavily in their favour and help counter the potential numerical shortfall in housing delivery in the first five years.

The objector has raised concerns about the potential implications of Havering failing to meet its OAHN particularly in regard to the position with other London Boroughs and adjoining and nearby districts outside London.

Havering has engaged extensively with the GLA in the preparation of its Local Plan and this has included specific discussion about addressing housing.

The GLA has confirmed that London Boroughs are not required to demonstrate how any unmet need from their own boroughs will be met in Other London Boroughs or adjoining districts. The preparation of the Havering Local Plan is not therefore required to address how any shortfall in this borough will be addressed within London or by adjoining / nearby local authorities.

The GLA has advised that the London Plan makes clear that London should be treated as a single housing market. The London Plan states that the Annual average housing supply monitoring targets set out in Table 3.1 are a minimum target for each borough. In order to meet local need and contribute to meeting strategic need each London borough is to seek to exceed this target through the measures set out in London Plan Policy 3.3E, paragraphs 3.19 and 3.19i of the Plan and Section 1 of the London Plan Housing SPG (2016).

The Housing SPG clarifies that this approach applies even where a borough has demonstrated it can exceed its local housing need. In preparing its Local Plan Havering (and Redbridge/Barking and Dagenham) will be expected to demonstrate it has sought to increase its housing supply in line with policy 3.3 of the London Plan and the Housing SPG in order to reduce the gap between local and strategic housing need and supply.

The Housing SPG 2016 notes that sensitivity testing during the development of the SHLAA showed that additional sources of housing such as higher density, housing led, mixed use development in accessible locations in Opportunity/Intensification Areas, town centres, surplus industrial land and other large sites could “fill” the gap between the minimum housing supply target and London’s identified need. This has been confirmed by monitoring which shows that collectively the boroughs have been approving sufficient capacity to address London-wide need.

The objector refers to the recent Government consultation 'Planning for the right homes in the right places'. It is recognised that the approach set out in the consultation is now reflected in the draft National Planning Policy Framework published in March 2018.

The Government White Paper consultation identified a housing ‘need’ figure for Havering of 1,821 new homes per year. It is noted that this figure is in a consultation document and has been derived from methodology that is not normally used in London.

The Council responded to the consultation identifying that there were strong concerns as to how this figure has been prepared and that it made no provision for the infrastructure to support the level of housing mentioned. It would also have a very detrimental impact on the open character and appearance of Havering. On this basis the Council considers that the figure identified by the Government is flawed, unachievable and unrealistic.

In preparing its Local Plan, the Council has engaged with other London Boroughs and adjoining districts. The details of these discussions are set out in the Duty to Cooperate statement. It is clear from the Duty to Cooperate engagement that adjoining local authorities are heavily engaged in their own Local Plan preparation including securing the necessary evidence to support this. This work will include the preparation of necessary SHMAs. It was not feasible and not desirable to ‘pause’ the preparation of the Havering Local Plan to enable all evidence base work (including SHMAs) to ‘catch up’ nor for this to be reflected in the Havering local Plan.

The Duty to Cooperate discussions have recognised that for most authorities involved in this process it will be extremely challenging for them to identify and deliver sites that will enable them to meet their own respective
OAHN. It is therefore highly unlikely that these authorities will be willing to help meet unmet need arising in London.

The Duty to Cooperate Statement confirms that issues around the provision of housing have been explicitly discussed and explored between the authorities. It was recognised in this process that seeking to resolve this would be extremely challenging and delay the delivery of the respective local plan at a time when local authorities re being pressed by Government to ensure that they have up to date Local Plans in place.

The Council does not believe that there are ‘exceptional circumstances’ to warrant the release of Green Belt land to meet the Borough’s housing need. As stated in the Housing White Paper (page 21), the Government “seeks to maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.”

The Council has prepared two Green Belt Studies in 2016 and 2018. The first Green Belt Study was undertaken by the London Borough of Havering in association with PBA and Enderby Consultants. This study assessed the contribution that land within the Green Belt makes to the Green Belt purposes (as defined in para 80 of the NPPF). To aid the assessments, the Green Belt in the Borough was divided into 24 land parcels. A performance value was attributed to the parcels for each purpose, based on predefined criteria. The study found that all 24 parcels make a contribution to Green Belt purposes, with 19 of the 24 Green Belt parcels making a fundamental contribution to the Green Belt purposes. A further four parcels were found to make a high or moderate/high contribution and only one parcel was found to make a low contribution.

A second Green Belt Study was prepared by LUC in 2018. The aim of this study was to provide conclusions on the potential degree of harm that may occur if the sites (which had been submitted to the Council as part of the Regulation 19 Consultation) were released from the Green Belt. This took account of three elements: 1) the contribution of the sites to the NPPF Green Belt purposes, 2) the potential impact on the wider integrity of the Green Belt and 3) the strength of revised Green Belt boundaries that would remain if the site was to be released. Out of a total of 84 sites assessed (with a total area of 849ha):

- 46 sites (total area of 682ha, which is 80.3% of the total area of the 84 sites) rated as ‘high’ in terms of harm to Green Belt resulting from release.
- 21 sites (120ha, 14.1%) rated as ‘moderate-high’ in terms of harm to Green Belt resulting from release.
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- 4 sites (17ha, 2%) rated as ‘low-moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (6ha, 0.7%) rated as ‘low’ in terms of harm to Green Belt resulting from release.

The site proposed by WYG was also assessed in the Stage 2 study and this Study concludes that releasing the site from the Green Belt would lead to a high degree of harm to the Green Belt. The reasons for this being:

- Although the site is not adjacent to the large built-up area of Havering, it is in close proximity to it (approximately 450m). The Site relates to the wider countryside and therefore development would represent expansion of the large built-up area into the open countryside.
- The Site lies between the settlements of Upminster and South Ockendon to the southeast. The settlements are not in close proximity (over 3km away) therefore the release of the Site would not lead to any significant perception of narrowing the gap between them, although there would be narrowing of the gap between them.
- The Site is rural in character and clearly displays the characteristics of the countryside. Development of the Site would lead to the encroachment of the countryside.

The Site is located approximately 450m from any existing Green Belt boundaries. If released, this would lead to the creation of new inset development with relatively weak boundaries. This would call into question the justification for retaining the remaining Green Belt land between the Site and the urban edge as it would become enclosed by development. The overall harm to the Green Belt resulting from release of this Site would therefore be high.

The Council’s response to LPREG19-97 also considers the Bush Farm site as well as several parcels of land in the
vicinity of it. Representation LPREG19-97 suggests that the Bush Farm site should be combined with an number of other proposals for land to be removed from the Green Belt (specifically, GB10, GB32, G59, GB65, GB78 and GB80). The Council’s response to GB97 sets out the conclusions from the Green Belt studies in regard to these.

<table>
<thead>
<tr>
<th>LPREG19-132</th>
<th>Green Belt site</th>
<th>No modification proposed</th>
<th>See response to LPREG19-131 (above).</th>
</tr>
</thead>
</table>

The representation refers to residential intensification of Upminster. The Council’s approach is to ensure that development respects and reflects the existing openness and suburban character of Havering. Intensification of development (through higher densities and / or taller buildings must be carefully considered to ensure these objectives are achieved.

<table>
<thead>
<tr>
<th>LPREG19-133</th>
<th>Lower Thames Crossing – Suggested amendment to key diagram to show Lower Thames Crossing route</th>
<th>No modification proposed</th>
<th>Your comments concerning diagram 5.2 in the Local Plan have been noted.</th>
</tr>
</thead>
</table>

Havering continues to work closely with Highways England as proposals for the preferred route of the Lower Thames Crossing are developed. At the time of preparing this report it is understood that Highways England is still undertaking work which will influence the location and form of the proposed route in Havering. It is understood that there will be further consultation in 2018/19 ahead of the submission of a Development Consent Order Application.

The primary focus of the Key Diagram is to illustrate the spatial strategy for Havering. For this reason potential proposals outside of the borough are not included. The Key Diagram does not include reference to the Highways England Lower Thames Crossing project and the Transport for London river crossings proposals for this reason.

The Council will continue to be engaged in the discussions on these important transport infrastructure projects. It will seek to ensure that when the Local Plan is reviewed it properly reflects the status of them and properly recognises them within the borough.

<table>
<thead>
<tr>
<th>LPREG19-134</th>
<th>Green Belt site</th>
<th>No modification proposed</th>
<th>See response to LPREG19-131 (above).</th>
</tr>
</thead>
</table>

The support in the representation for development in the Strategic Development Areas at Romford and Rainham and Beam Park is noted. The Housing Position Statement indicates sites that are planned to come forward in these areas. In due course, further detail will be provided by means of the Site Specific Allocations Local Plan.

<table>
<thead>
<tr>
<th>LPREG19-135</th>
<th>Green Belt site</th>
<th>No modification proposed</th>
<th>See response to LPREG19-131 (above).</th>
</tr>
</thead>
</table>

The comments in the representation about the recent Government consultation: Planning for the right homes in the right places are addressed in the response to LPREG19-131. The Council’s response to the consultation sets out why Havering considers that the Government’s approach to calculating housing need is flawed as far as Havering is concerned.

<table>
<thead>
<tr>
<th>LPREG19-136</th>
<th>Green Belt site</th>
<th>No modification proposed</th>
<th>See response to LPREG19-131 (above).</th>
</tr>
</thead>
</table>

The Authority Monitoring Report 2016/17 sets out the delivery of affordable homes in Havering (Table 4.2).

<table>
<thead>
<tr>
<th>LPREG19-137</th>
<th>Green Belt site</th>
<th>No modification proposed</th>
<th>See response to LPREG19-131 (above).</th>
</tr>
</thead>
</table>

There is scope for larger scale development at some sites in the Strategic Development Areas in Romford and at Rainham and Beam Park. These will provide the opportunities for the scale of development mentioned in the representation.

The Beam Park development by Countryside Properties at Beam park is an example of how the Council will work with partners to secure a comprehensive scheme that is well provided with necessary infrastructure and will create a community.

<table>
<thead>
<tr>
<th>LPREG19-138</th>
<th>Green Belt site</th>
<th>No modification proposed</th>
<th>See response to LPREG19-131 (above).</th>
</tr>
</thead>
</table>

The Council’s Vision is to secure healthy communities across the borough and it expects all new developments to contribute towards this. The release of Green Belt land is not a justification for, or a pre-requisite to creating...
| LPREG19 - 139 | Green Belt site | No modification proposed | See response to LPREG19-131 (above). The Council’s approach in the Local Plan is to ensure that new development makes efficient use of brownfield sites. The Housing Position Statement evidences that considerable development is planned to be delivered through the use of such sites. |
| LPREG19 - 140 | Green Belt site | No modification proposed | See response to LPREG19-131 (above). The Council has strongly supported the delivery of the Thames Chase Community Forest since its inception. Residents in Havering and further afield already have good access to the Community Forest without the release of extensive reas of Green Belt land for new homes. |
| LPREG19 - 141 | Green Belt site | No modification proposed | See response to LPREG19-131 (above). Paragraphs 14.0.4 -14.09 are intended to evidence the role of the Council in taking the lead to secure and steer new development. It sets out various mechanisms and approaches that may be used. Identification of the scope for new housing through housing zones is not intended to exclude other possible approaches. The Housing Position Statement evidences that a wide range of sites are planned to have a role in the delivery of new homes and this will be reflected in the forthcoming Site Specific Allocations document. |
| Higgins Homes Plc | **LPREG19 - 219** | Green Belt site | No modification proposed | The Outer North East London Strategic Housing Market Assessment 2016 indicates that there is a need for 1,366 new homes in Havering per annum. The Mayor of London sets minimum housing targets for each London Borough, and for Havering this is 1,170 homes per annum. The Local Plan identifies Romford and Rainham and Beam Park as Strategic Development Areas which have the capacity to deliver a significant amount of new housing. Both areas have also been designated as Housing Zones by the Mayor of London. 

The Council does not believe that there are ‘exceptional circumstances’ to warrant the release of Green Belt land to meet the Borough’s housing need. As stated in the Housing White Paper (page 21), the Government “seeks to maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.”

The Council has prepared two Green Belt Studies in 2016 and 2018. The first Green Belt Study was undertaken by the London Borough of Havering in association with PBA and Enderby Consultants. This study assessed the contribution that land within the Green Belt makes to the Green Belt purposes (as defined in para 80 of the NPPF). To aid the assessments, the Green Belt in the Borough was divided into 24 land parcels. A performance value was attributed to the parcels for each purpose, based on predefined criteria. The study found that all 24 parcels make a contribution to Green Belt purposes, with 19 of the 24 Green Belt parcels making a fundamental contribution to the Green Belt purposes. A further four parcels were found to make a high or moderate/high contribution and only one parcel was found to make a low contribution.

A second Green Belt Study was prepared by LUC in 2018. The aim of this study was to provide conclusions on the potential degree of harm that may occur if the sites (which had been submitted to the Council as part of the Regulation 19 Consultation) were released from the Green Belt. This took account of three elements: 1) the contribution of the sites to the NPPF Green Belt purposes, 2) the potential impact on the wider integrity of the Green Belt and 3) the strength of revised Green Belt boundaries that would remain if the site was to be released. Out of a total of 84 sites assessed (with a total area of 849ha):

- 46 sites (total area of 682ha, which is 80.3% of the total area of the 84 sites) rated as ‘high’ in terms of harm to Green Belt resulting from release.
- 21 sites (120ha, 14.1%) rated as ‘moderate-high’ in terms of harm to Green Belt resulting from release.
- 9 sites (24ha, 2.9%) rated as ‘moderate’ in terms of harm to Green Belt resulting from release.
• 4 sites (17ha, 2%) rated as ‘low-moderate’ in terms of harm to Green Belt resulting from release.
• 4 sites (6ha, 0.7%) rated as ‘low’ in terms of harm to Green Belt resulting from release.

The site proposed in this representation by Higgins Homes Plc (GB32) falls within parcel 6 of the Stage 1 Study. This Study concluded that the parcel makes a fundamental contribution to the Green Belt. The site was also assessed in the Stage 2 study and this Study concludes that releasing the site from the Green Belt would lead to a moderate degree of harm to the Green Belt. The reasons for this being:

• The Site lies adjacent to the large built-up area of Havering and relates both to the wider countryside and the urban edge. The Site makes some contribution to limiting sprawl.
• The Site lies between the settlements of Upminster and South Ockendon to the south east. The settlements are not in close proximity (over 3km away) with the barrier of the M25 lies between them. Release of the Site would not lead to any perception of narrowing the gap between them.
• The Site is rural in character and displays the characteristics of the countryside, albeit with some urbanising influence from the adjacent road and settlement edge. Development of the Site would lead to some sense of encroachment of the countryside.

The Site is relatively contained by the existing urban edge to the west, school to the north, Crematorium to the east and the B1421 road to the south. Release of the Site would not lead to any significant weakening of neighbouring Green Belt land. The overall harm to the Green Belt resulting from release of this Site would therefore be Moderate.

Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 3 of the 13 sustainability criteria, and ‘green’ (signifying that the site could perform well in sustainability terms) in relation to 6 of the criteria.

Memorial Gardens Ltd  LPREG19 - 220  Green Belt Site  No modification proposed

The Outer North East London Strategic Housing Market Assessment 2016 indicates that there is a need for 1,366 new homes in Havering per annum. The Mayor of London sets minimum housing targets for each London Borough, and for Havering this is 1,170 homes per annum. The Local Plan identifies Romford and Rainham and Beam Park as Strategic Development Areas which have the capacity to deliver a significant amount of new housing. Both areas have also been designated as Housing Zones by the Mayor of London.

The Council does not believe that there are ‘exceptional circumstances’ to warrant the release of Green Belt land to meet the Borough’s housing need. As stated in the Housing White Paper (page 21), the Government “seeks to maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.”

The Council has prepared two Green Belt Studies in 2016 and 2018. The first Green Belt Study was undertaken by the London Borough of Havering in association with PBA and Enderby Consultants. This study assessed the contribution that land within the Green Belt makes to the Green Belt purposes (as defined in para 80 of the NPPF). To aid the assessments, the Green Belt in the Borough was divided into 24 land parcels. A performance value was attributed to the parcels for each purpose, based on predefined criteria. The study found that all 24 parcels make a contribution to Green Belt purposes, with 19 of the 24 Green Belt parcels making a fundamental contribution to the Green Belt purposes. A further four parcels were found to make a high or moderate/high contribution and only one parcel was found to make a low contribution.

A second Green Belt Study was prepared by LUC. The aim of this study was to provide conclusions on the potential degree of harm that may occur if the sites (which had been submitted to the Council as part of the Regulation 19 Consultation) were released from the Green Belt. This took account of three elements: 1) the contribution of the sites to the NPPF Green Belt purposes, 2) the potential impact on the wider integrity of the Green Belt and 3) the strength of revised Green Belt boundaries that would remain if the site was to be released. Out of a total of 84 sites assessed (with a total area of 849ha):
The site proposed in this representation by Memorial Gardens Ltd (GB69) falls within parcel 2 of the Stage 1 Study. This Study concluded that the parcel makes a fundamental contribution to the Green Belt. The site was also assessed in the Stage 2 study and this Study concludes that releasing the site from the Green Belt would lead to a moderate-high degree of harm to the Green Belt. The reasons for this being:

- The site lies adjacent to the large built-up area of Havering but relates to the wider countryside – development would represent expansion of the large built-up area into the open countryside.
- The site lies between the settlements of Rainham and Purfleet. The settlements are not in close proximity (over 3.5km away) and the release of the Site is unlikely to lead to any significant perception of narrowing the gap between them, even when travelling between the towns along New Road.
- The site is rural in character and clearly displays the characteristics of the countryside, with limited urbanising influence from the adjacent road and settlement edge. Development of the Site would lead to the encroachment of the countryside.

Development of the site would cause the neighbouring Green Belt land within Spring Farm Park to be enclosed by development on three sides. This would lead to a sense of encroachment, weakening its contribution to the Green Belt. The overall harm to the Green Belt resulting from release of this Site would therefore be Moderate-High.

Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 3 of the 13 sustainability criteria, and ‘green’ (signifying that the site could perform well in sustainability terms) in relation to 7 of the criteria.
Improvements are also planned along the A1306 between Dovers Corner roundabout and the borough boundary to deliver transformational change and improve sustainable travel in the area.

TfL London Buses have carried out a review of bus services along the Elizabeth line (Crossrail). A result of this review has been a study looking at bus services in the Harold Wood/Harold Hill region. One of the outcomes of this study has been a proposed new bus route (No 497) which would link Harold Wood Station with Hilldene Avenue in Harold Hill via the Kings Park development.

The Council is aware of your concerns with the Romford to Upminster Push and Pull line and these have been previously raised with TfL.

<table>
<thead>
<tr>
<th>LPREG19 - 449</th>
<th>Concerns over Town centre development policy specifically in relation to prioritising A1 uses</th>
<th>No modification proposed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trinity Hall</td>
<td>LPREG19 - 198  Green Belt Site</td>
<td>No modification proposed</td>
</tr>
</tbody>
</table>

The Outer North East London Strategic Housing Market Assessment 2016 indicates that there is a need for 1,366 new homes in Havering per annum. The Mayor of London sets minimum housing targets for each London Borough, and for Havering this is 1,170 homes per annum. The Local Plan identifies Romford and Rainham and Beam Park as Strategic Development Areas which have the capacity to deliver a significant amount of new housing. Both areas have also been designated as Housing Zones by the Mayor of London.

The Council does not believe that there are ‘exceptional circumstances’ to warrant the release of Green Belt land to meet the Borough’s housing need. As stated in the Housing White Paper (page 21), the Government “seeks to maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.”

The Council has prepared two Green Belt Studies in 2016 and 2018. The first Green Belt Study was undertaken by the London Borough of Havering in association with PBA and Enderby Consultants. This study assessed the contribution that land within the Green Belt makes to the Green Belt purposes (as defined in para 80 of the NPPF). To aid the assessments, the Green Belt in the Borough was divided into 24 land parcels. A performance value was attributed to the parcels for each purpose, based on predefined criteria. The study found that all 24 parcels make a contribution to Green Belt purposes, with 19 of the 24 Green Belt parcels making a fundamental contribution and only one parcel was found to make a low contribution.

A second Green Belt Study was prepared by LUC in 2018. The aim of this study was to provide conclusions on the potential degree of harm that may occur if the sites (which had been submitted to the Council as part of the Regulation 19 Consultation) were released from the Green Belt. This took account of three elements: 1) the contribution of the sites to the NPPF Green Belt purposes, 2) the potential impact on the wider integrity of the Green Belt and 3) the strength of revised Green Belt boundaries that would remain if the site was to be released. Out of a total of 84 sites assessed (with a total area of 849ha):

- 46 sites (total area of 682ha, which is 80.3% of the total area of the 84 sites) rated as ‘high’ in terms of harm to Green Belt resulting from release.
- 21 sites (120ha, 14.1%) rated as ‘moderate-high’ in terms of harm to Green Belt resulting from release.
- 9 sites (24ha, 2.9%) rated as ‘moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (17ha, 2%) rated as ‘low’ in terms of harm to Green Belt resulting from release.
- 4 sites (6ha, 0.7%) rated as ‘low’ in terms of harm to Green Belt resulting from release.

The site proposed in this representation by Trinity Hall (GB29, 30 & 31) falls within parcel 13 of the Stage 1
Study. This Study concluded that the parcel makes a fundamental contribution to the Green Belt. The site was also assessed in the Stage 2 study and this Study concludes that releasing the site from the Green Belt would lead to a high degree of harm to the Green Belt. The reasons for this being:

- The site lies adjacent to the large built up area of Havering but relates strongly to the wider countryside.
- Development would represent significant expansion of the large built-up area into the open countryside.
- The site forms part of a critical gap between the settlements of Cranham and Emerson Park. Development within the Site would lead to a narrowing of the gap between the settlements.
- The site is rural in character and clearly displays characteristics of the countryside. Development of the Site would lead to encroachment of the countryside.

Release of the site would lead to a sense of encroachment to land to the east, north of Cranham, as this area would be enclosed by development on two sides and the A127 to the north. Release would weaken the contribution of land to the south towards River Drive, and west towards Emerson Park. The overall harm to the Green Belt resulting from release of this site would therefore be High.

Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 3 of the 13 sustainability criteria, and ‘green’ (signifying that the site could perform well in sustainability terms) in relation to 6 of the criteria.

LPREG19 - 456 Green Belt Site No modification proposed See response to LPREG19 -198 above

NHS property Services LPREG19 - 410 Objection to Social infrastructure Policy for being too restrictive Modification to Policy 16 Social Infrastructure

The Council will work with infrastructure providers to support the provision of essential new services and improvement of existing facilities in Havering alongside residential development. The Council will make sure that new and existing residents will have access to a range of social infrastructure facilities by:

i. Supporting proposals for new and extended social infrastructure provided they:
   a. Are accessible by public transport and active travel;
   b. Are located within the community that they are intended to serve and incorporate an inclusive design;

   c. Make use of an innovative delivery of social infrastructure;
   d. Do not adversely impact on residential character and amenity;
   e. Ensure highway safety, especially in regards to pedestrians and cyclists;
   f. Explore the possibility to co-locate, in multi-use buildings with complimentary services; and
   g. Are provided in multi-use, flexible, adaptable and healthy buildings.

ii. Requiring major developments to provide new social infrastructure facilities as part of mixed-use developments where feasible, where a deficiency is identified through the Council’s Infrastructure Delivery Plan (IDP).

**Stakeholders:** Applicants will be encouraged to consider funding arrangements for on-going maintenance costs.

Proposals which would result in a loss of social infrastructure in areas of defined need for that type of social infrastructure without realistic proposals for re-provision will not be permitted.

The suitability of redundant social infrastructure premises for support for specific parts of the policy are noted.

Reference in criteria (c) to ‘innovative form of delivery of social infrastructure is proposed to be deleted.

Reference in criteria (g) to multi-use is proposed to be deleted.

Given the importance of growth in Havering being supported by adequate provision of social and community infrastructure, it is reasonable that the Local Plan requires that major developments will be assessed in regard to whether new social infrastructure should be provided in mixed use schemes.

The obligations of the NHS regarding site disposal are noted and understood. However, the growth envisaged in the Local Plan must be supported by appropriate social and community infrastructure and for that reason it is valid that the Local Plan seeks to safeguard existing provision and examine scope for re-use of social infrastructure remises where existing facilities become redundant.
accommodating other forms of social infrastructure for which there is a defined need in the locality should be assessed before alternative developments will be considered by the Council. The assessment should take account of site constraints and consider the feasibility and viability of retaining the site for alternative social infrastructure provision.

The following paragraph was included at the end of the Social Infrastructure policy, however it should have been the first paragraph of the support text:

Social infrastructure covers a variety of health, community, cultural, sports and leisure facilities. It encompasses burial spaces, places of worship, health and education facilities, social care facilities, nurseries, theatres, sports pitches, swimming pools, and many other uses that provide a social function.

Paragraph 8.5.6

Sites currently used by social infrastructure facilities may come under pressure for redevelopment. The consolidation and modernisation of community facilities in accessible locations where multi-functional facilities can meet the needs of a range of users will be considered. The Council will, however, not permit proposals which would result in a loss of social infrastructure without a convincing demonstration by the developer that an equivalent replacement provision (in terms of size, usefulness, attractiveness, safety and quality) has been made. This process, as well as the disposal of surplus or redundant assets will need to be managed to ensure that critical uses are not lost from the local area. If the disposal of assets is part of an agreed programme of social infrastructure reprovision to ensure continued delivery of social infrastructure and related services, the loss of social infrastructure in areas of defined need may be acceptable, as set out in the London Plan.

The Outer North East London Strategic Housing Market Assessment 2016 indicates that there is a need for 1,366 new homes in Havering per annum. The Mayor of London sets minimum housing targets for each London Borough, and for Havering this is 1,170 homes per annum. The Local Plan identifies Romford and Rainham and Beam Park as Strategic Development Areas which have the capacity to deliver a significant amount of new housing. Both areas have also been designated as Housing Zones by the Mayor of London. The Council does not believe that there are ‘exceptional circumstances’ to warrant the release of Green Belt land to meet the Borough’s housing need. As stated in the Housing White Paper (page 21), the Government “seeks to maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.”

The Council has prepared two Green Belt Studies in 2016 and 2018. The first Green Belt Study was undertaken by the London Borough of Havering in association with PBA and Enderby Consultants. This study assessed the contribution that land within the Green Belt makes to the Green Belt purposes (as defined in para 80 of the NPPF). To aid the assessments, the Green Belt in the Borough was divided into 24 land parcels. A performance value was attributed to the parcels for each purpose, based on predefined criteria. The study found that all 24 parcels make a contribution to Green Belt purposes, with 19 of the 24 Green Belt parcels making a fundamental contribution to the Green Belt purposes. A further four parcels were found to make a high or moderate/high contribution and only one parcel was found to make a low contribution.

A second Green Belt Study was prepared by LUC in 2018. The aim of this study was to provide conclusions on the potential degree of harm that may occur if the sites (which had been submitted to the Council as part of the
Regulation 19 Consultation) were released from the Green Belt. This took account of three elements: 1) the contribution of the sites to the NPPF Green Belt purposes, 2) the potential impact on the wider integrity of the Green Belt and 3) the strength of revised Green Belt boundaries that would remain if the site was to be released. Out of a total of 84 sites assessed (with a total area of 849ha):

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- 4 sites (17ha, 2%) rated as ‘low-moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (6ha, 0.7%) rated as ‘low’ in terms of harm to Green Belt resulting from release.

The site proposed in this representation by NHS Property Services (GB81) falls within parcel 4 of the Stage 1 Study. This Study concluded that the parcel makes a fundamental contribution to the Green Belt. The site was also assessed in the Stage 2 study and this Study concludes that releasing the site from the Green Belt would lead to a low-moderate degree of harm to the Green Belt. The reasons for this being:

- The site lies adjacent of the large built up area of Haver.ing. The site only makes limited contribution to preventing sprawl because it already contains urbanising development and therefore there is already a perception of urban ‘sprawl’ and encroachment.
- The site is already developed and therefore plays a negligible role in in preventing the merging or erosion of the visual and physical gap between Hornchurch and Upminster.
- The urbanising influences both within and adjacent to the site mean that there is little sense of this area forming part of the countryside and therefore it plays no role in safeguarding the countryside from encroachment.

Release of this site would weaken slightly the contribution of land to the south of the Site where the Ingrebourne Valley Nature Reserve is located because this area would be contained by development on two sides, thereby weakening its contribution to purpose 3. However, the nature reserve in itself acts as a significant separating feature and could act as defensible Green Belt boundary thereby limiting harm to Green Belt south of the Site. The harm to the Green Belt resulting from release of this site would therefore be Low - Moderate. Whilst development of the Site would result in a lower degree of harm to the Green Belt, the Council do not consider that release of the site from the Green Belt is required at the present time. This site already has planning permission for circa 300 units as it was previously identified as a major developed site in the Green Belt. Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 9 of the criteria.

<table>
<thead>
<tr>
<th>LPREG19 - 412</th>
<th>Green Belt site</th>
<th>No modification proposed</th>
<th>See response to LPREG19 -411 above.</th>
</tr>
</thead>
<tbody>
<tr>
<td>LPREG19 - 413</td>
<td>Parking – objecting to proposed parking standards set out in Policy 24 and that the policy should be reworded to remove the minimum standards for the most accessible parts</td>
<td>No Modification proposed.</td>
<td>The Council’s parking policy (policy 24) has been informed by a Residential Car Parking Standards study which has drawn together a range of evidence to help inform the car parking standards for the borough having regard to the particular circumstances in Havering. Policy 24 recognises that as an outer London Borough for many residents there is a higher dependency on the car, compared to central and inner London where public transport provision is much more accessible. The policy seeks to recognise that many local journeys in Havering must be made by car because they are impractical to make by public transport. Although parts of Havering are well connected by public transport to destinations outside of the borough, many more local destinations do not have reasonable public transport access and this is reflected in the higher levels of car ownership and usage in Havering. In this regard Havering is typical of many other outer London boroughs. The London Plan expects that in areas of good public transport accessibility (PTAL 5-6) in all parts of London developments should aim for significantly less than one space per unit. The Council considers that this does not</td>
</tr>
</tbody>
</table>
of the borough.

adequately reflect the position in Havering regarding the practicalities of making journeys within the borough and the consequent ownership and usage levels of private cars.

For highly accessible parts of the borough (PTAL 5-6), the parking standards set out in Policy 24 recognise that a minimum parking standard of 0.5 spaces per unit is appropriate having regard to the particular circumstances involved

<table>
<thead>
<tr>
<th>Sports England</th>
<th>LPREG19 - 221</th>
<th>General support for the Plan however concerns over evidence base</th>
<th>No modification proposed</th>
<th>Refer to the Council’s response to comments LPREG19-377-381</th>
</tr>
</thead>
<tbody>
<tr>
<td>LPREG19 - 378</td>
<td>Request for greater clarity in the Spatial Strategy regarding improvements to leisure facilities and whether this will meet an identified strategic need.</td>
<td>Modification to Section 5 Borough-wide strategy for growth – Social Infrastructure Improvements to the borough’s existing leisure facilities (as set out in Policy 18) and new facilities in Romford Town Centre and Rainham and Beam Park. Modification to Policy 18 Open space, sports and recreation ix. Support improvements to the borough’s sports and recreation facilities in line with the recommendations in the Indoor Sport and Leisure Facilities and Outdoor Playing Pitch Strategies 2016 including: Paragraph 8.7.8: It is essential that Havering has modern and fit for purpose indoor sports facilities and the Council is actively seeking to upgrade the current provision. Havering’s Indoor Sport and Leisure Facilities Assessment and Strategy (2016) found that investment is needed in both community and school sports facilities. Provision will be significantly enhanced by the new Romford Leisure Centre, replacement of Hornchurch Leisure Centre, refurbishment of Chafford Sports Complex and improved facilities at Bretons Outdoor Recreation Centre as recommended by the Strategy in the Indoor Sport and Leisure Facilities and Outdoor Playing Pitch Strategies 2016</td>
<td>Policy 18 Open space, sports and recreation ix. Sets out the specific improvements that will be sought. Paragraphs 8.77 and 8.7.8 refer to Havering’s outdoor Playing Pitch Assessment and Strategy 2016 and the Indoor Sport and Leisure Facilities Assessment and Strategy 2016. A modification is proposed to Policy 18 and paragraph 8.7.8 to clarify that the new and improved facilities are based on the recommendations of the strategy.</td>
<td></td>
</tr>
<tr>
<td>LPREG19 - 379</td>
<td>Recommendatio n for improved links between the Local Plan and Active Design guidance</td>
<td>Modification to Policy 1 Romford Strategic Development Area Insert a new additional paragraph between paragraphs 6.1.25 and 6.1.26. New paragraph 6.1.26: Havering’s Indoor Sport and Leisure Facilities Strategy 2016-31 supports the provision of the new Romford Leisure Development which has now opened and offers a 25 m pool and 15 m learner pool, an ice rink, gym and studio space and which hosts the London Raiders Ice Hockey Team. Insert a new additional paragraph between paragraphs 6.2.18 and 6.2.19. New paragraph 6.2.19:</td>
<td>Regarding the community use of school facilities and community use agreements this is adequately covered in Policy 18 Open space, sports and recreation iii. The Council does not believe it is necessary to repeat this in Policy 1 and 2. Regarding open space in Rainham District Centre – The protection of open space is covered in Policy 18 Open Space, Sports and Recreation.</td>
<td></td>
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</table>
Havering’s Indoor Sport and Leisure Facilities Strategy 2016-31 recommends that a detailed feasibility study is undertaken to identify a ‘right sized’ facility to meet the needs of existing and future residents in the south of the Borough. The Strategy also identifies a need to improve the quality of existing school sports hall facilities, including Chafford Sports Complex.

Policy 12 Healthy Communities

The Council will seek to maximise the potential health gains from development proposals and ensure that any negative impacts are mitigated. All major development proposals must be supported by a Health Impact Assessment (HIA) to demonstrate that full consideration has been given to health and wellbeing and the principles of active design.

New paragraph 8.1.5:

When undertaking Health Impact Assessments, full consideration should be given to the principles of Active Design as set out in Sport England and Public Health England’s Active Design Guidance. Active design is about designing and adapting where we live to encourage activity in our everyday lives.

LPREG19 - 380
Concerns over the status of all playing fields, parks, open space and indoor and outdoor sport and leisure facilities. Protection/ re-provision sought for the playing field at Quarles Campus

Playing fields, parks and open spaces are designated on the Proposals Map and shown in the Proposals Map changes booklet.

Regarding Quarles Campus - Policy 18 Open space, sports and recreation protects existing playing fields. Detailed policy considerations for Quarles Campus will be set out in the forthcoming Site Specific Allocations Local Plan.

LPREG19 - 377
Support for overarching aims and objectives within the Strategic Objectives chapter

See Council’s proposed modifications relating to Policy 12 and para 8.1.5 as set out in response to LPREG19-379

LPREG19 - 381
Support for Policy on healthy communities. Calls for strengthening of Policy 12 by incorporating Active Design and its

See Council’s proposed modifications relating to Policy 12 and para 8.1.5 as set out in response to LPREG19-379

Policy 16 Social Infrastructure

Social infrastructure covers a variety of health, community, cultural, sports and leisure facilities. It encompasses burial spaces, places of worship, health and education facilities, social care facilities, nurseries, theatres, sports pitches, playing fields, swimming pools, and many other uses that provide a social function.

Regarding Paragraph 8.6.6. this provides examples of what innovate solutions might be explored, it does not mean that they will always be acceptable in policy terms. A minor modification is proposed to Policy 17.
Please note that the final paragraph of Policy 16 is proposed to be moved to the start of the support text. It was included in the Policy box in error.

Paragraph 8.5.6

The Council will, however, not permit proposals which would result in a loss of social infrastructure in an area of defined need for that type of social infrastructure without a convincing demonstration by the developer that an equivalent replacement provision (in terms of size, usefulness, attractiveness, safety and quality) has been made.

Policy 17 Education

Proposals with innovative and flexible design solutions and the shared use of open space and sports facilities will be considered favourably where it enables the delivery of a new school in an area of identified need and where the existing sports facility can accommodate additional play without compromising quality and accessibility for existing users.

Paragraph 8.7.2

Leisure and Sports and recreation facilities encompass indoor sports halls, swimming pools, fitness centres, outdoor sports pitches, playing fields, tennis courts and bowling greens.

The Council’s Vision: Havering Making a Greater London seeks to provide new homes in Havering and, in appropriate cases, the Council takes a positive and proactive stance in dealing with prospective private developers wishing to bring forward housing schemes in recognition of the importance of securing timely and high quality housing delivery.

In line with the Vision, the Local Plan Spatial Strategy acknowledges that the delivery of new homes is critical to London’s well-being. It sets out how the Council has approached the important topic of making sure that enough new homes are provided.

Havering has undertaken a Strategic Market Assessment to support the preparation of the Local Plan. Havering forms part of both the London-wide housing market area and the outer north east London sub housing market area with the London Boroughs of Barking and Dagenham and Redbridge. In line with the requirements of the National Planning Policy Framework, the Council has worked with these authorities to prepare its Strategic Housing Market Assessment (SHMA).

The resultant Outer North East London SHMA indicates that Havering’s full objectively assessed housing need is for 25,200 new homes over the period 2011-2033 or 1,145 homes per annum. Since the initial SHMA was undertaken, updated population projections have been published by the GLA. The updated population projections were reflected in an update (2017) of the SHMA which identified an increased housing need in Havering of 30,052 new homes over the same period (1,366 new homes per year).

The Council is making every effort to identify and bring forward suitable sites to exceed the current London Plan target and to meet housing need.

The Local Plan does not seek to constrain the number of new homes to come forward to 17,550 over the Plan period.
Further, the Council is aware that the current London Plan requires that boroughs should seek to close the gap between housing need (as assessed through a Strategic Housing Market Assessment) and supply.

The Council’s approach to providing new homes in the Havering Local Plan takes a balanced view about the importance of addressing housing requirements and securing sustainable development. Having undertaken recent studies to assess whether the Green Belt fulfils the roles identified in the National Planning Policy Framework, the Council is also committed to ensuring that the Green Belt is safeguarded. The Council has concluded that there are no exceptional circumstances to support releasing land from the Green Belt.

The Council’s commitment to the Green Belt is an important ‘driver’ in helping to secure new homes in Havering’s built up areas and through the important programmes being delivered through the Housing Zones and the Council’s estates regeneration programme (see below). The Council’s strategy also recognises that the scope to accommodate growth in Havering will be dependent upon the provision of infrastructure especially that needed to provide effective and efficient movement within Havering as well as social and community infrastructure necessary for residents such as schools and health facilities. The Council has prepared an Infrastructure Delivery Plan to support the Havering Local Plan and to inform the consideration of housing proposals.

Throughout the Local Plan process, the Council has rigorously sought to identify all sources of potential housing supply that will secure sustainable development in order to ensure that Havering is taking every opportunity to secure the delivery of new homes. This approach has been implemented to enable the gap between the housing targets in the London Plan and the objectively assessed need requirement to be closed as far as is reasonably possible. The Housing Position Statement which supports the Havering Local Plan explains the Council’s approach to this in more detail. A element is that the Council considers that the certainty of securing housing delivery over the overall plan period must be taken into account against the numbers of units approved particularly in the initial years of the Local Plan being implemented.

It sets out that the Council considers that over the period of the plan to 2031, the potential overall supply of additional homes in Havering may exceed the minimum annual housing target of 1,170 new homes per year set out in the current London Plan.

In summary, the approach in the Local Plan that the Council will implement is based on:

- focussing the delivery of new homes in Havering’s two housing Zones at Romford and Rainham and Beam Park. These two areas are identified in the Local Plan as Strategic Development Areas and have individual comprehensive policy frameworks to guide and steer their development to make sure that development provides high quality places with inclusive communities and the timely and effective provision of infrastructure
- supporting the intensification of twelve of its own existing housing estates through an ambitious regeneration programme that includes an experienced private sector development partner secured by means of a Joint Venture Limited Liability Partnership
- realising the housing opportunities that come forward on large sites outside of the Strategic Development Areas to provide opportunities for place-making and building communities. These include sites such as the former St Georges Hospital site in Hornchurch
- prioritising all land not designated for other planning purposes for new homes
- encouraging the effective use of land by re-using previously developed (brownfield) land and allocating a range of sustainable sites for housing development The latter will be identified in the forthcoming Site Specific Allocations Local Plan

The Local Plan Housing Position Statement sets out in more detail the specific potential housing opportunities that will come forward for the two Housing Zones and the Council’s twelve estates programme.

The Housing Position Statement identifies specific deliverable and developable sites for the first 10 years of the Plan. The Council is committed to ensuring that there is a sufficient supply of housing over the 15 year plan period and beyond and will therefore undertake an early review of the Plan.
The Statement also includes details of sites which it is anticipated will be included in the forthcoming Site Specific Allocations Local Plan document which will reflect up to date capacity studies where appropriate.

Underpinning the Council’s approach is a clear recognition of the importance of optimising the development potential of the sites in regard to their potential capacity whilst ensuring that they provide satisfactory residential environment for residents and maintaining the character and appearance of Havering. There is an emphasis on making sure the place-making role of new development is addressed and a focus on delivering places where communities can flourish and be cohesive and inclusive.

As a result of this approach, sufficient land has been identified to meet the minimum London Plan housing target for the first 10 years of the Local Plan if the delivery is taken over the 10 year period.

The Council considers that the greater certainty that is encompassed through the Housing Zones and the twelve estates programme should weigh heavily in their favour and help counter the potential numerical shortfall in housing delivery in the first five years.

The objector has raised concerns about the potential implications of Havering failing to meet its OAHN particularly in regard to the position with other London Boroughs and adjoining and nearby districts outside London.

Havering has engaged extensively with the GLA in the preparation of its Local Plan and this has included specific discussion about addressing housing.

The GLA has confirmed that London Boroughs are not required to demonstrate how any unmet need from their own boroughs will be met in Other London Boroughs or adjoining districts. The preparation of the Havering Local Plan is not therefore required to address how any shortfall in this borough will be addressed within London or by adjoining / nearby local authorities.

The GLA has advised that the London Plan makes clear that London should be treated as a single housing market. The London Plan states that the Annual average housing supply monitoring targets set out in Table 3.1 are a minimum target for each borough. In order to meet local need and contribute to meeting strategic need each London borough is to seek to exceed this target through the measures set out in London Plan Policy 3.3E, paragraphs 3.19 and 3.19i of the Plan and Section 1 of the London Plan Housing SPG (2016).

The Housing SPG clarifies that this approach applies even where a borough has demonstrated it can exceed its local housing need. In preparing its Local Plan Havering (and Redbridge/Barking and Dagenham) will be expected to demonstrate it has sought to increase its housing supply in line with policy 3.3 of the London Plan and the Housing SPG in order to reduce the gap between local and strategic housing need and supply.

The Housing SPG 2016 notes that sensitivity testing during the development of the SHLAA showed that additional sources of housing such as higher density, housing led, mixed use development in accessible locations in Opportunity/Intensification Areas, town centres, surplus industrial land and other large sites could ‘fill’ the gap between the minimum housing supply target and London’s identified need. This has been confirmed by monitoring which shows that collectively the boroughs have been approving sufficient capacity to address London-wide need.

The objector refers to the recent Government consultation ‘Planning for the right homes in the right places’. It is recognised that the approach set out in the consultation is now reflected in the draft National Planning Policy Framework published in March 2018.

The Government White Paper consultation identified a housing ‘need’ figure for Havering of 1,821 new homes per year. It is noted that this figure is in a consultation document and has been derived from methodology that is not normally used in London.
The Council responded to the consultation identifying that there were strong concerns as to how this figure has been prepared and that it made no provision for the infrastructure to support the level of housing mentioned. It would also have a very detrimental impact on the open character and appearance of Havering. On this basis the Council considers that the figure identified by the Government is flawed, unachievable and unrealistic.

In preparing its Local Plan, the Council has engaged with other London Boroughs and adjoining districts. The details of these discussions are set out in the Duty to Cooperate statement. It is clear from the Duty to Cooperate engagement that adjoining local authorities are heavily engaged in their own Local Plan preparation including securing the necessary evidence to support this. This work will include the preparation of necessary SHMAs. It was not feasible and not desirable to ‘pause’ the preparation of the Havering Local Plan to enable all evidence base work (including SHMAs) to ‘catch up’ nor for this to be reflected in the Havering local Plan. The Duty to Cooperate discussions have recognised that for most authorities involved in this process it will be extremely challenging for them to identify and deliver sites that will enable them to meet their own respective OAHN. It is therefore highly unlikely that these authorities will be willing to help meet unmet need arising in London.

The Duty to Co-operate Statement confirms that issues around the provision of housing have been explicitly discussed and explored between the authorities. It was recognised in this process that seeking to resolve this would be extremely challenging and delay the delivery of the respective local plan at a time when local authorities re being pressed by Government to ensure that they have up to date Local Plans in place.

<table>
<thead>
<tr>
<th>Objection</th>
<th>Description</th>
<th>Proposed Action</th>
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<tbody>
<tr>
<td>LPREG19-171</td>
<td>Objection over Havering’s future housing supply</td>
<td>No modification proposed</td>
</tr>
<tr>
<td>LPREG19-172</td>
<td>Objection over Havering’s future housing supply</td>
<td>No modification proposed</td>
</tr>
<tr>
<td>RSPB</td>
<td>Support for strategic objectives and Policy 30 - Nature Conservation. Calls for inclusion of Hainault Forest in Annex A.7.</td>
<td>No modification proposed</td>
</tr>
</tbody>
</table>
| Essex County Council | Objection over Havering’s future housing supply | No modification proposed | The Local Plan Spatial Strategy acknowledges that the delivery of new homes is critical to London’s well-being. It sets out how the Council has approached the important topic of making sure that enough new homes are provided. The Council is making every effort to identify and bring forward suitable sites to exceed the London Plan target and meet housing need. The Local Plan has been brought forward on the basis of identifying sites to address the delivery of housing over a 10 year period. Further detail is set out in the Housing Position Statement that supports the Local Plan. This is in line with the requirements set out in paragraph 47 of the National Planning Policy Framework. The Council takes a proactive and positive stance in dealing with prospective private developers wishing to bring forward housing schemes and this will be maintained over the Plan period. The Council is satisfied that housing }
delivery will increase over the Plan period because significant elements of the projected sites are in the Council’s two Housing Zones and within the Council’s twelve estates regeneration project. With regards to the final 5 years of the Plan period, the Council is in agreement that it will need to review the Local Plan to ensure that a suitable housing supply is identified. An explicit commitment to an early review of the Plan is therefore proposed.

The Council will be preparing a Site Specific Allocations Plan to complement and support the Local Plan and it is anticipated that further opportunities will come forward through the preparation of that. Additionally, the Council anticipates that because of the publication of the London Plan and the anticipated revision of the National Planning Policy Framework, it will be appropriate to bring forward an early review of the Havering Local Plan. This is likely to involve a further call for sites and this may yield further development opportunities.

The new London Plan (and its higher housing targets) was published after the Council had undertaken Regulation 19 consultation on the Local Plan. It would not be feasible to seek to reflect the draft London Plan in the Local Plan at this late stage in the preparation of the Local Plan especially when the London Plan is at an early stage in preparation.

In regard to the objector’s point regarding impact on transportation and highways, Havering has initiated a Statement of Common Ground which sets out a commitment for the relevant authorities to continue to work collaboratively on the sub-regional issue of growth proposals in local plans having an impact on the wider highway network. The Statement of Common Ground has been prepared on the wider understanding and acceptance that this is a sub – regional issue and is not confined to issues raised by the Havering Local Plan alone. Essex County Council has already signed the Statement of Common Ground.

As an example of this collaborative working, Havering is supporting work with constituent local authorities to review and assess the impact of growth on the A127 corridor.

<table>
<thead>
<tr>
<th>LPREG19 - 231</th>
<th>Welcomes Policy 23 and commitment to working with key partners. Suggests amendment to scheme included in table 3.</th>
<th>Modification to Policy 23 Transport connections Table 3 Havering Transport Schemes &quot;A127 Corridor Aspirations&quot; Working collaboratively with TfL, Essex County Council, Basildon, Southend, Brentwood and Thurrock District Councils examining the A127 Corridor from Gallows Corner in Havering out to Southend. This work will look at the aspirations that various authorities have for improvements along this key route to support growth across South Essex and LB Havering. This work will inform the production of a promotional document that can be used to highlight the importance of the Corridor and to support bids for external funding.</th>
<th>Your comments concerning Transport Connections Policy 23 have been noted and the suggested amendment to table 3 &quot;A127 Corridor Aspirations&quot; has been made.</th>
</tr>
</thead>
<tbody>
<tr>
<td>LPREG19 - 232</td>
<td>Concerns over cross boundary implications of uncertainties surrounding Havering’s future housing supply on education provision</td>
<td>No modification proposed</td>
<td>The Council’s Vision : Havering Making a Greater London seeks to provide new homes in Havering and, in appropriate cases, the Council takes a positive and proactive stance in dealing with prospective private developers wishing to bring forward housing schemes in recognition of the importance of securing timely and high quality housing delivery. In line with the Vision, the Local Plan Spatial Strategy acknowledges that the delivery of new homes is critical to London’s well-being. It sets out how the Council has approached the important topic of making sure that enough new homes are provided. Havering has undertaken a Strategic Market Assessment to support the preparation of the Local Plan. Havering</td>
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Further, the Council is aware that the current London Plan requires that boroughs should seek to close the gap between housing need (as assessed through a Strategic Housing Market Assessment) and supply.

The Council’s approach to providing new homes in the Havering Local Plan takes a balanced view about the importance of addressing housing requirements and securing sustainable development. Having undertaken recent studies to assess whether the Green Belt fulfils the roles identified in the National Planning Policy Framework, the Council is also committed to ensuring that the Green Belt is safeguarded. The Council has concluded that there are no exceptional circumstances to support releasing land from the Green Belt.

The Council’s commitment to the Green Belt is an important ‘driver’ in helping to secure new homes in Havering’s built up areas and through the important programmes being delivered through the Housing Zones and the Council’s estates regeneration programme (see below).

The Council’s strategy also recognises that the scope to accommodate growth in Havering will be dependent upon the provision of infrastructure especially that needed to provide effective and efficient movement within Havering as well as social and community infrastructure necessary for residents such as schools and health facilities. The Council has prepared an Infrastructure Delivery Plan to support the Havering Local Plan and to inform the consideration of housing proposals.

Throughout the Local Plan process, the Council has rigorously sought to identify all sources of potential housing supply that will secure sustainable development in order to ensure that Havering is taking every opportunity to secure the delivery of new homes. This approach has been implemented to enable the gap between the housing targets in the London Plan and the objectively assessed need requirement to be closed as far as is reasonably possible.

The Housing Position Statement which supports the Havering Local Plan explains the Council’s approach to this in more detail. A element is that the Council considers that the certainty of securing housing delivery over the overall plan period must be taken into account against the numbers of units approved particularly in the initial years of the Local Plan being implemented. It sets out that the Council considers that over the period of the plan to 2031, the potential overall supply of additional homes in Havering may exceed the minimum annual housing target of 1,170 new homes per year set out in the current London Plan.

In summary, the approach in the Local Plan that the Council will implement is based on:

- focusing the delivery of new homes in Havering’s two housing Zones at Romford and Rainham and Beam Park. These two areas are identified in the Local Plan as Strategic Development Areas and have individual comprehensive policy frameworks to guide and steer their development to make sure that development provides high quality places with inclusive communities and the timely and effective
provision of infrastructure
- supporting the intensification of twelve of its own existing housing estates through an ambitious regeneration programme that includes an experienced private sector development partner secured by means of a Joint Venture Limited Liability Partnership
- realising the housing opportunities that come forward on large sites outside of the Strategic Development Areas to provide opportunities for place-making and building communities. These include sites such as the former St Georges Hospital site in Hornchurch
- prioritising all land not designated for other planning purposes for new homes
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The Local Plan Housing Position Statement sets out in more detail the specific potential housing opportunities that will come forward for the two Housing Zones and the Council’s twelve estates programme.

The Housing Position Statement identifies specific deliverable and developable sites for the first 10 years of the Plan. The Council is committed to ensuring that there is a sufficient supply of housing over the 15 year plan period and beyond and will therefore undertake an early review of the Plan.

The Statement also includes details of sites which it is anticipated will be included in the forthcoming Site Specific Allocations Local Plan document which will reflect up to date capacity studies where appropriate.

Underpinning the Council’s approach is a clear recognition of the importance of optimising the development potential of the sites in regard to their potential capacity whilst ensuring that they provide satisfactory residential environment for residents and maintaining the character and appearance of Havering. There is an emphasis on making sure the place-making role of new development is addressed and a focus on delivering places where communities can flourish and be cohesive and inclusive.

As a result of this approach, sufficient land has been identified to meet the minimum London Plan housing target for the first 10 years of the Local Plan if the delivery is taken over the 10 year period.

The Council considers that the greater certainty that is encompassed through the Housing Zones and the twelve estates programme should weigh heavily in their favour and help counter the potential numerical shortfall in housing delivery in the first five years.

The objector has raised concerns about the potential implications of Havering failing to meet its OAHN particularly in regard to the position with Essex County Council.

Havering has engaged extensively with the GLA in the preparation of its Local Plan and this has included specific discussion about addressing housing.

The GLA has confirmed that London Boroughs are not required to demonstrate how any unmet need from their own boroughs will be met in Other London Boroughs or adjoining districts. The preparation of the Havering Local Plan is therefore not required to address how any shortfall in this borough will be addressed within London or by adjoining / nearby local authorities.

The GLA has advised that the London Plan makes clear that London should be treated as a single housing market. The London Plan states that the Annual average housing supply monitoring targets set out in Table 3.1 are a minimum target for each borough. In order to meet local need and contribute to meeting strategic need each London borough is to seek to exceed this target through the measures set out in London Plan Policy 3.3E, paragraphs 3.19 and 3.19i of the Plan and Section 1 of the London Plan Housing SPG (2016).

The Housing SPG clarifies that this approach applies even where a borough has demonstrated it can exceed its local housing need. In preparing its Local Plan Havering (and Redbridge/Barking and Dagenham) will be expected to demonstrate it has sought to increase its housing supply in line with policy 3.3 of the London Plan and the
Housing SPG in order to reduce the gap between local and strategic housing need and supply.

The Housing SPG 2016 notes that sensitivity testing during the development of the SHLAA showed that additional sources of housing such as higher density, housing led, mixed use development in accessible locations in Opportunity/Intensification Areas, town centres, surplus industrial land and other large sites could ‘fill’ the gap between the minimum housing supply target and London’s identified need. This has been confirmed by monitoring which shows that collectively the boroughs have been approving sufficient capacity to address London-wide need.

The objector refers to the recent Government consultation ‘Planning for the right homes in the right places’. It is recognised that the approach set out in the consultation is now reflected in the draft National Planning Policy Framework published in March 2018.

The Government White Paper consultation identified a housing ‘need’ figure for Havering of 1,821 new homes per year. It is noted that this figure is in a consultation document and has been derived from methodology that is not normally used in London.

The Council responded to the consultation identifying that there were strong concerns as to how this figure has been prepared and that it made no provision for the infrastructure to support the level of housing mentioned. On this basis the Council considers that the figure identified by the Government is flawed, unachievable and unrealistic.

In preparing its Local Plan, the Council has engaged with other London Boroughs and adjoining districts. The details of these discussions are set out in the Duty to Cooperate statement. It is clear from the Duty to Cooperate engagement that adjoining local authorities are heavily engaged in their own Local Plan preparation including securing the necessary evidence to support this. This work will include the preparation of necessary SHMAs. It was not feasible and not desirable to ‘pause’ the preparation of the Havering Local Plan to enable all evidence base work (including SHMAs) to ‘catch up’ nor for this to be reflected in the Havering local Plan.

The Duty to Cooperate discussions have recognised that for most authorities involved in this process it will be extremely challenging for them to identify and deliver sites that will enable them to meet their respective OAHN. It is therefore highly unlikely that these authorities will be willing to help meet unmet need arising in London.

The Duty to Cooperate Statement confirms that issues around the provision of housing have been explicitly discussed and explored between the authorities. It was recognised in this process that seeking to resolve this would be extremely challenging and delay the delivery of the respective local plan at a time when local authorities are being pressed by Government to ensure that they have up to date Local Plans in place.

The Duty to Cooperate Statement also makes clear that there are regular discussions between Havering and Essex County Council on a range of matters. The progress that has been made in regard to the preparation of a Statement of Common Ground for continued close working on transport matters is a clear demonstration of this. Havering is engaged closely with Essex and other stakeholders on planning issues linked to the A127 corridor in response to several authorities each having growth proposals that need to be considered in the light of the A127. It is intended that this work will generate a recognition in Government of the importance of the A127 and the case for its improvement. Havering considers that these initiatives robustly demonstrate its commitment to and willingness to work with other stakeholders on common issues and priorities.

This approach is already taking place in regard to other topics such as education. As noted the Havering school organisation and Essex school organisation teams maintain a close relationship, attending meetings where issues concerning place planning are regularly discussed, particularly if they have a potential cross border implication. Havering meets with neighbouring boroughs including Essex on a termly basis, maintaining close contact concerning key issues in between. In addition, Essex is consulted on Havering’s commissioning Plan for Education Provision which is updated on an annual basis.
<p>| LPREG19 - 234 | Concerns over impacts of drainage of new developments on watercourses within Essex | No modification proposed | Consultation on planning applications is beyond the remit of the Local Plan. However, the Council will explore and liaise with Essex County Council how it can make sure that Essex County Council is consulted on applications that have a potential impact on watercourses within Essex. These discussions are on-going. |
| LPREG19 - 235 | Seeking clarification on how minerals provision will be reviewed following adoption of new London Plan | No modification proposed | The emerging London Plan will be taken into account in any review of the East London Joint Waste Development Plan. Policy 38 seeks to maintain a 7 year aggregate landbank as per the appointment within the London Plan. The draft London Plan proposes to retain the same landbank appointment for Havering. |
| <strong>London Borough of Redbridge</strong> LPREG19 - 223 | Support for the vision and strategic objectives set out in the draft Plan. | No modification proposed | Support noted. |
| <strong>Groveworld Beam Park Regeneration</strong> LPREG19 - 240 | Support for the Strategic Objectives | No modification proposed | Support noted. |
| LPREG19 - 241 | Support for Rainham and Beam park SDA Policy. Calls for redevelopment of Rainham Steel | Modification to Policy 2 Rainham and Beam Park Strategic Development Area Paragraph 6.2.9 | The Council is committed to the redevelopment of this area as set out in Policy 2. The Council will utilise its powers to facilitate this development where necessary and appropriate as set out in section 14 Delivery and Implementation and specifically paragraph 14.0.7. The Employment Land review recommended the retention of the Rainham Steel office building. The site is of a good quality and is compatible with the housing development that will take place in the area. However, in the long term if Rainham Steel were to relocate from this location, the Council would not wish to retain the site for industrial use due to its prominent location and close proximity to the new residential development. The Council will seek a residential redevelopment in this scenario. |
| LPREG19 - 242 | Support for approach to affordable housing and encouragement for the Council to take account of individual site viability assessments. | No modification proposed | Support noted. Policy 4 sets a threshold approach to viability in line with the Mayor’s Affordable Housing and Viability Supplementary Planning Guidance 2017. There is scope within this policy to take account of individual viability assessments for specific development sites. |
| LPREG19 - 243 | Supports Housing Mix Policy | No modification proposed as a result of this comment however a minor modification is proposed – please refer to the Council’s response to LPREG19 -426. | |</p>
<table>
<thead>
<tr>
<th>LPREG19 - 244</th>
<th>Seeks clarification on what constitutes 'exceptional circumstance' in relation to provision of dual aspect accommodation</th>
<th>Modification to Policy 7 Residential Design and Amenity</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>ix. Maximise the provision of dual aspect accommodation unless exceptional circumstances are demonstrated.</td>
<td>Insert a new additional paragraph between paragraphs 7.5.4 and 7.5.5.</td>
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<tr>
<td></td>
<td>New paragraph 7.5.4: New development in Havering should be of a high quality and offer a good quality living environment for residents. Dual aspect accommodation offers a range of benefits such better daylight, a greater chance of direct sunlight for longer periods, natural cross ventilation, mitigating pollution, offering a choice of views, greater flexibility and adaptability. In line with the Mayor’s Housing SPG 2016 developments should minimise the number of single aspect dwellings. Single aspect dwellings that are north facing, or exposed to noise levels above which significant adverse effects on health and quality of life occur, or which contain three or more bedrooms should be avoided.</td>
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<table>
<thead>
<tr>
<th>LPREG19 - 245</th>
<th>Concerns over Parking standards</th>
<th>No modification proposed</th>
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<tbody>
<tr>
<td></td>
<td>Comments concerning Havering’s aspirations for better public transport connectivity are noted.</td>
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<tr>
<td></td>
<td>The Council recognises the importance of encouraging public transport use but is mindful of limitations of the existing public transport services for some local journeys in Havering.</td>
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<tr>
<td></td>
<td>The Council will always seek to optimise the use of sites in development proposals but it has to recognise several issues and factors (including car parking provision) have to be taken into account.</td>
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<tr>
<td></td>
<td>The current London Plan recognises that in Outer London boroughs in areas of low public transport accessibility, residents’ dependency on cars should be taken into account when considering parking standards.</td>
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<td></td>
<td>Furthermore paragraph 6.42i states that such standards could include minima, and that higher levels of provision than are set out in Table 6.2 of the London Plan would be permitted, where appropriate.</td>
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<table>
<thead>
<tr>
<th>LPREG19 - 246</th>
<th>Concerns over Parking standards</th>
<th>No modification proposed</th>
</tr>
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<tbody>
<tr>
<td></td>
<td>Flood defence contributions</td>
<td>Noted.</td>
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</tbody>
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<tr>
<th>LPREG19 - 368</th>
<th>Concerns over Parking Standards</th>
<th>No modification proposed</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>This appears to be duplication from LPREG19-245 so the same response applies.</td>
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<thead>
<tr>
<th>LPREG19 - 369</th>
<th>Provides information on the delivery of a residential scheme at Mudlands site in the Rainham and Beam Park Strategic Development Area.</th>
<th>No modification proposed</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Noted.</td>
<td></td>
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<table>
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<tr>
<th>Environment Agency</th>
<th>LPREG19 - 174</th>
<th>Concerns over evidence base in regards Water resources</th>
<th>Modification to Policy 36 Low carbon design, decentralised energy and renewable energy Paragraph 12.8.1</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>The London Plan is part of the Council’s Development Plan. It is therefore not needed to repeat policies contained within the London Plan, which sufficiently covers water efficiency. This reference is made clearer via the proposed modification.</td>
<td></td>
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</tbody>
</table>
Renewable energy supplies and achieving energy efficiency are crucial to meeting the Council’s ambition of reducing carbon emissions, and generating cleaner power locally. Specific requirements relating to minimising carbon dioxide emissions, **water efficiency**, sustainable design and construction and decentralised energy are set out within the London Plan and will be applied by the Council.

<table>
<thead>
<tr>
<th>LPREG19 - 175</th>
<th>Calls for involvement in future discussions regarding Lower Thames Crossing</th>
<th>Modification to Section 5 Borough-wide strategy for growth</th>
<th>Change made to highlight that the Council will work with other partners, including the Environment agency, regarding the Lower Thames Crossing.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Box in 5.1: Working with Highways England and other partners to minimise the adverse impact on <strong>Havering and its local residents</strong> and the environment of the Government’s preferred option for a Lower Thames Crossing.</td>
<td></td>
<td>As Highways England is the promoter of the scheme, it is expected that Highways England will engage directly with the Environment Agency to assist with developing proposals for the Lower Thames Crossing.</td>
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<thead>
<tr>
<th>LPREG19 - 176</th>
<th>Calls for collaborative working early on in a masterplan for Romford re. the River Rom.</th>
<th>No modification proposed</th>
<th>Support noted.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Support noted.</td>
<td>Also see amendments in response to LPREG19 -147.</td>
</tr>
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</table>

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<thead>
<tr>
<th>LPREG19 - 177</th>
<th>Support for SSSI and Flood Risk aims</th>
<th>No modification proposed</th>
<th>Support noted.</th>
</tr>
</thead>
</table>

| LPREG19 - 178 | Support for Policy 27- landscaping | No modification proposed | Support noted. |

| LPREG19 - 179 | Support for Green Infrastructure Policy | No modification proposed | The Council recognises that the list of partnerships in Policy 29 Green infrastructure is not exhaustive. However, it recognises the main partners with regards to the delivery of green infrastructure in the borough. As the South Essex Catchment Partnership is largely focused on neighbouring local authorities it is not referenced in the policy. |

<table>
<thead>
<tr>
<th>LPREG19 - 180</th>
<th>Supportive of the inclusion of rivers, streams and Thames Corridor in Nature Conservation Policy</th>
<th>Modification to Policy 31 Rivers and river corridors</th>
<th>Reference to the Thames River Basin Management Plan is sufficiently made in Policy 31 Rivers and river corridors.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>To include footnote in paragraph 12.3.3: The Thames River Basin Management Plan 2015-2021 (*).</td>
<td></td>
<td>Change made to clarify the setback requirements.</td>
</tr>
<tr>
<td></td>
<td>Paragraph 12.3.5: for development in river corridors and areas affected by tidal and fluvial flood risk developers should work in partnership with the Environment Agency.</td>
<td></td>
<td>Change made to clarify what is meant with ‘in close proximity, which is being defined as 20m of a main river as suggested by the Environment Agency and agreed with the Lead Local Flood Authority’.</td>
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<thead>
<tr>
<th>LPREG19 - 181</th>
<th>Support for the aims of Policy 31- rivers and river corridors, but amendments proposed</th>
<th>Modification to Policy 31 Rivers and river corridors</th>
<th>Support noted.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Paragraph 12.3.2: Include ‘Mardyke’ in list of rivers</td>
<td></td>
<td>Change made to clarify what is meant with ‘in close proximity, which is being defined as 20m of a main river as suggested by the Environment Agency and agreed with the Lead Local Flood Authority’.</td>
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<tr>
<td></td>
<td>Add to the end of 12.3.2: For the implantation of this policy, any development within 20m of a main river is considered in close proximity.</td>
<td></td>
<td>Change made to 12.3.5 as proposed.</td>
</tr>
<tr>
<td></td>
<td>Paragraph 12.3.5: For development in river corridors and areas affected by tidal and fluvial flood risk developers should work in partnership with the Environment Agency.</td>
<td></td>
<td>Change made to clarify the setback requirements.</td>
</tr>
</tbody>
</table>
| LPREG19 - 182 | Support for Policy 32 - Flood management. Additional wording proposed | Modification to Policy 32 Flood management  
New paragraph 12.4.8  
In some cases, the discharge or infiltration of surface water may require a permit under the Environmental Permitting Regulations. Developers are therefore advised to review available guidance (1) and seek advice from the Environment Agency at an early stage.  
Wording has been included to make developers aware of the potential need for a permit under the Environmental Permitting Regulations. |
| LPREG19 - 183 | Support for the aims of Policy 33 - Air Quality. Additional wording proposed | No modification proposed | Consideration will be given to this when the East London Joint Waste Development Plan is reviewed. The Council does not consider it appropriate to include this in the Local Plan. |
| LPREG19 - 184 | Concerns regarding the sewage network capacity in the Borough. Additional wording proposed | Modification to Policy 34 Managing pollution  
Paragraph 12.6.5:  
Regard should be given to the Source Protection Zone along the border with Barking & Dagenham, which needs to be protected during development around discharges or pathways to groundwater. The Council’s leaflet ... | Support noted.  
The policy context for adequate waste water infrastructure is sufficiently covered by London Plan Policy 5.14 Water quality and wastewater infrastructure. Sewerage is also covered by the Council’s Infrastructure Delivery Plan.  
Proposed changes with regards to the EA’s groundwater protection principles have been accepted, including reference to the Source Protection Zone. |
| LPREG19 - 185 | Concerns over waste management capacity in the Borough and ref. to LWARB and WRAP. | Modification to Policy 35 On-site waste management  
Paragraph 12.7.3 (to be added at the end of the paragraph).  
For developments including flatted properties, it will be expected that the required waste management plan adheres with the advice and template provided by the London Waste & Recycling Board (1).  
(1) http://www.lwarb.gov.uk/what-we-do/resource-london/successes-to-date/efficiencies-programme-outputs/ | Comments noted.  
The Council’s guidance on waste management referenced in paragraph 12.7.3 sufficiently covers requirements for flatted developments. Reference to the LWARB guidance is therefore not needed.  
Reference to the relevant guidance on flatted developments has been included.  
The Council is committed to working with the other East London Waste Authorities to updating the Joint Waste Development Plan. |
<p>| LPREG19 - 186 | Calls for Policy 36 - Low carbon design, decentralised energy &amp; renewable energy to incorporate water efficiency measures. Amendment | No modification proposed | The London Plan is part of the Council’s development plan. It is therefore not needed to repeat policies contained within the London Plan, which sufficiently covers water efficiency. This link is enforced by reference to the London Plan policies on water efficiency in paragraph 12.8.1, in response to LPREG19 -181 |</p>
<table>
<thead>
<tr>
<th>Ellandi LLP</th>
<th>Spatial Strategy</th>
<th>Modification to Section 5 Borough-wide spatial strategy</th>
</tr>
</thead>
</table>
| LPREG19 - 352 | Romford SDA | Modification to Policy 1 Romford Strategic Development Area  
  Social infrastructure  
  To support growth in the Romford Strategic Development Area and to assist in ensuring it is a successful place to live the Council will work with developers and service providers to ensure the delivery of:  
  aiii. Romford Leisure Centres  
  Paragraph 6.1.22 :  
  Education provision is particularly challenging in Romford. Existing schools within the area are already at full capacity and whilst the Council’s school expansion programme will assist in meeting future demand, this will not offer sufficient capacity over the Plan period. In order to meet the need for primary school places in the Romford area a 3 form of entry primary school (630 places) has been approved on the Bridge Close development site and the new school should be sufficient to meet demand for the additional primary places needed over the next five years. There is a further 6FE need for primary school places beyond the first five years. This will need to be delivered through new schools. A 6/8FE secondary school is required in the second phase of the Plan period (5-10 years). The Council will seek to identify sites suitable for additional education provision through the Romford Masterplan and Site Specific Allocations Local Plan.  
  Paragraph 5.1.5:  
  Romford is identified as a metropolitan centre in the London Plan and is the largest town centre in the borough. Romford has scope for development across a number of well located and well connected sites. The Local Plan recognises its potential for significant regeneration and intensification. Romford is already a key transport hub in Havering with more than 25 bus routes using the town centre. From 2019, it will benefit from improved rail services as a result of the arrival of Elizabeth line services through Crossrail. Its potential has been recognised by its designation as a Mayoral Housing Zone and the Local Plan will provide the means to assist in accelerating the delivery of new homes on a number of sites in and around the town centre. A minimum of 5,300 new homes will be delivered in the Romford Strategic Development Area. This plan also envisages business growth and an expanded leisure and cultural role for Romford. The next London Plan will re-affirm the role of Romford by designating it as an Opportunity Area in recognition of its potential to address an important part of Havering’s growth potential.  
  SA to refer to 5,300 figure instead of the 6,500 figure for the Romford SDA. |
| LPREG19 - 353 | Beam Park Local | No modification proposed |
| | | The proposed Local Centre at Beam Park is to serve the new communities in the surrounding area as well as... |
The Council’s Vision: Havering Making a Greater London seeks to provide new homes in Havering and, in appropriate cases, the Council takes a positive and proactive stance in dealing with prospective private developers wishing to bring forward housing schemes in recognition of the importance of securing timely and high quality housing delivery.

In line with the Vision, the Local Plan Spatial Strategy acknowledges that the delivery of new homes is critical to London’s well-being. It sets out how the Council has approached the important topic of making sure that enough new homes are provided.

Havering has undertaken a Strategic Market Assessment to support the preparation of the Local Plan. Havering forms part of both the London-wide housing market area and the outer north east London sub housing market area with the London Boroughs of Barking and Dagenham and Redbridge. In line with the requirements of the National Planning Policy Framework, the Council has worked with these authorities to prepare its Strategic Housing Market Assessment (SHMA).

The resultant Outer North East London SHMA indicates that Havering’s full objectively assessed housing need is for 25,200 new homes over the period 2011-2033 or 1,145 homes per annum. Since the initial SHMA was undertaken, updated population projections have been published by the GLA. The updated population projections were reflected in an update (2017) of the SHMA which identified an increased housing need in Havering of 30,052 new homes over the same period (1,366 new homes per year).

The Council is making every effort to identify and bring forward suitable sites to exceed the current London Plan target and to meet housing need.

The Local Plan does not seek to constrain the number of new homes to come forward to 17,550 over the Plan period.

Further, the Council is aware that the current London Plan requires that boroughs should seek to close the gap between housing need (as assessed through a Strategic Housing Market Assessment) and supply.

The Council’s approach to providing new homes in the Havering Local Plan takes a balanced view about the importance of addressing housing requirements and securing sustainable development. Having undertaken recent studies to assess whether the Green Belt fulfils the roles identified in the National Planning Policy Framework, the Council is also committed to ensuring that the Green Belt is safeguarded. The Council has concluded that there are no exceptional circumstances to support releasing land from the Green Belt.

The Council’s commitment to the Green Belt is an important ‘driver’ in helping to secure new homes in Havering’s built up areas and through the important programmes being delivered through the Housing Zones and the Council’s estates regeneration programme (see below).

The Council’s strategy also recognises that the scope to accommodate growth in Havering will be dependent upon the provision of infrastructure especially that needed to provide effective and efficient movement within Havering as well as social and community infrastructure necessary for residents such as schools and health facilities. The Council has prepared an Infrastructure Delivery Plan to support the Havering Local Plan and to inform the consideration of housing proposals.

Throughout the Local Plan process, the Council has rigorously sought to identify all sources of potential housing supply that will secure sustainable development in order to ensure that Havering is taking every opportunity to secure the delivery of new homes. This approach has been implemented to enable the gap between the housing targets in the London Plan and the objectively assessed need requirement to be closed as far as is reasonably possible.
The Housing Position Statement which supports the Havering Local Plan explains the Council’s approach to this in more detail. A key element is that the Council considers that the certainty of securing housing delivery over the overall plan period must be taken into account against the numbers of units approved particularly in the initial years of the Local Plan being implemented.

It sets out that the Council considers that over the period of the plan to 2031, the potential overall supply of additional homes in Havering may exceed the minimum annual housing target of 1,170 new homes per year set out in the current London Plan.

In summary, the approach in the Local Plan that the Council will implement is based on:

- focussing the delivery of new homes in Havering’s two housing Zones at Romford and Rainham and Beam Park. These two areas are identified in the Local Plan as Strategic Development Areas and have individual comprehensive policy frameworks to guide and steer their development to make sure that development provides high quality places with inclusive communities and the timely and effective provision of infrastructure.
- supporting the intensification of twelve of its own existing housing estates through an ambitious regeneration programme that includes an experienced private sector development partner secured by means of a Joint Venture Limited Liability Partnership.
- realising the housing opportunities that come forward on large sites outside of the Strategic Development Areas to provide opportunities for place-making and building communities. These include sites such as the former St Georges Hospital site in Hornchurch.
- prioritising all land not designated for other planning purposes for new homes.
- encouraging the effective use of land by re-using previously developed (brownfield) land and allocating a range of sustainable sites for housing development. The latter will be identified in the forthcoming Site Specific Allocations Local Plan.

The Local Plan Housing Position Statement sets out in more detail the specific potential housing opportunities that will come forward for the two Housing Zones and the Council’s twelve estates programme. The Housing Position Statement includes details of the expected delivery of sites in the Romford Strategic Development Area (Anne 1 Table 8.1).

The Housing Position Statement identifies specific deliverable and developable sites for the first 10 years of the Plan. The Council is committed to ensuring that there is a sufficient supply of housing over the 15 year plan period and beyond and will therefore undertake an early review of the Plan.

The Statement also includes details of sites which it is anticipated will be included in the forthcoming Site Specific Allocations Local Plan document which will reflect up to date capacity studies where appropriate.

Underpinning the Council’s approach is a clear recognition of the importance of optimising the development potential of the sites in regard to their potential capacity whilst ensuring that they provide satisfactory residential environment for residents and maintaining the character and appearance of Havering. There is an emphasis on making sure the place-making role of new development is addressed and a focus on delivering places where communities can flourish and be cohesive and inclusive.

As a result of this approach, sufficient land has been identified to meet the minimum London Plan housing target for the first 10 years of the Local Plan if the delivery is taken over the 10 year period.

The Council considers that the greater certainty that is encompassed through the Housing Zones and the twelve estates programme should weigh heavily in their favour and help counter the potential numerical shortfall in housing delivery in the first five years.

The objector has raised concerns about the potential implications of Havering failing to meet its OAHN particularly in regard to the position with other London Boroughs and adjoining and nearby districts outside London.
Havering has engaged extensively with the GLA in the preparation of its Local Plan and this has included specific discussion about addressing housing.

The GLA has confirmed that London Boroughs are not required to demonstrate how any unmet need from their own boroughs will be met in Other London Boroughs or adjoining districts. The preparation of the Havering Local Plan is not therefore required to address how any shortfall in this borough will be addressed within London or by adjoining / nearby local authorities.

The GLA has advised that the London Plan makes clear that London should be treated as a single housing market. The London Plan states that the Annual average housing supply monitoring targets set out in Table 3.1 are a minimum target for each borough. In order to meet local need and contribute to meeting strategic need each London borough is to seek to exceed this target through the measures set out in London Plan Policy 3.3E, paragraphs 3.19 and 3.19i of the Plan and Section 1 of the London Plan Housing SPG (2016).

The Housing SPG clarifies that this approach applies even where a borough has demonstrated it can exceed its local housing need. In preparing its Local Plan Havering (and Redbridge/Barking and Dagenham) will be expected to demonstrate it has sought to increase its housing supply in line with policy 3.3 of the London Plan and the Housing SPG in order to reduce the gap between local and strategic housing need and supply.

The Housing SPG 2016 notes that sensitivity testing during the development of the SHLAA showed that additional sources of housing such as higher density, housing led, mixed use development in accessible locations in Opportunity/Intensification Areas, town centres, surplus industrial land and other large sites could ‘fill’ the gap between the minimum housing supply target and London’s identified need. This has been confirmed by monitoring which shows that collectively the boroughs have been approving sufficient capacity to address London-wide need.

The objector refers to the recent Government consultation ‘Planning for the right homes in the right places’. It is recognised that the approach set out in the consultation is now reflected in the draft National Planning Policy Framework published in March 2018.

The Government White Paper consultation identified a housing ‘need’ figure for Havering of 1,821 new homes per year. It is noted that this figure is in a consultation document and has been derived from methodology that is not normally used in London.

The Council responded to the consultation identifying that there were strong concerns as to how this figure has been prepared and that it made no provision for the infrastructure to support the level of housing mentioned. It would also have a very adverse impact on the character and appearance of Havering. On this basis the Council considers that the figure identified by the Government is flawed, unachievable and unrealistic.

The objector has referred to density issues noting that these are expected to be removed from the forthcoming London Plan. The Council will be bringing forward further planning policy and guidance documents to support the Havering Local Plan. These will include a Site Specific Allocations document and a Masterplan for Romford and it is likely that these will address design issues including density.

| LPREG19 - 356 | Affordable Housing | No modification proposed | Policy 4 Affordable Housing is consistent with the Mayors Affordable Housing and Viability Supplementary Planning Guidance 2017 and is supported by the GLA’s Regulation 19 consultation response. Paragraph 7.2.8 sets summaries the findings of the Outer North East London SHMA which found that the vast majority of households in Havering can only afford social housing if they receive housing benefit. This equates to approximately 80% of households. The SHMA provides a robust evidence base for a 70:30 tenure split. The Council will prepare further guidance on the Council’s preferred split between specific affordable products.

| LPREG19 - 357 | Housing Mix | Policy 5 Housing mix | Policy 5 is informed by the Outer North East London SHMA, which provides a robust evidence base in relation to the need for properties of varying sizes. This is set out in paragraphs 7.3.2 and 7.3.3. |
The Council will support development proposals that provide a mix of dwelling types, sizes and tenures. All housing schemes should include a proportion of family sized homes and reflect the recommended housing mix identified in Table 2 unless; when considering the mix of dwelling sizes appropriate for a particular development proposal, the Council will have regard to. It can be robustly demonstrated that a variation to the mix in Table 2 is justified having regard to individual site circumstances including location, site constraints, viability and the achievement of mixed and balanced communities.

Where proposals are seeking to provide retirement, sheltered or extra care housing, the Council recognises that there may be a need for greater flexibility with regard the mix of units to be provided within Developments and the housing mix as set out in Table 2 does not apply to such proposals, particularly in achieving the provision of 3 bedroom units.

Table 2 Borough Wide Housing Mix

LPREG19 - Requests for the reference to lifetime homes to be removed from Policy 7 and for greater flexibility in relation to the requirement for dual aspect accommodation.

Modification to Policy 7 Residential Design and Amenity

Paragraph 7.5.3 Developments will be expected to deliver ‘lifetime’ homes and ‘lifetime’ neighbourhoods reflecting the six principles relating to access, services and amenities, built and natural environments, social network and well-being, and housing. By developing homes which are adaptable to change based on the needs of residents, it will facilitate greater pride and sense of community.

ix. Maximises the provision of dual aspect accommodation unless exceptional circumstances are demonstrated;

Insert a new additional paragraph between paragraphs 7.5.4 and 7.5.5.

New paragraph 7.5.4:

New development in Havering should be of a high quality and offer a good quality living environment for residents. Dual aspect accommodation offers a range of benefits such better daylight, a greater chance of direct sunlight for longer periods, natural cross ventilation, mitigating pollution, offering a choice of views, greater flexibility and adaptability. In line with the Mayor’s Housing SPG 2016 developments should minimise the number of single aspect dwellings. Single aspect dwellings that are north facing, or exposed to noise levels above which significant adverse effects on health and quality of life occur, or which contain three or more bedrooms should be avoided.

Glossary

Lifetime Homes Standards - Lifetime Homes are ordinary homes designed to incorporate 16 design criteria that can be universally applied to new homes at minimal cost. Each design feature adds to the comfort and convenience of the home and supports the changing needs of individuals and families at different stages of life.
It is noted that much of the representation supports the Local Plan.

The issues raised are:

- the PSA is not defined on the policies map/schedule
- the way qualitative needs have been factored into the assessment of overall retail and leisure needs
- the quantum of need being explicitly set out in policy

The PSA is defined with reference to the primary and secondary frontages already listed in the draft plan. This is the relevant designation as set out in the National Planning Policy Framework (NPPF) when it comes to applying the sequential approach to site selection.

The representation says that ‘the Plan cannot be found sound as there is no assessment of qualitative need which is half of the process of identifying retail and leisure needs – without this assessment, the Plan’s overarching objective to enhance the vitality and viability of Havering’s town centres could be put at risk’.

This is incorrect for several reasons:

- An assessment of qualitative need is provided at pp. 44-46 of the Havering Retail and Leisure Study (2015) and this was informed by the town centre assessments. The recommendations at Section 7 provide a framework for town centre strategies to enhance the vitality and viability of the borough’s centre have regard to qualitative considerations
- The Planning Practice Guidance (PPG) does not provide any guidance on the relative importance of the qualitative part of the assessment and this is confirmed at para. 5.6.1 of the 2015 study. The PPG refers the need being ‘based on quantitative assessments, but also on an understanding of the qualitative requirements of each market segment’. As required by the PPG, the 2015 study has demonstrated an understanding of the qualitative requirements in the retail and leisure markets. This understanding is factored into the approach taken on sales efficiency growth over the plan period
- The PPG goes on to say that ‘assessing development needs should be proportionate’. The Savills representation expresses concern that the capacity figures set out were ‘relying on the quantitative assessment alone’. This is not correct; the assumptions that underpin the capacity assessment take account of qualitative factors, notably through the application of sales efficiency improvements over the plan period. The approach taken in the 2015 study was to apply a blanket assumption; this is the standard approach in studies of this nature and reflect the fact that there is a range in the quality of existing floorspace across the borough. The updated quantitative assessment has explored this point again and adopts the level used in the GLA’s latest comparison retail assessment. This approach follows the PPG’s direction to be ‘proportionate’ in approach.

The representation also makes reference to a number of qualitative factors such as ‘market demand/commercial need for new floorspace, the amount of vacant floorspace in situ (which can be either re-occupied or re-purposed thereby reducing the need for floorspace elsewhere) and the quality of existing retail provision’. There is no formal guidance on what factors should be considered; as set out para. 5.6.1, the 2013 study had regard to the now-revoked PPS4 Practice Guidance in the absence of any alternative, which refers to ‘identifying gaps in local provision; consumer choice and competition; over-trading; ‘location-specific issues’, and quality of existing provision’.

Finally, the need for qualitative improvement is reflected in the recommendations for Romford (para. 5.7.2). The representation appears to suggest that qualitative need should be used as a basis for tempering quantitative need the Council’s consultants have done through the sales efficiency assumptions which would allow for vacant space (above a reasonable churn) was reoccupied. This approach is considered to align with the NPPF which is
clear in its direction that local authorities should plan positively; so while the 2015 study acknowledges the pressures faced by Havering in terms of competition from outside the borough and the need for improvement of existing floorspace during the plan period to ensure the continued attraction of the comparison goods offer, the need figures identified are based on Havering’s maintaining its current role in meeting retail and leisure needs.

With regard to identifying the comments in the representation about the quantum of need within policy, it is relatively common to include a phasing over time. This could be done relatively straightforwardly based on the quantitative update, with the majority of comparison need focused on Romford town centre.

| LPREG19 - 360 | Request for clarity over what is meant by ‘stakeholders’ in Policy 16 | Modification to Policy 16 Social infrastructure: 

(...)

Stakeholders Applicants will be encouraged to consider funding arrangements for on-going maintenance costs. | Wording changed to clarify the policy intention. |
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<tr>
<td>LPREG19 - 361</td>
<td>Affordable Workspace</td>
<td>Refer to the Council’s proposed modifications in response to LPREG19 - 103</td>
<td>Refer to the Council’s proposed modifications in response to LPREG19 - 103</td>
</tr>
</tbody>
</table>
| LPREG19 - 362 | Parking | No modification proposed | Comments concerning Havering’s aspirations for better public transport connectivity are noted. 

The Council’s parking policy (policy 24) has been informed by a Residential Car Parking Standards study which has drawn together a range of evidence to help inform the car parking standards for the borough having regard to the particular circumstances in Havering.

Policy 24 recognises that as an outer London Borough for many residents there is a higher dependency on the car, compared to central and inner London where public transport provision is much more accessible. The policy seeks to recognise that many local journeys in Havering must be made by car because they are impractical to make by public transport. Although parts of Havering are well connected by public transport to destinations outside of the borough, many more local destinations do not have reasonable public transport access and this is reflected in the higher levels of car ownership and usage in Havering. In this regard Havering is typical of many other outer London boroughs.

The London Plan expects that in areas of good public transport accessibility (PTAL 5-6) in all parts of London developments should aim for significantly less than one space per unit. The Council considers that this does not adequately reflect the position in Havering regarding the practicalities of making journeys within the borough and the consequent ownership and usage levels of private cars.

For highly accessible parts of the borough (PTAL 5-6), the parking standards set out in Policy 24 recognise that a minimum parking standard of 0.5 spaces per unit is appropriate having regard to the particular circumstances involved |
| LPREG19 - 363 | Design | Modification to Policy 26 Urban Design | 

The Council will require development proposals of a strategic nature to be subject to an Urban Design Review Panel.

Paragraph 11.1.16:

The National Planning Policy Framework states that Local planning authorities should have local design review arrangements in place to provide assessment and support to ensure high standards of design. The Council will establish a Design Review Panel comprising of independent specialists and Council representatives. The Council supports the use of
Urban Design Review Panels and will expect development proposals of a strategic nature to be subject to such a review. For the purpose of this policy development proposals of a strategic nature are those that have potential to significantly impact or alter the character of an area including those that comprise of tall buildings and those that are referable to the Mayor. If an applicant is in doubt about whether a design review is required this should be discussed with the Council’s Planning Department at pre-application stage. This will include large development schemes within the Romford and Rainham and Beam Park Development Area.

| LPREG19 - 364 | Clarification sought on Policy 28 & Para 11.3.7 re. agreed selection criteria for Local lists and how these will be determined | Modification to Policy 28 Heritage assets
Paragraph 11.3.7:
Not all of Havering’s heritage assets are designated. There are also many non-designated heritage assets that contribute to the character and distinctiveness of the borough’s historic environment including historic parks and gardens of local interest and locally important historic buildings. In order to ensure that these elements of the historic environment are conserved in a manner appropriate to their significance, the Council will work with local communities to promote the identification and maintenance of a list of non-designated heritage assets when these meet its agreed criteria. The proposed Local List Criteria will be subject to public consultation. Development proposals affecting non-designated heritage assets will be dealt with in accordance with the NPPF. |

| LPREG19 - 365 | Requests for a number of definitions to be added/deleted | Modification to Glossary
**Lifetime Homes Standards** - Lifetime Homes are ordinary homes designed to incorporate 16 design criteria that can be universally applied to new homes at minimal cost. Each design feature adds to the comfort and convenience of the home and supports the changing needs of individuals and families at different stages of life. |

| With regards to the inclusion of a definition of ‘Stakeholder’ please refer to the Council’s proposed modification in response to comment 19-360

| With regards to the inclusion of a definition of ‘Strategic’ and ‘Large Development’ please refer to the Council’s proposed modification in response to comment 19-363 |

| LPREG19 - 366 | Duty to Co-operate | No modification proposed |

The Duty to Co-operate Statement was made available on the consultation website for the Regulation 19 consultation together with other proposed submission documents.

In addition to the key milestones, the statement also sets out what engagement on which issues has taken place with individual stakeholders. The statement also provides a summary of the engagement on particular strategic issues. The Council has therefore provided a comprehensive statement in which it has demonstrated how the Duty to Co-operate has been met.

Annex A Key relationships and bodies includes a comprehensive review of engagement through the preparation of the Havering Local Plan. It includes details of engagement with statutory organisations, local authorities and regular liaison meetings with ‘ad hoc’ stakeholders such as the Association of London Borough Planning Officers (ALBPO). Dates are included for the specific Duty to Cooperate events that Havering ’hosted’ with other local authorities (Section A3 Table A2). The programme of other regular meetings that Havering had with other stakeholders is identified (Section A3 Table A3). Specific topics addressed with relevant local authorities are itemised (Section A3 Table A4).

Annex B provides an audit trail to document how specific strategic issues were progressed. It includes : Housing need and delivery, employment, Green Belt, Transport, Infrastructure, Flood risk and rivers, Natural environment and Minerals. For each of the issues, there is a ‘time-line’ identified from initial engagement through to the current, up to date position for submission of the Local Plan.

The objector comments that more detail is needed on who was involved with the listed events. In most
instances, principal stakeholders are identified by organisation. In some cases, such as the events involving the preparation of the SHMA, it is clear from other parts of the Local Plan who would be involved. For example, SHMA events would normally comprise: London Boroughs of Redbridge, Newham, Barking and Dagenham and Havering.

| LPREG19 - 367 | Objection with regards to the process that has been followed. Information provided on Mercury Shopping Centre | No modification proposed | The Council has brought forward the Havering Local Plan to ensure that it has an up to date suite of planning policies to guide development in the borough at a time of great change. The Havering Local Plan replaces the Havering Local Development Framework (including the Romford Area Action Plan) which was adopted in 2008. The Council considers that an up to date Local Plan is essential because it will assist in the delivery of its two Housing Zones (at Romford and Rainham and Beam Park) and the regeneration of its twelve Council estates project.

The Borough will also benefit from the arrival of Crossrail / Elizabeth line services from 208/19 which will significantly improve access to and from Romford and into and from Central London. It is expected that this will be reflected in increases in development interest in Havering.

The Council is also looking to secure significant public transport connectivity improvements between the north and south of the borough and has commissioned feasibility work to support and inform this.

Havering regard to these factors and its relatively modest plan-making resources, the Council determined that the most effective way forward and of ensuring that Havering has up to date planning policies is to bring forward the Havering Local Plan which has now been submitted.

As set out in its Local Development Scheme, it will be followed by the preparation of a Site Specific Allocations Local Plan which will provide details of individual sites for development. The Housing Position Statement document (which supports and informs the Havering Local Plan) will also inform and support the preparation of the Site Specific Allocations document and assist in securing its timely delivery. Considerable work has already been done to inform the Housing Position Statement in regard to matters such as site capacity and potential.

In addition, the Council will be bringing forward a range of other documents such as planning guidance and a Master-plan for Romford which will also inform the preparation of the Site Specific Allocations work.

The Council has taken the opportunity as set out in the Regulations and PPG to progress from initial consultation on the Local Plan in 2015 to pre-submission version of its Local Plan in the interests of delivering its Local Plan effectively and efficiently having regard to the matters outlined above.

It is unfair for the objector to say that there has been no opportunity for stakeholders to be involved following the initial consultation. Initial consultation took place in Spring 2015 (options stage). It was followed in
November 2016 by the publication of a Direction of Travel document which was published to show stakeholders how the Local Plan work was progressing and to provide the opportunity for comment on matters such as timeframe for delivery, its emerging vision, strategic objectives and spatial strategy. Details of this are set out in the Councils’ Consultation Statement.

The comments from the objector regarding support for the Romford Strategic Development Area are noted. The specific comments regarding the Mercury Gardens site are also noted and will inform further work on preparing planning policies for the borough.

<table>
<thead>
<tr>
<th>ADREG19 -9</th>
<th>Sustainability Appraisal</th>
<th>No modification proposed</th>
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</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Comments noted. The Sustainability Appraisal has been prepared in accordance with the requirements of the SEA Regulations and provides the appropriate level of detail to reflect the detail and scope of the Local Plan. With regard to the comment that an assessment of each individual policy should be presented in the SA Report: Whilst each policy has been evaluated through the appraisal process, the appraisal of the plan has not been presented on a policy-by-policy and objective-by-objective basis. Instead it is presented through an overall assessment of the plan policies. A key reason why it has been presented in this way is that an understanding of the likely impacts of plan policies can only be established when they are implemented together. In this context the likely significant effects of a plan cannot be established on a policy-by-policy basis; instead they can only be effectively evaluated through a consideration of the plan policies together. This also reflects the provisions of the SEA Directive and transposing SEA Regulations, which provide a focus on the assessment of the ‘draft plan’. A further important reason why this approach is appropriate is that it increases the accessibility of the SA Report. This reflects the document’s key role as a consultation document to accompany the draft plan, and ensures that the ability of the public and stakeholders to effectively participate in the process is enabled. With regards to the comment that alternatives considered should be considered for each policy: The Local Plan is a development plan. As such reasonable alternatives have been considered in detail for the fundamental element of the Local Plan, namely alternative spatial strategies for development. In this context five options have been assessed for the spatial strategy, which included options that sought to deliver a different housing mix. The implications of these options are presented in Section 5 of the SA Report, and the reasons for the preferred spatial strategy for the Local Plan set out in Section 6 of the SA Report. A full assessment of the plan policies has been presented in section 8 of the SA Report.</td>
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<table>
<thead>
<tr>
<th>Paul Howard</th>
<th>LPREG19 -250</th>
<th>Green Belt Site</th>
<th>No modification proposed</th>
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</thead>
<tbody>
<tr>
<td></td>
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<td>The Outer North East London Strategic Housing Market Assessment 2016 indicates that there is a need for 1,366 new homes in Havering per annum. The Mayor of London sets minimum housing targets for each London Borough, and for Havering this is 1,170 homes per annum. The Local Plan identifies Romford and Rainham and Beam Park as Strategic Development Areas which have the capacity to deliver a significant amount of new housing. Both areas have also been designated as Housing Zones by the Mayor of London. The Council does not believe that there are ‘exceptional circumstances’ to warrant the release of Green Belt land to meet the Borough’s housing need. As stated in the Housing White Paper (page 21), the Government “seeks to maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.” The Council has prepared two Green Belt Studies in 2016 and 2018. The first Green Belt Study was undertaken by the London Borough of Havering in association with PBA and Enderby Consultants. This study assessed the contribution that land within the Green Belt makes to the Green Belt purposes (as defined in para 80 of the NPPF). To aid the assessments, the Green Belt in the Borough was divided into 24 land parcels. A performance value was attributed to the parcels for each purpose, based on predefined criteria. The study found that all 24...</td>
</tr>
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</table>
parcels make a contribution to Green Belt purposes, with 19 of the 24 Green Belt parcels making a fundamental contribution to the Green Belt purposes. A further four parcels were found to make a high or moderate/high contribution and only one parcel was found to make a low contribution.

A second Green Belt Study was prepared by LUC in 2018. The aim of this study was to provide conclusions on the potential degree of harm that may occur if the sites (which had been submitted to the Council as part of the Regulation 19 Consultation) were released from the Green Belt. This took account of three elements: 1) the contribution of the sites to the NPPF Green Belt purposes, 2) the potential impact on the wider integrity of the Green Belt and 3) the strength of revised Green Belt boundaries that would result if the site was to be released. Out of a total of 84 sites assessed (with a total area of 849ha):

- 46 sites (total area of 682ha, which is 80.3% of the total area of the 84 sites) rated as 'high' in terms of harm to Green Belt resulting from release.
- 21 sites (120ha, 14.1%) rated as 'moderate-high' in terms of harm to Green Belt resulting from release.
- 9 sites (24ha, 2.9%) rated as 'moderate' in terms of harm to Green Belt resulting from release.
- 4 sites (17ha, 2%) rated as 'low' in terms of harm to Green Belt resulting from release.
- 4 sites (6ha, 0.7%) rated as 'low' in terms of harm to Green Belt resulting from release.

The site proposed in this representation by Paul Howard (GB83) falls within parcels 18, 19 and 20 of the Stage 1 Study. This Study concluded that the parcels make a fundamental contribution to the Green Belt. The village was also assessed in the Stage 2 study and this Study concludes that releasing the village from the Green Belt (i.e. insetting it) would lead to a high degree of harm to the Green Belt. The reasons for this being:

- The area within the village is already to a large extent developed, but avoidance of any increase in development density is important in retaining its sense of distinction from the nearby large, built-up area at Collier Row.
- The extent of existing development and the absence of any towns for some distance to the north means that the village does not contribute to this purpose.
- The village retains a strong rural character, despite its proximity to the urban edge, as a result of its landform and woodland setting, and the retention of open grassland areas in within its immediate setting.

Despite linear sprawl, Havering-atte-Bower retains a rural open character and sense of separation from significant urbanising influence. Insetting it from the Green Belt would potentially permit higher-density development that could affect the sense of openness within the settlement. This could weaken the justification for retaining the open spaces within and around it which are important contributors to countryside character and the wider openness of the Green Belt. Increased urbanisation would reduce the sense of distinction between Collier Row, Havering-atte-Bower and Stapleford Abbotts, increasing the perception of metropolitan sprawl. The harm to the Green Belt resulting from release of this Site would therefore be high. Limiting Green Belt release to the north of Orange Tree Hill and Broxhill Road would retain greater separation between an inset village area and Collier Row, but would nonetheless constitute significant encroachment on the countryside. Harm for release of this section of the village would be Moderate-High.

Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This village was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 4 of the 13 sustainability criteria, and ‘green’ (signifying that the site could perform well in sustainability terms) in relation to 7 of the criteria.

| Jardin Smith International Pte | LPREG19 - 251 | Green Belt Site | No modification proposed | The Outer North East London Strategic Housing Market Assessment 2016 indicates that there is a need for 1,366 new homes in Havering per annum. The Mayor of London sets minimum housing targets for each London Borough, and for Havering this is 1,170 homes per annum. The Local Plan identifies Romford and Rainham and Beam Park as Strategic Development Areas which have the capacity to deliver a significant amount of new housing. Both areas have also been designated as Housing Zones by the Mayor of London.

The Council does not believe that there are ‘exceptional circumstances’ to warrant the release of Green Belt land to meet the Borough’s housing need. As stated in the Housing White Paper (page 21), the Government “seeks to maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should...
amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements."

The Council has prepared two Green Belt Studies in 2016 and 2018. The first Green Belt Study was undertaken by the London Borough of Havering in association with PBA and Enderby Consultants. This study assessed the contribution that land within the Green Belt makes to the Green Belt purposes (as defined in para 80 of the NPPF). To aid the assessments, the Green Belt in the Borough was divided into 24 land parcels. A performance value was attributed to the parcels for each purpose, based on predefined criteria. The study found that all 24 parcels make a contribution to Green Belt purposes, with 19 of the 24 Green Belt parcels making a fundamental contribution to the Green Belt purposes. A further four parcels were found to make a high or moderate/high contribution and only one parcel was found to make a low contribution.

A second Green Belt Study was prepared by LUC in 2018. The aim of this study was to provide conclusions on the potential degree of harm that may occur if the sites (which had been submitted to the Council as part of the Regulation 19 Consultation) were released from the Green Belt. This took account of three elements: 1) the contribution of the sites to the NPPF Green Belt purposes, 2) the potential impact on the wider integrity of the Green Belt and 3) the strength of revised Green Belt boundaries that would remain if the site was to be released.

Out of a total of 84 sites assessed (with a total area of 849ha):

- 46 sites (total area of 682ha, which is 80.3% of the total area of the 84 sites) rated as ‘high’ in terms of harm to Green Belt resulting from release.
- 21 sites (120ha, 14.1%) rated as ‘moderate-high’ in terms of harm to Green Belt resulting from release.
- 9 sites (24ha, 2.9%) rated as ‘moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (17ha, 2%) rated as ‘low-moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (6ha, 0.7%) rated as ‘low’ in terms of harm to Green Belt resulting from release.

The site proposed in this representation by Jardin Smith (GB76) falls within parcel 17 of the Stage 1 Study. This Study concluded that the parcel makes a fundamental contribution to the Green Belt. The site was also assessed in the Stage 2 study and this Study concludes that releasing the site from the Green Belt would lead to a high degree of harm to the Green Belt. The reasons for this being:

- The Site lies adjacent to the large built-up area of Havering but relates strongly to the wider countryside – development would represent expansion of the large built-up area into the open countryside.
- The Site forms part of the gap between the settlements of Harold Hill and Collier Row. Development within the Site would lead to the erosion of part of the gap between the settlements, particularly when travelling along Lower Bedford Lane.
- The Site is rural in character and clearly displays the characteristics of the countryside. Development of the Site would lead to encroachment of the countryside.

Release of this Site would weaken the integrity of the adjacent Green Belt land to the north-east and south-east because it would be almost fully enclosed by development. The integrity of the adjacent Green Belt land to the south-west would also be weakened as development would be located along its north-eastern edge as well as the existing development along its southern edge. The overall harm to the Green Belt resulting from release of this Site would therefore be High.

Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 2 of the 13 sustainability criteria, and ‘green’ (signifying that the site could perform well in sustainability terms) in relation to 7 of the criteria.
<table>
<thead>
<tr>
<th>LPREG19-253</th>
<th>Spatial strategy – request for opportunities for development around stations to be recognised</th>
<th>Modification to Policy 3 Housing supply The delivery of new homes will also be achieved by: Insert new bullet point between viii. and ix. New ix: Supporting residential development proposals around stations where it is compatible with the character of the local area.</th>
<th>Modification proposed to Policy 3 Housing supply to support appropriate residential development around stations. The Council consider that this more appropriate for inclusion in Policy 3 rather than the Key features of the Spatial Strategy.</th>
</tr>
</thead>
<tbody>
<tr>
<td>LPREG19-254</td>
<td>Housing</td>
<td>Refer to the modification proposed in response to comment 19-253</td>
<td>The Council does not consider it to appropriate to have a general blanket policy to promote and encourage high density—mixed use development around rail and tube stations. The setting of Havering’s rail and tube stations varies and whilst mixed use, high density may be acceptable around some stations may not be suitable around all. Please also refer to the Council’s proposed modification in response to comment 19-253.</td>
</tr>
<tr>
<td>LPREG19-256</td>
<td>Request for PRS to be included in policy 5 Housing Mix</td>
<td>No modification proposed</td>
<td>In preparing the Havering Local Plan, the Council has sought to avoid unnecessary repetition of planning policy set out in the National Planning Policy Framework and the London Plan. Policy 3.8 of the London Plan and paragraph 3.54 of the explanatory text recognise the potential provided by Private Rented Sector (PRS). It is considered unnecessary to repeat this in the Havering Local Plan. Policy 5 of the Local Plan says that ‘the Council will support development proposals that provide a mix of dwelling types, sizes and tenures.’ The policy does not specifically identify the full range of tenures that will be encompassed within this.</td>
</tr>
<tr>
<td>LPREG19-255</td>
<td>Support for the approach to affordable housing. Request for references to the Mayor’s Draft Affordable Housing and Viability SPG to be updated as this has now been adopted.</td>
<td>Modification to Policy 4 Affordable Housing Paragraph 7.2.2 : This is also consistent with the London Plan and the Mayor’s Draft Affordable Housing and Viability Supplementary Planning Guidance (20167). Paragraph 7.2.5 : The Council supports a transparent approach to viability in line with the Mayor’s Draft Affordable Housing and Viability Supplementary Planning Guidance (20167).</td>
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<tr>
<td>LPREG19-257</td>
<td>Amendments proposed to Policy 20 Loss of Industrial Land</td>
<td>Modification proposed to Policy 20 Loss of Industrial Land See response to LPREG19-388.</td>
<td>See response to LPREG19-388.</td>
</tr>
<tr>
<td>LPREG19-258</td>
<td>Crossrail</td>
<td>Modification to Policy 23 Transport connections Paragraph 7.2.2 : i. “Maximising the development opportunities supported by Crossrail as well as the benefits from Crossrail for local businesses and residents.</td>
<td>Noted</td>
</tr>
<tr>
<td>LPREG19-259</td>
<td>Design</td>
<td>No modification proposed</td>
<td>The Council acknowledges that development comprising high densities and taller buildings may be appropriate in locations such as Romford town centre subject to schemes being high quality and satisfactory in urban design terms having regard to their surroundings. Havering is a typical outer London borough and largely comprises development typical of its suburban character and setting. It would be inappropriate to adjust the policy to provide more flexibility to schemes of higher density and/or tall buildings as they would be out of character with their surroundings. Some transport hubs in Havering, for example the railway stations at Harold Wood and Gidea Park are adjoined by largely residential areas comprising development of mainly two storesy.</td>
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<tr>
<td>LPREG19-260</td>
<td>Promotion of car parks at Gidea Park, Harold Wood and</td>
<td>No modification proposed</td>
<td>A meeting was held with TfL property on 21st November 2017 to discuss the potential of these sites. We understand that feasibility work is currently under-way. The Council is keen to continue to work collaboratively with TfL to understand how these sites could make a contribution to Havering’s housing supply and will engage with TfL throughout the preparation of the Site Specific Allocations Local Plan.</td>
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</table>
The review of the Joint Waste DPD (2012) will be the appropriate opportunity to consider the future of the waste composting operation. It will also provide the opportunity to consider if any extension is appropriate for the Freightmaster Strategic Industrial Location (SIL) to accommodate such an operation. Such matters will also need to be addressed in regard to the long-term future of the Veolia land reclamation programme and the programme for the provision of the London Riverside Conservation Park (‘Wildspace’). The Mayor of London in the London Plan comments that the boundaries of Strategic Industrial Locations should be defined taking into account strategic and local assessments of supply and for industry and demand. In commenting on the havering Local Plan he has not made any comments to the effect that the Strategic Industrial Location should be extended. The Mayor off London Riverside Opportunity Area Planning Framework document (2015) envisages the Freightmaster estate being designated as a Strategic Industrial Location but does not identify this including the composting facilities at the Veolia operation.

### Veolia ES

<table>
<thead>
<tr>
<th>LPREG19</th>
<th>SIL boundary</th>
<th>No modification proposed</th>
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<tr>
<td>187</td>
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</table>

Support for Strategic Objectives. Promotion of an existing residential site at 412 Brentwood Road for residential intensification

The Local Plan is supportive of residential redevelopment subject to meeting the requirements of relevant policies such as (but not limited to) Policy 5 Housing mix, Policy 7 Residential design and amenity and Policy 26 Urban design.

### RM2 Development Ltd

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<thead>
<tr>
<th>LPREG19</th>
<th>Support for Strategic Objectives.</th>
<th>No modification proposed</th>
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<tbody>
<tr>
<td>261</td>
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</table>

Housing

Support for the policy is noted.

The Council already seeks to optimise the development potential of all sites including those with greater levels of public transport accessibility (those with a PTAL rating of more than 3). In doing this, the Council will take a balanced approach which looks to realise the scope for addressing housing needs by developing sites and the importance of ensuring that the development on a site accords with its wider setting and the streetscene because it places a high priority on maintaining and enhancing the character and appearance of the borough. Additionally, the Council will take into account the provision of infrastructure in the area adjoining a site to ensure that residents have access to the services and facilities needed to support their lives such as schools and health facilities.

Reference is made in the submission to the higher housing need figure for Havering (identified in the Government consultation ‘Planning for the right homes in the right places’). As a result of the Government’s proposed new methodology for assessing housing need, the Government consultation document identified an annual housing need target for Havering of 1,821 new homes per year. The Council objected to the consultation robustly on the basis that the methodology was flawed and that the new target identified for Havering is undeliverable and unrealistic. It also makes no reference in regard to the importance of appropriate infrastructure being provided.

### LPREG19

<table>
<thead>
<tr>
<th>LPREG19</th>
<th>No modification proposed</th>
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<tr>
<td>262</td>
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</table>

Parking

Your comments concerning Policy 24 are noted.

The Council’s parking policy (policy 24) has been informed by a Residential Car Parking Standards study which has drawn together a range of evidence to help inform the car parking standards for the borough having regard to the particular circumstances in Havering.

Policy 24 recognises that as an outer London Borough for many residents there is a higher dependency on the car, compared to central and inner London where public transport provision is much more accessible. The policy seeks to recognise that many local journeys in Havering must be made by car because they are impractical to make by public transport. Although parts of Havering are well connected by public transport to destinations outside of the borough, many more local destinations do not have reasonable public transport access and this is reflected in the higher levels of car ownership and usage in Havering. In this regard Havering is typical of many...
The London Plan expects that in areas of good public transport accessibility (PTAL 5-6) in all parts of London developments should aim for significantly less than one space per unit. The Council considers that this does not adequately reflect the position in Havering regarding the practicalities of making journeys within the borough and the consequent ownership and usage levels of private cars.

For highly accessible parts of the borough (PTAL 5-6), the parking standards set out in Policy 24 recognise that a minimum parking standard of 0.5 spaces per unit is appropriate having regard to the particular circumstances involved.

<table>
<thead>
<tr>
<th>Ebcliffe Ltd</th>
<th>LREG19 - 264</th>
<th>Wind energy</th>
<th>No modification proposed</th>
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</table>
| In preparing the Havering Local Plan the Council has had to comply with the requirements set out in Written Ministerial Statement (HCWS42). As a result a number of potential sites for wind turbines have been identified in the evidence base document supporting the Local Plan. Identification of these sites in this document does not imply or constitute any support from the Council for wind turbine proposals if they were brought forward. The Council will consider any such proposals on their merits and with full regard to national planning policy. In line with HCWS42, proposals will also be required to be accompanied by a consultation statement setting out how proposals have been the subject of meaningful pre-application consultation with the affected local community.

It would be inappropriate for the Wind Resource Evidence 2016 Study to be adjusted in respect of the Mardyke Farm site because the same considerations apply to each of the other potential sites identified in the document.

<table>
<thead>
<tr>
<th>Rowley Cardrome</th>
<th>LREG19 - 265</th>
<th>Green Belt Site</th>
<th>No modification proposed</th>
</tr>
</thead>
</table>
| The Outer North East London Strategic Housing Market Assessment 2016 indicates that there is a need for 1,366 new homes in Havering per annum. The Mayor of London sets minimum housing targets for each London Borough, and for Havering this is 1,170 homes per annum. The Local Plan identifies Romford and Rainham and Beam Park as Strategic Development Areas which have the capacity to deliver a significant amount of new housing. Both areas have also been designated as Housing Zones by the Mayor of London.

The Council does not believe that there are ‘exceptional circumstances’ to warrant the release of Green Belt land to meet the Borough’s housing need. As stated in the Housing White Paper (page 21), the Government “seeks to maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.”

The Council has prepared two Green Belt Studies in 2016 and 2018. The first Green Belt Study was undertaken by the London Borough of Havering in association with PBA and Enderby Consultants. This study assessed the contribution that land within the Green Belt makes to the Green Belt purposes (as defined in para 80 of the NPPF). To aid the assessments, the Green Belt in the Borough was divided into 24 land parcels. A performance value was attributed to the parcels for each purpose, based on predefined criteria. The study found that all 24 parcels make a contribution to Green Belt purposes, with 19 of the 24 Green Belt parcels making a fundamental contribution to the Green Belt purposes. A further four parcels were found to make a high or moderate/high contribution and only one parcel was found to make a low contribution.

A second Green Belt Study was prepared by LUC in 2018. The aim of this study was to provide conclusions on the potential degree of harm that may occur if the sites (which had been submitted to the Council as part of the Regulation 19 Consultation) were released from the Green Belt. This took account of three elements: 1) the contribution of the sites to the NPPF Green Belt purposes, 2) the potential impact on the wider integrity of the Green Belt and 3) the strength of revised Green Belt boundaries that would remain if the site was to be released.

Out of a total of 84 sites assessed (with a total area of 849ha):

- 46 sites (total area of 682ha, which is 80.3% of the total area of the 84 sites) rated as ‘high’ in terms of harm to Green Belt resulting from release.
- 21 sites (120ha, 14.1%) rated as ‘moderate-high’ in terms of harm to Green Belt resulting from release.
- 9 sites (24ha, 2.9%) rated as ‘moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (17ha, 2%) rated as ‘low-moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (6ha, 0.7%) rated as ‘low’ in terms of harm to Green Belt resulting from release.

The site proposed in this representation by Rowley Cardrome (GB38) falls within parcel 24 of the Stage 1 Study. This Study concluded that the parcel makes a fundamental contribution to the Green Belt. The site was also assessed in the Stage 2 study and this Study concludes that releasing the site from the Green Belt would lead to a low-moderate degree of harm to the Green Belt. The reasons for this being:

- The site lies adjacent to the large built-up area of Havering and, although the eastern part contains built development, the western part does relate to the wider countryside – development in these parts would represent some expansion of the large built-up area into the countryside.
- The site lies between the settlements of Romford and Dagenham and between the settlements of Romford and Hornchurch. As the settlement of Romford extends further west towards Dagenham and south towards Hornchurch than the site, the release of the Site would not lead to any significant perception of narrowing the gap between these settlements and Romford.
- The east of the site contains built development and makes limited contribution to safeguarding the countryside from encroachment. The west of site however is open and therefore development of this part of the Site could lead to a limited sense of encroachment of the countryside.

Development within the site would lead to some sense of encroachment on the adjacent Green Belt area to the west and south, however the Site is bounded to the west by a band of woodland. The overall harm to the Green Belt resulting from release of this site would therefore be low-moderate. Whilst release of the site would result in a lower degree of harm to the Green Belt, the Council do not consider that there are ‘exceptional circumstances’ at the present time to justify the release of Green Belt land.

Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 1 of the 13 sustainability criteria, and ‘green’ (signifying that the site could perform well in sustainability terms) in relation to 11 of the criteria.

<table>
<thead>
<tr>
<th>Brentwood Borough Council</th>
<th>LPREG19 - 224</th>
<th>Support for the Local Plan</th>
<th>No modification proposed</th>
<th>Support noted</th>
</tr>
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<tbody>
<tr>
<td>Brett Aggregates</td>
<td>LPREG19 - 266</td>
<td>Amendments to mineral policies proposed</td>
<td>No modification proposed</td>
<td>The objector’s comments are noted in regard to the land-bank provision being be at least 7 years to be in line with national planning policy requirements and the London Plan. The Council recognises that there are relatively small resources of workable land-won sand and gravel resources in London. It sets out in Policy 37 Minerals reserves that it recognises the strategic need for the supply of aggregates and this includes safeguarding mineral reserves in Havering through Minerals Safeguarding Areas. Extensive Green Belt areas in Havering have already been subject to aggregates working. This has had a very detrimental impact on the landscape and on amenity whilst working has taken place. In order to safeguard the amenity of the borough, Havering strongly considers that other parts of London should help meet the need for aggregates rather than further working in Havering. Adding reference to ‘at least’ would increase the pressure for aggregates to be worked in Havering through the submission of further proposals. It would be likely to result in minerals operations and facilities (such as plant and equipment) continuing for many years beyond the current planned working regimes. As a result it would lead to further despoiling of the Green Belt and reduced amenity for residents in the vicinity of mineral working operations. The Mayor of London has raised no objection to this policy in terms of ‘general conformity’ matters.</td>
</tr>
<tr>
<td>Highways</td>
<td>LPREG19 -</td>
<td>Modification to Policy 23 Transport connections Table 3 Havering transport</td>
<td>Following the consultation response from Highways England to the Proposed Submission Local Plan Havering</td>
<td></td>
</tr>
</tbody>
</table>

134
England | 225 | schemes Additional scheme suggested to be included in Table 3: Transport Scheme: Lower Thames Crossing. Scheme Description: Proposed tunnel crossing of the River Thames east of London. The purpose of the new crossing is to provide relief to journey times and congestion that is currently experienced on the Dartford Crossing whilst also addressing future capacity needs. The scheme extends from its connection with the M25 between Junctions 29 and 30 within the southern part of the Borough eastwards into Thurrock BC. This scheme is being promoted by Highways England and is to be determined by the Secretary of State for Transport as a Nationally Significant Infrastructure Project. Delivery Timescales: 5 – 10 years Key Partners: Highways England

| LPREG19 - 226 | Transport No modification proposed | Comments noted. The Council is fully aware of the scheme being developed by Highways England at J28 of the M25 and that this will be subject to a Development Consent Order (DCO) process. Your comments concerning the National Planning Practise Guidance in relation to the acoustic environment are noted. It is understood that the impact the scheme at Junction 28/M25 will have on the local area including noise will become known following further assessment work and will be subject to a statutory consultation process that is expected to take place later this year (2018). The proposed capacity improvement scheme at junction 28 of the M25 would be taken into account in the event that any proposals are brought forward for permanent Gypsy and Traveller pitches at “The Caravan Park, Putwell Bridge”.

| LPREG19 - 227 | Transport No modification proposed | The Council undertook the preparation of a Local Plan Wind Resource Study (2016) to support the preparation of the Local Plan in accordance with the requirements set out in the Ministerial Statement (HCWS42).
As a result, a number of potential sites for wind turbines have been identified in the evidence base document supporting the Local Plan. Identification of these sites in this document does not imply or constitute any support from the Council for wind turbine proposals.

Paragraphs 12.8.4-12.8.6 make clear that proposals must satisfy planning policy requirements and be able to demonstrate that they have addressed community concerns. Policy 36 makes it clear that any proposals for wind turbines have to be subjective to meaningful pre-application consultation with the affected local community. This would also include stakeholders such as Highways England.

The Council is fully aware of the scheme being developed by Highways England and that this will be subject to a Development Consent Order (DCO). This would be taken into consideration in the event that any planning applications for wind turbines within the red line boundary of the J28/M25 scheme were brought forward.

| Mr Clemence | LPREG19 - 267 Green belt Site No modification proposed | The Outer North East London Strategic Housing Market Assessment 2016 indicates that there is a need for 1,366 new homes in Havering per annum. The Mayor of London sets minimum housing targets for each London Borough, and for Havering this is 1,170 homes per annum. The Local Plan identifies Romford and Rainham and Beam Park as Strategic Development Areas which have the capacity to deliver a significant amount of new housing. Both areas have also been designated as Housing Zones by the Mayor of London.
The Council does not believe that there are ‘exceptional circumstances’ to warrant the release of Green Belt land to meet the Borough’s housing need. As stated in the Housing White Paper (page 21), the Government “seeks to maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.”

The Council has prepared two Green Belt Studies in 2016 and 2018. The first Green Belt Study was undertaken by the London Borough of Havering in association with PBA and Enderby Consultants. This study assessed the contribution that land within the Green Belt makes to the Green Belt purposes (as defined in para 80 of the NPPF). To aid the assessments, the Green Belt in the Borough was divided into 24 land parcels. A performance value was attributed to the parcels for each purpose, based on predefined criteria. The study found that all 24 parcels make a contribution to Green Belt purposes, with 19 of the 24 Green Belt parcels making a fundamental contribution to the Green Belt purposes. A further four parcels were found to make a high or moderate/high contribution and only one parcel was found to make a low contribution.

A second Green Belt Study was prepared by LUC in 2018. The aim of this study was to provide conclusions on the potential degree of harm that may occur if the sites (which had been submitted to the Council as part of the Regulation 19 Consultation) were released from the Green Belt. This took account of three elements: 1) the contribution of the sites to the NPPF Green Belt purposes, 2) the potential impact on the wider integrity of the Green Belt and 3) the strength of revised Green Belt boundaries that would remain if the site was to be released. Out of a total of 84 sites assessed (with a total area of 849ha):

- 46 sites (total area of 682ha, which is 80.3% of the total area of the 84 sites) rated as ‘high’ in terms of harm to Green Belt resulting from release.
- 21 sites (120ha, 14.1%) rated as ‘moderate-high’ in terms of harm to Green Belt resulting from release.
- 9 sites (24ha, 2.9%) rated as ‘moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (17ha, 2%) rated as ‘low-moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (6ha, 0.7%) rated as ‘low’ in terms of harm to Green Belt resulting from release.

The site proposed in this representation by Mr Clemence (GB16) falls within parcel 13 of the Stage 1 Study. This Study concluded that the parcel makes a fundamental contribution to the Green Belt. The site was also assessed in the Stage 2 study and this Study concludes that releasing the site from the Green Belt would lead to a moderate-high degree of harm to the Green Belt. The reasons for this being:

- The site lies adjacent to the large built-up area of Havering but relates to the wider countryside – development would represent expansion of the large built-up area into the open countryside.
- The site lies between the settlements of Emerson Park and Cranham to the east. The settlements are in close proximity (within 1km) and the release of the Site could lead to a limited narrowing of the gap between them.
- The site is rural in character and clearly displays the characteristics of the countryside, with limited urbanising influence from the adjacent settlement edge. Development of the Site would lead to the encroachment of the countryside.

Development of the site would cause the neighbouring Green Belt land to the northeast and south to be enclosed by development on two or three sides and would lead to a sense of encroachment, weakening its Green Belt contribution. The overall harm to the Green Belt resulting from release of this Site would therefore be Moderate-High.

Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 4 of the 13 sustainability criteria, and ‘green’ (signifying that the site could perform well in sustainability terms) in relation to 5 of the criteria.

| McCarthy and Stone Retirement | LPREG19 - 382 | Information provided on specialist | No modification proposed | Noted |
| Lifestyles | accommodation and wider policy context. | Whilst paragraph 7.4.5 indicates that there is a current and projected surplus of affordable sheltered housing accommodation in Havering, this position may change over the plan period to 2031.

The approach in the Local Plan is consistent with Policy 3.8 Housing Choice in the London Plan and, in particular, with paragraph 3.51 where it is stated that this Plan (the Mayor) supports boroughs in seeking the application of the principles of its affordable housing policies to the range of housing developments.

Paragraph 3.51 also highlights the importance of promoting mixed and balanced communities rather than segregated ones. The importance of this is specifically addressed in Policy 3.9 Mixed and balanced communities where the London Plan notes that this should be secured through small schemes as well as large ones. The Local Plan is consistent with the London Plan in regard to expecting affordable housing to be provided on site with ‘off-site’ provision an exception.

It is noted that the objector notes that the Mayor of London has rejected proposals for a review mechanism for viability.

<table>
<thead>
<tr>
<th>Affordable housing</th>
<th>No modification proposed</th>
<th>LPREG19 - 383</th>
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<table>
<thead>
<tr>
<th>Housing mix</th>
<th>Policy 5 Housing Mix</th>
<th>Where proposals are seeking to provide retirement, sheltered or extra care housing, the Council recognises that there may be a need for greater flexibility with regard the mix of units to be provided within Developments and the housing mix as set out in table 2 does not apply to such proposals particularly in achieving the provision of 3 bedroom units.</th>
</tr>
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</table>

| Specialist accommodation | No modification proposed | The specific type of accommodation provided by the objector is noted. Policy 6 Specialist accommodation reflects the approach of other housing policies in the Local Plan and is positively presented and includes criteria that proposals have to satisfy. It would be inappropriate for this policy to ‘encourage’ a particular type of accommodation when other types of homes are not also encouraged.

The objector refers to the importance of ‘Lifetime’ homes. These matters are addressed in Policy 7 Residential design and amenity where paragraph 7.5.3 notes that developments will be expected to deliver ‘Lifetime’ homes and neighbourhoods.

It is appropriate for proposals to be assessed against the requirement to create mixed, balanced and inclusive communities to ensure that these objectives are achieved and developments are prevented which would be insular and detached from their surroundings and communities.

It is recognised that residents in sheltered accommodation may not make a great deal of ‘active’ use of the adjoining amenity space linked to a development. However, in an Outer London Borough like Havering, it is important that all developments contribute to its open, suburban character and appearance and the provision of spacious amenity areas can assist in achieving this.

There may be considerable levels of activity associated with a sheltered scheme especially where the occupiers are relatively young. This may encompass movements to and from the scheme by residents as well as visits to it by friends, family and services such as healthcare professionals and carers. It is appropriate for these to be taken into account in determining the acceptability of a scheme in order to safeguard the residential amenity of residents in the scheme itself and adjoin areas.

It will be inappropriate for car parking for schemes to be dealt with on a site by site basis for this type of proposal alone. The suggestion by the objector takes no account that over time occupiers and their circumstances will change and this may include very different ‘profiles’ regarding car ownership. If adequate provision is not made from first occupation it cannot be secured later on. Havering reflects many other Outer London boroughs and has high levels of car ownership and use compared to other parts of London. It is expected that this will be |
|---------------------|-------------------------|---------------|

<table>
<thead>
<tr>
<th>Specialist accommodation</th>
<th>No modification proposed</th>
<th>LPREG19 - 385</th>
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</table>

<table>
<thead>
<tr>
<th>Specialist accommodation</th>
<th>No modification proposed</th>
<th>LPREG19 - 385</th>
</tr>
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</table>
Paragraphs 7.4.11 and 7.4.13 recognise the importance of schemes being well designed and suited to their occupiers rather than left to market forces or the application of ‘standard’ design solutions which may be unsuited to their residents.

The Outer North East London Strategic Housing Market Assessment 2016 indicates that there is a need for 1,366 new homes in Havering per annum. The Mayor of London sets minimum housing targets for each London Borough, and for Havering this is 1,170 homes per annum. The Local Plan identifies Romford and Rainham and Beam Park as Strategic Development Areas which have the capacity to deliver a significant amount of new housing. Both areas have also been designated as Housing Zones by the Mayor of London.

The Council does not believe that there are ‘exceptional circumstances’ to warrant the release of Green Belt land to meet the Borough’s housing need. As stated in the Housing White Paper (page 21), the Government “seeks to maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.”

The Council has prepared two Green Belt Studies in 2016 and 2018. The first Green Belt Study was undertaken by the London Borough of Havering in association with PBA and Enderby Consultants. This study assessed the contribution that land within the Green Belt makes to the Green Belt purposes (as defined in para 80 of the NPPF). To aid the assessments, the Green Belt in the Borough was divided into 24 land parcels. A performance value was attributed to the parcels for each purpose, based on predefined criteria. The study found that all 24 parcels make a contribution to Green Belt purposes, with 19 of the 24 Green Belt parcels making a fundamental contribution to the Green Belt purposes. A further four parcels were found to make a high or moderate/high contribution and only one parcel was found to make a low contribution.

A second Green Belt Study was prepared by LUC in 2018. The aim of this study was to provide conclusions on the potential degree of harm that may occur if the sites (which had been submitted to the Council as part of the Regulation 19 Consultation) were released from the Green Belt. This study took account of three elements: 1) the contribution of the sites to the NPPF Green Belt purposes, 2) the potential impact on the wider integrity of the Green Belt and 3) the strength of revised Green Belt boundaries that would remain if the site was to be released. Out of a total of 84 sites assessed (with a total area of 849ha):

- 46 sites (total area of 682ha, which is 80.3% of the total area of the 84 sites) rated as ‘high’ in terms of harm to Green Belt resulting from release.
- 21 sites (120ha, 14.1%) rated as ‘moderate-high’ in terms of harm to Green Belt resulting from release.
- 9 sites (24ha, 2.9%) rated as ‘moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (17ha, 2%) rated as ‘low-moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (6ha, 0.7%) rated as ‘low’ in terms of harm to Green Belt resulting from release.

The site proposed in this representation by Omega after Alpha (GB28) falls within parcel 13 of the Stage 1 Study. This study concluded that the parcel makes a fundamental contribution to the Green Belt. The site was also assessed in the Stage 2 study and this Study concludes that releasing the site from the Green Belt would lead to a high degree of harm to the Green Belt. The reasons for this being:

- The site lies adjacent to the large built-up area of Havering, but both relate to the wider countryside. Therefore, development would represent expansion of the large built-up area into the open countryside.
- Both parts of the site lie between the settlements of Emerson Park and Cranham to the east. The settlements are in close proximity (within 1km) and the release of the site could lead to the perception of narrowing the gap between them.
- Both parts of the site are rural in character and clearly display the characteristics of the countryside. Development of the Site would lead to the encroachment of the countryside.

Development of the site would cause the neighbouring Green Belt land to the west to be enclosed by development on three sides and would limit its contribution to the Green Belt and there would be no justification for its retention as Green Belt. Release of the site may also weaken the contribution of Green Belt mantained with residents of sheltered accommodation.
land to the east in the relatively narrow wedge of Green Belt between Emerson Park and Cranham. The overall harm to the Green Belt resulting from release of this site would therefore be High. Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as 'red' (signifying that the site could perform poorly in sustainability terms) in relation to 4 of the 13 sustainability criteria, and 'green' (signifying that the site could perform well in sustainability terms) in relation to 5 of the criteria.

| LPREG19 - 452 | Green Belt Site | No modification proposed | See response to LPREG19 -450 above. |
| LPREG19 - 453 | Green Belt Site | No modification proposed | See response to LPREG19 -450 above. |
| LPREG19 - 454 | Green Belt Site | No modification proposed | See response to LPREG19 -450 above. |

The Outer North East London Strategic Housing Market Assessment 2016 indicates that there is a need for 1,366 new homes in Havering per annum. The Mayor of London sets minimum housing targets for each London Borough, and for Havering this is 1,170 homes per annum. The Local Plan identifies Romford and Rainham and Beam Park as Strategic Development Areas which have the capacity to deliver a significant amount of new housing. Both areas have also been designated as Housing Zones by the Mayor of London.

The Council does not believe that there are ‘exceptional circumstances’ to warrant the release of Green Belt land to meet the Borough’s housing need. As stated in the Housing White Paper (page 21), the Government “seeks to maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.”

The Council has prepared two Green Belt Studies in 2016 and 2018. The first Green Belt Study was undertaken by the London Borough of Havering in association with PBA and Enderby Consultants. This study assessed the contribution that land within the Green Belt makes to the Green Belt purposes (as defined in para 80 of the NPPF). To aid the assessments, the Green Belt in the Borough was divided into 24 land parcels. A performance value was attributed to the parcels for each purpose, based on predefined criteria. The study found that all 24 parcels make a contribution to Green Belt purposes, with 19 of the 24 Green Belt parcels making a fundamental contribution to the Green Belt purposes. A further four parcels were found to make a high or moderate(high contribution and only one parcel was found to make a low contribution.

A second Green Belt Study was prepared by LUC in 2018. The aim of this study was to provide conclusions on the potential degree of harm that may occur if the sites (which had been submitted to the Council as part of the Regulation 19 Consultation) were released from the Green Belt. This took account of three elements: 1) the contribution of the sites to the NPPF Green Belt purposes, 2) the potential impact on the wider integrity of the Green Belt and 3) the strength of revised Green Belt boundaries that would remain if the site was to be released. Out of a total of 84 sites assessed (with a total area of 849ha):

- 46 sites (total area of 682ha, which is 80.3% of the total area of the 84 sites) rated as 'high' in terms of harm to Green Belt resulting from release.
- 21 sites (120ha, 14.1%) rated as 'moderate-high' in terms of harm to Green Belt resulting from release.
- 9 sites (24ha, 2.9%) rated as 'moderate' in terms of harm to Green Belt resulting from release.
- 4 sites (17ha, 2%) rated as 'low-moderate' in terms of harm to Green Belt resulting from release.
- 4 sites (6ha, 0.7%) rated as 'low' in terms of harm to Green Belt resulting from release.

The site proposed in this representation by Mrs Ellis (GB26) falls within parcel 13 of the Stage 1 Study. This Study concluded that the parcel makes a fundamental contribution to the Green Belt. The site was also assessed in the Stage 2 study and this Study concludes that releasing the site from the Green Belt would lead to a high degree of harm to the Green Belt. The reasons for this being:

- The sites lie adjacent to the large built-up area of Havering but relate strongly to the wider countryside – development in any of these parts would represent expansion of the large built-up area into the open countryside.
GB26a (site 3) forms part of a critical gap between Emerson Park and Cranham. GB26b and GB26c play a negligible role in preventing the erosion of the physical gap between Cranham and Emerson Park, however their position at the top of the valley edge means that there would be erosion of the perceived visual gap between these settlements.

The sites are all rural in character and clearly display the characteristics of the countryside. Development would lead to significant encroachment of the countryside.

Release of the site would significantly weaken the contribution of intervening Green Belt land to west of the Site as far as the settlement edge of Emerson Park as these areas would be enclosed by development weakening their contribution to purpose 1, 2 and 3. Green Belt land between GB26a (site 3) and the A127 would also be weakened. The overall harm to the Green Belt resulting from release of this Site would therefore be High.

Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 3 of the 13 sustainability criteria, and ‘green’ (signifying that the site could perform well in sustainability terms) in relation to 4 of the criteria.

<table>
<thead>
<tr>
<th>LPREG19 - 437</th>
<th>Green Belt Site</th>
<th>No modification proposed</th>
<th>See response to LPREG19 - 436 above.</th>
</tr>
</thead>
<tbody>
<tr>
<td>LPREG19 - 438</td>
<td>Green Belt Site</td>
<td>No modification proposed</td>
<td>See response to LPREG19 - 436 above.</td>
</tr>
<tr>
<td>LPREG19 - 439</td>
<td>Green Belt Site</td>
<td>No modification proposed</td>
<td>See response to LPREG19 - 436 above.</td>
</tr>
<tr>
<td>LPREG19 - 440</td>
<td>Green Belt Site</td>
<td>No modification proposed</td>
<td>See response to LPREG19 - 436 above.</td>
</tr>
<tr>
<td>LPREG19 - 441</td>
<td>Green Belt Site</td>
<td>No modification proposed</td>
<td>See response to LPREG19 - 436 above.</td>
</tr>
<tr>
<td>LPREG19 - 329</td>
<td>Concerns over proposed transport works to the A3106 within Rainham and Beam Park SDA</td>
<td>No modification proposed</td>
<td>This scheme is integral to the success of the Beam Park Housing Zone. Designs are progressed and currently being tested for feasibility through various traffic modelling scenarios. Funding is in place to deliver this project and public consultation is due to take place in early summer. This project has full support from its funder, Transport for London and the GLA</td>
</tr>
<tr>
<td>LPREG19 - 330</td>
<td>Support for Strategic Objectives</td>
<td>No modification proposed</td>
<td>Support noted</td>
</tr>
<tr>
<td>LPREG19 - 332</td>
<td>Support for Key diagram. Addition of potential river crossing proposed</td>
<td>No modification proposed</td>
<td>The Mayor has made it clear in his draft transport Strategy that further river crossings in east London will only be considered once Silvertown Tunnel, Lower Thames Crossing and the Docklands Light Railway (DLR) extension to Thamesmead have been delivered and that a series of specific criteria would also have to be met. The priority to be afforded to a potential crossing between the London Boroughs of Bexley and Havering appears to be considerably less than with the previous Mayoral administration. Nevertheless Havering understands that the Mayor of London is continuing to consider the scope for such a crossing and is undertaking work to inform this. The primary focus of the Key Diagram is to illustrate the spatial strategy for Havering. For this reason potential proposals outside of the borough are not included. The Key Diagram does not include reference to the Highways England Lower Thames Crossing project and the Transport for London river crossings proposals for this reason. The Council will continue to be engaged in the discussions on these important transport infrastructure projects. It will seek to ensure that when the Local Plan is reviewed it properly reflects the status of them and properly recognises them within the borough.</td>
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</table>

Countryside Properties Plc and L&Q

LPREG19 - 332 | Support for Key diagram. Addition of potential river crossing proposed | No modification proposed | The Mayor has made it clear in his draft transport Strategy that further river crossings in east London will only be considered once Silvertown Tunnel, Lower Thames Crossing and the Docklands Light Railway (DLR) extension to Thamesmead have been delivered and that a series of specific criteria would also have to be met. The priority to be afforded to a potential crossing between the London Boroughs of Bexley and Havering appears to be considerably less than with the previous Mayoral administration. Nevertheless Havering understands that the Mayor of London is continuing to consider the scope for such a crossing and is undertaking work to inform this.

The primary focus of the Key Diagram is to illustrate the spatial strategy for Havering. For this reason potential proposals outside of the borough are not included. The Key Diagram does not include reference to the Highways England Lower Thames Crossing project and the Transport for London river crossings proposals for this reason.

The Council will continue to be engaged in the discussions on these important transport infrastructure projects. It will seek to ensure that when the Local Plan is reviewed it properly reflects the status of them and properly recognises them within the borough. |
<table>
<thead>
<tr>
<th>Ref</th>
<th>Objection</th>
<th>Modification Proposed</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>LPEG9 - 331</td>
<td>Objection to Spatial Strategy re. social infrastructure</td>
<td>No modification proposed</td>
<td>Havering has worked closely with a wide range of stakeholders in preparing its Local Plan and supporting evidence base. This includes the preparation of the Infrastructure Delivery Plan (IDP) which has encompassed liaison with third parties such as the Clinical Commissioning Group (CCG). Both the Local Plan and the IDP have been prepared to take account of the most up to date information from the CCG on the location, type and size of facility required to support the growth identified in the Local Plan over the Plan period. The Council will continue to work closely with all relevant stakeholders (including CCG) to ensure that the IDP and Local Plan are up to date. There will be scope in any future review of the Local Plan to ensure that the latest requirements of such organisations are adequately reflected in it. Regarding the comments on behalf of the CCG, the CCG has confirmed that two new facilities of 1,500 m2 in the Beam Park development and close to Rainham Town Centre will be required which will provide combined capacity for 30,000 patients. This information has been included in the Infrastructure Delivery Plan (IDP).</td>
</tr>
<tr>
<td>LPEG9 - 333</td>
<td>Objection to Para 6.1.24 re. developer contributions for education provision</td>
<td>No modification proposed</td>
<td>The reference to a minimum 700 units for primary and 3,000 units for secondary triggering the need for part of the development site to be set aside to provide a publicly funded school, are only average figures. The specific tenure and unit size breakdown for each development will be used to calculate the child yield using the publicly available GLA population calculator, once a split by unit size/tenure is available.</td>
</tr>
<tr>
<td>LPEG9 - 334</td>
<td>Objection Policy 2- Rainham and Beam Park SDA re. retail floorspace provision</td>
<td>No modification proposed</td>
<td>The quoted floorspace figures relate only to the provision of modern retail and commercial units and do not encompass any other supporting and non-residential uses. It was intended that this scale of development would provide an appropriate critical mass of such floorspace to function effectively as a local centre for the new community focussed on the new Beam Park development. The figures are indicative and will be applied with reasonable degree of flexibility to optimise the overall development. The provision in the policy regarding ceiling height is intended to provide flexibility and adaptability for conversion into commercial spaces in the future. It is noted that the current planning application appears to have been prepared outside of these parameters. In criteria iii), the Council would seek to ensure through development management that any improvements to bus services included easy access to / from other public transport facilities and services such as the new Beam Park station. In criteria iv), the reference to ‘active travel connection’ between Rainham Village, Beam Park Station and the Rainham Employment Area is intended to encompass active modes of movement such as walking and cycling (not vehicular). In criteria v), the reference to bus ‘links’ is to ensure that improved public transport connections are provided between Rainham and Romford including the Queens Hospital.</td>
</tr>
<tr>
<td>LPEG9 - 337</td>
<td>Objection to Policy 3 request for flexibility in relation to housing tenure.</td>
<td>No modification proposed</td>
<td>The objector’s support for Policy 3 is noted including the support for the delivery of housing in the Romford Strategic Development Area. The Local Plan is quite clear that the Council’s approach is to seek to increase housing supply over the Plan period. The Council’s Vision : Havering Making a Greater London seeks to provide new homes in Havering and, in appropriate cases, the Council takes a positive and proactive stance in dealing with prospective private developers wishing to bring forward housing schemes in recognition of the importance of securing timely and high quality housing delivery. In line with the Vision, the Local Plan Spatial Strategy acknowledges that the delivery of new homes is critical to London’s well-being. It sets out how the Council has approached the important topic of making sure that enough</td>
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new homes are provided.

Havering has undertaken a Strategic Market Assessment to support the preparation of the Local Plan. Havering forms part of both the London-wide housing market area and the outer north east London sub housing market area with the London Boroughs of Barking and Dagenham and Redbridge. In line with the requirements of the National Planning Policy Framework, the Council has worked with these authorities to prepare its Strategic Housing Market Assessment (SHMA).

The resultant Outer North East London SHMA indicates that Havering’s full objectively assessed housing need is for 25,200 new homes over the period 2011-2033 or 1,145 homes per annum. Since the initial SHMA was undertaken, updated population projections have been published by the GLA. The updated population projections were reflected in an update (2017) of the SHMA which identified an increased housing need in Havering of 30,052 new homes over the same period (1,366 new homes per year).

The Council is making every effort to identify and bring forward suitable sites to exceed the current London Plan target and to meet housing need.

The Local Plan does not seek to constrain the number of new homes to come forward to 17,550 over the Plan period.

Further, the Council is aware that the current London Plan requires that boroughs should seek to close the gap between housing need (as assessed through a Strategic Housing Market Assessment) and supply.

The Council’s approach to providing new homes in the Havering Local Plan takes a balanced view about the importance of addressing housing requirements and securing sustainable development. Having undertaken recent studies to assess whether the Green Belt fulfils the roles identified in the National Planning Policy Framework, the Council is also committed to ensuring that the Green Belt is safeguarded. The Council has concluded that there are no exceptional circumstances to support releasing land from the Green Belt.

The Council’s commitment to the Green Belt is an important ‘driver’ in helping to secure new homes in Havering’s built up areas and through the important programmes being delivered through the Housing Zones and the Council’s estates regeneration programme (see below).

The Council’s strategy also recognises that the scope to accommodate growth in Havering will be dependent upon the provision of infrastructure especially that needed to provide effective and efficient movement within Havering as well as social and community infrastructure necessary for residents such as schools and health facilities. The Council has prepared an Infrastructure Delivery Plan to support the Havering Local Plan and to inform the consideration of housing proposals.

Throughout the Local Plan process, the Council has rigorously sought to identify all sources of potential housing supply that will secure sustainable development in order to ensure that Havering is taking every opportunity to secure the delivery of new homes. This approach has been implemented to enable the gap between the housing targets in the London Plan and the objectively assessed need requirement to be closed as far as is reasonably possible.

The Housing Position Statement which supports the Havering Local Plan explains the Council's approach to this in more detail. A element is that the Council considers that the certainty of securing housing delivery over the overall plan period must be taken into account against the numbers of units approved particularly in the initial years of the Local Plan being implemented.

It sets out that the Council considers that over the period of the plan to 2031, the potential overall supply of additional homes in Havering may exceed the minimum annual housing target of 1,170 new homes per year set out in the current London Plan.

In summary, the approach in the Local Plan that the Council will implement is based on:

- focussing the delivery of new homes in Havering’s two housing Zones at Romford and Rainham and Beam Park. These two areas are identified in the Local Plan as Strategic Development Areas and have
individual comprehensive policy frameworks to guide and steer their development to make sure that development provides high quality places with inclusive communities and the timely and effective provision of infrastructure

- supporting the intensification of twelve of its own existing housing estates through an ambitious regeneration programme that includes an experienced private sector development partner secured by means of a Joint Venture Limited Liability Partnership
- realising the housing opportunities that come forward on large sites outside of the Strategic Development Areas to provide opportunities for place-making and building communities. These include sites such as the former St George's Hospital site in Hornchurch
- prioritising all land not designated for other planning purposes for new homes
- encouraging the effective use of land by re-using previously developed (brownfield) land and allocating a range of sustainable sites for housing development. The latter will be identified in the forthcoming Site Specific Allocations Local Plan

The Local Plan Housing Position Statement sets out in more detail the specific potential housing opportunities that will come forward for the two Housing Zones and the Council's twelve estates programme.

The Housing Position Statement identifies specific deliverable and developable sites for the first 10 years of the Plan. The Council is committed to ensuring that there is a sufficient supply of housing over the 15 year plan period and beyond and will therefore undertake an early review of the Plan.

The Statement also includes details of sites which it is anticipated will be included in the forthcoming Site Specific Allocations Local Plan document which will reflect up to date capacity studies where appropriate.

Underpinning the Council's approach is a clear recognition of the importance of optimising the development potential of the sites in regard to their potential capacity whilst ensuring that they provide satisfactory residential environment for residents and maintaining the character and appearance of Havering. There is an emphasis on making sure the place-making role of new development is addressed and a focus on delivering places where communities can flourish and be cohesive and inclusive.

As a result of this approach, sufficient land has been identified to meet the minimum London Plan housing target for the first 10 years of the Local Plan if the delivery is taken over the 10 year period.

The Council considers that the greater certainty that is encompassed through the Housing Zones and the twelve estates programme should weigh heavily in their favour and help counter the potential numerical shortfall in housing delivery in the first five years.

The objector has raised concerns about the potential implications of Havering failing to meet its OAHN, particularly in regard to the position with other London Boroughs and adjoining and nearby districts outside London.

Havering has engaged extensively with the GLA in the preparation of its Local Plan and this has included specific discussion about addressing housing.

The GLA has confirmed that London Boroughs are not required to demonstrate how any unmet need from their own boroughs will be met in other London Boroughs or adjoining districts. The preparation of the Havering Local Plan is not therefore required to address how any shortfall in this borough will be addressed within London or by adjoining / nearby local authorities.

The GLA has advised that the London Plan makes clear that London should be treated as a single housing market. The London Plan states that the Annual average housing supply monitoring targets set out in Table 3.1 are a minimum target for each borough. In order to meet local need and contribute to meeting strategic need each London borough is to seek to exceed this target through the measures set out in London Plan Policy 3.3E, paragraphs 3.19 and 3.19i of the Plan and Section 1 of the London Plan Housing SPG (2016).
The Housing SPG clarifies that this approach applies even where a borough has demonstrated it can exceed its local housing need. In preparing its Local Plan Havering (and Redbridge/Barking and Dagenham) will be expected to demonstrate it has sought to increase its housing supply in line with policy 3.3 of the London Plan and the Housing SPG in order to reduce the gap between local and strategic housing need and supply.

The Housing SPG 2016 notes that sensitivity testing during the development of the SHLAA showed that additional sources of housing such as higher density, housing led, mixed use development in accessible locations in Opportunity/Intensification Areas, town centres, surplus industrial land and other large sites could ‘fill’ the gap between the minimum housing supply target and London’s identified need. This has been confirmed by monitoring which shows that collectively the boroughs have been approving sufficient capacity to address London-wide need.

In preparing its Local Plan, the Council has engaged with other London Boroughs and adjoining districts. The details of these discussions are set out in the Duty to Cooperate statement. It is clear from the Duty to Cooperate engagement that adjoining local authorities are heavily engaged in their own Local Plan preparation including securing the necessary evidence to support this. This work will include the preparation of necessary SHMAs. It was not feasible and not desirable to ‘pause’ the preparation of the Havering Local Plan to enable all evidence base work (including SHMAs) to ‘catch up’ nor for this to be reflected in the Havering local Plan.

The Duty to Cooperate discussions have recognised that for most authorities involved in this process it will be extremely challenging for them to identify and deliver sites that will enable them to meet their own respective OAHN. It is therefore highly unlikely that these authorities will be willing to help meet unmet need arising in London.

The Duty to Cooperate Statement confirms that issues around the provision of housing have been explicitly discussed and explored between the authorities. It was recognised in this process that seeking to resolve this would be extremely challenging and delay the delivery of the respective local plan at a time when local authorities re being pressed by Government to ensure that they have up to date Local Plans in place.

The objector refers to the recent Government consultation ‘Planning for the right homes in the right places’. It is recognised that the approach set out in the consultation is now reflected in the draft National Planning Policy Framework published in March 2018.

The Government White Paper identified a housing ‘need’ figure for Havering of 1,821 new homes per year. It is noted that this figure is in a consultation document and has been derived from methodology that is not normally used in London.

The Council responded to the consultation identifying that there were strong concerns as to how this figure has been prepared and that it made no provision for the infrastructure to support the level of housing mentioned. This level of housing provision would also have a very detrimental impact on the open character and appearance of Havering. On this basis the Council considers that the figure identified by the Government is flawed, unachievable and unrealistic.

<table>
<thead>
<tr>
<th>LPREG19-338</th>
<th>Modification to Show River Beam on Figure 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>LPREG19-339</td>
<td>Objection to Policy 4 - Affordable Housing re. ned for flexibility</td>
</tr>
<tr>
<td></td>
<td>No modification proposed</td>
</tr>
<tr>
<td>LPREG19-340</td>
<td>Support for Policy 5 - Housing Mix.</td>
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<td></td>
<td>Policy 5 Housing mix</td>
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<td></td>
<td>The Council will support development proposals that provide a mix of dwelling types, sizes and tenures. All housing schemes should include a proportion of family sized homes and</td>
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</tbody>
</table>
reflect the recommended housing mix identified in Table 2 unless,
When considering the mix of dwelling sizes appropriate for a particular development proposal, the Council will have regard to it can be robustly demonstrated that a variation to the mix in Table 2 is justified having regard to individual site circumstances including location, site constraints, viability and the achievement of mixed and balanced communities.

Where proposals are seeking to provide retirement, sheltered or extra care housing, the Council recognises that there may be a need for greater flexibility with regard to the mix of units to be provided within Developments and the housing mix as set out in Table 2 does not apply to such proposals, particularly in achieving the provision of 3 bedroom units.

| LPREG19 - 335 | Support for Para 6.2.5. Amendment proposed | Modification to Policy 2 Rainham and Beam Park Strategic Development Area
Paragraph 6.2.5:
There are a number of development opportunities within public and private ownership. The GLA are an important landowner in the area and are bringing forward the Beam Park site for residential and mixed use development with Persimmon Countryside Properties PLC and L&Q. | Support noted |
| LPREG19 - 336 | Support for Key Features of the Spatial Strategy. Amendment proposed | No modification proposed |
| LPREG19 - 341 | Objection to Para 7.5.7 re. public amenity space | No modification proposed. The design of new buildings and the spaces they create is important and helps reinforce the character and appearance of a neighbourhood. This is especially relevant in an Outer London Borough like Havering where there is a long established open, suburban character. The provision of amenity space linked to homes is a key component of this and it also provides outdoor space for residents to enjoy. Policy 7 Residential design and amenity says that on all flatted developments communal amenity space will be expected but it is not prescriptive about the size of this or its format. The scope for roof gardens to be provided where it is not possible to provide private gardens and communal amenity space is addressed. Paragraph 7.5.9 already notes that proximity to public open space will be considered when addressing the adequacy of private amenity space. The explanatory text makes clear, however, that proximity to open space will be considered where the design of a scheme is of sufficient high quality and contributions are made for enhancements to open space. This is to ensure that developers do not try to bring forward schemes that are fundamentally flawed in design terms and try and justify the amenity space provision on the basis of a public open space being nearby. |
| LPREG19 - 343 | Objection to policy 17 point iv. Re. on site drop off/pick ups | Development proposals for privately operated and owned nurseries will also be expected to demonstrate that:

- They meet the floorspace requirements as set out in the statutory framework for the early years foundation stage
- Drop offs can be catered for safely on site
- There is no significant adverse impact on the amenity of neighbours
Amendment / addition to explanatory text: |
Replace 4th sentence with:
As privately owned and operated nurseries generate significant traffic during peak hours, proposals will be expected to provide sufficient car parking (including pick-up and drop-off points) on site.

And add new 5th sentence:
It is recognised, however, that it may not always be possible or appropriate for pick-up and drop-off points to be provided within Council school sites which also include Early Years provision.

<table>
<thead>
<tr>
<th>LPREG19-343</th>
<th>Support for Para 8.6.6 re. guidance for innovative design for schools</th>
<th>No modification proposed</th>
<th>Support noted</th>
</tr>
</thead>
<tbody>
<tr>
<td>LPREG19-344</td>
<td>Support for Policy 18 re. improvements to sports &amp; recreational facilities</td>
<td>No modification proposed</td>
<td>Support noted</td>
</tr>
<tr>
<td>LPREG19-346</td>
<td>Objection to Policy 22- Skills and training re. Local labour requirements</td>
<td>No modification proposed</td>
<td>A 20% requirement is a <strong>minimum</strong> requirement in most Section 106 Agreements and is established common practice amongst most local authorities. It is surprising that Countryside is not aware of this requirement given its activities across a number of boroughs. A developer will need to advertise vacancies arising from the development and as such it is not clear how the task of sending the same information to the Council’s jobs brokerage team is onerous. The Council is willing to work with developers to review the job roles beforehand and to assess which jobs can be filled from its client base and which are specialist in nature /difficult to recruit to and may require specialist further advertisement. These are flexibilities that can be accommodated and negotiated within the Employment and Skills Plan development stage. The lead officer for local vacancies is <a href="mailto:Joanna.Busz@Havering.gov.uk">Joanna.Busz@Havering.gov.uk</a> The inclusion of local supply chain opportunities does not preclude a developer from achieving economies of scale or competitiveness in the process. The Council will expect a transparent process of tendering and demonstrable evidence of advertising local opportunities which should be communicated to the nominated lead officer within the Council (Sarah Moss who can be contacted at <a href="mailto:Sarah.Moss@Havering.gov.uk">Sarah.Moss@Havering.gov.uk</a>)</td>
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<tr>
<td>LPREG19-347</td>
<td>Support for Policy 23 &amp; Para 10.1.6 re. Financial contributions to transport infra. improvements</td>
<td>No modification proposed</td>
<td>Support noted</td>
</tr>
<tr>
<td>LPREG19-349</td>
<td>Support for Policy 26- Urban Design</td>
<td>No modification proposed</td>
<td>Support noted</td>
</tr>
<tr>
<td>LPREG19-350</td>
<td>Support for Para 12.2.7 &amp; Map 2 re. wildlife</td>
<td>No modification proposed</td>
<td>Noted. The policy position in Policy 3- Nature conservation is to conserve and, where possible, extend wildlife corridors. The functions of the wildlife corridors could be combined with other flooding, ecology and amenity functions, consistent with Policy 29 Green infrastructure.)</td>
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<tr>
<td>LPREG19 - 351</td>
<td>Objection to Policy 36: Energy re. specifics of the Beam Park development site</td>
<td>The policy has been reworded to take account of feasibility (see LPREG19 - 328).</td>
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<tr>
<td>LPREG19 - 348</td>
<td>Objection to Policy 24: Parking provision and Design re. Parking in Rainham and Beam Park</td>
<td>The Council’s parking policy (Policy 24) has been informed by a Residential Car Parking Standards study which has drawn together a range of evidence to help inform the car parking standards for the borough having regard to the particular circumstances in Havering. Policy 24 recognises that as an outer London Borough for many residents there is a higher dependency on the car, compared to central and inner London where public transport provision is much more accessible. The policy seeks to recognise that many local journeys in Havering must be made by car because they are impractical to make by public transport. Although parts of Havering are well connected by public transport to destinations outside of the borough, many more local destinations do not have reasonable public transport access and this is reflected in the higher levels of car ownership and usage in Havering. An example of this is the limited north/south connectivity in Havering, particularly from Rainham with journeys by public transport to Romford and further north currently taking a considerable amount of time. Policy 23 - Transport Connections sets out the Council’s aspirations for improving public transport connectivity including between links from Rainham to the north of the borough. For areas of low accessibility (PTAL 0-2), minimum parking standards have been set out and these are included in table 4 in policy 24. The London Plan expects that in areas of good public transport accessibility (PTAL 5-6) in all parts of London developments should aim for significantly less than one space per unit. The Council considers that this does not adequately reflect the position in Havering regarding the practicalities of making journeys within the borough and the consequent ownership and usage levels of private cars. For highly accessible parts of the borough (PTAL 5-6), the parking standards set out in Policy 24 recognise that a minimum parking standard of 0.5 spaces per unit is appropriate having regard to the particular circumstances involved</td>
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<tr>
<td>LPREG19 - 345</td>
<td>Objection to Policy 21: Affordable Workspace re. reasoned justification Refer to the Council’s proposed modifications in response to LPREG19 - 103</td>
<td>Refer to the Council’s proposed modifications in response to LPREG19 - 103</td>
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</tbody>
</table>
| Mr Timothy Lyons | Concerns over Havering’s future housing supply. Green Belt Site proposed No modification proposed | The Outer North East London Strategic Housing Market Assessment 2016 indicates that there is a need for 1,366 new homes in Havering per annum. The Mayor of London sets minimum housing targets for each London Borough, and for Havering this is 1,170 homes per annum. The Local Plan identifies Romford and Rainham and Beam Park as Strategic Development Areas which have the capacity to deliver a significant amount of new housing. Both areas have also been designated as Housing Zones by the Mayor of London. The Council does not believe that there are ‘exceptional circumstances’ to warrant the release of Green Belt land to meet the Borough’s housing need. As stated in the Housing White Paper (page 21), the Government “seeks to maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be
amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.”

The Council has prepared two Green Belt Studies in 2016 and 2018. The first Green Belt Study was undertaken by the London Borough of Havering in association with PBA and Enderby Consultants. This study assessed the contribution that land within the Green Belt makes to the Green Belt purposes (as defined in para 80 of the NPPF). To aid the assessments, the Green Belt in the Borough was divided into 24 land parcels. A performance value was attributed to the parcels for each purpose, based on predefined criteria. The study found that all 24 parcels make a contribution to Green Belt purposes, with 19 of the 24 Green Belt parcels making a fundamental contribution to the Green Belt purposes. A further four parcels were found to make a high or moderate/high contribution and only one parcel was found to make a low contribution.

A second Green Belt Study was prepared by LUC in 2018. The aim of this study was to provide conclusions on the potential degree of harm that may occur if the sites (which had been submitted to the Council as part of the Regulation 19 Consultation) were released from the Green Belt. This took account of three elements: 1) the contribution of the sites to the NPPF Green Belt purposes, 2) the potential impact on the wider integrity of the Green Belt and 3) the strength of revised Green Belt boundaries that would remain if the site was to be released.

Out of a total of 84 sites assessed (with a total area of 849ha):

- 46 sites (total area of 682ha, which is 80.3% of the total area of the 84 sites) rated as ‘high’ in terms of harm to Green Belt resulting from release.
- 21 sites (120ha, 14.1%) rated as ‘moderate-high’ in terms of harm to Green Belt resulting from release.
- 9 sites (24ha, 2.9%) rated as ‘moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (17ha, 2%) rated as ‘low-moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (6ha, 0.7%) rated as ‘low’ in terms of harm to Green Belt resulting from release.

The site proposed in this representation by Mr Timothy Lyons (GB65) falls within parcel 4 of the Stage 1 Study. This Study concluded that the parcel makes a fundamental contribution to the Green Belt. The site was also assessed in the Stage 2 study and this Study concludes that releasing the site from the Green Belt would lead to a high degree of harm to the Green Belt. The reasons for this being:

- The site makes no contribution to preventing sprawl because it does not lie adjacent to the large built up area and is sufficiently distant (1km) to make no contribution to preventing sprawl.
- The site forms part of the gap between Aveley and Rainham which are some 3.5km apart. The site lies between the two settlement and would lead to some perception of narrowing the gap between the settlements.
- The site is rural in character and clearly displays characteristics of the countryside. Development of this Site would lead to encroachment of the countryside.

Release would lead to the creation of an inset area of development not linked to any existing settlement. It would also result in the creation of a weak Green Belt boundary and weaken the Green Belt contribution of neighbouring undeveloped land around the a site by encroaching on the open countryside. The overall harm to the Green Belt resulting from release of this site would therefore be High.

Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 7 of the 13 sustainability criteria, and ‘green’ (signifying that the site could perform well in sustainability terms) in relation to 4 of the criteria.

The Outer North East London Strategic Housing Market Assessment 2016 indicates that there is a need for 1,366 new homes in Havering per annum. The Mayor of London sets minimum housing targets for each London Borough, and for Havering this is 1,170 homes per annum. The Local Plan identifies Romford and Rainham and Beam Park as Strategic Development Areas which have the capacity to deliver a significant amount of new housing. Both areas have also been designated as Housing Zones by the Mayor of London.

The Council does not believe that there are ‘exceptional circumstances’ to warrant the release of Green Belt land to meet the Borough’s housing need. As stated in the Housing White Paper (page 21), the Government “seeks to
maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.”

The Council has prepared two Green Belt Studies in 2016 and 2018. The first Green Belt Study was undertaken by the London Borough of Havering in association with PBA and Enderby Consultants. This study assessed the contribution that land within the Green Belt makes to the Green Belt purposes (as defined in para 80 of the NPPF). To aid the assessments, the Green Belt in the Borough was divided into 24 land parcels. A performance value was attributed to the parcels for each purpose, based on predefined criteria. The study found that all 24 parcels make a contribution to Green Belt purposes, with 19 of the 24 Green Belt parcels making a fundamental contribution to the Green Belt purposes. A further four parcels were found to make a high or moderate/high contribution and only one parcel was found to make a low contribution.

A second Green Belt Study was prepared by LUC in 2018. The aim of this study was to provide conclusions on the potential degree of harm that may occur if the sites (which had been submitted to the Council as part of the Regulation 19 Consultation) were released from the Green Belt. This took account of three elements: 1) the contribution of the sites to the NPPF Green Belt purposes, 2) the potential impact on the wider integrity of the Green Belt and 3) the strength of revised Green Belt boundaries that would remain if the site was to be released. Out of a total of 84 sites assessed (with a total area of 849ha):

- 46 sites (total area of 682ha, which is 80.3% of the total area of the 84 sites) rated as ‘high’ in terms of harm to Green Belt resulting from release.
- 21 sites (120ha, 14.1%) rated as ‘moderate-high’ in terms of harm to Green Belt resulting from release.
- 9 sites (24ha, 2.9%) rated as ‘moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (17ha, 2%) rated as ‘low-moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (6ha, 0.7%) rated as ‘low’ in terms of harm to Green Belt resulting from release.

The first site proposed in this representation by The Crown Estate (GB37) falls within parcel 21 of the Stage 1 Study. This Study concluded that the parcel makes a fundamental contribution to the Green Belt. The site was also assessed in the Stage 2 study and this Study concludes that releasing the site from the Green Belt would lead to a high degree of harm to the Green Belt. The reasons for this being:

- The site lies adjacent to the large built-up area of Havering but relates to the wider countryside – development would represent expansion of the large built-up area into the open countryside.
- The site is critical in forming part of the Green Belt that separates the settlements of Collier Row and Chadwell Heath to the southwest. The settlements are in close proximity (less than 1km apart) and the release of the Site could lead to the visual and physical narrowing of the gap between them, especially when travelling between the towns along the A12.
- The site is rural in character and clearly displays the characteristics of the countryside, with limited urbanising influence from the adjacent settlement edge and road. Development of the Site would lead to the encroachment of the countryside.

Development of the site would cause the neighbouring Green Belt land to the south beyond the A12 to be enclosed by development on three sides and may weaken its performance in terms of purpose 1 and 3. The overall harm to the Green Belt resulting from release of this Site would therefore be high.

Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 2 of the 13 sustainability criteria, and ‘green’ (signifying that the site could perform well in sustainability terms) in relation to 8 of the criteria.

The second site proposed in this representation by The Crown Estate (GB34) falls within parcel 20 of the Stage 1 Study. This Study concluded that the parcel makes a fundamental contribution to the Green Belt. The site was also assessed in the Stage 2 study and this Study concludes that releasing the site from the Green Belt would lead to a high degree of harm to the Green Belt. The reasons for this being:
• The site lies adjacent to the large built-up area of Havering but relates strongly to the wider countryside – development would represent expansion of the large built-up area into the open countryside.

• The site lies between the settlements of Collier Row and Chadwell Heath and Hainault to the north west. Development of the Site would lead to the erosion of part of the gap between the settlements, although it is acknowledged that there is significant existing ribbon development along Collier Row Road between Collier Row and Chadwell Heath.

• The site is rural in character and displays the characteristics of the countryside. Development of the Site would lead to encroachment of the countryside.

Release of this site would weaken the Green Belt boundary and the contribution of adjacent Green Belt land to the west because the hedgerow along the western edge of the Site does not represent a strong boundary. The overall harm to the Green Belt resulting from release of this site would therefore be High.

Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 2 of the 13 sustainability criteria, and ‘green’ (signifying that the site could perform well in sustainability terms) in relation to 6 of the criteria.

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**KFC**

LPREG19 - 189

Concerns over Policy 12 re. Singling out specific uses. Amendment to Part iii. Policy 13 proposed

See proposed change to LPREG19 -433

Policy criterion modified to omit specific uses.

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**Power Leisure Bookmakers**

LPREG19 - 431

Concerns over soundness of Policy 12, 13 and reasoned justification paragraphs

No modification proposed

Comments noted.

The Council considers that it is justified to control the number of betting shops within its town centres to maintain vital and viable town centres. The Council believes that it not overly restricts these uses, as there is still room for additional betting shops the majority of the borough’s town centres, as shown in the town centre position statement. The Council is justified to control the number of betting shops as it wishes to prevent over concentration of these uses to keep town centres vital and viable.

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LPREG19 - 433

Calls for removal of wording “Betting Shops” from Policy 12 part iii.

Modification to Policy 12 Healthy communities iii. Promoting the diversification of uses within town centres and managing the overconcentration of uses that can have a negative health impacts such as betting shops and fast food takeaways (refer to Policy 13);

The specific reference to uses has been removed from the policy.

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LPREG19 - 434

Concern over reasoned justification for proposed betting shop thresholds

No modification proposed

Comments noted.

The Council considers that it is justified to control the number of betting shops and pay day loan shops within its town centres to maintain vital and viable town centres. The Council believes that it not overly restricts these uses, as there is still room for additional units of these uses the majority of the borough's town centres, as shown in the town centre position statement. The Council is justified to cover these two Sui Generis uses in a single policy criterion, as it wishes to prevent over concentration of these uses to keep town centres vital and viable.

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**Loundmain Ltd**

LPREG19 - 320

Concerns over Havering’s future housing supply

No modification proposed

It is noted that the objector supports the emphasis that Policy 3 places on ensuring an adequate supply of housing including the delivery of a large proportion f homes in the Romford Strategic Development Area.

The Council’s Vision : Havering Making a Greater London seeks to provide new homes in Havering and, in appropriate cases, the Council takes a positive and proactive stance in dealing with prospective private developers wishing to bring forward housing schemes in recognition of the importance of securing timely and high quality housing delivery.

In line with the Vision, the Local Plan Spatial Strategy acknowledges that the delivery of new homes is critical to London’s well-being. It sets out how the Council has approached the important topic of making sure that enough new homes are provided.
Havering has undertaken a Strategic Market Assessment to support the preparation of the Local Plan. Havering forms part of both the London-wide housing market area and the outer north east London sub housing market area with the London Boroughs of Barking and Dagenham and Redbridge. In line with the requirements of the National Planning Policy Framework, the Council has worked with these authorities to prepare its Strategic Housing Market Assessment (SHMA).

The resultant Outer North East London SHMA indicates that Havering’s full objectively assessed housing need is for 25,200 new homes over the period 2011-2033 or 1,145 homes per annum. Since the initial SHMA was undertaken, updated population projections have been published by the GLA. The updated population projections were reflected in an update (2017) of the SHMA which identified an increased housing need in Havering of 30,052 new homes over the same period (1,366 new homes per year).

The Council is making every effort to identify and bring forward suitable sites to exceed the current London Plan target and to meet housing need.

The Local Plan does not seek to constrain the number of new homes to come forward to 17,550 over the Plan period.

Further, the Council is aware that the current London Plan requires that boroughs should seek to close the gap between housing need (assessed through a Strategic Housing Market Assessment) and supply.

The Council’s approach to providing new homes in the Havering Local Plan takes a balanced view about the importance of addressing housing requirements and securing sustainable development. Having undertaken recent studies to assess whether the Green Belt fulfils the roles identified in the National Planning Policy Framework, the Council is also committed to ensuring that the Green Belt is safeguarded. The Council has concluded that there are no exceptional circumstances to support releasing land from the Green Belt.

The Council’s commitment to the Green Belt is an important ‘driver’ in helping to secure new homes in Havering’s built up areas and through the important programmes being delivered through the Housing Zones and the Council’s estates regeneration programme (see below).

The Council’s strategy also recognises that the scope to accommodate growth in Havering will be dependent upon the provision of infrastructure especially that needed to provide effective and efficient movement within Havering as well as social and community infrastructure necessary for residents such as schools and health facilities. The Council has prepared an Infrastructure Delivery Plan to support the Havering Local Plan and to inform the consideration of housing proposals.

Throughout the Local Plan process, the Council has rigorously sought to identify all sources of potential housing supply that will secure sustainable development in order to ensure that Havering is taking every opportunity to secure the delivery of new homes. This approach has been implemented to enable the gap between the housing targets in the London Plan and the objectively assessed need requirement to be closed as far as is reasonably possible.

The Housing Position Statement which supports the Havering Local Plan explains the Council’s approach to this in more detail. A element is that the Council considers that the certainty of securing housing delivery over the overall plan period must be taken into account against the numbers of units approved particularly in the initial years of the Local Plan being implemented.

It sets out that the Council considers that over the period of the plan to 2031, the potential overall supply of additional homes in Havering may exceed the minimum annual housing target of 1,170 new homes per year set out in the current London Plan.

In summary, the approach in the Local Plan that the Council will implement is based on:

- focussing the delivery of new homes in Havering’s two housing Zones at Romford and Rainham and
Beam Park. These two areas are identified in the Local Plan as Strategic Development Areas and have
individual comprehensive policy frameworks to guide and steer their development to make sure that
development provides high quality places with inclusive communities and the timely and effective
provision of infrastructure
- supporting the intensification of twelve of its own existing housing estates through an ambitious
regeneration programme that includes an experienced private sector development partner secured by
means of a Joint Venture Limited Liability Partnership
- realising the housing opportunities that come forward on large sites outside of the Strategic
Development Areas to provide opportunities for place-making and building communities. These include
sites such as the former St Georges Hospital site in Hornchurch
- prioritising all land not designated for other planning purposes for new homes
- encouraging the effective use of land by re-using previously developed (brownfield) land and allocating
a range of sustainable sites for housing development The latter will be identified in the forthcoming Site
Specific Allocations Local Plan

The Local Plan Housing Position Statement sets out in more detail the specific potential housing opportuni-
ties that will come forward for the two Housing Zones and the Council’s twelve estates programme.

The Housing Position Statement identifies specific deliverable and developable sites for the first 10 years of the
Plan. The Council is committed to ensuring that there is a sufficient supply of housing over the 15 year plan
period and beyond and will therefore undertake an early review of the Plan.

The Statement also includes details of sites which it is anticipated will be included in the forthcoming Site Specific
Allocations Local Plan document which will reflect up to date capacity studies where appropriate.

Underpinning the Council’s approach is a clear recognition of the importance of optimising the development
potential of the sites in regard to their potential capacity whilst ensuring that they provide satisfactory
residential environment for residents and maintaining the character and appearance of Havering. There is an
emphasis on making sure the place-making role of new development is addressed and a focus on delivering
places where communities can flourish and be cohesive and inclusive.

As a result of this approach, sufficient land has been identified to meet the minimum London Plan housing
target for the first 10 years of the Local Plan if the delivery is taken over the 10 year period.

The Council considers that the greater certainty that is encompassed through the Housing Zones and the twelve
estates programme should weigh heavily in their favour and help counter the potential numerical shortfall in
housing delivery in the first five years.

The objector has raised concerns about the potential implications of Havering failing to meet its OAHN
particularly in regard to the position with other London Boroughs and adjoining and nearby districts outside
London.

Havering has engaged extensively with the GLA in the preparation of its Local Plan and this has included specific
discussion about addressing housing.

The GLA has confirmed that London Boroughs are not required to demonstrate how any unmet need from their
own boroughs will be met in Other London Boroughs or adjoining districts. The preparation of the Havering Local
Plan is not therefore required to address how any shortfall in this borough will be addressed within London or by
adjoining / nearby local authorities.

The GLA has advised that the London Plan makes clear that London should be treated as a single housing market.
The London Plan states that the Annual average housing supply monitoring targets set out in Table 3.1 are a
minimum target for each borough. In order to meet local need and contribute to meeting strategic need each
London borough is to seek to exceed this target through the measures set out in London Plan Policy 3.3E,
paragraphs 3.19 and 3.19i of the Plan and Section 1 of the London Plan Housing SPG (2016).
The Housing SPG clarifies that this approach applies even where a borough has demonstrated it can exceed its local housing need. In preparing its Local Plan Havering (and Redbridge/Barking and Dagenham) will be expected to demonstrate it has sought to increase its housing supply in line with policy 3.3 of the London Plan and the Housing SPG in order to reduce the gap between local and strategic housing need and supply. The Housing SPG 2016 notes that sensitivity testing during the development of the SHLAA showed that additional sources of housing such as higher density, housing led, mixed use development in accessible locations in Opportunity/Intensification Areas, town centres, surplus industrial land and other large sites could ‘fill’ the gap between the minimum housing supply target and London’s identified need. This has been confirmed by monitoring which shows that collectively the boroughs have been approving sufficient capacity to address London-wide need.

The objector refers to the recent Government consultation ‘Planning for the right homes in the right places’. It is recognised that the approach set out in the consultation is now reflected in the draft National Planning Policy Framework published in March 2018.

The Government White Paper consultation identified a housing ‘need’ figure for Havering of 1,821 new homes per year. It is noted that this figure is in a consultation document and has been derived from methodology that is not normally used in London.

The Council responded to the consultation identifying that there were strong concerns as to how this figure has been prepared and that it made no provision for the infrastructure to support the level of housing mentioned. On this basis the Council considers that the figure identified by the Government is flawed, unachievable and unrealistic.

In preparing its Local Plan, the Council has engaged with other London Boroughs and adjoining districts. The details of these discussions are set out in the Duty to Co-operate statement. It is clear from the Duty to Cooperate engagement that adjoining local authorities are heavily engaged in their own Local Plan preparation including securing the necessary evidence to support this. This work will include the preparation of necessary SHMAs. It was not feasible and not desirable to ‘pause’ the preparation of the Havering Local Plan to enable all evidence base work (including SHMAs) to ‘catch up’ nor for this to be reflected in the Havering local Plan. The Duty to Co-operate discussions have recognised that for most authorities involved in this process it will be extremely challenging for them to identify and deliver sites that will enable them to meet their own respective OAHN. It is therefore highly unlikely that these authorities will be willing to help meet unmet need arising in London.

The Duty to Co-operate Statement confirms that issues around the provision of housing have been explicitly discussed and explored between the authorities. It was recognised in this process that seeking to resolve this would be extremely challenging and delay the delivery of the respective local plan at a time when local authorities re being pressured by Government to ensure that they have up to date Local Plans in place.

The policy already includes a commitment to increasing the amount of housing within the borough by re-using previously developed land and this will include land which can be demonstrated not to be needed for employment purposes.

<table>
<thead>
<tr>
<th>LPREG19</th>
<th>Support in principle for Policy 1. Calls for greater clarity over housing delivery in relation to the Romford SDA in order to avoid ambiguity</th>
<th>Modification to Policy 1 Romford Strategic Development Area</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>“Over the plan period the Council will support the delivery of over 5,300 (2) new high quality homes within the Romford Strategic Development Area in well managed residential and mixed use schemes that provide attractive places to live and which are well integrated with the existing community.”</td>
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<td></td>
<td>&amp; a greater emphasis to be placed in support of high density schemes on previously developed sites in the Romford SDA. Amendment proposed.</td>
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<tr>
<td><strong>LPREG19 - 322</strong></td>
<td>Objection to Policy 19 &amp; 20 re. Inflexibility to permit alternate uses on LSIS sites given Havering’s current housing situation.</td>
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</tbody>
</table>
| | Modification proposed to Policy 20 Loss of industrial land
See response to LPRE19-388 |
| | Modification proposed to Policy 19 Business growth:

9.1.4 Strategic Industrial Locations (SILs) are locations identified by the Mayor of London, following assessment of future demand, as London’s main reservoir of industrial land. They are identified as vital for providing capacity for activities such as logistics, waste management, utilities, land for transport, and industrial ’services to support the service sector’, and they are accorded strategic protection by the Mayor of London and London boroughs. The Locally Strategic Industrial Sites (LSISs) are sites identified by the Council as vital for local industrial functions, including availability of low rent accommodation, which support a range of local employment. The Council nevertheless realise the importance of addressing other strategic and local land-use requirements, in particular the pressing need for new homes. The Council will, therefore, keep under review the need for employment land as part of a managed approach in line with the requirements in the National Planning Policy Framework and the London Plan and with regard to meeting the other objectives of this Local Plan.

9.1.6 The ELR advises that 24ha of employment land can be released over the Plan period. Industrial land previously designated for its local significance can be released from industrial employment use. The previously designated land recommended for release comprises 2.7 ha at Crow Lane (Romford gas works), 15.4 ha at Rainham West and 1.4 ha at Bridge Close, Romford. The de-designation of these sites will facilitate the delivery of new residential developments and make a significant contribution towards meeting the borough's housing need. Safeguarding SILs and the remaining LSISs will ensure that there is sufficient capacity to meet projected demand for industrial land in the borough going forward over the plan period.

Add new paragraph 9.1.13:

Policy 20 Loss of Locally Significant Industrial Sites and Non-designated industrial land sets out how the Council will approach proposals for the loss of employment land in these sites. |

See response to LPREG19-388.
| LPREG19 - 323 | Request for greater flexibility in relation to the application of Policy 5 – Housing Mix | Policy 5 Housing mix  
The Council will support development proposals that provide a mix of dwelling types, sizes and tenures.  
All housing schemes should include a proportion of family sized homes and reflect the recommended housing mix identified in Table 2 unless;  
When considering the mix of dwelling sizes appropriate for a particular development proposal, the Council will have regard to it can be robustly demonstrated that a variation to the mix in Table 2 is justified having regard to individual site circumstances including location, site constraints, viability and the achievement of mixed and balanced communities.  
Where proposals are seeking to provide retirement, sheltered or extra care housing, the Council recognises that there may be a need for greater flexibility with regard to the mix of units to be provided within Developments and the housing mix as set out in table 2 does not apply to such proposals particularly in achieving the provision of 3 bedroom units. |  |
| LPREG19 - 324 | Objection to Policy 24 - Parking provision and design re. the undermining of London Plan parking standards | No modification proposed | Policy 23 Transport Connections includes a requirement for new developments tooptimise sustainable access and other future transport connections wherever applicable.  
The Council’s parking policy (policy 24) has been informed by a Residential Car Parking Standards study which has drawn together a range of evidence to help inform the car parking standards for the borough having regard to the particular circumstances in Havering.  
Policy 24 recognises that as an outer London Borough for many residents there is a higher dependency on the car, compared to central and inner London where public transport provision is much more accessible. The policy seeks to recognise that many local journeys in Havering must be made by car because they are impractical to make by public transport. Although parts of Havering are well connected by public transport to destinations outside of the borough, many more local destinations do not have reasonable public transport access and this is reflected in the higher levels of car ownership and usage in Havering. In this regard Havering is typical of many other outer London boroughs.  
For areas of low accessibility (PTAL 0-2), minimum parking standards have been set out and these are included in table 4 in policy 24.  
The London Plan expects that in areas of good public transport accessibility (PTAL 5-6) in all parts of London developments should aim for significantly less than one space per unit. The Council considers that this does not adequately reflect the position in Havering regarding the practicalities of making journeys within the borough and the consequent ownership and usage levels of private cars.  
For highly accessible parts of the borough (PTAL 5-6), the parking standards set out in Policy 24 recognise that a minimum parking standard of 0.5 spaces per unit is appropriate having regard to the particular circumstances involved |  |
| LPREG19 - 325 | Amendment proposed to Policy 12 re. HIA | Modification to Policy 12 Healthy Communities  
The Council will seek to maximise the potential health gains from development proposals and ensure that any negative impacts are mitigated. All major development proposals must be supported by a Health Impact Assessment (HIA) to demonstrate that full consideration has been given to health and wellbeing and the principles of active design.  
Paragraph 8.1.4. | The Council’s stance on Health Impact Assessment’s is in accordance with the London Plans commitment to improving health and addressing health inequalities as laid out in Policy 3.2 part C. |
To ensure that health and wellbeing is given full consideration in the future development of the borough, a Health Impact Assessment should be undertaken by developers for all major developments. HIAs can help to identify aspects of development that can be enhanced to achieve the greatest health gains and where there is a need to mitigate any potential negative impacts. The level of detail included in the HIA should be commensurate with the size and type of development proposed. Developers should use the Council’s Health Impact Assessment template when undertaking their assessments.

New paragraph 8.1.5:
When undertaking Health Impact Assessments, full consideration should be given to the principles of Active Design as set out in Sport England and Public Health England’s Active Design Guidance. Active design is about designing and adapting where we live to encourage activity in our everyday lives.

The Council is not seeking any commitment beyond common standard practice amongst local authorities. This requirement does not present cost burdens beyond those a developer would normally incur in the course of delivering a scheme. The conditions for employing a local resident or offering supply chain opportunities should not be more costly or burdensome than any other process that the company may wish to use.

Additionally:
I. A 20% requirement is a minimum requirement in most Section 106 Agreements and is established common practice amongst most local authorities.

II. A Developer will need to advertise vacancies arising from the development at any rate either directly as a or via its contracting and /sub-contracting arrangements for this development. A Developer should build this requirement into its contracting processes. As such the Council cannot see how the task of sending the same information to the Council’s jobs brokerage team is onerous. The Council is willing to work with a Developer to review the job roles beforehand and to assess which jobs can be filled from its client base and which are specialist in nature /difficult to recruit to and may require specialist and further advertisement. These are flexibilities that can be accommodated and negotiated within the Employment and Skills Plan development stage. The lead officer for local vacancies is Joanna.Busz@Havering.gov.uk

III. The inclusion of local supply chain opportunities does not preclude a Developer from achieving economies of scale or competitiveness in the process. The Council will expect a transparent process of tendering and demonstrable evidence of advertising local opportunities which should be communicated to the nominated lead officer within the Council (Sarah Moss who can be contacted at Sarah.Moss@Havering.gov.uk)

| LPREG19 - 326 | Objection to Policy 22 - skills and training re. Impact of Employment and Skills Plan measures on scheme viability and deliverability. | No modification proposed | The Council is not seeking any commitment beyond common standard practice amongst local authorities. This requirement does not present cost burdens beyond those a developer would normally incur in the course of delivering a scheme. The conditions for employing a local resident or offering supply chain opportunities should not be more costly or burdensome than any other process that the company may wish to use. Additionally:

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| LPREG19 - 327 | Concerns over wording of Policy 26 re. The purpose of using Urban Design Review Panel. Greater clarification sought re. Timescales, Modification to Policy 26 Urban Design | The Council will expect development proposals of a strategic nature to will be subject to an Urban Design Review Panel. Paragraph 11.1.16 The National Planning Policy Framework states that Local planning authorities should have local design review arrangements in place to provide assessment and support to ensure high standards of design. The | The Council will expect development proposals of a strategic nature to will be subject to an Urban Design Review Panel. Paragraph 11.1.16 The National Planning Policy Framework states that Local planning authorities should have local design review arrangements in place to provide assessment and support to ensure high standards of design. The |
Council will establish a Design Review Panel comprising of independent specialists. The Council supports the use of Urban Design Review Panels and will expect development proposals of a strategic nature to be subject to such a review. For the purpose of this policy development proposals of a strategic nature are those that have potential to significantly impact or alter the character of an area including those that comprise of tall buildings and those that are referable to the Mayor. If an applicant is in doubt about whether a design review is required this should be discussed with the Council’s Planning Department at pre-application stage. This will include large development schemes within the Romford and Rainham and Beam Park Development Area.

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Concerns over wording of Policy 36 re. Impact of imposing climate change mitigation measures on scheme viability and deliverability. Modification proposed

The Council will require major development, where feasible, to prioritise connection to any existing or planner decentralised energy networks and, where feasible, integrate combined heat and power systems on site.

Modification to Policy 36 Low carbon design, decentralised energy and renewable energy

The Council will require major development, where feasible, to prioritise connection to any existing or planner decentralised energy networks and, where feasible, integrate combined heat and power systems on site.

Affinity

Concerns regarding lack of Site Allocations in the Local Plan. Information provided on Rom Valley Way Site and Atlanta Boulevard

No modification proposed

The Council has brought forward the Havering Local Plan to ensure that it has an up to date suite of planning policies to guide development in the borough at a time of great change. The Havering Local Plan replaces the Havering Local Development Framework (including the Romford Area Action Plan) which was adopted in 2008.

The Council considers that an up to date Local Plan is essential because it will assist in the delivery of its two Housing Zones (at Romford and Rainham and Beam Park) and the regeneration of its twelve Council estates project.

The Borough will also benefit from the arrival of Crossrail / Elizabeth line services from 208/19 which will significantly improve access to and from Romford and into and from Central London. It is expected that this will be reflected in increases in development interest in Havering.

The Council is also looking to secure significant public transport connectivity improvements between the north and south of the borough and has commissioned feasibility work to support and inform this.

Havering regard to these factors and its relatively modest plan-making resources, the Council determined that the most effective way forward and of ensuring that Havering has up to date planning policies is to bring forward the Havering Local Plan which has now been submitted.

As set out in its Local Development Scheme, it will be followed by the preparation of a Site Specific Allocations Local Plan which will provide details of individual sites for development. The Housing Position Statement document (which supports and informs the Havering Local Plan) will also inform and support the preparation of the Site Specific Allocations document and assist in securing its timely delivery. Considerable work has already been done to inform the Housing Position Statement in regard to matters such as site capacity and potential.

In addition, the Council will be bringing forward a range of other documents such as planning guidance and a Master-plan for Romford which will also inform the preparation of the Site Specific Allocations work.

The Council has taken the opportunity as set out in the Regulations and PPG to progress from initial consultation on the Local Plan in 2015 to pre-submission version of its Local Plan in the interests of delivering its Local Plan effectively and efficiently having regard to the matters outlined above.
It is unfair for the objector to say that there has been no opportunity for stakeholders to be involved following the initial consultation. Initial consultation took place in Spring 2015 (options stage). It was followed in November 2016 by the publication of a Direction of Travel document which was published to show stakeholders how the Local Plan work was progressing and to provide the opportunity for comment on matters such as timeframe for delivery, its emerging vision, strategic objectives and spatial strategy. Details of this are set out in the Councils’ Consultation Statement.

The comments from the objector regarding support for the Romford Strategic Development Area are noted. The specific comments regarding the Rom Valley Way and Atlanta Boulevard sites are also noted and will inform further work on preparing planning policies for the borough.

<table>
<thead>
<tr>
<th>LPREG19 - 300</th>
<th>Support for inclusion of Rom Valley Way site within Spatial Strategy. Amends proposed to Para 5.1.5 to ref. a min. no. of units to be delivered within the Romford SDA</th>
<th>Modification to Section 5 Borough-wide spatial strategy Paragraph 5.1.5: Romford is identified as a metropolitan centre in the London Plan and is the largest town centre in the borough. Romford has scope for development across a number of well located and well connected sites. The Local Plan recognises its potential for significant regeneration and intensification. Romford is already a key transport hub in Havering with more than 25 bus routes using the town centre. From 2019, it will benefit from improved rail services as a result of the arrival of Elizabeth line services through Crossrail. Its potential has been recognised by its designation as a Mayoral Housing Zone and the Local Plan will provide the means to assist in accelerating the delivery of new homes on a number of sites in and around the town centre. A minimum of 5,300 new homes will be delivered in the Romford Strategic Development Area. This plan also envisages business growth and an expanded leisure and cultural role for Romford. The next London Plan will re-affirm the role of Romford by designating it as an Opportunity Area in recognition of its potential to address an important part of Havering’s growth potential.</th>
</tr>
</thead>
<tbody>
<tr>
<td>LPREG19 - 301</td>
<td>Support for Policy 1. Calls for identification of strategic development sites and minimum yields in the Plan. Amendments proposed</td>
<td>See response to LPREG19-300 Information on the sites identified in the Romford Strategic Development Area is included in the Housing Position Statement (Annex 1 Table 8.1). The response to LPREG-300 includes a proposed modification to paragraph 5.1.5 to make clear that the reference to 5,300 dwellings is a minimum. Information on the employment and retail floor space requirements for the Local Plan are set out in the relevant evidence base documents (Employment Land Review 2018 and Retail and Leisure Study 2018).</td>
</tr>
<tr>
<td>LPREG19 - 302</td>
<td>Calls for deletion of ref. to Romford Leisure Centre &amp; a reconsideration of approach to funding for an additional 1 FE school in Policy 1</td>
<td>Modification to Policy 1 Romford Strategic Development Area Social infrastructure To support growth in the Romford Strategic Development Area and to assist in ensuring it is a successful place to live the Council will work with developers and service providers to ensure the delivery of: Amendment to criteria xxii</td>
</tr>
</tbody>
</table>
xxii. A 3 form of entry primary school (630 places) has been approved on the Bridge Close development site and the new school should be sufficient to meet demand for the additional primary places needed over the next five years. A further 6FE is needed for primary school places beyond the first five years.

LPREG19 - 303
Concerns over Policy 1 - Romford SDA & IDP re. education funding and provision (S106 & CIL charging)
Modification to Policy 1 Romford Strategic Development Area
A 3 form of entry primary school (630 places) has been approved on the Bridge Close development site and the new school should be sufficient to meet demand for the additional primary places needed over the next five years. A further 6FE need for primary school places beyond the first five years. The later stage will be addressed via the Site Specific Allocation Plan that will identify specific sites for future schools. If further sites come forward for housing development then we will need to assess whether further education provision will be needed.

LPREG19 - 304
Concerns over Para 6.1.25 re. Methodology by which schools pupil numbers are calculated following development. Additional evidence required
Modification to Policy 1 Romford Strategic Development Area
The reference to a minimum 700 units for primary and 3,000 units for secondary triggering the need for part of the development site to be set aside to provide a publicly funded school, are only average figures. The specific tenure and unit size breakdown for each development will be used to calculate the child yield using the publicly available GLA population calculator.

LPREG19 - 305
Concerns over Havering’s future housing supply. Calls for identification of strategic development sites in the Plan
No modification proposed
The objector’s support for Policy 3 is noted including the support for the delivery of housing in the Romford Strategic Development Area. The Local Plan is quite clear that the Council’s approach is to seek to increase housing supply over the Plan period.

The Council’s Vision: Havering Making a Greater London seeks to provide new homes in Havering and, in appropriate cases, the Council takes a positive and proactive stance in dealing with prospective private developers wishing to bring forward housing schemes in recognition of the importance of securing timely and high quality housing delivery.

In line with the Vision, the Local Plan Spatial Strategy acknowledges that the delivery of new homes is critical to London’s well-being. It sets out how the Council has approached the important topic of making sure that enough new homes are provided.

Havering has undertaken a Strategic Market Assessment to support the preparation of the Local Plan. Havering forms part of both the London-wide housing market area and the outer north east London sub housing market area with the London Boroughs of Barking and Dagenham and Redbridge. In line with the requirements of the National Planning Policy Framework, the Council has worked with these authorities to prepare its Strategic Housing Market Assessment (SHMA).

The resultant Outer North East London SHMA indicates that Havering’s full objectively assessed housing need is for 25,200 new homes over the period 2011-2033 or 1,145 homes per annum. Since the initial SHMA was undertaken, updated population projections have been published by the GLA. The updated population projections were reflected in an update (2017) of the SHMA which identified an increased housing need in Havering of 30,052 new homes over the same period (1,366 new homes per year).

The Council is making every effort to identify and bring forward suitable sites to exceed the current London Plan.
target and to meet housing need. The Local Plan does not seek to constrain the number of new homes to come forward to 17,550 over the Plan period.

Further, the Council is aware that the current London Plan requires that boroughs should seek to close the gap between housing need (as assessed through a Strategic Housing Market Assessment) and supply.

The Council’s approach to providing new homes in the Havering Local Plan takes a balanced view about the importance of addressing housing requirements and securing sustainable development. Having undertaken recent studies to assess whether the Green Belt fulfils the roles identified in the National Planning Policy Framework, the Council is also committed to ensuring that the Green Belt is safeguarded. The Council has concluded that there are no exceptional circumstances to support releasing land from the Green Belt.

The Council’s commitment to the Green Belt is an important ‘driver’ in helping to secure new homes in Havering’s built-up areas and through the important programmes being delivered through the Housing Zones and the Council’s estates regeneration programme (see below). The Council’s strategy also recognises that the scope to accommodate growth in Havering will be dependent upon the provision of infrastructure especially that needed to provide effective and efficient movement within Havering as well as social and community infrastructure necessary for residents such as schools and health facilities. The Council has prepared an Infrastructure Delivery Plan to support the Havering Local Plan and to inform the consideration of housing proposals.

Throughout the Local Plan process, the Council has rigorously sought to identify all sources of potential housing supply that will secure sustainable development in order to ensure that Havering is taking every opportunity to secure the delivery of new homes. This approach has been implemented to enable the gap between the housing targets in the London Plan and the objectively assessed need requirement to be closed as far as is reasonably possible.

The Housing Position Statement which supports the Havering Local Plan explains the Council’s approach to this in more detail. A element is that the Council considers that the certainty of securing housing delivery over the overall plan period must be taken into account against the numbers of units approved particularly in the initial years of the Local Plan being implemented. It sets out that the Council considers that over the period of the plan to 2031, the potential overall supply of additional homes in Havering may exceed the minimum annual housing target of 1,170 new homes per year set out in the current London Plan.

In summary, the approach in the Local Plan that the Council will implement is based on:

- focussing the delivery of new homes in Havering’s two housing Zones at Romford and Rainham and Beam Park. These two areas are identified in the Local Plan as Strategic Development Areas and have individual comprehensive policy frameworks to guide and steer their development to make sure that development provides high quality places with inclusive communities and the timely and effective provision of infrastructure
- supporting the intensification of twelve of its own existing housing estates through an ambitious regeneration programme that includes an experienced private sector development partner secured by means of a Joint Venture Limited Liability Partnership
- realising the housing opportunities that come forward on large sites outside of the Strategic Development Areas to provide opportunities for place-making and building communities. These include sites such as the former St Georges Hospital site in Hornchurch
- prioritising all land not designated for other planning purposes for new homes
- encouraging the effective use of land by re-using previously developed (brownfield) land and allocating a range of sustainable sites for housing development The latter will be identified in the forthcoming Site Specific Allocations Local Plan

The Local Plan Housing Position Statement sets out in more detail the specific potential housing opportunities
that will come forward for the two Housing Zones and the Council’s twelve estates programme.

The Housing Position Statement identifies specific deliverable and developable sites for the first 10 years of the Plan. The Council is committed to ensuring that there is a sufficient supply of housing over the 15 year plan period and beyond and will therefore undertake an early review of the Plan.

The Statement also includes details of sites which it is anticipated will be included in the forthcoming Site Specific Allocations Local Plan document which will reflect up to date capacity studies where appropriate.

Underpinning the Council’s approach is a clear recognition of the importance of optimising the development potential of the sites in regard to their potential capacity whilst ensuring that they provide satisfactory residential environment for residents and maintaining the character and appearance of Havering. There is an emphasis on making sure the place-making role of new development is addressed and a focus on delivering places where communities can flourish and be cohesive and inclusive.

As a result of this approach, sufficient land has been identified to meet the minimum London Plan housing target for the first 10 years of the Local Plan if the delivery is taken over the 10 year period.

The Council considers that the greater certainty that is encompassed through the Housing Zones and the twelve estates programme should weigh heavily in their favour and help counter the potential numerical shortfall in housing delivery in the first five years.

The objector has raised concerns about the potential implications of Havering failing to meet its OAHN particularly in regard to the position with other London Boroughs and adjoining and nearby districts outside London.

Havering has engaged extensively with the GLA in the preparation of its Local Plan and this has included specific discussion about addressing housing.

The GLA has confirmed that London Boroughs are not required to demonstrate how any unmet need from their own boroughs will be met in Other London Boroughs or adjoining districts. The preparation of the Havering Local Plan is not therefore required to address how any shortfall in this borough will be addressed within London or by adjoining / nearby local authorities.

The GLA has advised that the London Plan makes clear that London should be treated as a single housing market. The London Plan states that the Annual average housing supply monitoring targets set out in Table 3.1 are a minimum target for each borough. In order to meet local need and contribute to meeting strategic need each London borough is to seek to exceed this target through the measures set out in London Plan Policy 3.3E, paragraphs 3.19 and 3.19i of the Plan and Section 1 of the London Plan Housing SPG (2016).

The Housing SPG clarifies that this approach applies even where a borough has demonstrated it can exceed its local housing need. In preparing its Local Plan Havering (and Redbridge/Barking and Dagenham) will be expected to demonstrate it has sought to increase its housing supply in line with policy 3.3 of the London Plan and the Housing SPG in order to reduce the gap between local and strategic housing need and supply.

The Housing SPG 2016 notes that sensitivity testing during the development of the SHLAA showed that additional sources of housing such as higher density, housing led, mixed use development in accessible locations in Opportunity/Intensification Areas, town centres, surplus industrial land and other large sites could “fill” the gap between the minimum housing supply target and London’s identified need. This has been confirmed by monitoring which shows that collectively the boroughs have been approving sufficient capacity to address London-wide need.

In preparing its Local Plan, the Council has engaged with other London Boroughs and adjoining districts. The details of these discussions are set out in the Duty to Cooperate statement. It is clear from the Duty to Cooperate engagement that adjoining local authorities are heavily engaged in their
own Local Plan preparation including securing the necessary evidence to support this. This work will include the preparation of necessary SHMAs. It was not feasible and not desirable to ‘pause’ the preparation of the Havering Local Plan to enable all evidence base work (including SHMAs) to ‘catch up’ nor for this to be reflected in the Havering local Plan.

The Duty to Cooperate discussions have recognised that for most authorities involved in this process it will be extremely challenging for them to identify and deliver sites that will enable them to meet their own respective OAHN. It is therefore highly unlikely that these authorities will be willing to help meet unmet need arising in London.

The Council will be bringing forward a Site Specific Allocations Local Plan in due course.

<table>
<thead>
<tr>
<th>LPREG19 - 306</th>
<th>Calls for removal of ref. to the London Plan Density Matrix &amp; greater clarity sought re. suitability of high density development in sustainable locations</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>No medication proposed</td>
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<tr>
<td></td>
<td>In line with the requirements, the Havering Local Plan has been prepared against the current London Plan and that includes the density matrix referred to in Policy 3.</td>
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<td></td>
<td>The Council will be bring forward a Site Specific Allocations document, planning guidance to support the Local Plan and is preparing a Master-plan for Romford. These will address issues around the potential development of sites in Romford and this are expected to encompass matters such as design and density.</td>
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<tr>
<th>LPREG19 - 307</th>
<th>Concerns regarding the 70/30 tenure split in Policy 4 Affordable Housing.</th>
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<tbody>
<tr>
<td></td>
<td>No modification proposed</td>
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<tr>
<td></td>
<td>Policy 4 Affordable Housing is consistent with the Mayors Affordable Housing and Viability Supplementary Planning Guidance 2017 and is supported by the GLA’s Regulation 19 consultation response.</td>
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<td></td>
<td>Paragraph 7.2.8 sets summaries the findings of the Outer North East London SHMA which found that the vast majority of households in Havering can only afford social housing if they receive housing benefit (This equates to approximately 80% of households. The SHMA provides a robust evidence base for a 70:30 tenure split. The Council will prepare further guidance on the Council’s preferred split between specific affordable products.</td>
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<tr>
<th>LPREG19 - 308</th>
<th>Request for greater flexibility in relation to the application of Policy 5 – Housing Mix</th>
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<tr>
<td></td>
<td>Policy 5 Housing mix</td>
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<td>The Council will support development proposals that provide a mix of dwelling types, sizes and tenures.</td>
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<td>All housing schemes should include a proportion of family sized homes and reflect the recommended housing mix identified in Table 2 unless;</td>
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<td>When considering the mix of dwelling sizes appropriate for a particular development proposal, the Council will have regard to: It can be robustly demonstrated that a variation to the mix in Table 2 is justified having regard to individual site circumstances including location, site constraints, viability and the achievement of mixed and balanced communities.</td>
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<td></td>
<td>Where proposals are seeking to provide retirement, sheltered or extra care housing, the Council recognises that there may be a need for greater flexibility with regard the mix of units to be provided within Developments and the housing mix as set out in table 2 does not apply to such proposals, particularly in achieving the provision of 3 bedroom units.</td>
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<tr>
<th>LPREG19 - 309</th>
<th>Requests for the reference to lifetime homes to be removed from Policy 7 and for greater flexibility in Modification to Policy 7 Residential Design and Amenity</th>
</tr>
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<tbody>
<tr>
<td></td>
<td>v. adhere to the London Plan policies in regards to Lifetime Homes Standards and Lifetime Neighbourhoods</td>
</tr>
<tr>
<td></td>
<td>Paragraph 7.5.3 Developments will be expected to deliver ‘lifetime’ homes and ‘lifetime’ neighbourhoods reflecting the six principles relating to access,</td>
</tr>
</tbody>
</table>
| LPREG19 - 310 | Objection to Policy 13- Town centre development re. Evidence base. Modification proposed | Modification to Policy 13 Town centre development  
Additional paragraph in the policy:  
The need for an Impact Assessment will be determined on a case by case basis. |
| LPREG19 - 311 | Additional wording to Policy 16 proposed. Calls for inclusion of a ‘stakeholder’ definition in the Glossary | Modification to Policy 16  
Social infrastructure  
Stakeholders: Applicants will be encouraged to consider funding arrangements for reasonable on-going maintenance costs. |
| LPREG19 - 312 | Calls for removal of affordable workspace policy. Modification proposed re. inclusion of a viability clause | Refer to the Council’s proposed modifications in response to LPREG19 - 103 |
Concerns over quantum of Parking standards proposed

No modification proposed

The Council’s parking policy (policy 24) has been informed by a Residential Car Parking Standards study which has drawn together a range of evidence to help inform the car parking standards for the borough having regard to the particular circumstances in Havering.

Policy 24 recognises that as an outer London Borough for many residents there is a higher dependency on the car, compared to central and inner London where public transport provision is much more accessible. The policy seeks to recognise that many local journeys in Havering must be made by car because they are impractical to make by public transport. Although parts of Havering are well connected by public transport to destinations outside of the borough, many more local destinations do not have reasonable public transport access and this is reflected in the higher levels of car ownership and usage in Havering. In this regard Havering is typical of many other outer London boroughs.

The London Plan expects that in areas of good public transport accessibility (PTAL 5-6) in all parts of London developments should aim for significantly less than one space per unit. The Council considers that this does not adequately reflect the position in Havering regarding the practicalities of making journeys within the borough and the consequent ownership and usage levels of private cars.

For highly accessible parts of the borough (PTAL 5-6), the parking standards set out in Policy 24 recognise that a minimum parking standard of 0.5 spaces per unit is appropriate having regard to the particular circumstances involved.

Greater clarification sought re. Urban Design Review Panel procedure & calls for the definition of ‘Strategic’ to be added to the Glossary

Modification to Policy 26 Urban Design

The Council will expect development proposals of a strategic nature to be subject to an Urban Design Review Panel.

Paragraph 11.1.16:

The National Planning Policy Framework states that Local planning authorities should have local design review arrangements in place to provide assessment and support to ensure high standards of design. The Council will establish a Design Review Panel comprising of independent specialists and Council representatives. The Council supports the use of Urban Design Review Panels and will expect development proposals of a strategic nature to be subject to such a review. For the purpose of this policy development proposals of a strategic nature are those that have potential to significantly impact or alter the character of an area including those that comprise of tall buildings and those that are referable to the Mayor. If an applicant is in doubt about whether a design review is required this should be discussed with the Council’s Planning Department at pre-application stage. This will include large development schemes within the Romford and Rainham and Beam Park Development Area.

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<table>
<thead>
<tr>
<th>LPREG19 - 317</th>
<th>Modifications proposed to Glossary</th>
<th>Modification to Glossary</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Lifetime Homes Standards - Lifetime Homes are ordinary homes designed to incorporate 16 design criteria that can be universally applied to new homes at minimal cost. Each design feature adds to the comfort and convenience of the home and supports the changing needs of individuals and families at different stages of life.</td>
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With regards to the inclusion of a definition of 'Stakeholder' please refer to the Council’s proposed modification in response to comment 19-360

With regards to the inclusion of a definition of 'Strategic' and 'Large Development' please refer to the Council’s proposed modification in response to comment 19-363/ 19-315

<table>
<thead>
<tr>
<th>LPREG19 - 316</th>
<th>Clarification sought on Policy 28 &amp; Para 11.3.7 re. agreed selection criteria for Local lists and how these will be determined</th>
<th>Modification to Policy 28 Heritage assets</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Paragraph 11.3.7: Not all of Havering's heritage assets are designated. There are also many non-designated heritage assets that contribute to the character and distinctiveness of the borough's historic environment including historic parks and gardens of local interest and locally important historic buildings. In order to ensure that these elements of the historic environment are conserved in a manner appropriate to their significance, the Council will work with local communities to promote the identification and maintenance of a list of non-designated heritage assets when these meet its agreed criteria. The proposed Local List Criteria will be subject to Public Consultation in line with Historic England Advice Note 7: Local Heritage Listing. Development proposals affecting non-designated heritage assets will be dealt with in accordance with the NPPF.</td>
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Development proposals affecting non-designated heritage assets will be dealt with in accordance with the NPPF.

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<tr>
<th>LPREG19 - 318</th>
<th>Concerns over DC and Consultation process</th>
<th>No modification proposed</th>
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<tr>
<td></td>
<td>The Duty to Co-operate Statement was made available on the consultation website for the Regulation 19 consultation together with other proposed submission documents. In addition to the key milestones, the statement also sets out what engagement on which issues has taken place with individual stakeholders. The statement also provides a summary of the engagement on particular strategic issues. The Council has therefore provided a comprehensive statement in which it has demonstrated how the Duty to Co-operate has been met. Annex A Key relationships and bodies includes a comprehensive review of engagement through the preparation of the Havering Local Plan. It includes details of engagement with statutory organisations, local authorities and...</td>
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regular liaison meetings with ‘ad hoc’ stakeholders such as the Association of London Borough Planning Officers (ALBPO). Dates are included for the specific Duty to Cooperate events that Havering ‘hosted’ with other local authorities (Section A3 Table A2). The programme of other regular meetings that Havering had with other stakeholders is identified (Section A3 Table A3). Specific topics addressed with relevant local authorities rea itemised (Section A3 Table A4).

Annex B provides an audit trail to document how specific strategic issues were progressed. It includes: Housing need and delivery, employment, Green Belt, Transport, Infrastructure, Flood risk and rivers, Natural environment and Minerals. For each of the issues, there is a ‘time-line’ identified from initial engagement through to the current, up to date position for submission of the Local Plan.

The objector comments that more detail is needed on who was involved with the listed events. In most instances, principal stakeholders are identified by organisation. In some cases, such as the events involving the preparation of the SHMA, it is clear from other parts of the Local Plan who would be involved. For example, SHMA events would normally comprise: London Boroughs of Redbridge, Newham, Barking and Dagenham and Havering.

ADREG19-8
Sustainability Appraisal
No modification proposed
 Comments noted.

The Sustainability Appraisal has been prepared in accordance with the requirements of the SEA Regulations and provides the appropriate level of detail to reflect the detail and scope of the Local Plan.

With regard to the comment that an assessment of each individual policy should be presented in the SA Report:

- Whilst each policy has been evaluated through the appraisal process, the appraisal of the plan has not been presented on a policy-by-policy and objective-by-objective basis. Instead it is presented through an overall assessment of the plan policies.

- A key reason why it has been presented in this way is that an understanding of the likely impacts of plan policies can only be established when they are implemented together. In this context the likely significant effects of a plan cannot be established on a policy-by-policy basis; instead they can only be effectively evaluated through a consideration of the plan policies together. This also reflects the provisions of the SEA Directive and transposing SEA Regulations, which provide a focus on the assessment of the ‘draft plan’.

- A further important reason why this approach is appropriate is that it increases the accessibility of the SA Report. This reflects the document’s key role as a consultation document to accompany the draft plan, and ensures that the ability of the public and stakeholders to effectively participate in the process is enabled.

With regards to the comment that alternatives considered should be considered for each policy:

The Local Plan is a development plan. As such reasonable alternatives have been considered in detail for the fundamental element of the Local Plan, namely alternative spatial strategies for development.

In this context five options have been assessed for the spatial strategy, which included options that sought to deliver a different housing mix. The implications of these options are presented in Section 5 of the SA Report, and the reasons for the preferred spatial strategy for the Local Plan set out in Section 6 of the SA Report. A full assessment of the plan policies has been presented in section 8 of the SA Report.

Genesis Housing Association
LPREG19-268
Support for the Draft Local Plan
No modification proposed
Support noted

Portland Capital
LPREG19-275
Information about Portland
No modification proposed
Noted
<table>
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<tr>
<th>Capital</th>
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<tbody>
<tr>
<td><strong>LPREG19 – 292</strong> Modification proposed to Policy 1 - Romford SDA</td>
</tr>
<tr>
<td>Modification to Policy 1 Romford Strategic Development Area</td>
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<tr>
<td>“Over the plan period the Council will support the delivery of over 5,300 (2) new high quality homes within the Romford Strategic Development Area in well managed residential and mixed use schemes that provide attractive places to live and which are well integrated with the existing community.”</td>
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<tr>
<td>References already made to strong strategic transport links. 6.13 and 6.14 reference the importance of Romford for providing housing growth.</td>
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<tr>
<td><strong>LPREG19 - 294</strong> Request for greater flexibility in relation to the application of Policy 4 Affordable Housing</td>
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<tr>
<td>No modification proposed</td>
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<tr>
<td>The support for the policy is noted.</td>
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<tr>
<td>The Council is committed to securing the highest level of affordable housing because market housing is unaffordable for many residents in Havering. Notwithstanding this, the Council recognises the importance of ensuring there are enough homes of all tenures in Havering and will, in appropriate instances, take a balanced view about the proportion of affordable housing that should be secured</td>
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<tr>
<td><strong>LPREG19 - 293</strong> Support for Policy 3 - Housing Supply &amp; Para 7.1.15</td>
</tr>
<tr>
<td>No modification proposed</td>
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<tr>
<td>The objector’s support for Policy 3 is noted including the support for the delivery of housing in the Romford Strategic Development Area. The Local Plan is quite clear that the Council’s approach is to seek to increase housing supply over the Plan period.</td>
</tr>
<tr>
<td>The Council’s Vision : Havering Making a Greater London seeks to provide new homes in Havering and, in appropriate cases, the Council takes a positive and proactive stance in dealing with prospective private developers wishing to bring forward housing schemes in recognition of the importance of securing timely and high quality housing delivery.</td>
</tr>
<tr>
<td>In line with the Vision, the Local Plan Spatial Strategy acknowledges that the delivery of new homes is critical to London’s well-being. It sets out how the Council has approached the important topic of making sure that enough new homes are provided.</td>
</tr>
<tr>
<td>Havering has undertaken a Strategic Market Assessment to support the preparation of the Local Plan. Havering forms part of both the London-wide housing market area and the outer north east London sub housing market area with the London Boroughs of Barking and Dagenham and Redbridge. In line with the requirements of the National Planning Policy Framework, the Council has worked with these authorities to prepare its Strategic Housing Market Assessment (SHMA).</td>
</tr>
<tr>
<td>The resultant Outer North East London SHMA indicates that Havering’s full objectively assessed housing need is for 25,200 new homes over the period 2011-2033 or 1,145 homes per annum. Since the initial SHMA was undertaken, updated population projections have been published by the GLA. The updated population projections were reflected in an update (2017) of the SHMA which identified an increased housing need in Havering of 30,052 new homes over the same period (1,366 new homes per year).</td>
</tr>
<tr>
<td>The Council is making every effort to identify and bring forward suitable sites to exceed the current London Plan target and to meet housing need.</td>
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<td>The Local Plan does not seek to constrain the number of new homes to come forward to 17,550 over the Plan period.</td>
</tr>
<tr>
<td>Further, the Council is aware that the current London Plan requires that boroughs should seek to close the gap between housing need (a assessed through a Strategic Housing Market Assessment) and supply.</td>
</tr>
<tr>
<td>The Council’s approach to providing new homes in the Havering Local Plan takes a balanced view about the importance of addressing housing requirements and securing sustainable development. Having undertaken recent studies to assess whether the Green Belt fulfils the roles identified in the National Planning Policy Framework, the Council is also committed to ensuring that the Green Belt is safeguarded. The Council has concluded that there are no exceptional circumstances to support releasing land from the Green Belt.</td>
</tr>
</tbody>
</table>
The Council’s commitment to the Green Belt is an important ‘driver’ in helping to secure new homes in Havering’s built up areas and through the important programmes being delivered through the Housing Zones and the Council’s estates regeneration programme (see below).

The Council’s strategy also recognises that the scope to accommodate growth in Havering will be dependent upon the provision of infrastructure especially that needed to provide effective and efficient movement within Havering as well as social and community infrastructure necessary for residents such as schools and health facilities. The Council has prepared an Infrastructure Delivery Plan to support the Havering Local Plan and to inform the consideration of housing proposals.

Throughout the Local Plan process, the Council has rigorously sought to identify all sources of potential housing supply that will secure sustainable development in order to ensure that Havering is taking every opportunity to secure the delivery of new homes. This approach has been implemented to enable the gap between the housing targets in the London Plan and the objectively assessed need requirement to be closed as far as is reasonably possible.

The Housing Position Statement which supports the Havering Local Plan explains the Council’s approach to this in more detail. A element is that the Council considers that the certainty of securing housing delivery over the overall plan period must be taken into account against the numbers of units approved particularly in the initial years of the Local Plan being implemented.

It sets out that the Council considers that over the period of the plan to 2031, the potential overall supply of additional homes in Havering may exceed the minimum annual housing target of 1,170 new homes per year set out in the current London Plan.

In summary, the approach in the Local Plan that the Council will implement is based on:

- focussing the delivery of new homes in Havering’s two housing Zones at Romford and Rainham and Beam Park. These two areas are identified in the Local Plan as Strategic Development Areas and have individual comprehensive policy frameworks to guide and steer their development to make sure that development provides high quality places with inclusive communities and the timely and effective provision of infrastructure
- supporting the intensification of twelve of its own existing housing estates through an ambitious regeneration programme that includes an experienced private sector development partner secured by means of a Joint Venture Limited Liability Partnership
- realising the housing opportunities that come forward on large sites outside of the Strategic Development Areas to provide opportunities for place-making and building communities. These include sites such as the former St Georges Hospital site in Hornchurch
- prioritising all land not designated for other planning purposes for new homes
- encouraging the effective use of land by re-using previously developed (brownfield) land and allocating a range of sustainable sites for housing development. The latter will be identified in the forthcoming Site Specific Allocations Local Plan

The Local Plan Housing Position Statement sets out in more detail the specific potential housing opportunities that will come forward for the two Housing Zones and the Council’s twelve estates programme.

The Housing Position Statement identifies specific deliverable and developable sites for the first 10 years of the Plan. The Council is committed to ensuring that there is a sufficient supply of housing over the 15 year plan period and beyond and will therefore undertake an early review of the Plan.

The Statement also includes details of sites which it is anticipated will be included in the forthcoming Site Specific Allocations Local Plan document which will reflect up to date capacity studies where appropriate.

Underpinning the Council’s approach is a clear recognition of the importance of optimising the development potential of the sites in regard to their potential capacity whilst ensuring that they provide satisfactory residential environment for residents and maintaining the character and appearance of Havering. There is an emphasis on making sure the place-making role of new development is addressed and a focus on delivering places where communities can flourish and be cohesive and inclusive.
As a result of this approach, sufficient land has been identified to meet the minimum London Plan housing target for the first 10 years of the Local Plan if the delivery is taken over the 10 year period.

The Council considers that the greater certainty that is encompassed through the Housing Zones and the twelve estates programme should weigh heavily in their favour and help counter the potential numerical shortfall in housing delivery in the first five years.

The objector has raised concerns about the potential implications of Havering failing to meet its OAHN particularly in regard to the position with other London Boroughs and adjoining and nearby districts outside London.

Havering has engaged extensively with the GLA in the preparation of its Local Plan and this has included specific discussion about addressing housing.

The GLA has confirmed that London Boroughs are not required to demonstrate how any unmet need from their own boroughs will be met in Other London Boroughs or adjoining districts. The preparation of the Havering Local Plan is not therefore required to address how any shortfall in this borough will be addressed within London or by adjoining / nearby local authorities.

The GLA has advised that the London Plan makes clear that London should be treated as a single housing market. The London Plan states that the Annual average housing supply monitoring targets set out in Table 3.1 are a minimum target for each borough. In order to meet local need and contribute to meeting strategic need each London borough is to seek to exceed this target through the measures set out in London Plan Policy 3.3E, paragraphs 3.19 and 3.19i of the Plan and Section 1 of the London Plan Housing SPG (2016).

The Housing SPG clarifies that this approach applies even where a borough has demonstrated it can exceed its local housing need. In preparing its Local Plan Havering (and Redbridge/Barking and Dagenham) will be expected to demonstrate it has sought to increase its housing supply in line with policy 3.3 of the London Plan and the Housing SPG in order to reduce the gap between local and strategic housing need and supply.

The Housing SPG 2016 notes that sensitivity testing during the development of the SHLAA showed that additional sources of housing such as higher density, housing led, mixed use development in accessible locations in Opportunity/Intensification Areas, town centres, surplus industrial land and other large sites could ‘fill’ the gap between the minimum housing supply target and London’s identified need. This has been confirmed by monitoring which shows that collectively the boroughs have been approving sufficient capacity to address London-wide need.

In preparing its Local Plan, the Council has engaged with other London Boroughs and adjoining districts. The details of these discussions are set out in the Duty to Cooperate statement.

It is clear from the Duty to Cooperate engagement that adjoining local authorities are heavily engaged in their own Local Plan preparation including securing the necessary evidence to support this. This work will include the preparation of necessary SHMAs. It was not feasible and not desirable to ‘pause’ the preparation of the Havering Local Plan to enable all evidence base work (including SHMAs) to ‘catch up’ nor for this to be reflected in the Havering local Plan.

The Duty to Cooperate discussions have recognised that for most authorities involved in this process it will be extremely challenging for them to identify and deliver sites that will enable them to meet their own respective OAHN. It is therefore highly unlikely that these authorities will be willing to help meet unmet need arising in London.

The Duty to Cooperate Statement confirms that issues around the provision of housing have been explicitly discussed and explored between the authorities. It was recognised that in this process that seeking to resolve this would be extremely challenging and delay the delivery of the respective local plan at a time when local authorities are being pressed by Government to ensure that they have up to date Local Plans in place.
The objector’s comments regarding the promotion of density appropriate to accessibility are noted. Havering acknowledges the importance of optimising delivery from sites but notes that it is also important that proposals should properly recognise and reflect local circumstances so that the open and suburban character of the borough is maintained.

| LPREG19-295 | Request for greater flexibility in relation to the application of Policy 5 – Housing Mix | Policy 5 Housing mix
The Council will support development proposals that provide a mix of dwelling types, sizes and tenures. All housing schemes should include a proportion of family sized homes and reflect the recommended housing mix identified in Table 2 unless,
When considering the mix of dwelling sizes appropriate for a particular development proposal, the Council will have regard to it can be robustly demonstrated that a variation to the mix in Table 2 is justified having regard to individual site circumstances including location, site constraints, viability and the achievement of mixed and balanced communities.

Where proposals are seeking to provide retirement, sheltered or extra care housing, the Council recognises that there may be a need for greater flexibility with regard the mix of units to be provided within Developments and the housing mix as set out in table 2 does not apply to such proposals particularly in achieving the provision of 3 bedroom units.

| LPREG19-296 | Additional clarification required for Polices 19 & 20. Modifications proposed to both policies | Refer to the modification proposed to LPREG19-388
See response to LPREG19-388 (Policy 20).
Locally Significant Industrial Sites (LSISs) have replaced Secondary Employment Areas in the Local Development Framework (2008). The proposed modification recognises the potential for LSISs and non-designated industrial land to contribute towards securing wider land-use objectives in the Local Plan.

| LPREG19-297 | Concerns over Policy 20 - Loss of Industrial land | Refer to the modification proposed to LPREG19-388
See response to LPREG-388 (Policy 20)

| LPREG19-299 | Objection to Policy 24 - Parking provision and design | No modification proposed
Policy 23 Transport Connections of the Local Plan includes a requirement for new developments to optimise sustainable access and other future transport connections wherever applicable.

The Council’s parking policy (policy 24) has been informed by a Residential Car Parking Standards study which has drawn together a range of evidence to help inform the car parking standards for the borough having regard to the particular circumstances in Havering.

Policy 24 recognises that as an outer London Borough for many residents there is a higher dependency on the car, compared to central and inner London where public transport provision is much more accessible. The policy seeks to recognise that many local journeys in Havering must be made by car because they are impractical to make by public transport. Although parts of Havering are well connected by public transport to destinations outside of the borough, many more local destinations do not have reasonable public transport access and this is reflected in the higher levels of car ownership and usage in Havering. In this regard Havering is typical of many other outer London boroughs.

For areas of low accessibility (PTAL 0-2), minimum parking standards have been set out and these are included in table 4 in policy 24.

The London Plan expects that in areas of good public transport accessibility (PTAL 5-6) in all parts of London developments should aim for significantly less than one space per unit. The Council considers that this does not adequately reflect the position in Havering regarding the practicalities of making journeys within the borough
and the consequent ownership and usage levels of private cars. For highly accessible parts of the borough (PTAL 5-6), the parking standards set out in Policy 24 recognise that a minimum parking standard of 0.5 spaces per unit is appropriate having regard to the particular circumstances involved.

LPREG19 - 298  |  Request for viability considerations to be added to Policy 21 Affordable workspace  |  Refer to the modifications proposed to LPREG19 - 103  |  Refer to the Council’s proposed modifications in response to LPREG19 - 103

SEGRO plc  

LPREG19 - 276  |  Information provided on SEGRO  |  No modification proposed  |  Noted

LPREG19 - 277  |  Additional information provided on SEGRO  |  No modification proposed  |  Noted

LPREG19 - 282  |  Support for Havering’s Vision. Minor modifications proposed to para 2.2.7  |  The employment area to the south of Rainham and Beam Park will have retained its role as a strategically important industrial area and will have benefited from transformational new developments and an intensification of employment uses in a safe and secure environment.  |  Support noted

LPREG19 - 283  |  Support for Strategic Objectives  |  No modification proposed  |  Support noted

LPREG19 - 284  |  Support for the Borough’s strategy for growth. Minor amendment proposed.  |  No modification proposed  |  The Council has undertaken an employment land review to understand the requirements for the protection or release of industrial land. Havering’s strategy for growth is based on the recommendations in the employment land review. It identified 19.5 hectares of land to be released from designated industrial employment use to enable wider regeneration benefits. The land recommend for release comprises 2.7 ha at Crow Lane (Romford gas works), 15.4 ha at Rainham West and 1.4 ha at Bridge Close, Romford. Safeguarding Strategic Industrial Locations and the remaining Locally Significant Industrial Sites will ensure that there is sufficient capacity to meet projected demand for industrial land in the borough going forward over the plan period. The Employment land review recommends that a further 4 to 5 hectares of employment land can be released from other non-designated sites over the Plan Period, making the overall amount of employment land to be released not greater than 24 hectares.

LPREG19 - 285  |  Support for Section 6 Strategic Development Areas. Minor amendment proposed.  |  Modification to Policy 26 Urban design Paragraph 11.1.8: Streets should be designed as public spaces with the needs of all users considered. Well designed streets with safe, direct, convenient and clear pedestrian and cycle routes helps to maximise the transport choices of residents, and can influence people to use more active modes of travel. Residential layouts designed solely to meet the requirements of vehicular traffic are not acceptable. New routes and connections should provide integrated routes for pedestrians, cyclists and vehicular traffic. When designing new residential and mixed use developments consideration should be given to how frequent deliveries will be accommodated.  |  The Council acknowledge that access by public transport to the Rainham Employment Area is currently limited. Officers are working with TfL to explore opportunities to improve access through the London Riverside Business Improvement District by bus.

The Council is currently developing proposals to deliver transformational change in the Rainham and Beam Park Strategic Development Area (SDA) along the A1306 between Dovers Corner roundabout and the borough boundary. This will look at improving connectivity by foot (pedestrian crossing points) and by bike (cycle paths) along this key route to support the Rainham and Beam Park Housing Zone.

Havering has recently been allocated funding from TfL’s Liveable Neighbourhoods programme to look at options for improving access into Romford town centre to support the Romford Housing Zone. Feasibility work will begin on this in 2018/19.

Havering will be engaging with developers as Planning Applications for various sites along the Rainham and Beam Park Housing Zone are submitted to ensure that that access by foot, bike and by bus are taken into account.
<table>
<thead>
<tr>
<th>Reference</th>
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</thead>
<tbody>
<tr>
<td>LPREG19 - 286</td>
<td>Support for Policies 19 &amp; 20 Business Growth and Loss of Industrial Land. Modification to Policy 19 proposed.</td>
<td>Modification to Policy 19 Business growth x. Supporting the strategic significant growth potential of the Borough in logistics activities of greater than sub-regional importance, as set out in the London Plan. Modification to Policy 20 Loss of industrial land ii. The existing employment land use causes unacceptable detrimental effects, (that cannot be mitigated by design, use of new technologies or greener buildings), on the amenity of nearby residential areas; and</td>
<td>Support noted</td>
</tr>
<tr>
<td>LPREG19 - 287</td>
<td>Objection to Policy 21 Affordable Workspace</td>
<td>Refer to the Council’s proposed modifications in response to LPREG19 - 103</td>
<td>Refer to the Council’s proposed modifications in response to LPREG19 - 103</td>
</tr>
<tr>
<td>LPREG19 - 288</td>
<td>Support for Policy 22 Skills and Training</td>
<td>No modification proposed</td>
<td>Support noted</td>
</tr>
<tr>
<td>LPREG19 - 289</td>
<td>Modification proposed to Parking Provision &amp; Design Policy</td>
<td>No modification proposed</td>
<td>Policy 24 refers to the parking standards in the London Plan, this includes any flexibility provided. The Council do not consider it necessary to repeat this in the Local Plan.</td>
</tr>
<tr>
<td>LPREG19 - 290</td>
<td>Support for Para 11.2.7 on landscaping and biodiversity</td>
<td>Modification to Policy 26 Urban design Paragraph 11.1.8: Streets should be designed as public spaces with the needs of all users considered. Well designed streets with safe, direct, convenient and clear pedestrian and cycle routes helps to maximise the transport choices of residents, and can influence people to use more active modes of travel. Residential layouts designed solely to meet the requirements of vehicular traffic are not acceptable. New routes and connections should provide integrated routes for pedestrians, cyclists and vehicular traffic. When designing new residential and mixed use developments consideration should be given to how frequent deliveries will be accommodated. Paragraph 11.2.4 sets out a number of examples of how biodiversity can be incorporated into developments. The requirement to provide for the needs of business for delivery and servicing is also contained in London Plan Policy 6.13 Parking.</td>
<td>Support noted</td>
</tr>
<tr>
<td>LPREG19 - 291</td>
<td>Policy 36-Low Carbon Design, Decentralised Energy and Renewable Energy and sustainability</td>
<td>No modification proposed</td>
<td>Noted</td>
</tr>
<tr>
<td>First Base BCR LLP</td>
<td>Reference to the Council’s proposed modifications in response to LPREG19 - 103</td>
<td>No modification proposed</td>
<td>Support and information noted</td>
</tr>
<tr>
<td>LPREG19 - 428</td>
<td>Support for the Spatial Strategy</td>
<td>No modification proposed</td>
<td>Support noted</td>
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<tr>
<td>Reference</td>
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<tr>
<td><strong>LPREG19-429</strong></td>
<td>Range rather than specific unit numbers. No modification proposed. Your comments concerning the number of new homes cited within the Housing Position Statement are noted. The figures that are cited in Annex 3 of the Housing position Statement have been derived from... (to discuss with LM).</td>
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<tr>
<td><strong>LPREG19-430</strong></td>
<td>Support for paragraph 6.1.14 re. tall buildings. No modification proposed. Support noted.</td>
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<tr>
<td><strong>Jacques</strong></td>
<td><strong>LPREG19-279</strong> New Zealand Way. No modification proposed. Designation of land as a Village Green falls outside the scope of the Local Plan and would need to be done under the appropriate legislation.</td>
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<td><strong>Metropolitan Police Service</strong></td>
<td><strong>LPREG19-280</strong> Support for Secured by Design. No modification proposed. Support noted.</td>
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<tr>
<td><strong>Education and Skills Funding Agency</strong></td>
<td><strong>LPREG19-228</strong> Support for Policy 12 Healthy communities, Policy 17 Education &amp; proposed CIL. Modifications proposed. Information regarding Harris Academy in Rainham is noted. The Council wishes to work collaboratively with ESFA throughout the preparation of the Site Specific Allocations Local Plan. Support noted. Sufficient reference to the Thames Chase Plan is made in paragraph 12.1.4. See change made to LPREG19-175. Support noted. Your comments concerning involvement in the Lower Thames Crossing project are noted. An amendment has been made to section 5.1 stating that the Council will work with other partners, regarding the Lower Thames Crossing. This has been further addressed in the Duty to Co-operate Statement. As Highways England are the promoter of the scheme, it is expected that Highways England will engage directly with the Thames Chase Trust to assist with developing proposals for the Lower Thames Crossing and deliver appropriate environmental improvements to minimise its impact. Havering will support the Thames Chase Trust in this process. References to Thames Chase and the Thames Chase plan have been strengthened as requested. Policy 29 Green infrastructure applies to both Romford and Rainham and Beam Park. Repetition of policy criteria is therefore not necessary. The Thames Chase Community Forest will continue to be shown on the Proposals Map. The Council has set out criteria for wind development proposals which prevent the potential negative impacts highlighted.</td>
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<td><strong>Thames Chase Trust</strong></td>
<td><strong>LPREG19-281</strong> Concerns over reference to the ‘Thames Chase Community Forest’. Modifications proposed. Modification to Section 5 Borough-wide Strategy for Growth Box in 5.1: Working with Highways England and other partners to minimise the adverse impact on Havering and its local residents and the environment of the Government’s preferred option for a Lower Thames Crossing. (same text as in LPREG19-175) Paragraph 5.1.11: Havering is one of London’s greenest boroughs with extensive open spaces and more than half of the borough designated as Metropolitan Green Belt as identified on the Proposals Map. The spatial strategy of the Local Plan is to optimise the use of brownfield land for meeting the demand for new homes and business growth and to provide continued protection for Havering’s Green Belt, and its most valuable open spaces and its ecological assets. The Thames Chase Community Forest will be enhanced in line with the Thames Chase Plan. Support noted. Sufficient reference to the Thames Chase Plan is made in paragraph 12.1.4. See change made to LPREG19-175. Support noted. Your comments concerning involvement in the Lower Thames Crossing project are noted. An amendment has been made to section 5.1 stating that the Council will work with other partners, regarding the Lower Thames Crossing. This has been further addressed in the Duty to Co-operate Statement. As Highways England are the promoter of the scheme, it is expected that Highways England will engage directly with the Thames Chase Trust to assist with developing proposals for the Lower Thames Crossing and deliver appropriate environmental improvements to minimise its impact. Havering will support the Thames Chase Trust in this process. References to Thames Chase and the Thames Chase plan have been strengthened as requested. Policy 29 Green infrastructure applies to both Romford and Rainham and Beam Park. Repetition of policy criteria is therefore not necessary. The Thames Chase Community Forest will continue to be shown on the Proposals Map. The Council has set out criteria for wind development proposals which prevent the potential negative impacts highlighted.</td>
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<td><strong>Richard Bint</strong></td>
<td><strong>LPREG19-319</strong> Calls for strengthening of Green infrastructure policy and commitment to protecting. No modification proposed. The Proposals Map shows the full extent of the Thames Chase Community Forest. The Thames Chase Community Forest is also recognised in the Spatial Portrait and the Green Infrastructure Policy.</td>
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The policy criteria included in Policy 10 Garden and Backland Development seek to make sure that negative impacts on surrounding homes are avoided.

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The Outer North East London Strategic Housing Market Assessment 2016 indicates that there is a need for 1,366 new homes in Havering per annum. The Mayor of London sets minimum housing targets for each London Borough, and for Havering this is 1,170 homes per annum. The Local Plan identifies Romford and Rainham and Boreham Park as Strategic Development Areas which have the capacity to deliver a significant amount of new housing. Both areas have also been designated as Housing Zones by the Mayor of London.

The Council does not believe that there are ‘exceptional circumstances’ to warrant the release of Green Belt land to meet the Borough’s housing need. As stated in the Housing White Paper (page 21), the Government “seeks to maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.”

The Council has prepared two Green Belt Studies in 2016 and 2018. The first Green Belt Study was undertaken by the London Borough of Havering in association with PBA and Enderby Consultants. This study assessed the contribution that land within the Green Belt makes to the Green Belt purposes (as defined in para 80 of the NPPF). To aid the assessments, the Green Belt in the Borough was divided into 24 land parcels. A performance value was attributed to the parcels for each purpose, based on predefined criteria. The study found that all 24 parcels make a contribution to Green Belt purposes, with 19 of the 24 Green Belt parcels making a fundamental contribution to the Green Belt purposes. A further four parcels were found to make a high or moderate/high contribution and only one parcel was found to make a low contribution.

A second Green Belt Study was prepared by LUC in 2018. The aim of this study was to provide conclusions on the potential degree of harm that may occur if the sites (which had been submitted to the Council as part of the Regulation 19 Consultation) were released from the Green Belt. This took account of three elements: 1) the contribution of the sites to the NPPF Green Belt purposes, 2) the potential impact on the wider integrity of the Green Belt and 3) the strength of revised Green Belt boundaries that would remain if the site was to be released. Out of a total of 84 sites assessed (with a total area of 849ha):

- 46 sites (total area of 682ha, which is 80.3% of the total area of the 84 sites) rated as ‘high’ in terms of harm to Green Belt resulting from release.
- 21 sites (120ha, 14.1%) rated as ‘moderate-high’ in terms of harm to Green Belt resulting from release.
- 9 sites (24ha, 2.9%) rated as ‘moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (17ha, 2%) rated as ‘low-moderate’ in terms of harm to Green Belt resulting from release.
- 4 sites (6ha, 0.7%) rated as ‘low’ in terms of harm to Green Belt resulting from release.
The site proposed in this representation by CBRE (GB40) falls within parcel 24 of the Stage 1 Study. This Study concluded that the parcel makes a fundamental contribution to the Green Belt. The site was also assessed in the Stage 2 study and this Study concludes that releasing the site from the Green Belt would lead to a moderate-high degree of harm to the Green Belt. The reasons for this being:

- The site lies between the large built-up areas of Havering and Dagenham but relates to the wider countryside – development would represent expansion of the large built-up area into the open countryside.
- The site is critical in forming the part of the Green Belt that separates the settlements of South Hornchurch and Dagenham. The settlements are in close proximity (less than 1km apart) and the release of the Site could therefore lead to the visual and physical narrowing of the gap between them, especially when travelling between the towns along Dagenham Road.
- The site is rural in character and displays characteristics of the countryside, with limited urbanising influence from the on-site buildings, adjacent road and settlement edge. Development of the Site would lead to the encroachment of the countryside.

Development of the site would cause the neighbouring Green Belt land to the east to be enclosed by development on three sides and would limit its performance in physically and visually separating the settlements of South Hornchurch and Dagenham. This would lead to a sense of encroachment and lead to a visual and physical narrowing of the gap between the two settlements, weakening the land's contribution to the Green Belt. Moreover, development of the Site would cause the neighbouring Green Belt land to the southeast, occupied by the playing field, to be enclosed by development on all sides. This would lead to a significant sense of encroachment, weakening its contribution to the Green Belt. The overall harm to the Green Belt resulting from release of this site would therefore be Moderate - High.

Para 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when drawing up Green Belt boundaries. This site was considered in the sustainability assessment that was undertaken alongside the Stage 2 study. The site was rated as ‘red’ (signifying that the site could perform poorly in sustainability terms) in relation to 3 of the 13 sustainability criteria, and ‘green’ (signifying that the site could perform well in sustainability terms) in relation to 7 of the criteria.