



# Sustainability Appraisal for the Havering Local Plan

SA Report Addendum

December 2018

## Quality information

### Prepared by

---

Nick Chisholm-Batten  
Associate

### Checked by

---

Steve Smith  
Technical Director

### Approved by

---

Steve Smith  
Technical Director

## Revision history

| Revision | Revision date                 | Details               | Authorised                    | Name        | Position           |
|----------|-------------------------------|-----------------------|-------------------------------|-------------|--------------------|
| V2.0     | 1 <sup>st</sup> December 2018 | Addendum to SA Report | 3 <sup>rd</sup> December 2018 | Steve Smith | Technical Director |

### Prepared for:

London Borough of Havering

### Prepared by:

AECOM Infrastructure & Environment UK Limited  
Aldgate Tower  
2 Lemn Street  
London E1 8FA  
United Kingdom  
aecom.com

© 2018 AECOM Infrastructure & Environment UK Limited. All Rights Reserved.

This document has been prepared by AECOM Infrastructure & Environment UK Limited ("AECOM") for sole use of our client (the "Client") in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. No third party may rely upon this document without the prior and express written agreement of AECOM.

## Table of Contents

|    |   |    |
|----|---|----|
| 1. | Introduction to this SA Report Addendum.....  | 1  |
| 2. | Updates to the assessment of spatial strategy options .....   | 2  |
| 3. | Updates to the overview of the reasons for choosing the preferred spatial strategy for the Local Plan ..... | 15 |

*This page is intentionally blank.*

# 1. Introduction to this SA Report Addendum

This document is an addendum to the Sustainability Appraisal (SA) Report submitted with the Havering Local Plan for Examination in Public in early 2018. The addendum has been prepared in response to questions raised by the Inspector following initial examination hearings undertaken in October 2018.

The addendum presents a number of clarifications and supplementary information for the SA Report. This is with a view to supporting ongoing examination through providing additional clarity on the information and findings presented in the SA Report. The additional clarity relates specifically to the appraisal of spatial strategy options and the overview of the Council's reasons for choosing the preferred spatial strategy for the Local Plan.

This addendum is structured as follows:

- **Chapter 2** presents supplementary findings relating to the assessment of reasonable alternatives presented in Tables 5.1 to 5.9 in the SA Report.
- **Chapter 3** presents further information regarding the overview of the Council's reasons for choosing the preferred spatial strategy for the Local Plan presented in Chapter 6 of the SA Report.

## 2. Updates to the assessment of spatial strategy options (Tables 5.1 to 5.9 in the SA Report)

A number of supplementary findings been provided in respect of the appraisal of the five spatial strategy options assessed in **Chapter 5** of the SA Report. These revisions present supplementary information on the relative sustainability merits of the five options appraised, including in relation to Option 1.

The following tables therefore update and replace **Table 5.1 – Table 5.9** in the SA Report.

### Updated Table 5.1: Biodiversity

#### Spatial strategy options

---

Option 1: Meeting the London Plan target and reflecting current densities- 12,180 dwellings over ten years

---

Option 2: Greater density in the two SDAs- 13,412 dwellings over ten years

---

Option 3: Greater density the two SDAs and further development in Hornchurch and Upminster- 13,650 dwellings over ten years

---

Option 4: Lower density to accommodate more family/older people's housing with corresponding limited Green Belt development in recognition of the trade-offs involved- 12,180 dwellings over ten years

---

Option 5: Exceeding OAHN by facilitating greater density the two SDAs, further development in Hornchurch and Upminster, and limited Green Belt release- 15,010 dwellings over ten years

---

Whilst the significance of the effects from each option on features and areas of biodiversity interest largely depends on the detailed location, scale and nature of development and the incorporation of biodiversity enhancement measures, it can be considered that a higher level of housing development in a settlement increases the likelihood (and potential magnitude) of negative effects on the designated sites and habitats and species present in their vicinity. This is linked to an increased likelihood of direct effects, such as from land take, disturbance or the loss of key features of ecological value, and an increased likelihood of indirect effects, such as from a reduction of ecological connectivity, and changes in land use patterns.

In relation to nationally designated nature conservation sites, three SSSIs are present in Havering. The two key sites in the south of the borough are: the Ingrebourne Marshes SSSI, which comprises part of the Ingrebourne Valley and supports the largest and one of the most diverse coherent areas of freshwater marshland in Greater London; and the Inner Thames Marshes SSSI, which forms the largest remaining expanse of wetland bordering the upper reaches of the Thames Estuary, and is of particular note for its diverse ornithological interest, including the variety of breeding birds and the numbers of wintering wildfowl, waders, finches and birds of prey. SSSI Impact Risk Zones (IRZs) are a GIS tool/dataset which maps zones around SSSIs according to the particular sensitivities of the features for which they are notified. They specify the types of development that have the potential to have adverse impacts at a given location. Natural England is a statutory consultee on development proposals that might impact on SSSIs. In this context, IRZs relating to the Ingrebourne Marshes SSSI and the Inner Thames Marshes SSSI for 'residential development of 100 units or more' covers the whole of Rainham. As such, Option 2, 3 and 5, which puts forward 2,534 dwellings in the Rainham and Beam Park SDA has the most potential to have effects on the two SSSIs. The option with the least potential to impact on the two sites is Option 4, which promotes fewer dwellings, at 1,771 dwellings. Through proposing the delivery of 2,112 dwellings in the Rainham and Beam Park SDA, Option 1 sits between the lower number proposed through Option 4, and the higher number proposed through Option 2, 3 and 5. Other proposed locations for development are not within the IRZs for these two SSSIs.

The Hornchurch Cutting SSSI has been designated for its geodiversity interest and is located on the Hornchurch to Romford railway line north east of Hornchurch town centre. Given its designation for geological exposures, the extent of the site's IRZ is limited to within 50m of the site. As such, it is unlikely that the options being considered would result in significant effects on the integrity of the site, or that any one of options would have an increased likelihood of effects on this nationally designated site.

Two SSSIs are located in close proximity to the north of the borough, Hainault Forest SSSI and Curtismill Green SSSI. IRZs for these SSSIs relating to residential development do not extend to the settlements closest to the sites in the north of the borough, including Collier Row and Harold Hill. As such, Option 3 and 5, which propose a similar limited level of housing in these locations, would not be likely to lead to effects on the integrity of these sites. However, IRZs relating to the SSSIs extend into the undeveloped Green Belt on the northern edge of the

---

---

borough. As such Options 4 and 5 have the potential to lead to effects on the SSSIs if development were to be proposed in the Green Belt in these locations.

Whilst the Green Belt has been designated to prevent urban sprawl, and not for biodiversity reasons, and parts of the Metropolitan Green Belt in general have low biodiversity value, the options which facilitate development within the Green Belt have the potential to lead to increased impacts on biodiversity assets. This is reflected by the increased concentration of BAP Priority Habitats in the areas of Havering within the Green Belt, in comparison with the concentration of BAP Priority Habitats in the built up parts of the borough. As such, Options 4 and 5 have increased potential to have impacts on key habitats of ecological importance through proposing new development within the Green Belt, with the likelihood of significant effects on habitats, species and ecological networks within the green belt less under Option 1, 2 and 3.

Option 4 also has the potential to lead to the less efficient use of land, with increased scope for direct impacts from new development on existing biodiversity assets. However it should be recognised that lower density development can support the biodiversity value of some locations through open space and garden provision. This, however, depends on the design and layout of new development and implementation of high quality multifunctional green infrastructure networks.

The facilitation of increased densities in the two SDAs through Option 2, 3 and 5, and increased densities in district centres and the estate renewal programme through Option 3 and 5 will reduce the need for new development areas in other areas of the borough. Given existing densities, this is also likely to take place (albeit a slightly lesser extent) through Option 1. This would likely help reduce impacts on habitats, species and ecological networks in these locations. The facilitation of an increased level of development in key centres in the borough will however increase pressures on existing urban habitats and species in these centres, including brownfield biodiversity.

---

## Updated Table 5.2: Climate Change

### Spatial strategy options

---

Option 1: Meeting the London Plan target and reflecting current densities- 12,180 dwellings over ten years

---

Option 2: Greater density in the two SDAs- 13,412 dwellings over ten years

---

Option 3: Greater density the two SDAs and further development in Hornchurch and Upminster- 13,650 dwellings over ten years

---

Option 4: Lower density to accommodate more family/older people's housing with corresponding limited Green Belt development in recognition of the trade-offs involved- 12,180 dwellings over ten years

---

Option 5: Exceeding OAHN by facilitating greater density the two SDAs, further development in Hornchurch and Upminster, and limited Green Belt release- 15,010 dwellings over ten years

---

### Climate change mitigation

Road transport is an increasingly significant contributor to greenhouse gas emissions in Havering. The options which direct an increased level of housing provision to the key town and district centres will promote accessibility through directing housing to the settlements with the broadest range of services and facilities. This will help limit the need to travel to services and facilities, therefore helping to limit emissions from transport. In this context, Option 2, 3 and 5, and to a lesser extent, Option 1, promote the largest level of housing in Romford, which designated as a Metropolitan Centre through the London Plan, is the settlement with the widest range of services and amenities in the borough. Similarly Option 3 directs the highest level of housing growth to the district centres (notably, given capacity, Hornchurch and Upminster) which, after Romford are the settlements best served by services and facilities. On this basis, this option has the most potential to support the use of sustainable modes of transport and minimise the need to travel. Overall, in terms of housing delivery, Option 3 and 5 promotes the highest level of housing in Romford, Upminster and Hornchurch, followed by Option 2. Option 4 promote a significantly lower proportion of houses in these three key settlements, doing less to support a reduction of greenhouse gas emissions from transport for the reasons stated.

The Rainham and Beam Park SDA comprises part of the London Riverside development. Given that the proposed housing growth in this area is part of the larger London Riverside Opportunity Area, it is considered that new housing will be delivered alongside a significant improvement of services, facilities and amenities in the area and enhancements to employment opportunities, including at the Rainham Employment Area. Proposals will also be supported by enhancements to sustainable transport networks, utilising Rainham's location on the Essex Thameside line and a new station at Beam Park. The current proposals for the London Riverside Opportunity Area also seeks to promote lower carbon lifestyles, including through decentralised energy provision and realising low to zero-carbon energy potential opportunities. As such development in this location

---

has the potential to help limit the carbon footprint of new housing growth. In the context of the above, Options 2, 3 and 5 which seek to deliver an increased level of housing at the Rainham and Beam Park SDA, have the potential to support lower carbon lifestyles. This is also likely to take place through Option 1, which given the spatial distribution promoted through the option, delivers over 17% of the option's proposed housing delivery within the SDA.

Option 4, through spreading growth around the borough is likely to be less sustainable than focusing development within the key settlements because the more suburban locations will have fewer services and amenities readily available and encourage more travel. This is a factor that developers cannot easily mitigate. Dispersed growth is also more difficult to serve by public transport and may not achieve the 'critical mass' necessary to deliver new/improved public transport services to the nearest centres. As a result more trips are likely to be made by private car, with implications for greenhouse gas emissions. Similarly, Option 5, through facilitating development within the Green Belt away from existing centres, has the potential to have a similar effect in relation to emissions.

In terms of the other aspects relating to greenhouse gas emissions, the sustainability performance of development depends on elements such as the integration of energy efficient design within new development and the provision of renewable energy generation. This however can only be assessed on a site by site basis once the details of potential development become clearer (e.g. when 'pre-app' discussions take place between developers and the Council or a planning application is submitted). It should be noted though that the higher quantum of development proposed through Options 5 (and to a lesser extent) Option 3 will do more to increase the built footprint of the borough, with associated potential overall increases in greenhouse gas emissions.

In terms of carbon sequestration, this depends on elements such as the integration of green infrastructure enhancements within new development areas, incorporating the on and off-site provision of carbon sinks.

#### *Climate change adaptation*

In relation to fluvial and tidal flood risk, this largely relates to the presence of the River Thames and the Rivers Beam, Rom and Ingrebourne (and their tributaries). In relation to the River Thames, the parts of the borough to the south of Rainham are at risk from both fluvial and tidal flood risk. With regards to the River Beam, flood risk areas extend through the west of Hornchurch, and flood risk associated with the River Rom is present in Romford, Rise Green and Rush Park. In relation to the River Ingrebourne, flood risk extends into parts of Harold Wood, western Upminster and Rainham.

Whilst all options have the potential to lead to development in these flood zones, or elevated levels of flood risk, it is considered that the provisions of the NPPF and national policy in relation to flooding will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented. For example, the NPPF does not permit development within flood risk areas or where the effect would be to increase flood risk elsewhere without appropriate mitigation measures. Likewise, adherence to the recommendations and guidance presented in the Strategic Flood Risk Assessment (SFRA) undertaken to inform the Local Plan will help limit effects.

In relation to surface water flooding, given the urbanised nature of much of the borough, this is a key risk in many parts of Havering. A particular area of risk is Romford town centre. However, the effect of each option on flood risk from surface water runoff is difficult to establish given uncertainties regarding the nature of development and the incorporation of mitigation measures such as sustainable urban drainage systems (SuDS).

In relation to the other climate change adaptation issues, including increasing the resilience of Havering to extreme weather events, the urban heat island effect and other elements associated with the potential effects of climate change in the borough, it is not possible to evaluate the extent to which the options will support adaptation. This will depend on the extent to which new development facilitated through the options promotes, for example, the provision of high quality green infrastructure networks.

With regards to the cumulative impacts of development, there is potential for negative effects on flood risk if unmitigated. In respect to the four areas where most development is allocated through the options, the cumulative effect of housing delivery could be a significant change in the provision of hard standing which may lead to an increase in flooding either locally or elsewhere, if unmitigated. In addition, there is the potential for cumulative effects to occur where development in a number of settlements along the same watercourse will lead to changes to watercourse flow rates and an increased risk of flooding. For example, Harold Wood, Upminster and Rainham are all located along the River Ingrebourne. However, it is considered that potential cumulative effects with respect to this issue will be limited due to the provisions of the NPPF and national policy in relation to flooding.

---

## Updated Table 5.3: Land, Soil and Water Resources

### Spatial strategy options

---

Option 1: Meeting the London Plan target and reflecting current densities- 12,180 dwellings over ten years

---

Option 2: Greater density in the two SDAs- 13,412 dwellings over ten years

---

Option 3: Greater density the two SDAs and further development in Hornchurch and Upminster- 13,650 dwellings over ten years

---

Option 4: Lower density to accommodate more family/older people's housing with corresponding limited Green Belt development in recognition of the trade-offs involved- 12,180 dwellings over ten years

---

Option 5: Exceeding OAHN by facilitating greater density the two SDAs, further development in Hornchurch and Upminster, and limited Green Belt release- 15,010 dwellings over ten years

---

### Land and soil resources

All of the five options are likely to promote the use of previously developed land for new housing. However Option 3 which delivers a higher level of housing through facilitating increased densities in the two SDAs (Romford and Rainham / Beam Park), further development in Hornchurch and Upminster and delivering increased densities through the Council's estate renewal programme, have the most potential among the options to deliver the efficient use of land. In contrast, Option 4, which promotes lower densities and facilitates an element of Green Belt development, and Option 5, which delivers some Green Belt development, will do the least amongst the options to promote the efficient use of land. These two options also have the most potential to lead to the loss of greenfield land in the borough. Options 1 and 2 are also likely to support the efficient use of land through limiting Green Belt development

In relation to agricultural land quality, recent (post 1988) detailed agricultural land classification has not been undertaken in most of the borough. However, the earlier classification indicated that there are significant areas of Grade 1 agricultural land present to the south east of Upminster. In the non-built up parts of the north of the borough, the earlier classification also classified land as Grade 3 agricultural land. It is uncertain whether this comprises Grade 3a land (i.e. land classified as the best and most versatile agricultural land) or Grade 3b land (i.e. land not classified as such).

Whilst Option 3 and 5 promotes a larger housing delivery in Upminster (and, as such, in a part of the borough with higher agricultural quality land present), development under this option would be focussed on Upminster town centre. As such, there is less likely to be landtake on the best and most versatile agricultural land in this location. However, Options 4 and 5, through facilitating development in the Green Belt have increased potential to lead to the loss of higher quality agricultural land in this area, as well as in northern parts of the borough.

### Water resources

In relation to water supply, the NPPF states that local plans should plan positively to ensure the provision of infrastructure for water supply, including an assessment of its quality and capacity (paragraphs 156, 157 and 162). In the context of the current assessment, it is anticipated that the Water Resources Management Plans prepared by water supply companies will be expected to address long-term water supply issues associated with growth.

### Waste

The generation of waste is an inevitable consequence of development, including both waste generated by construction, as well as waste subsequently generated by households etc.. In a simplified scenario, the more housing that is delivered, the more waste that will be generated. In this context, Options 3 and 5 have the most potential to increase waste arisings though delivering more housing, with Option 1 and 4 having the most potential to limit waste arisings.

The management of waste, including the minimisation of waste and the encouragement of the re-use, recycling and recovery of waste materials would be undertaken on a site by site basis. All development would be required though to meet the relevant legislative requirements with regard to waste. Given the legislative and regulatory requirements regarding waste it is considered that development is unlikely to have a significant negative impact on waste management.

---

## Updated Table 5.4: Environmental Quality

### Spatial strategy options

---

Option 1: Meeting the London Plan target and reflecting current densities- 12,180 dwellings over ten years

---

Option 2: Greater density in the two SDAs- 13,412 dwellings over ten years

---

Option 3: Greater density the two SDAs and further development in Hornchurch and Upminster- 13,650 dwellings over ten years

---

Option 4: Lower density to accommodate more family/older people's housing with corresponding limited Green Belt development in recognition of the trade-offs involved- 12,180 dwellings over ten years

---

Option 5: Exceeding OAHN by facilitating greater density the two SDAs, further development in Hornchurch and Upminster, and limited Green Belt release- 15,010 dwellings over ten years

---

### Air quality

Air quality is a key issue for Havering. The whole of the borough was designated as an Air Quality Management Area in 2006 due to levels of nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub>). The main source of air pollution is road traffic vehicle emissions. Significant amounts also come from residential and commercial gas use, industry, construction sites and emissions from outside London.

Given that the options currently being considered are housing focused, this assessment focuses on emissions from transport related to housing growth.

The options which direct an increased level of housing provision to the key town and district centres will promote accessibility through directing housing to the settlements with the broadest range of services and facilities. This will help limit the need to travel to services and facilities, therefore helping to limit emissions from transport. In this context, Options 2, 3 and 5 promote the highest level of housing growth in Romford, which, designated as a Metropolitan Centre through the London Plan, is the settlement with the widest range of services and amenities in the borough. Similarly Options 3 and 5 direct the highest level of housing delivery to the larger district centres of Hornchurch and Upminster, which, after Romford are the two settlements best served by services and facilities, and the other district centres. Option 1 also supports a spatial strategy which focuses on the SDAs and the larger settlements in the borough. On this basis, these options have the most potential to support the use of sustainable modes of transport (including walking and cycling) and minimising the need to travel.

Overall, in terms of housing delivery, Option 3 and 5 promote the highest level of housing in Romford, Upminster and Hornchurch. Option 4 promotes a lower proportion of housing growth in these three key settlements, doing less to reduce the need to travel for services and facilities and limit emissions.

The Rainham and Beam Park SDA is part of the London Riverside development. Given that proposed housing growth in this area is part of the larger London Riverside Opportunity Area, it is considered that new housing at this location will be delivered alongside a significant improvement of services, facilities and amenities in the area and enhancements to employment opportunities, including at the Rainham Employment Area. Proposals will also be supported by enhancements to sustainable transport networks, utilising Rainham's location on the Essex Thameside line and a proposed new station at Beam Park. As such, development in this location has the potential to help limit emissions from transport resulting from growth. In this context, Option 1, 2 and 3, which seek to deliver an increased proportion of housing growth at the Rainham and Beam Park SDA, have the potential to limit emissions for these reasons.

Option 4, through spreading growth around the borough, including within the Green Belt, has the potential to increase emissions through encouraging car use. This is due to the option being likely to deliver housing at locations with fewer services and amenities readily available. This is a factor that developers cannot easily mitigate. Dispersed growth is also more difficult to serve by public transport and may not achieve the 'critical mass' necessary to deliver new/improved public transport services and walking and cycling networks to the nearest centres. As a result, more trips are likely to be made by private car, with implications for emissions from transport. Similarly, Option 5, through facilitating development within the Green Belt away from existing centres, has the potential to have a similar effect in relation to emissions.

### Soil quality

All five options have the potential to support the widespread remediation of contaminated land in the borough through promoting the use of previously developed land. However, Options 3 and 5, which deliver a higher level of housing through facilitating increased densities in the SDAs (Romford and Rainham / Beam Park), increasing delivery in Hornchurch and Upminster, as well as delivering increased densities through the Council's estate renewal programme, have the most potential among the options to deliver the remediation of brownfield sites. In contrast, Option 4, which promotes lower densities and facilitates an element of Green Belt development, and will

---

---

do less to facilitate the remediation of areas of land contamination by reducing an impetus on previously developed land.

### *Water quality*

Whilst the significance of the effects from each option on water quality largely depends on the location, scale and nature of development and the incorporation of mitigation measures (e.g. SuDS, it can be considered that a higher level of housing development within a settlement increases the likelihood (and potential magnitude) of negative effects on both surface water and groundwater resources. This is linked to increased levels of surface water runoff, increased suspended sediment loading and discharge of polluted runoff.

The chemical and biological water quality of watercourses in Havering has historically been poor, with particular issues relating to the water quality of the River Ingrebourne and the River Rom/Beam. The latest Water Framework Directive assessment identifies some improvements, with sections of Havering's waterways achieving moderate quality classification. Under the provisions of the Water Framework Directive, the Beam and Ingrebourne need to achieve good status by 2027.

In relation to the water quality of these watercourses, the River Rom and the River Beam have the potential to be affected by new development areas in Romford, Hornchurch, Rainham/Beam Park and Collier Row. In this respect, Options 3 and 5, followed by Option 2, have the most potential to lead to cumulative impacts on water quality in these two watercourses. The water quality of the River Ingrebourne has the potential to be affected by new development areas in Upminster, Harold Wood and Rainham. As such, Option 3 and 5 have the most potential to lead to cumulative impacts on water quality on the River Ingrebourne. It should be noted though that the development of previously developed land has the potential to support the remediation of contaminated land which may support longer term enhancements to water quality.

In relation to groundwater quality, part of Rainham and South Hornchurch are underlain by Zone 1 and 2 groundwater Source Protection Zones. In this respect, Options 1, 2, 3 and 5 have the most potential to lead to effects on groundwater quality through facilitating an increased level of housing development in these locations.

---

## Updated Table 5.5: Historic Environment, Landscape and Townscape

### Spatial strategy options

---

Option 1: Meeting the London Plan target and reflecting current densities- 12,180 dwellings over ten years

---

Option 2: Greater density in the two SDAs- 13,412 dwellings over ten years

---

Option 3: Greater density the two SDAs and further development in Hornchurch and Upminster- 13,650 dwellings over ten years

---

Option 4: Lower density to accommodate more family/older people's housing with corresponding limited Green Belt development in recognition of the trade-offs involved- 12,180 dwellings over ten years

---

Option 5: Exceeding OAHN by facilitating greater density the two SDAs, further development in Hornchurch and Upminster, and limited Green Belt release- 15,010 dwellings over ten years

---

The Rainham and Beam Park SDA covers the part of Rainham town centre designated through the Rainham Conservation Area. In this context, Options 2, 3 and 5, and to a lesser extent Option 1, have the most potential among the options to have impacts on the fabric and setting of the conservation area through facilitating an increased level of housing delivery in its vicinity. Whilst development, if poorly designed, can have negative impacts on the setting and fabric of the historic environment, high quality and sensitive design and layout can bring positive effects. In this context, as part of the wider London Riverside Opportunity Area, there is significant potential for new development in the area to enhance the setting of the historic environment through public realm improvements, enhancements to green infrastructure provision and investment in features and areas of cultural heritage interest. As such, an increased level of housing delivery in this area has the potential to offer additional opportunities for enhancing the setting and fabric of features and areas of cultural heritage interest, including the Rainham Conservation Area, depending on design, layout, materials used and the provision of green infrastructure enhancements.

In relation to Romford, historic environment constraints are limited to the Romford Conservation Area (covering the Market Place, High Street, North Street and South Street in the town centre) and approximately twelve listed buildings. The Romford Housing Zone, which comprises part of the SDA and will be a focus of development in the area, covers three locations in Romford town centre. The smallest of these, located to the north of the High Street, is located adjacent to Romford Conservation Area. Whilst increased housing delivery at this location through Option 2, 3 and 5, and to a lesser extent Option 1, if poorly designed, could have negative impacts on the setting and fabric of the conservation area, high quality and sensitive design and layout could bring positive effects. As such, high quality design and layout could offer significant enhancements to the setting of the historic environment in this location. This is significant given Romford Conservation Area is deemed to be 'at risk' and in a 'very bad' condition by Historic England, resulting in the inclusion of the conservation area on Historic England's Heritage at Risk Register<sup>1</sup>. Similarly, one of the larger areas of the Housing Zone covers an area to the west of the town centre, a location with two listed buildings present, the Salem Chapel and Church of St Andrew, which are both Grade II listed. Given the current opportunities to enhance the poor public realm in this area, an increased focus on the Housing Zone through Options 2, 3 and 5 has significant opportunities to enhance the setting of these two key features of cultural heritage interest.

Parts of Upminster and Hornchurch are of historic environment interest. Two conservation areas cover various parts of Hornchurch town centre, namely the Langtons Conservation Area and the St Andrews Conservation Area (the nearby St Leonards Conservation Area and the RAF Hornchurch Conservation Areas are outside of the town centre) and a range of listed buildings are present in the town. In relation to Upminster, a number of listed buildings are present in the town and the town has a distinctive character. In this respect, Option 3 and 5, which direct an increased level of housing growth to Hornchurch and Upminster have increased potential to effect on these areas of historic environment interest within the towns. Given greater capacity for growth in Hornchurch when compared to Upminster, there is a greater likelihood of effects on the historic environment in Hornchurch than Upminster resulting from these options. However, as highlighted above, these effects need not be negative; an increased level of housing delivery has the potential to offer additional opportunities for enhancing the setting and fabric of features and areas of cultural heritage interest, depending on design, layout, materials used and the provision of green infrastructure enhancements.

In relation to Collier Row and Harold Hill, no statutory historic environment designations are present in these settlements. However, Option 3 and 5, which promotes an increased level of development across all of the district centres, have increased potential for effects on the historic environment or townscape character in these locations.

---

54% of Havering is covered by the Metropolitan Green Belt. Whilst the Green Belt is designated to prevent urban

---

<sup>1</sup> Historic England, Heritage at Risk Register 2017.

---

growth into countryside, and as such not directly designated for landscape quality purposes, development within the Green Belt is nonetheless likely to have adverse impacts on landscape character and local distinctiveness through facilitating growth in the open countryside. This includes in locations such as Havering-atte-Bower, or Noak Hill, which have a rich historic environment resource. As such, Options 4 and 5, which facilitate a level of housing growth within the Green Belt, have more potential than Options 1-3 (which seek to focus development within the existing built-up areas of Havering) to lead to impacts on landscape character and local distinctiveness.

---

## Updated Table 5.6: Population and Community

### Spatial strategy options

---

Option 1: Meeting the London Plan target and reflecting current densities- 12,180 dwellings over ten years

---

Option 2: Greater density in the two SDAs- 13,412 dwellings over ten years

---

Option 3: Greater density the two SDAs and further development in Hornchurch and Upminster- 13,650 dwellings over ten years

---

Option 4: Lower density to accommodate more family/older people's housing with corresponding limited Green Belt development in recognition of the trade-offs involved- 12,180 dwellings over ten years

---

Option 5: Exceeding OAHN by facilitating greater density the two SDAs, further development in Hornchurch and Upminster, and limited Green Belt release- 15,010 dwellings over ten years

---

In relation to housing delivery, of the five options Option 2, 3 and 5 will meet (and exceed) the established Objectively Assessment Housing Need for Havering. However all five options (including Option 1 and Option 4) deliver the Further Alterations to the London Plan target for the borough.

Overall, through delivering a larger number of dwellings, Options 5 and 3 have most potential to deliver a broader range of housing types and tenures in the borough. Option 4 however focuses on the key housing needs in the borough of family housing and older peoples housing. As such, the option will do more to deliver these types of housing.

Accessibility to services and facilities is a key influence on the quality of life of residents and community cohesion. In this regard, development in the larger centres (Romford, Hornchurch and Upminster) will enhance accessibility through directing housing to the settlements with the broadest range of services and facilities. This will support accessibility to the wider range of amenities located in these settlements. Locating more housing in closer proximity to the services and facilities available in the key centres of the borough will also likely support quality of life and wellbeing through promoting walking and cycling and active lifestyles.

In this context, Option 1, 2 and 3 promote the highest proportion of housing growth in Romford, which, designated as a Metropolitan Centre through the London Plan, is the settlement with the widest range of services and amenities in the borough. Options 3 and 5 promote the highest proportion of housing growth to the larger district centres of Hornchurch and Upminster, which, after Romford, are the two settlements best served by services and facilities in the borough, as well as the remaining district centres. On this basis, these options have the most potential to support accessibility to existing community facilities and promote more active lifestyles.

The Rainham and Beam Park SDA is part of the London Riverside development. Given that proposed housing growth in this area will take place as part of the larger London Riverside Opportunity Area, it is considered that new housing at this location will be delivered alongside a significant improvement of services, facilities and amenities in the area. Proposals will also be supported by enhancements to sustainable transport networks, utilising Rainham's location on the Essex Thameside line and a proposed new station at Beam Park, and significant green infrastructure enhancements. As such, development in this location has the potential to support the quality of life of residents by promoting accessibility to services and facilities, facilitating access to green infrastructure networks, and encouraging sustainable transport use. In this context, Options 1, 2 and 3 which seek to deliver an increased proportion of housing growth at the Rainham and Beam Park SDA, have the potential to promote these benefits.

Option 4, through spreading growth around the borough, including within the Green Belt, has an increased likelihood of delivering housing at locations with fewer services and amenities readily available. Dispersed growth is also more difficult to serve by public transport and may not achieve the 'critical mass' necessary to deliver new/improved public transport services and walking and cycling networks to the nearest centres. As a result, development is less likely to take place in accessible locations through Option 4. Option 5, through facilitating development within the Green Belt away from existing service centres, also partly has the potential to have a similar effect.

Whilst Havering has relatively low levels of overall deprivation, a number of pockets of deprivation are present in the borough, with areas of South Hornchurch and the Harold Hill area (Gooshays and Heaton wards) being within the 10% most deprived Lower Super Output Areas (LSOAs) nationally, and the wider areas of Harold Hill and Romford being in the 20% most deprived nationally (ONS 2010).

In this context, the provision of increased levels of development in South Hornchurch through the Rainham and Beam Park SDA via Options 2, 3 and 5 may help support the regeneration of the area, helping to promote a reduction of deprivation levels locally. Similarly, increased levels of housing delivery in Romford through the same options may support combating deprivation in more deprived areas of the town. This, however, depends on new

---

---

development areas being well planned, supported by appropriate infrastructure and service provision, and being of appropriate design which supports a high quality public realm.

---

## Updated Table 5.7: Health and Wellbeing

### Spatial strategy options

---

Option 1: Meeting the London Plan target and reflecting current densities- 12,180 dwellings over ten years

---

Option 2: Greater density in the two SDAs- 13,412 dwellings over ten years

---

Option 3: Greater density the two SDAs and further development in Hornchurch and Upminster- 13,650 dwellings over ten years

---

Option 4: Lower density to accommodate more family/older people's housing with corresponding limited Green Belt development in recognition of the trade-offs involved- 12,180 dwellings over ten years

---

Option 5: Exceeding OAHN by facilitating greater density the two SDAs, further development in Hornchurch and Upminster, and limited Green Belt release- 15,010 dwellings over ten years

---

The general health profile of Havering's residents has changed. In 2011, 81.6% of residents reported that they were in good health and 5.2% in bad health, compared to 69.7% in good health and 8.2% in bad health in 2001 (Census 2011). Accessibility to community services and health and recreational facilities are a key influence on health and wellbeing. In this respect, development in the larger centres (Romford, Hornchurch and Upminster) will enhance accessibility through directing housing to the settlements with the broadest range of services and facilities; this will support accessibility to the wider range of amenities located in these settlements, with benefits for the health and wellbeing of residents. In addition, the key centres in the borough have a wider range of health services, including primary health care services, and sports and recreational facilities, so better supporting residents' health and wellbeing. Furthermore, locating more housing in closer proximity to the facilities available in the key centres will also encourage healthier modes of travel including walking and cycling.

In this context, Option 1, 2 and 3 promote the highest proportion of housing growth in Romford, which, designated as a Metropolitan Centre through the London Plan, is the settlement with the widest range of services and amenities in the borough. Similarly, Options 3 and 5 promote the highest proportion of housing delivery to the larger district centres of Hornchurch and Upminster, which, after Romford are the two settlements best served by facilities. On this basis, this option has the most potential to support accessibility to community facilities (including health services and recreational amenities) and promote healthier modes of travel (including walking and cycling).

Overall, in terms of housing delivery, Options 2 and 3, followed by Options 1 and 5 promote a higher proportion of housing growth in Romford, Upminster and Hornchurch. Option 4 promotes a lower proportion of housing growth in these three key settlements, doing less to support accessibility to services and facilities and support active modes of travel.

The Rainham and Beam Park SDA is part of the London Riverside development. Given that proposed housing growth in this area is part of the larger London Riverside Opportunity Area, it is considered that new housing at this location will be delivered alongside a significant improvement of services, facilities and amenities in the area. Proposals will also be supported by enhancements to sustainable transport networks, utilising Rainham's location on the Essex Thameside line and a proposed new station at Beam Park, and significant green infrastructure enhancements. As such, development in this location has the potential to support health and wellbeing by promoting accessibility to services and facilities, facilitating access to green infrastructure networks, and encouraging active modes of travel. In this context, Options 2, 3 and 5 which seek to deliver an increased level of housing at the Rainham and Beam Park SDA, have the potential to support health and wellbeing for these reasons.

Option 4, through spreading growth around the borough, including within the Green Belt, has the potential to encourage car use. This is due to the option being likely to deliver housing at locations with fewer services and amenities readily available. This is a factor that developers cannot easily mitigate. Dispersed growth is also more difficult to serve by public transport and may not achieve the 'critical mass' necessary to deliver new/improved public transport services and walking and cycling networks to the nearest centres. As a result more trips are likely to be made by private car, with implications for health and wellbeing. Similarly, Option 5, through facilitating development within the Green Belt away from existing centres, has the potential to have a similar effect.

The delivery of higher levels of housing growth across the borough has the potential to lead to effects on health and wellbeing through increasing road safety issues and impacts on air and noise from increased traffic flows at certain locations. This may have impacts on the health and wellbeing of residents. In this context, Options 3 and Option 5 have increased potential to lead to increases in traffic flows through delivering a higher quantum of development in Havering. Effects however depend on the detailed location of new development areas and the integration of elements such as sustainable transport and green infrastructure provision.

---

## Updated Table 5.8: Transportation

### Spatial strategy options

---

Option 1: Meeting the London Plan target and reflecting current densities- 12,180 dwellings over ten years

---

Option 2: Greater density in the two SDAs- 13,412 dwellings over ten years

---

Option 3: Greater density the two SDAs and further development in Hornchurch and Upminster- 13,650 dwellings over ten years

---

Option 4: Lower density to accommodate more family/older people's housing with corresponding limited Green Belt development in recognition of the trade-offs involved- 12,180 dwellings over ten years

---

Option 5: Exceeding OAHN by facilitating greater density the two SDAs, further development in Hornchurch and Upminster, and limited Green Belt release- 15,010 dwellings over ten years

---

The options which direct an increased level of housing provision to the key town and district centres in Havering will promote accessibility through directing housing to the settlements with the broadest range of services and facilities. This will help limit the need to travel by car to amenities. Settlements will be developed which are accessible by foot or by bike providing residents with alternative options to travel other than the car.

Options 1, 2 and 3 promote the highest proportion of housing delivery in Romford, which, designated as a Metropolitan Centre through the London Plan, is the settlement with the widest range of services and amenities in the borough with a PTAL rating of 6a/b. Similarly Options 3 and 5 direct the highest proportion of housing growth to the larger district centres of Hornchurch and Upminster, which, after Romford are the two settlements in the borough best served by services and facilities. Apart from Romford, these district centres have the highest PTAL ratings within the borough (Hornchurch is serviced by the London Underground District Line, whilst Upminster is serviced by both the District Line and Essex Thameside line and both centres have reliable, frequent bus connections). Overall, in terms of housing delivery, Options 2 and 3 promote the highest proportion of housing in Romford, Upminster and Hornchurch, followed by Option 1 and 5. Option 4 promotes a significantly lower proportion of houses in these three locations, doing less to support sustainable transport use.

The Rainham and Beam Park SDA is part of the London Riverside development. Given the proposed housing growth in this area is part of the larger London Riverside Opportunity Area, it is considered that new housing will be delivered alongside a significant improvement of services, facilities and amenities in the area. Proposals will also be supported by enhancements to sustainable transport networks, utilising Rainham's location on the Essex Thameside line and a proposed new station at Beam Park due to be in operation in 2020 (Havering Council continues to lobby Network Rail and the Train Operating Company C2C for increased capacity on the Essex Thameside line to support growth in the Rainham and Beam Park area including longer trains and a higher frequency of services. Havering is currently developing proposals to radically change the A1306 New Road to support development of the Rainham and Beam Park Housing Zone and provide people with the options to travel more sustainably). As such, development in this location has the potential to support sustainable transport use. In the context of the above, Option 2 and 3, which seek to deliver an increased level of housing at the Rainham and Beam Park SDA, have increased potential to support these elements.

Option 4, through spreading growth around the borough is likely to be less sustainable than focusing development within the key settlements because the more suburban locations will have fewer services and amenities readily available and encourage more travel. This is a factor that developers cannot easily mitigate. Dispersed growth is also more difficult to serve by public transport and may not achieve the 'critical mass' necessary to deliver new/improved public transport services to the nearest centres. As a result more trips are likely to be made by private car. Similarly, Option 5, through facilitating development within the Green Belt away from existing centres where public transport provision is limited, is likely to result in a greater number of trips being made by car. In the context of the options considered, well located and coordinated development with nearby key amenities and community facilities reduces the need to travel. This provides opportunities for the development of sustainable movement corridors which utilises growth to support public transport and walking and cycling. As such, the options considered all have the potential to support development at existing and future public transport nodes, including Crossrail and the new station planned for Beam Park. The level of growth considered through the options also offer opportunities for contributing or realising the need for new infrastructure to accompany new development.

---

## Updated Table 5.9: Economic Vitality, Employment and Skills

### Spatial strategy options

---

Option 1: Meeting the London Plan target and reflecting current densities- 12,180 dwellings over ten years

---

Option 2: Greater density in the two SDAs- 13,412 dwellings over ten years

---

Option 3: Greater density in the two SDAs and further development in Hornchurch and Upminster- 13,650 dwellings over ten years

---

Option 4: Lower density to accommodate more family/older people's housing with corresponding limited Green Belt development in recognition of the trade-offs involved- 12,180 dwellings over ten years

---

Option 5: Exceeding OAHN by facilitating greater density the two SDAs, further development in Hornchurch and Upminster, and limited Green Belt release- 15,010 dwellings over ten years

---

Overall, through delivering a larger number of dwellings in Havering, Options 3 and 5 have the potential to deliver increased levels of housing provision, with additional potential to support the economic vitality of the borough. All of the options are, however, likely to have a long-term positive effect on the economy through the delivery of housing, and if matched with housing provision, employment and associated improvements to services/facilities.

Options 2, 3 and 5 will do more to support the economic vitality of Romford through allocating a higher number of houses in the vicinity of the town. This will help rejuvenate the town centre and support Romford's status as a Metropolitan Centre. Options 3 and 5 will also do most to support the economic vitality of the key district centres of Hornchurch and Upminster through facilitating larger allocations in the towns. These options will also do more to support accessibility to employment and learning opportunities (including outside of the borough) through promoting development at locations with good access to key centres and transport nodes. It should also be noted that Option 1, whilst delivering fewer homes in Romford and the district centres than Option 5, will promote the delivery of a higher *proportion* of growth in Romford and the district centres. This will also support accessibility.

In contrast Option 4, which directs an increased proportion of development to the Green Belt, will do less to promote the economic vitality of existing centres in the borough.

Option 2, 3 and 5 through facilitating an increased level of housing delivery at the Rainham and Beam Park SDA will do more to support the overall economic regeneration of Rainham and South Hornchurch. Given that proposed housing growth in this area is part of the larger London Riverside Opportunity Area, it is considered that new housing at this location will be delivered alongside enhancements to employment opportunities, including at the Rainham Employment Area. Proposals will also be supported by enhancements to sustainable transport networks, utilising Rainham's location on the Essex Thameside line and a proposed new station at Beam Park. As such, additional housing growth in this location has the potential to support economic regeneration proposals for the immediate and wider area, with Options 2, 3 and 5 doing more to facilitate this.

---

### 3. Updates to the overview of the reasons for choosing the preferred spatial strategy for the Local Plan

Clarifications and supplementary information have also been made with respect to **Chapter 6** of the SA Report, which presents an overview of the Council's reasons for choosing the preferred spatial strategy for the Local Plan.

The text below therefore replaces the text previously presented in Chapter 6.

### 6. Overview of the reasons for choosing the preferred spatial strategy for the Local Plan

The following overview sets out the London Borough of Havering's reasons for selecting the preferred spatial strategy approach for the Local Plan. This is in light of the various evidence base studies undertaken for the Local Plan, consultation responses received on the Local Plan to date and the findings of the SA process.

#### The Local Plan's preferred spatial strategy

During the preparation of the Local Plan, the Council opted for a spatial strategy which most supports the intensification of its two Strategic Development Areas at Romford, and Rainham and Beam Park. Further growth will be accommodated from major regeneration of the Council's own housing estates, which will support an ambitious local authority home building programme. In recognition that the borough's district centres are important providers of retail, leisure and essential services, the spatial strategy seeks to maintain and enhance these centres and support the intensification of uses including residential development and business growth.

The spatial strategy also seeks to provide continued protection for Havering's extensive Green Belt land. This is in conformity with the London Plan (2016) that states that;

*"growth will be supported and managed across all parts of London to ensure it takes place within the current boundaries of Greater London without encroaching on the Green Belt, or on London's protected open Spaces"* (London Plan (2016) Policy 1 p34)

*"The Mayor strongly supports the current extent of London's Green Belt, its extension in appropriate circumstances and its protection from inappropriate development."* (London Plan (2016) Policy 7.6 p312)

The Council considers that this spatial strategy best meets the aim of delivering sustainable development in accessible locations by seeking to meet and exceed the London Plan housing target, whilst protecting the Green Belt and ensuring the character and amenity of the borough is maintained and enhanced for future generations to enjoy. As set out in paragraph 5.1.3 of the Local Plan (reference: LBHLP1.2):

*"The Council has developed its strategy to deliver 'good growth' in the right locations across Havering having regard to the potential of the individual areas identified for that growth and the importance of making sure it has a good fit with and integrates well with its surroundings. This growth will be dependent upon and facilitated by significant public transport investment and improvements. In line with national and Mayoral planning policy, development is to be directed to the most accessible and well connected areas in the borough where there are existing concentrations of supporting social and community infrastructure or where this can be delivered alongside, and supported by, new developments."*

Given the requirement of the NPPF to meet sustainable development needs so far as is consistent with the policies of that Framework, the Council has developed the most appropriate spatial strategy to respond to this. The spatial strategy and Local Plan Policies 1 and 2 for Romford and Rainham and Beam Park address this requirement for sustainable development by proposing the two Strategic

Development Areas and appropriate development in other town centres outside of these locations. It reflects the strategic context provided by the NPPF and the London Plan, with which the Local Plan has to be in 'general conformity'. It therefore aims to translate the policy approaches applicable to Havering into planning policies that are both relevant and necessary.

This approach was supported by the consultation response received through the Regulation 19 consultation from the Mayor of London, which highlighted:

*"The Mayor welcomes the draft plan's positive approach to growth, including housing supply. The spatial strategy rightly identifies Romford and Rainham and Beam Park as areas in which to concentrate growth as these areas is receiving significant investment in transport and have been identified as Housing Zones, which will further support the delivery of homes in these areas." (reference: LPREG19-414)*

The following outline provides an overview of the key elements which influenced the choice of the preferred spatial strategy for the Local Plan.

### Opportunity Areas

The Romford Development Framework (2015) (reference: LBHLP.53) identified the potential for development in Romford;

*"Romford Town Centre has huge potential for economic growth. By utilising property demand and value growth driven by the arrival of Crossrail, it can deliver thousands of new homes and jobs."(p5)*

The Rainham Beam Park Planning Framework (2016) (reference: LBHLP.54) identified the potential in Rainham and Beam Park;

*"In June 2015, following a successful bidding process, Rainham and Beam Park was identified as one of the GLA's new 'Housing Zones'. This will bring tens of millions of pounds in investment funding towards the social and physical infrastructure necessary to support new homes in the area and will help to overcome some of the challenges of delivering development within the Rainham and Beam Park area" (p13)*

Whilst Rainham and Beam Park is already identified within the London Riverside Opportunity Area, Romford is now also identified as an Opportunity Area in the draft London Plan.

London's Opportunity Areas are recognised in the London Plan as the capital's major reservoirs of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility. The London Plan says that typically they can accommodate at least 5,000 jobs or 2,500 new homes or a combination of the two, along with other supporting facilities and infrastructure.

Romford is also identified in the London Plan as a Metropolitan Town Centre. The Mayor of London had already recognised Romford as a potential area for growth and, in early 2016, Romford was granted Housing Zone Status which will provide significant investment in order to accelerate the delivery of new homes. There are a number of opportunity sites within the Romford Strategic Development Area which can accommodate significant housing growth.

Policy 2.15 of the London Plan (2016) outlines that town centres are designated as areas of commercial intensification and residential development. As such, development proposals in town centres should "*sustain and enhance the viability and vitality of town centres*", accommodate economic and/ or housing growth, support and enhance the competitiveness, quality and diversity of town centre retail, leisure, arts, cultural and other consumer services and public services. This is also supported by the Havering Retail and Commercial Leisure Assessment (2015) (reference: LBHLP.21) and update (2018) (LBHLP.21.4), the Employment Land Review (2015) (reference: LBHLP.20), and Addendum (2018) (reference: LBHLP.20.1) which highlights these locations also offer a range of investment opportunities with substantial capacity to accommodate new homes, jobs and infrastructure.

## Strategic Development Areas, Housing Zones and housing estate regeneration

The Strategic Housing Land Availability Assessment (2017) (reference: LBHLP.17) highlighted that Romford and London Riverside (which Rainham and Beam Park forms part of) are areas with large site capacity (p76). The Housing Position Statement (2018) (reference: LBHLP.15) also identified both Romford and Rainham and Beam Park as key areas for growth within Havering and profiles the expected number of housing units to be delivered. As highlighted by the Housing Position Statement:

*"There are a number of opportunity sites within the Romford Strategic Development Area which can accommodate housing growth. There is an increased demand for homes in east London, and with areas closer to central London becoming unaffordable to many, both demand and house values will grow, especially with the arrival of Crossrail..."*

*Rainham and Beam Park Strategic Development Area is a major growth and regeneration area and provide the opportunity to establish an exciting new residential neighbourhood linked to the delivery of a new railway station on the existing Essex Thameside line at Beam Park."*

(Housing Position Statement (2018) (reference: LBHLP.15, p9)

The building of a significant number of new homes in the two Strategic Development Areas will be supported by means of a range of planning and financial measures through the Mayor of London's Housing Zone Programme. Designation of the two Housing Zones has been a significant influence on the patterns and forms of development that the Local Plan will seek to deliver.

Havering is one of only a few London boroughs with two Housing Zones and the Council considers that this will be an important element in its ability to deliver the new homes that the borough needs over the plan period because it provides a high degree of certainty that the new homes will come forward.

*"The building of homes in these areas is supported by a range of planning and financial measures. HZ programmes are funded by a combination of local authority funding, Greater London Authority (GLA) direct and recoverable grant, and external funding. HZ finance will be used predominately to deliver physical infrastructure in advance or in parallel to developments, which will significantly increase viability and hence improve Community Infrastructure Levy/section 106 contribution potential. In the Local Plan, each Housing Zone forms the focus for a Strategic Development Area (SDA)." (Havering Infrastructure Delivery Plan (2018) reference: LBHLP.31pii)*

The quantum and location of growth will also be partly accommodated as a result of the Council's commitment to major regeneration of its own housing estates. The Council is planning to build a significant number of new homes in one of the most ambitious local authority home building programmes in the country. The initial programme focuses on 12 sites across the borough (including sites close to Romford and Rainham) and is expected to deliver over 2,000 additional homes.

Havering is committed to securing and promoting 'good growth' and it would not limit other sites coming forward that are not included in the Strategic Development areas if they provide the opportunity to deliver this. The Council takes a proactive approach to working with developers and landowners to support them at a very early stage of pre-application development discussions to ensure that suitable sustainable proposals are submitted.

## Infrastructure

The strategy recognises the importance of communities being properly served by timely and effective provision of infrastructure. It seeks to ensure that all new development including, especially, new housing is properly supported by the provision of necessary infrastructure including public utilities and social and community facilities. This includes the school places and health care facilities necessary for the quantum of proposed new development and is reflected in the Strategic Development Area policies explicitly highlighting the infrastructure that will be necessary to support change and growth in these areas. Specific policies in the Local Plan deal with education, social and community facilities and identify where these will be necessary over the period of the Local Plan.

The Council's approach has been shaped by information in the Infrastructure Evidence Base Report prepared in 2015 to support the emerging Havering Community Infrastructure Levy. The Infrastructure Evidence Base Report subsequently formed the basis of the Infrastructure Delivery Plan that is a key part of the evidence base of the Local Plan. The approach in the Local Plan also has regard to the Council's Local Implementation Plan strategy and annual submissions from which transport themed programmes and projects are derived.

The Infrastructure Evidence Base Report considered a wide range of infrastructure types. It examined the adequacy of existing provision and provided an assessment of future needs based on factors such as expected population growth and the delivery of other plans and strategies of the Council. The report recognised that in many instances there was already a commitment to new infrastructure being provided in particular locations such as Romford and Rainham and Beam Park by reason of the accessibility of these areas and that they were already identified as growth areas through plans and strategies of the Mayor of London and the Council.

### Accessibility and transport

The proposed spatial strategy supports the development of housing in the most accessible locations in the borough with excellent transport links, especially to areas outside of Havering.

Accessibility will further improve with the introduction of rail services on the Crossrail / Elizabeth line and the delivery of the new Beam Park station on the existing Thameside line at Rainham. Major public realm improvements to aid accessibility to and from Romford and aid traffic flow along the Ring Road are also planned as part of the Mayor's 'Liveable Neighbourhoods' funding, and through the A1306 Beam Parkway scheme in Rainham.

### Green Belt

In the course of preparing the Local Plan, the Council commissioned two Green Belt studies. The Green Belt Study (2016) (*reference: LBHLP.26*) which found that all of the Green Belt in Havering has value when considered against the purposes of the Green Belt. The Sites Green Belt Assessment (2018) (*reference: LBHLP.27-27.2.2*) assessed 84 sites that were submitted to the Council for potential release from the Green Belt through the Local Plan process. The assessment considered implications for the Green Belt if these sites were released and considered their sustainability.

In light of these studies, the Council is confident that sufficient land supply to meet its development needs (including housing) has been found outside the Green Belt.

### Environmental considerations

The Council considers the preferred spatial strategy provides an appropriate balance between delivering growth and protecting and enhancing the quality of the borough's environment.

In terms of the historic environment and landscape/townscape character, the Council considers that the level of growth proposed in the preferred spatial strategy optimally balances the need to create opportunities for enhancing the fabric and setting of heritage assets and townscape character, while not proposing a level of growth which would lead to wider scale impacts on the historic environment and townscape/landscape quality. This includes through seeking to protect the Green Belt.

In terms of biodiversity assets, the facilitation of increased densities in the two Strategic Development Areas and some district centres, and the intensification of uses enabled by the estate renewal programme facilitated through the preferred spatial strategy will reduce the need for new development areas in other parts of the borough. This includes in parts of the Green Belt with biodiversity value. The Council also considers that the preferred spatial strategy offers significant opportunities to enhance ecological networks in urban parts of borough, including through the rejuvenation of key corridors, including river corridors, and improved green infrastructure networks.

Through focusing development on the more accessible locations in the borough by public transport and walking and cycling networks, the Council considers that the preferred spatial strategy will

promote air and noise quality and support a limitation of greenhouse gas emissions from transport. It is also considered that the spatial strategy's focus on previously developed land will support soil resources, and limit the loss of productive agricultural land.

