Examination into the Havering Local Plan
2016 - 2031

Further response from London Borough of Havering to Inspector

Actions arising from the Havering Local Plan Examination in Public October 2018

January 2019
Matter 1 Legal compliance and Duty to Co-operate

1.1 Position statement with progress on Statements of Common Ground (SoCG)

1.1.1 All SoCG have been sent out to the relevant authorities for signatures. We have received signed SoCG from the following authorities:

- Thurrock Council
- Brentwood Council
- Basildon Council
- London Borough of Bexley
- Essex County Council
- Environment Agency
- Newham
- London Borough of Redbridge
- Rochford
- Chelmsford City Council
- Natural England

1.1.2 We await signed copies back from the following authorities:

- London Borough of Barking and Dagenham
- Greater London Authority
- London Borough of Waltham Forest
- Highways England

1.2 Sustainability Appraisal – Evidence to support reaching Option 1 (demonstrate ‘transparency’). (This was also raised in regard to Matter 3.)


1.3 The SA should clearly and fully explain why all alternatives have been rejected, including options 2 and 3, which do not require the release of GB land. The SA (page 32) says that options 2, 3 and 5 would ‘overburden existing facilities and put pressure on existing infrastructure’. What evidence has the Council used to reach this conclusion?


1.4 Habitat Regulations Assessment (HRA) – how have actions identified as amber on table page 22 onwards been translated into changes in the Local Plan

1.4.1 Appendix A documents an initial sifting process that was used to identify those policies on which the HRA (documented in the body of the HRA report) needed to focus. In other words the sole purpose of the table presented from page 22 onwards was to ‘scope’ those policies that promoted development (principally housing or employment) for further discussion in the main body of the HRA report; green means scoped out, amber means scoped in. Therefore, Appendix A does not identify any actions except the report authors. Amber shading simply denotes that the effects of
the policy require discussion in the main body of the HRA report before a definitive conclusion can be reached regarding likely significant effects. Amber shading does not denote that any amendments are required to policies.

1.4.2 Appendix A identified that only policies 1, 2, 3 and 19 could not be immediately dismissed without further consideration, because these were the policies that determine the quantum and location of development in the borough. This outcome is summarised in section 4 of the report. That set the scope for the body of the HRA which needed to focus on the implications of policies 1, 2, 3 and 19 in terms of the housing and employment growth they set out. In the remainder of the report AECOM then determined whether any likely significant effects would actually arise from the housing and employment covered by those policies and a conclusion is reached that they would not. As a result no changes to any policies were required.

Matter 2- Spatial Strategy

2.1 Map of Twelve Estates programme and provide indication of how the numbers have changed with the approvals /updated delivery figures.

2.1.1 A map was provided during the examination and has been uploaded to the website. The most recent information on the anticipated delivery numbers is contained within the Housing Position Statement 2019: Technical Update and Annexes 1, 2, 3 and 4. This is based on information provided by the Council’s regeneration department as of January 2019 and pre-application reports. Exact numbers are subject to change through the ongoing planning process. No applications have been submitted for these sites.

2.2 Clarify references to 3,000 / 3,250 new homes in Local Plan Policy 2 and Rainham and Beam Park Framework and advise correct figure.

2.2.1. The Rainham and Beam Park Master Plan Planning Framework (2016: LBHLP.54:p9) states that;

“The illustrative masterplan establishes the following development headlines for Rainham and Beam Park: 3,250 homes…..”

2.2.2 Whilst the Proposed Submission Local Plan (LBHLP.1:p22) Policy 2 states that;

“The Council will support the delivery of over 3,000 new high quality homes…”

2.2.3 Since the Planning Framework was completed, Notting Hill Housing has been appointed as the Council’s development partner and financial appraisal work has been completed.

The current housing trajectory lists 3151 homes to be developed in Rainham and Beam Park and this is likely to increase once further viability work is undertaken.
At this time it is suggested by the Council that the *at least 3000 new high quality homes* figure is included in the Plan as the numbers could change until the final planning applications have been approved.

**Matter 3 Housing**

3.1 Housing Trajectory queries
3.1.1 Action points relating to the housing trajectory are covered in Housing Position Statement 2019: Technical Update, Annex 1 of which contains an updated housing trajectory.

3.2 Include Mercury / Ellandi proposal in Housing Trajectory
3.2.1 Whilst Ellandi have put forward development plans and provided a statement of intent they are not the owners of the site they wish to develop. (The Mercury Centre and associated car parks.) Grainhome Ltd who is the freeholder of the site does not support Ellandi’s development plans and are seeking to bring forward their own plans for the site.

3.2.2 Notwithstanding the comments at the examination hearing, the position in the current housing trajectory is that this site is not included as the Council have not had a clear message from the owners that they wish to develop or that the land is available for them to do so. If this situation changes we may incorporate the site at a later date.

3.3 Check Sandgate Close site in Housing Position Statement
3.3.1 The Sandgate Close site is included in Annex 2 of the Housing Position Statement 2019: Technical Update – a site assessment as to deliverability is overview is provided. The application has received a recommendation for approval at planning committee. A section 106 agreement is yet to be signed.

**Matter 3 Housing Other Matters**

3.4 Modification Policy 5 - needs to be clearer the flexibility of policy
3.4.1 See response in 3.5

3.5 Modification Policy 5 - Does the word ‘robustly’ need to be included as modification? Should originally wording be kept and does it provide the flexibility required in this policy?

3.5.1 The word “robustly” does not need to be included as a modification. The original text provides enough justification and flexibility for the requirement of the Council seeking to maximise the provision of family sized units but also ensures it is clear to developer’s that the Council will take into account specific site circumstances and treat each application on site by site basis.

3.5.2 The original text should be kept;
“When considering the mix of dwelling sizes appropriate for a particular development proposal, the Council will have regard to individual site circumstances including location, site constraints, viability and the achievement of mixed and balanced communities. In all cases, the Council will require developers to demonstrate how they have sought to maximise the proportion of family units through the design of the scheme.”

3.5.3 Paragraph 7.3.4 provides further clarity on this flexibility;

“The Council does recognise that the high level of demand for three bed properties will be challenging and that it may not be possible to meet the recommended housing mix on all sites. Some sites, for example, may be more appropriate for families with children, particularly sites with safe access to amenity and play space. However, it is essential that the supply of family housing is stepped up to maintain an adequate stock of housing suitable for occupation as family dwellings. The Council will expect developers to demonstrate how they have sought to maximise the provision of family housing within their schemes. In flatted schemes, developers should be creative with their approaches to providing family accommodation and should demonstrate how they have considered the provision of family units such as duplexes at ground floor level. Where the recommended level of three bed properties cannot be achieved, the priority will be to provide two bed rather than one bed properties.”

3.6 Policy 6 reference at 7.4.4 of Plan to a review of the need but this is not in the evidence base. The Inspector needs evidence relating to the need and supply. Where and when will the supply be provided in order to meet the identified need? Is there a need for specific site allocations to meet the need?

3.6.1 In 2015 the Council undertook a major review of the need and current supply of specialist older persons housing. The review also included an assessment of the Council’s own sheltered and extra care provision. The review looked not only at the current condition of the Council’s stock but also made a number of recommendations concerning the future of that stock. This report is provided as part of the evidence pack for the inspector. (Older Persons Report: 2015) Included within the response below is;

• A review of the 2015 reports needs analysis to see if it is requires amending in light of any changes such as changes to demographics, social care policy etc;

• An update on action that has been taken to implement the reviews recommendations especially where these impact on the supply of accommodation for older people;

3.6.2 The review of the current and projected need for specialist older persons housing need was undertaken in 2015. This looked at a wide variety of information (section 4 of the Older Persons Report: 2015) and this included:

• GLA Report Assessing Potential Demand for older person housing in London 2014 (the figures of which were subsequently used in the GLA London Plan for establishing the need for specialist older persons accommodation);
• Housing LIN on line assessment tool for establishing need for specialist older persons housing;
• Examining Councils waiting lists for older persons housing (including sheltered and extra care);
• Residential and Nursing admissions;
• Building on the councils previous Extra Care housing strategy;
• Wide variety of Health statistics and projections relating to older people in Havering and
• Long term population and general demographic projections for older people in Havering.

3.6.3 The resulting analysis and projection looked at not just the overall need for specialist older person’s accommodation but also the different type of accommodation and also the different tenure mixes.

3.6.4 In arriving at the Havering older persons housing model it took into account a number of local factors which both the GLA and Housing LIN models being regionally and nationally base could not take into account. Although both acknowledge that these local circumstances accept that there could be changes to their figures when local circumstances are taken into account. These included:

• The policies and practices of the authority in relation to adult social care and the approach to keeping people in their own homes & long-term use of nursing and residential care;
• The actual condition of the existing sheltered housing stock;
• Local surveys regarding older persons preferences for different types of Housing and
• The tenure split amongst older people in Havering.

3.6.5 As with any long-term model any result was caveated as if there were changes in any of the key factors such as the overall population projections or the long-term tenure assumptions this could affect both the overall need analysis and tenure split.

The key components that made up the model were:
• Population figures based on ONS 2015 projections;
• That the level of homeownership amongst older people in Havering would remain at 79% Homeowners 21% Rented;
• That for modelling purposes 100 people per 1000 over 75 would wish to move into retirement/sheltered housing;
• That for modelling purposes 20 people per 1000 over 75 would wish to move into Enhanced Sheltered Housing and
• That for modelling purposes 25 people per 1000 over 75 would wish to move into Extra Care Housing.

Note: These figures were similar to those used by Housing LIN except in respect of sheltered retirement housing where they use a figure of 110.

3.6.6 The resulting model showed that whilst there was an overall need for additional specialist accommodation, there was an oversupply of affordable sheltered housing and a deficit for all tenures in the higher need housing (enhanced and extra care.)
The biggest demand was for private owned leased accommodation a reflection of the high levels of existing homeownership amongst older people in Havering.

Table 1 below gives the details:

<table>
<thead>
<tr>
<th>Havering</th>
<th>2015</th>
<th>2025</th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Demand</td>
<td>Supply</td>
<td>Variance</td>
<td>Demand</td>
<td>Supply</td>
<td>Variance</td>
</tr>
<tr>
<td><strong>Sheltered Housing</strong></td>
<td>2260</td>
<td>1734</td>
<td>526</td>
<td>2870</td>
<td>1734</td>
<td></td>
</tr>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>-Rent</td>
<td>475</td>
<td>1024</td>
<td>+549</td>
<td>603</td>
<td>1024</td>
<td>+421</td>
</tr>
<tr>
<td>-Lease</td>
<td>1785</td>
<td>710</td>
<td>1075</td>
<td>2267</td>
<td>710</td>
<td>1643</td>
</tr>
<tr>
<td><strong>Enhanced Sheltered</strong></td>
<td>452</td>
<td>0</td>
<td>452</td>
<td>574</td>
<td>0</td>
<td>574</td>
</tr>
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<td><strong>20 per 1000 +75</strong></td>
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<td></td>
<td></td>
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<tr>
<td>-Rent</td>
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<td>0</td>
<td>95</td>
<td>121</td>
<td>0</td>
<td>121</td>
</tr>
<tr>
<td>-Lease</td>
<td>357</td>
<td>0</td>
<td>357</td>
<td>453</td>
<td>0</td>
<td>453</td>
</tr>
<tr>
<td><strong>Extra Care</strong></td>
<td>565</td>
<td>195</td>
<td>370</td>
<td>718</td>
<td>195</td>
<td>523</td>
</tr>
<tr>
<td><strong>per 1000+75</strong></td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>-Rent</td>
<td>119</td>
<td>175</td>
<td>+56</td>
<td>151</td>
<td>175</td>
<td>+24</td>
</tr>
<tr>
<td>-Lease</td>
<td>446</td>
<td>20</td>
<td>426</td>
<td>567</td>
<td>20</td>
<td>547</td>
</tr>
</tbody>
</table>

3.6.7 Given that this review was carried out in 2015 we have taken the opportunity to see whether there had been any substantial changes to key factors which would lead to changes in these need figures.

Population

3.6.8 Since the review was completed there have been updates on the overall population projections in Havering. The base date was originally 2015 and this has now been changed to 2018. The overall growth in numbers of older people means that there is a small increase in the numbers requiring accommodation than in 2015. However, over the longer timeframe the increase in numbers is slightly lower than the 2015 projections. These changes are not significant enough to amend the overall conclusions that were drawn from the original report.

Tenure Mix

3.6.9 As you would expect over such a short period there has not been any change to the tenure mix of older people and therefore the 21% affordable 79% private, owner occupy has been maintained. However, over time this may be an area which would need to be revisited with the overall reduction in owner occupation among the younger population.

3.6.10 On a separate point the development of new schemes especially in the not for profit sector are increasingly developed on a mixed tenure basis which does give
the ability for tenure of schemes to be changed over time thus giving greater flexibility to ensure that all Havering residents needs are catered for.

Adult social Care Policy
3.6.11 The original report supported Havering’s long held view that there were sufficient residential and nursing homes in the borough to cater for the needs of its residents and that additional specialist provision should concentrate on providing sheltered and extra care accommodation. Also, that there was an increasing ability for people to remain in their own home with appropriate adaptations, modern day telecare and where necessary home care support.

3.6.12 Havering adult social care services have continued to maximise people’s independence and where possible this means ensuring that people remain in their own accommodation. This has meant that whilst overall numbers of people that are being assisted continues to increase, the numbers who are in nursing or residential care remained stable between 2015 and 2017 (552/557) whilst in 2016/17 88% of people requiring respite care after leaving hospital were able to have this delivered in their own homes. These trends are continuing and within the current year there has been a further decrease in the use of residential and nursing care.

3.6.13 Therefore there seems strong evidence not to amend the underlying assumptions that the model is built on. If the latest population projections are applied and the table is updated to cover 2018 to 2028, then this does show a small reduction in the predicted need by 2028, as the table below illustrates. For purposes of consistency no change has been made to the supply section at this stage.

Table 2 Adjusted to include latest ONS projections and starting date updated to 2018 end date 2028 (no change in supply)
3.6.14 The majority of action that has been taken in regard to the physical changes outlined in the 2015 report have to date related to the councils own sheltered housing stock. They have however been carried out in accordance with the overall needs that the report identified.

3.6.15 The report found that:
- That not all of the councils sheltered housing schemes were up to modern standards and that whilst some could be upgraded and were also popular, others would be difficult if not impossible to upgrade;
- That, as has already been stated, there was a projected surplus of affordable sheltered schemes within the borough and this would continue even with the older persons population growth;
- That this contrasted either the current and projected deficit in sheltered/retirement housing for lease and sale in the borough and
- That although there was a current and projected deficit in enhanced and extra care housing it was greatest in the sale/lease sector.

3.6.16 In Oct. 2016 the Council agreed a programme of closing and upgrading sheltered schemes, which is now being implemented. The table below demonstrates that based on current capacity studies there will be a 66% increase in the number of properties available to older people across the seven schemes. Specifically, in response to the recommendations of the report there is a net loss in the number of

<table>
<thead>
<tr>
<th>Sheltered Housing 100 per 1000+75</th>
<th>Demand 2018</th>
<th>Supply 2018</th>
<th>Variance 2018</th>
<th>Demand 2028</th>
<th>Supply 2028</th>
<th>Variance 2028</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rent</td>
<td>480</td>
<td>1024</td>
<td>598 / 1024</td>
<td>-426</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lease</td>
<td>1805</td>
<td>710</td>
<td>2250 / 710</td>
<td>1540</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Enhanced Sheltered 20 per 1000+75</td>
<td>457</td>
<td>0</td>
<td>457 / 0</td>
<td></td>
<td>574</td>
<td>0 / 574</td>
</tr>
<tr>
<td>Rent</td>
<td>96</td>
<td>0</td>
<td>96 / 0</td>
<td></td>
<td>120</td>
<td>0 / 120</td>
</tr>
<tr>
<td>Lease</td>
<td>361</td>
<td>0</td>
<td>361 / 0</td>
<td></td>
<td>450</td>
<td>0 / 450</td>
</tr>
<tr>
<td>Extra Care 25 per 1000+75</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rent</td>
<td>120</td>
<td>175</td>
<td>150 / 175</td>
<td>-25</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lease</td>
<td>451</td>
<td>20</td>
<td>562 / 20</td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>
affordable sheltered properties across the schemes. 60% of new properties for older persons housing will be available for lease or sale. The development of two retirement villages will allow for people with varying care needs to be accommodated within Brunswick Court and will be redeveloped to become an extra-care housing complex.

Table 3- Council sites (figures are based on the position at the time of writing and area subject to change)

<table>
<thead>
<tr>
<th>Site</th>
<th>Proposed no. of Units</th>
<th>Current no. of Units</th>
<th>Private</th>
<th>Affordable Rent</th>
<th>Total</th>
<th>Property Specification</th>
<th>Start on Site</th>
<th>Site Practical Completion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Queen Street*</td>
<td>31</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>General Needs</td>
<td>Jan 2020</td>
<td>Nov-2028</td>
</tr>
<tr>
<td>Brunswick Court</td>
<td>47</td>
<td>0</td>
<td>54</td>
<td>54</td>
<td></td>
<td>Extra Care</td>
<td>Sept-2022</td>
<td>Feb-2024</td>
</tr>
<tr>
<td>Dell Court</td>
<td>29</td>
<td>51</td>
<td>29</td>
<td>80</td>
<td></td>
<td>Over 55's</td>
<td>Sept-2024</td>
<td>Feb-2026</td>
</tr>
<tr>
<td>Delderfield House</td>
<td>14</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>General Needs</td>
<td>Sept-2024</td>
<td>Feb-2026</td>
</tr>
<tr>
<td>Royal Jubilee Court</td>
<td>79</td>
<td>99</td>
<td>53</td>
<td>152</td>
<td></td>
<td>Retirement Village</td>
<td>Sept-2026</td>
<td>Nov-2028</td>
</tr>
<tr>
<td>Maygreen Crescent and</td>
<td>31</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>General Needs</td>
<td>Sept-2026</td>
<td>Nov-2028</td>
</tr>
<tr>
<td>Park Lane*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>286</strong></td>
<td><strong>285</strong></td>
<td><strong>191</strong></td>
<td><strong>476</strong></td>
<td></td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

3.6.17 The council’s approach has been to plan to redevelop existing sites, both big and small ensuring that when they are redeveloped the density is increased where appropriate and to avoid developing on green field sites. The programme that has been developed will ensure that there is sufficient affordable sheltered, enhanced/extra care accommodation to meet the projected needs of older residents who need this accommodation. There is still a deficit for people who want to either purchase or lease properties, which although the council has started to address by developing mixed tenure schemes will not be totally addressed and will need the input of the private market. Since 2015 there has only been one new private retirement scheme developed of 40 units. Two other proposals which applied for planning permission were refused due in part to them being built on green belt land.

3.6.18 Policy 6 of the Local Plan clearly identifies the types of sites and developments which are appropriate to meet the specialist needs of local people. The Spatial Strategy’s approach to emphasise housing delivery in the Strategic
Development Areas, supported by the required infrastructure, will help to ensure a wide range appropriate sites are available in accessible locations, close to essential services. The housing trajectory currently anticipates over 9,000 new homes to be delivered within the Strategic Development Areas over the plan period. In addition, the Site Specific Allocations Local Plan Document will look to identify where sites are appropriate for specialist older persons housing.

It is still the authority’s contention that there are sufficient brown field sites, which are detailed elsewhere in the local plan, in need of development to outweigh any consideration of making exceptions to the current and proposed greenbelt policy. There will need to be a variety of schemes developed of different sizes and offering varying degrees of housing support. This means that brownfield sites of differing sizes will be suitable.

3.6.19 The councils own planned programme illustrates that using five of the seven available sites they have been able increase overall number of units by 166% with differing size schemes.

3.7 Policy 6- Reference data to London Plan and where there might be discrepancies with Local Plan figures

3.7.1 Within the London Plan Havering is allocated a figure of 185 units of additional specialist housing per year or 1850 over 10-year period. Of this they indicate that 135 should be for owner occupiers and 50 for intermediate (shared ownership). The Mayor considered that there was no need for any additional affordable specialist older people housing. The London plan does not attempt to break this down between different types of specialist older person housing. It also acknowledges that it is based on regional assessment and common assumptions being applied across London, therefore when a borough does undertake its own assessment there may be variations. It was also originally undertaken in 2013 and it is unclear whether any changes have been made to take into account latest population projections.

3.7.2 When this data is compared with Havering’s own model and consolidating the different types of older persons housing then this shows that the Havering model assume a slightly overall higher level of need over the 10-year period. Although in terms of affordable housing there is an estimated surplus of accommodation rather than the balanced figure that the London Plan produces. This is probably due to the fact that the London Plan figures assume that 50% of the affordable housing stock does not meet modern standards. A figure which is accepted would need to be adjusted for each individual borough.

Table 4

<table>
<thead>
<tr>
<th>Required Supply</th>
<th>Owner Occ/Intermediate</th>
<th>Affordable Rent</th>
<th>Total 10 years</th>
</tr>
</thead>
<tbody>
<tr>
<td>London Plan</td>
<td>185</td>
<td>0</td>
<td>1850</td>
</tr>
<tr>
<td>Havering 2015</td>
<td>256</td>
<td>-276</td>
<td>2560</td>
</tr>
</tbody>
</table>
3.8 Council to consider if specific Regeneration Policy is required

3.8.1 The Council does not consider that a specific regeneration policy is required. The two Strategic Development Areas of Romford and Rainham and Beam Park contain the major development sites and Policies 1 and 2 each provide a comprehensive policy framework and as to secure the development of these areas. Each of these policies addresses a wide range of topics such as residential and commercial development, connectivity, social infrastructure and design and heritage.

3.8.2 The Council considers that taken together within the umbrella of each policy these effectively provide the means to securing regeneration in the areas covered by the policies. Section 14 of the Local Plan dealing with Implementation, provides an explanation of the ‘tools’ and the approaches that the Council will use to deliver the Local Plan. Together with the policies in the Local Plan, this will enable the Council to secure necessary regeneration. Additionally, a number of initiatives that are highlighted in the Local Plan (such as its own Twelve Estates programme, its housing development company (Mercury Land Holdings) and the delivery of specific projects such as the London ‘Wildspace’ project at Rainham and its implementation of ‘Liveable Neighbourhoods’ projects in Romford and Rainham) will deliver regeneration benefits and opportunities. For these reasons, the Council considers that the Local Plan should not include a specific policy on ‘regeneration’ as this is being addressed and delivered by other means.

3.8.3 The Romford Masterplan which is in the process of being developed will also be used to guide strategic policies within the Town Centre and identify development briefs, site opportunities and regeneration areas in greater detail.

3.8.4 For Rainham and Beam Park (Policy 2) already gives consideration to comprehensive development of sites;

“The transformation of the Rainham and Beam Park area into a successful residential neighbourhood can only be achieved if the area is dealt with comprehensively, with developers contributing in a positive and proactive manner to finding solutions that ensure the wider vision for the area is not prejudiced by any single development phase. Sites along New Road will be expected to be brought forward in a comprehensive manner avoiding 'piecemeal' development.”

(LBHLP.1.2 Submission Local Plan with Proposed Amendments (tracked changes) 6.2.3 p25)

3.8.5 The Council recognises that whilst the private sector will play a significant role in delivering new homes and employment in Havering there might be sites that due to complexities of delivery (such as Bridge Close and Rainham and Beam Park) will require public sector intervention to deliver comprehensive development and optimise the potential of Havering’s Development sites.
3.8.6 As set out in Section 14 of the Local Plan dealing with implementation, the Council is taking the lead in working in partnership with developers to deliver the visions and strategy outline in the plan and this will support the delivery of comprehensive development in the Strategic Development Areas.

3.8.7 The Local Plan references this commitment (The Proposed Submission Local Plan (LBHL.P.1:p99 14.0.4-14.0.8))

“The Council is committed to working collaboratively and constructively, and from the outset, with landowners, developers, investors, infrastructure providers, adjoining boroughs, the Mayor of London and other key stakeholders in the private, voluntary and community sectors across the borough to deliver the growth and development that is set out in this Local Plan. The Council will continue to work with all its partners and use all its relevant powers and programmes to ensure that, as far as possible, conditions exist to deliver the strategy in the Havering Local Plan.

The Council knows that its role and that of other public bodies as land owners is important through direct investment in the provision of land for new homes and infrastructure. To this end, the Council has established its own housing company, and an ambitious estates regeneration programme and has entered into three joint venture partnerships. The Council is also working proactively with other public sector bodies and private developers to bring forward sites in public and private ownership to increase the supply of housing in the borough.

As a land owner, the Council will promote and encourage specific development on its land as this will assist in addressing its priorities as well as in securing investor confidence. In appropriate circumstances, the Council may seek to enter into partnership agreement with private investors to encourage specific uses on land in Council ownership or on land adjacent to Council’s land.

The Council’s preferred approach towards land assembly will be through proactive and positive negotiation. Where necessary, appropriate and justified the Council may facilitate development by exercising its Compulsory Purchase Powers to acquire and assembly land in the public interest.

Havering has established a private sector focussed Housing Company, Mercury Land Holdings, to bring forward residential homes for market rent and sale. Also The Council’s Housing Department is ready to meet the challenge by investing in new Council Housing. Bridge Close, Angel Way, and Waterloo Road estate are the three sites where Havering are seeking Housing Zone (HZ) financial intervention as the market on its own would be unable to deal with a number of the complex issues to bring these sites forward.”

Matter 4 Gypsy and Traveller

4.1 Review GTAA information regarding ‘unknown’ households and revise as necessary (Detail to be provided in letter from Inspector)

This will be contained in a response to the inspector in January 2019.
4.2 Consider the scope for unauthorised pitches to help address identified needs (Detail to be provided in letter from Inspector)
This will be contained in a response to the inspector in January 2019.

Matter 5 Green Belt

5.1 Why Council had adopted a change in position for the GB38 brownfield site, especially in circumstances where we may not be able to meet 5 year demand. Provide further information regarding why this site has not been allocated. (Cardrome)

Background

5.1.1 The Havering Local Development Framework (2008) addressed the Green Belt in Policies CP14 Green Belt and DC45-47. Policy CP14 identified that four Major Developed Sites were to be retained in the Green Belt:

- St George’s Hospital, Hornchurch
- Quarles Campus, Harold Hill
- Cardrome, Romford
- Nags Head Lane Sewage Treatment works, Harold Wood and Upminster

5.1.2 The policy explanatory text identified that this approach was in line with the then Planning Policy Guidance Note Number 2 Green Belt (PPG2). It said that, the criteria set out in Annex C of PPG2 would apply to these Major Developed Sites in the event of their redevelopment.

5.1.3 The policy context for the preparation of the Havering Local Plan was provided by the National Planning Policy Framework (2012). The concept of Major Development Sites was removed from the National Planning Policy Framework (NPPF), so the Local Plan does not address this nor identify these sites as such.

5.1.4 However, the final bullet point in paragraph 89 of the NPPF identifies that one of the exceptions to the general presumption against inappropriate development in the Green Belt is in relation to ‘ limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land) whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.’

5.1.5 The spatial strategy for the Havering Local Plan is set out in Section 5 of the Local Plan. In summary, it provides for protection of the Green Belt in line with national and Mayoral planning policy and the borough’s land use needs being addressed within the urban areas of Havering. Through the implementation of this strategy, the Council expects to be able to deliver 17,550 new homes over the Plan Period.
5.1.6 The Local Plan Housing Position Statement is part of the evidence base for the Havering Local Plan and the Technical update prepared after the examination identifies sites for housing development over the plan period.

5.1.7 The focus of the Housing Position Statement document is sites that have been identified as having potential for housing and those that already have planning permission for residential development.

5.1.8 In line with the wider strategy of the Local Plan (see above), the thrust of the document is to secure housing development on suitable sites within the urban, built up area. Nevertheless, the document does identify the St George’s Hospital site and Quarles Camus site as having housing potential in the recognition of their specific circumstances and the extensive advanced stage that redevelopment proposals have reached. The former includes the implications arising from the form of existing development on the site(s) when considered in the light of paragraph 89 of the NPPF and the potential that this provides for new development. The latter recognises the circumstances with both these sites in regard to the position that proposals for development have reached.

Consideration of the four Major Developed Sites in the Local Development Framework

5.1.9 The Council recognise that the St George’s Hospital, Quarles Campus and Romford Cardrome sites were all identified as Major Development Sites in the Local Development Framework.

5.1.10 However, it considers that for the reasons set out below, the circumstances pertaining to the St George’s Hospital and Quarles Campus sites are different to those for the Romford Cardrome site and there is no inconsistency in the approach in the Local Plan. It considers that the Romford Cardrome site should not be a specific allocation in the Local Plan.

St George’s Hospital site

5.1.11 The St Georges Hospital site (circa 12 hectares) is included in the Housing Position Statement reflecting that it has been the subject of discussions for redevelopment for several years. These discussions were originally with advisers for the Health Service and National Health Service Property Services following the site being declared surplus by Havering CCG and decommissioned in 2012. Subsequently, discussions have taken place in the context of the submission of a planning application for the redevelopment of the site.

5.1.12 These discussions started initially in late 2012 and included public consultation and the preparation of illustrative masterplans to support residential development and the provision of a health care facility on land retained within the overall site.

5.1.13 They were reflected in the approval of a planning application (P0459.16) in 2016 for residential development (279 units) in 2016/7 and the approval of a planning application (P0323.15) for up to 3,000sqm of health care facilities on land retained for health purposes.
5.1.14 The Committee Report for these applications noted that partial or complete redevelopment of previously developed sites could be considered appropriate development in the Green Belt if it would not have a greater impact upon the openness of the Green Belt and does not undermine the purpose of the site’s inclusion in the Green Belt.

5.1.15 The report noted that the applicant had undertaken an assessment of the impact on the openness based on the built form within the Green belt – the quantum (footprint and volume) and spread of development (development envelope), comparing the development proposals against the former Hospital layout, its buildings and hard surfaces and that of a previously refused scheme.

5.1.16 The report concluded that the existing and propose forms of development would provide a similar spread, plan form and layout but that the proposed amount of built footprint would be reduced by almost a quarter (24%). It was noted that this was a further 8% reduction compared to what was proposed in an earlier refused scheme.

5.1.17 The report noted that the proposed scheme would ‘retain the buildings on the frontage of the site but remove a number of the large institutional buildings, re-providing their volume over a number of smaller buildings whilst maintaining the historic block layout of the site. Notably the long corridor run which traverses much of the site and a significant proportion of the extensive parking area along the Suttons Lane frontage of the site would be removed. These features currently impact negatively on the visual impression of the extent of development on the site and their removal/reduction would contribute positively to the openness of the site’.

5.1.18 The report also considered the height of buildings on the site and in the planning application. It noted that the proposed development would be mainly 2-3 storeys high which reflect the characteristic scale of domestic architecture in the surroundings. It noted that some elements of the scheme had been revised to reduce the visual impact of the development. It was concluded that the revised approach to residential heights proposed would have no greater impact on the openness of the Green Belt than the existing buildings on the site. A proposed health care facility was adjudged to have a neutral impact on openness.

5.1.19 It was concluded that all matters considered the indicative masterplan and parameter plans demonstrate that the effect on openness would be neutral and have no greater or lesser impact. It was also considered that cumulatively the revisions that have been made to the spread, nature and quantum of development were also considered to have reduced the perceived impact of the residential component of the redevelopment to an extent that adequately addresses previous concerns about the impact of the scheme upon the openness of the Green Belt. It was noted that planning conditions would be imposed to strictly control key elements such as extent of the development envelope, heights and footprints.

Quarles Campus, Harold Hill
5.1.20 The Quarles Campus site in Harold Hill is part of Havering College of Higher and Further Education. The College has other educational campuses and facilities in Hornchurch and Rainham. The Council own the Quarles Campus site. The site comprises the buildings, hard surfaces and sports pitches of the Quarles Campus of Havering College of Further and Higher Education. It is located on the eastern edge of the settlement of Harold Hill. It is bounded on its north, south and west sides by residential development and to the east by Hatters Wood and Dagnam Park.

5.1.21 Redevelopment of the site was initially considered through the Council’s comprehensive ‘Ambitions’ regeneration programme for Harold Hill in 2008. Some activities at the College were to be relocated to a proposed ‘Learning Village’ centred on the Settle Road school sites nearby whilst others would re-locate to the Hornchurch campus of the College.

5.1.21 The Council established Mercury Land Holdings (MLH) in 2015 to deliver quality, well located and managed PRS housing, deliver a financial return to Havering and to help it meet its regeneration objectives. In November 2017, Havering’s Cabinet approved MLH’s Business Plan for 2017. The Business Plan looked to bring forward development at three key sites including the Quarles Campus site. The other sites were in Romford and Hornchurch.

5.1.22 MLH has an option to purchase the Quarles Campus site and is working on the preparation of a planning application for a residential redevelopment. The proposal would encompass around 35% affordable homes and retain the open areas at the rear of the site.

5.1.23 The Housing Position Statement Annex 5 Capacity Analysis includes an assessment of the development potential of the Quarles Campus site. It notes that the site is previously developed land in the Green Belt covering almost 3.7 hectares. The text confirms that the assessment of development capacity (up to 138 units comprised of 60 houses and 78 flats is based on a development sited on the previously developed area with the rear of the site retained as open space.

5.1.24 The assessment supporting the Housing Position Statement is based on a scheme of houses and flats of between 2-3 storeys in line with the current form of development on the site of up to 3 storeys. The assessment was prepared to accord with the ‘impact’ and ‘openness’ requirements of the NPPF for previously developed sites in the Green Belt as set out above.

5.1.25 MLH is seeking to secure a developer partner (most likely a volume house builder) with a view to the submission of a planning application to redevelop the Quarles site in 2019/2020. Consideration is being given to a scheme proceeding on the basis of a phased release of parts of the site to enable some College functions to continue.

**Romford Cardrome, Romford**

5.1.26 The Council considers that the position with regard to the Romford Cardrome site is quite different to the St George’s Hospital and Quarles Campus sites above.
5.1.27 The Cardrome site adjoins Upper Rainham Road and covers almost 5 hectares. The southern part of the site is occupied by a skate park (which is statutorily listed) whilst the remainder mainly comprises open land which is laid out with a simple network of private roads to facilitate driver training off the highway. There is a car parking area and a number of smaller buildings associated with the driver training operations.

5.1.28 These are located in the middle part of the site behind the petrol filling station which has a frontage to Upper Rainham Road and the rest of the Cardrome layout ‘wraps’ around these.

5.1.29 The Council’s Green Belt Assessment Report (2018) document identifies this site as reference GB38 and provides narrative text on its location and characteristics. The Council considers that there is limited scope for development on the site to meet the requirements of paragraph 89 of the NPPF when regard is given to the limited extent of development on the site currently.

5.1.30 The relatively limited building coverage on the site at the present time would mean that the quantum of new development that could be accommodated within the constraints of paragraph 89 of the NPPF would be very modest. The potential contribution to delivering the Council’s housing strategy would be small. Further, it would not include the certainty of delivery that arises with several of the opportunities in the Housing Position Statement and the Technical Update.

5.1.31 Other than the representation seeking that the site be removed from the Green Belt, the Council has not been approached by the site owners about the scope for redevelopment for residential purposes.

**Nags Head Lane Sewage Treatment works**

5.1.32 For completeness, this response will also consider the fourth Major Developed Site identified in the Local Development Framework.

5.1.33 The remaining Major Developed Site identified in the Havering Local Development Framework is between Harold Wood and Upminster. It is the Nags Head Lane Sewage treatment works. This remains an operational public utilities facility which is essential for the requirements of the north of Havering.

5.1.34 The site includes a two storey office building, ancillary buildings and ground level sewage treatment plant equipment. There have been no discussions about this being surplus to requirements and the issue of redevelopment has not arisen.

5.1.35 The form of the buildings on the site at the present time would constrain the scope for residential redevelopment required to satisfy paragraph 89 of the NPPF.

5.1.36 Having regard to these considerations, it has not been considered in the context of delivery of the Council’s housing strategy in the Local Plan.

**Conclusion**
5.1.37 For these reasons, the Council considers that its approach to Major Developed Sites is consistent and the approach to the Cardrome site is robust and reasonable.

Matter 6 Economy and Employment

6.1 What amount of land is required for waste activity purposes in Havering as outlined in Joint Waste DPD. Would the loss of the land not included in the current boundary for the Freightmaster estate impact on this.

Background to the preparation of the Joint Waste Plan (2012)

6.1.1 The Joint Waste Plan DPD was prepared jointly by the constituent boroughs of the East London Waste Authority and adopted in 2012. The Plan was prepared to address the requirements of the Planning and Compulsory Purchase Act 2004 which requires local authorities to replace their existing Unitary Development Plans with Local Development Frameworks.

6.1.2 Paragraph 1.2 of the Joint Waste Plan notes that the purpose of the Joint Waste DPD is to set out a planning strategy to 2021 for sustainable waste management which enables the adequate provision of waste management facilities (including disposal) in appropriate locations for municipal and commercial and industrial waste having regard to the London Plan borough level apportionment and construction, excavation and demolition and hazardous wastes.

6.1.3 Paragraph 1.3 notes that the Joint Waste DPD was prepared by the London Boroughs of Havering, Barking and Dagenham, Redbridge and Newham. The decision to work together was established through the respective borough Local Development Schemes and built on the positive working relationship between the boroughs as part of the East London Waste Authority (ELWA). ELWA is the waste authority covering the four boroughs. The Joint Waste Plan was prepared to set waste management targets and site allocations suitable for waste management for implementation across each of the four boroughs.

What the Joint Waste Plan says about waste management capacity

6.1.4 Section 4 of the Joint Waste DPD identifies existing waste management capacity in the ELWA area and Future Waste Management Requirements.

6.1.5 Table 4 of the Joint Waste DPD summarises the average capacity surplus / deficit within the ELWA boroughs that are required to meet the London Plan (2011) target apportionments for Municipal Solid Waste and Construction and Industry Waste.

6.1.6 In respect of recycling Municipal Waste and Construction and Industry Waste, the Joint Waste Plan identifies a surplus capacity for years 2011, 2016, and 2021 of 786,203, 674,313 and 415,428 tonnes per year, respectively.
6.1.7 In respect of composting Municipal Waste and Construction and Industry Waste, Table 4 identifies a capacity requirement for composting for years 2011, 2016 and 2021 of 47,440, 109,170 and 320,255 tonnes per year, respectively.

6.1.8 In respect of recovery (all facilities), the Joint Waste Plan identifies a capacity for the years 2011, 2016 and 2021 of 262,710, 256,090 and 269,370 tonnes per year, respectively.

6.1.9 Section 5 of the Joint Waste DPD includes policies for waste management including the identification of sites.

6.1.10 Policy W2 identifies the amounts of municipal and commercial waste to be managed by the ELWA boroughs for the years, 2011, 2016 and 2021 as 1,228,000, 1,395,000 and 1,573,000 tonnes per year, respectively.

6.1.11 The Joint Waste Plan says that the ELWA boroughs will meet this apportionment by:

- safeguarding the capacity of sites listed in Schedule 1 of the Joint Waste DPD; and
- approving strategic waste management facilities where it will contribute to the ELWA boroughs meeting the London Plan apportionment on sites listed at the locations listed in Schedule 2 of the Joint Waste DPD.

6.1.12 Policy W2 notes that where an applicant can demonstrate there are no opportunities within these preferred areas for a waste management facility, sites within designated industrial areas as identified in LDFs will be considered.

6.1.13 Table 5 in Policy W2 summarises the average capacity and land area required within the ELWA boroughs to meet the London Plan apportionments for MunicipalSolid Waste and Construction and Industry waste and recovery.

6.1.14 In order to meet the cumulative capacities identified in Table 4, the Joint Plan identifies land area requirements for composting for years 2011, 2016 and 2021 as 3-6 hectares, 4-12 hectares and 6-12 hectares.

6.1.15 The table identifies recovery operations requiring 3-5 hectares in 2011, nil hectares in 2016 and 1 hectare in 2021.

**How this affects Havering**

6.1.16 Schedule 1 identifies facilities for recycling, composting and recovery in the authorities involved in the ELWA area.

6.1.17 For Havering, sites are identified at Gerpins Lane, the Rainham Waste and Recycling and Reclamation Centre (at the site operated by Veolia) and Frog Island. The composting facility at Veolia is identified as having a capacity of 153,000 tonnes per year. It is understood that each of these facilities remain operational.
6.1.18 The Plan notes that at the time of its preparation, the Veolia facilities were only safeguarded until 2018 when their existing planning permissions would expire.

6.1.19 This position is linked to the wider Veolia operation of filling and restoring the site to become the ‘Wildspace’ nature conservation facility.

6.1.20 The sites identified in Schedule 2 are areas within which potentially available and suitable sites for waste management can be located. They represent a refinement of the broad locations identified in the London Plan and borough strategies. The Joint Waste DPD notes that ‘This builds flexibility into the Joint Waste DPD and boroughs are confident that sufficient opportunities will arise within these areas’ (paragraph 5.10).

6.1.21 The Joint Waste Plan notes in paragraph 5.11 that each of the identified sites was considered in the context of the type of waste treatment technology that could be suitable on that site based on the typical characteristics and key local issues published in ‘Planning for Waste Management Facilities and Recycling and Recovery Facilities’.

6.1.22 The Joint Waste Plan notes in paragraph 5.12 that the sites listed in Schedule 2 provide sufficient potential capacity to manage the tonnages of waste identified in Table 5 (referred to above).

6.1.23 Schedule 2 of the Joint Waste Plan identifies 2 small scale facilities being provided at Ferry Lane North (up to 1.5 hectares) and composting facilities being provided at two sites:

- Gerpins Lane (adjoining the existing Re-Use and Recycling facility); and
- Hall Farm (a former landfill site)

6.1.24 The Joint Waste Plan says that:

- the Gerpins Lane site could accommodate a medium size composting facility up to 5 hectares in area
- the Hall Lane site could accommodate a large size composting facility up to 19 hectares in area.

6.1.25 It identified that both sites were (then) owned by ELWA and envisaged both proposals coming forward by 2020 and being dependent on private operators coming forward.

6.1.26 ELWA has advised that it sold the Hall Farm site around 4 years ago but it retains ownership of the Gerpins Lane site.

6.1.27 No composting has taken place at either site or ELWA do not now plan to use the Gerpins Lane site for composting because the Veolia facility adjoining Freightmaster provides adequate capacity.

**Composting facilities at the Veolia site**
6.1.28 ELWA has confirmed that through a waste management contract with Renewi (formerly Shanks) it sends garden waste from Havering to the open air composing facility at the Veolia landfill site. Material is taken there by road from a waste transfer facility at Frog Island. The Veolia facility may also deal with other garden waste from other sources but this is commercially based information and not available to the Council nor ELWA.

6.1.29 Since the Joint Waste Plan was adopted, the position with regard to the duration of operations at the Veolia site has changed. This is detailed below because this has a bearing on the implications for further facilities in Havering and, in due course, the preparation of the replacement Joint Waste Plan.

6.1.30 Operations at the Veolia landfill site (including the composting operations) were the subject of a planning application (reference P1566.12) in 2012 that was approved in December 2014. The planning application was for the continuation of waste inputs and the operation of other waste management facilities including open air composting. A previous planning permission (P1275.96) provided for the depositing of refuse materials through controlled landfill amounting to the importation of 12.3 million cubic metres of waste. The permission required the site to be restored by 2018 and to rely on river sourced waste imports from 2012. In short, the long term objective behind the Veolia operations is to secure the delivery of the ‘Wildspace’ nature conservation facility as a major visitor destination and attraction in the wider Thames Gateway area. The facility would provide for public access (footpath and cycle), riverside paths, car parking and potentially a visitor centre. It would provide for the creation of new habitats and active management of these to secure a large amount of London’s targets for bio-diversity, flora and fauna.

6.1.31 The 2014 permission provides for the land fill operations at the site (almost 180 hectares) to be extended in duration and completed by 2024. It required restoration of the site to be completed by 2026 (where previously the site was required to be restored by 2018).

6.1.32 This revised programme also provided for composting operations to continue at the Veolia site with the benefit of an extant planning permission (albeit with an end-date for them).

6.1.33 ELWA was contacted in the course of preparing this response. ELWA has advised that it assumes that the Veolia facility has adequate capacity for composting based on Renewi’s intention to continue to send garden waste to the Veolia treatment facility. Havering considers that under these circumstances it would be appropriate for composting to continue at the Veolia site until 2024 in line with the planning permission identified above.

6.1.34 However, the Council considers there is no case for the site used for this activity being included within an extended Freightmaster Estate boundary through the Local Plan process.

6.1.35 In this regard, it is also noted that as stated at the Examination hearing, the consultation response to the Regulation 19 stage consultation from the Mayor of
London does not seek any adjustment to the boundary of the Freightmaster SIL site to encompass any part of the Veolia site. Neither does the latest draft London Plan make provision for adjusting the existing SIL boundary to encompass the composting operation with the Freightmaster Estate.

6.1.36 The constituent ELWA boroughs are in the initial stages of bringing forward a review of the Joint Waste Plan alongside their respective local plan work. The programme for this is still to be finalised but it is envisaged that a new Waste Plan can be prepared and adopted within the extended period for operations continuing at the Veolia facility (including composting). The new Plan will be able to identify any necessary composting capacity / sites.

6.2 By not allocating sites for waste uses in local plan will this impact on Joint Waste DPD?
6.2.1 The Council considers that it is not necessary for the Local Plan to allocate sites for waste management in the Local Plan when regard is given to the modest facilities identified in Schedule 2 of the Joint Waste Plan and the existing provision identified above at the Veolia site.

6.3 Policy 19- PM83- Where in London Plan is the reference to the Port of London Authority

6.3.1 The reference to the port of London Authority can be found in paragraph 7.77 on p328 of the London Plan (2016);

“the location and availability of capacity at comparable alternative wharves, having regard to current and projected Port of London and wharf capacity and market demands.”

6.4 Policy 19- PM 84- 9.14 wording where in London Plan can this be found?

6.4.1 The wording that was required to be checked was the proposed policy modification;

“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.”

6.4.2 Whilst the London Plan (2016) does not explicitly state the text in the proposed policy modification reference is made to the importance of managing industrial capacity in policy 2.7A (i) where reference is made to 'managing and improving the stock of industrial capacity to meet both strategic and local needs…….' Additionally, Policy 4.4 Managing Industrial Land and Premises refers in criteria (b) to the need for boroughs to 'plan, monitor and manage release of surplus industrial land ………so that it can contribute to strategic and local planning objectives, especially those to provide more housing…….'
6.4.3 The London Plan (2016) also states the importance of Increasing Housing Supply and exploring all opportunities to deliver housing in (Policy 3.3);

“LDF preparation

(E) Boroughs should identify and seek to enable additional development capacity to be brought forward to supplement these targets having regard to the other policies of this Plan and in particular the potential to realise brownfield housing capacity through the spatial structure it provides including:

(d) mixed use redevelopment, especially of surplus commercial capacity and surplus public land, and particularly that with good transport accessibility." (p99)

6.5 Policy 21- Provide evidence/reference from current London Plan on affordable workspace.

6.5.1 The London Plan (2016) Policy 2.7: Outer London Economy states that;

“The Mayor will, and boroughs and other stakeholders should, seek to address constraints and opportunities in the economic growth of outer London so that it can rise above its long term economic trends by: managing and improving the stock of industrial capacity to meet both strategic and local needs, including those of small and medium sized enterprises (SMEs), start- ups and businesses requiring more affordable workspace including flexible, hybrid office/industrial premises.” (p52)

6.5.2 The supporting text in paragraph 2.34 of the London Plan also supports the development of affordable workspace;

“Supporting growth in either category will require a strategic approach to office and retail provision in outer London, consolidating its strengths by releasing surplus capacity and enabling additional development in competitive locations for growth. It will also be important to consider the particular needs of new and developing sectors many of the ‘knowledge-based’ sectors can start out and grow through home working, and may need innovative approaches to ensuring the ready availability of information and communications technology. These could range from greater business support through local libraries to bespoke town centre business centres to larger facilities such as innovation parks. Boroughs should support flexible B1 business use of existing buildings and new forms of development to meet the needs of occupiers who require different types of affordable workspace. The Economic Development Strategy sets out the GLA Group’s broader approach to supporting innovation.”(p54)

Matter 7 Towns and Communities

7.1 Policy 13- Need to provide further evidence that retail development needs can be met in existing town centre foot print.

Please see separate paper Supplementary Retail Note December 2018.
7.2 Policy 13- Need to provide the evidence to compare the vacancy rates with other areas in London. Need further justification for the proposed lower threshold for impact assessments (locally set threshold justification)

Please see separate paper Supplementary Retail Note December 2018.

Matter 8 Connections

8.1 Policy 24 Parking standards - If the inspector finds that that the plan is not sound in relation to this issue, is there any middle ground which can be met that will satisfy the requirements of both TfL and LBH?

How would Council modify the policy to make it sound?

Meetings have been arranged with Transport for London. A meeting held in December 2018 and further meetings are being held in January 2019. Further work to be undertaken.

Matter 9 High Quality Places

9.1 All actions for this matter were modifications and can be found in the modifications document.

Matter 10 Green Places

10.1 Policy 31-32 cross reference to changes to wording with EA responses. Are there any outstanding issues from EA response which have not been incorporated into the Plan?

10.1.1 The Environment Agency (EA) in their REG 19 response found Policy 31 sound but made some recommend suggested amendments. Where relevant these have been suggested as proposed modifications to the Local Plan submission document. They can be found on pages 86- 89 of LBHLP.1.2 - Submission Local Plan with Proposed Amendments (tracked changes) document.

a) “LBH are encouraged to include the River Mardyke in Section 12.3.2 of the supporting text.”

10.1.2 This addition has been made to paragraph 12.3.2.

b) “We recommend that clarification is given on what is considered to be within ‘close proximity’."

10.1.3 Further clarification has been added to paragraph 12.3.2;

“For the implementation of this policy, any development within 20 metres of a main river is considered in close proximity.”
c) “Amended wording: To protect and enhance the biodiversity and amenity value of river corridors while accommodating future adaptations to flood defences, the Council will require development to be set back by 8 metres from main rivers, ordinary watercourses and other flood assets, and 16 metres from tidal rivers or defence structures, including underground tie rods and anchors.”

10.1.4 The additional text of “including underground tie rods and anchors.” has been added to the 3rd paragraph in Policy 31.

d) Amended wording – para 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 and the Council to obtain advice on necessary improvement measures, integrating improvements to flood defences in the design of development and creating an attractive riverside’.

10.1.5 The additional text and fluvial has been added to the text in paragraph 12.3.5

10.1.6 The only suggested policy modification that has not been included is:

e) Tall buildings must be sufficiently set back so as to not over shade the river channel.

10.1.7 The EA in their REG 19 response found Policy 32 sound but suggested the following text for consideration;

“The Environmental Permitting Regulations 2010 make it an offence to cause or knowingly permit an activity that will result in the input of pollutants to surface water or groundwater, unless authorised to do so by an environmental permit. Developers should refer to https://www.gov.uk/topic/environmental-management/environmental-permits for further guidance.”

10.1.8 The following modification has been proposed in paragraph 12.4.9 ;

“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 (13) and seek advice from the Environment Agency at an early stage.”

10.1.9 Footnote 13 references the website.

10.1.10 There are no outstanding issues with either policy 31 or 32.

10.2 Policy 35 – check consistency with London Plan

10.2.1 Policy 35 relates to the need to provide adequate waste collection facilities on new developments and maximise reuse or recycling of waste.
10.2.2 The London Plan (2016) does not have a specific Policy relating to on-site waste management but does make reference to waste collection throughout the Plan.

10.2.3 Policy 5.3 Sustainable design and construction (p183) promotes:

“(e) Minimising the generation of waste and maximising reuse or recycling”

10.2.4 This is accordance with the principles of Policy 35.

10.2.5 Paragraph 12.7.1 of the Havering Local Plan submission document states that:

“The Council follows the waste hierarchy approach and is committed firstly to minimising the production of waste (waste prevention) and then maximising the re-use and recycling or composting of waste and minimising the use of landfill with disposal seen as the final option.” (LBHL.P.1.2 - Submission Local Plan with Proposed Amendments - tracked changes p17)

10.2.6 This is in accordance with Chapter 5 of the London Plan- London Response to Climate Change waste section at paragraph 5.65;

“The Mayor is committed to a policy framework for waste management which starts from the position the best approach are to reduce the amount of waste that arises in the first place. Where this is not possible, he supports an approach based on the waste hierarchy that emphasises re-use, and then recycling and composting, before energy recovery and disposal.” (p205)

10.2.7 Policy 35 is therefore consistent with the approach in the London Plan.

**Matter 11 Minerals**

11.1 All actions for this matter were proposed modifications and can be found in the modifications document.

**Matter 12: Infrastructure, implementation and monitoring**

12.1 Implementation - provide details that infrastructure will be taken forward and funded and if did not get funded could development still go ahead (eg Rainham creek bridge) this is part of information required for Matter 3)

**Background**

12.1.1 In line with the National Planning Policy Framework, the Council has recognised the importance of the provision of infrastructure to support development envisaged in the Havering Local Plan.

12.1.2 The Council has recognised that the implementation of the Havering Local Plan (Local Plan) will:

• place demands on existing infrastructure; and
require the provision of new infrastructure.

12.1.3 The likely impacts of the proposed scale and distribution of development on different aspects of infrastructure have been considered to inform and support the Havering Local Plan. The Havering Infrastructure Delivery Plan 2018 (reference: LBHLP.31) has been prepared to support the Havering Local Plan. It identifies the infrastructure necessary to deliver the Council’s ‘Vision’ and to ensure that residents and businesses in Havering have the necessary infrastructure.

12.1.4 The Local Plan and the Infrastructure Delivery Plan (IDP) will, in tandem, help ensure the timely and effective delivery of infrastructure to meet the needs of growing communities and businesses and to protect and enhance the borough.

12.1.5 The Council has sought to ensure that the Local Plan is a short, concise and focussed document that concentrates on setting out Havering’s planning policies. Alongside this, the IDP document has a key role because it comprehensively identifies:

- The types of additional infrastructure which will be needed over the fifteen year plan period
- The funding sources which may be available for this infrastructure
- The agencies and stakeholders that will be involved in infrastructure provision and delivery.

12.1.6 The IDP also supports the Havering Community Infrastructure Levy which has recently been submitted for independent Examination. The Havering CIL will be an important tool in enabling the Council to ensure that growth and change in the Local Plan is supported by the timely provision of infrastructure.

12.1.7 This will encompass much more than CIL simply securing funding towards the cost of infrastructure. The Council intends for the implementation of Havering’s CIL to be a means to provide a clear framework for the Council to highlight its approach to infrastructure including setting out its priorities and securing the infrastructure. CIL will be a tool to enable stakeholders involved in infrastructure to understand and deliver the infrastructure needed in the borough.

**How the Local Plan identifies the infrastructure needed in Havering**

12.1.8 The specific infrastructure required to support the Local Plan is set out in detail in the IDP in narrative form in Section 6: Future Infrastructure Requirements in Havering and in Section 7: Future Infrastructure Items and Costs (including in Table 7.2).

12.1.9 At a time when funding for infrastructure is constrained, the Council recognises that making sure existing infrastructure is retained and is ‘fit for purpose’ will be an important part of the delivery of the Local Plan.

12.1.10 Therefore, as well as making provision for new infrastructure, the Havering Local Plan will safeguard the provision of a wide range of infrastructure types such as community facilities, leisure and recreation facilities.
12.1.11 The IDP has been prepared to align with the overall period of the Local Plan, but it highlights those elements of infrastructure needed for the first five years of the Local Plan. This is to ensure that growth and change linked to the Local Plan’s early period is properly supported by infrastructure. It will assist in ensuring that development identified to come forward in years 5-10 of the Local Plan period is supported by infrastructure that is already in place or being delivered.

12.1.12 Infrastructure is highlighted clearly in the key elements of the spatial strategy in Section 5 of the Local Plan where there are specific sections on social and transport infrastructure. Subsequently, a number of Local Plan policies highlight infrastructure requirements:

- Policies 1 and 2 for the Strategic Development Areas
- Policies 16-18 (inclusive) for social infrastructure, education and open spaces, respectively
- Policy 23 Connections for transport- themed infrastructure

**Funding streams for infrastructure to support the Local Plan**

12.1.13 Ensuring that Havering is well provided for in terms of infrastructure will encourage families to settle in Havering. It will also help ensure that it is a place where businesses wish to invest.

12.1.14 The indicative overall costs for infrastructure necessary to support the Local Plan are set out in Table ES1 of the IDP - Estimated Total Cost of Identified Infrastructure Requirements and reproduced below:

<table>
<thead>
<tr>
<th>Infrastructure Sector</th>
<th>Total Cost (£m)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Education</td>
<td>218</td>
</tr>
<tr>
<td>Transport</td>
<td>115</td>
</tr>
<tr>
<td>Health</td>
<td>78</td>
</tr>
<tr>
<td>Culture and Community</td>
<td>32</td>
</tr>
<tr>
<td>Green Infrastructure</td>
<td>48</td>
</tr>
<tr>
<td>Recreation and leisure</td>
<td>63</td>
</tr>
<tr>
<td>Urban regeneration</td>
<td>20</td>
</tr>
<tr>
<td>Others</td>
<td>4</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>578</strong></td>
</tr>
</tbody>
</table>

12.1.15 The Council acknowledges that there is a wide range of potential funding sources for the provision of infrastructure. The role, and relative contribution, of these sources will vary through time according to national economic circumstances, government policy and as new mechanisms are introduced and others phased out.

12.1.16 The Council also acknowledges that there is likely to be further potential volatility and uncertainty in funding for infrastructure as the Local Plan is implemented. The Council also recognises that the significant cuts to public finance and expenditure will create a challenging setting for infrastructure providers who are
highly dependent on the ‘public purse’. Notwithstanding this, it has every intention through the Local Plan of making sure there is a good ‘fit’ between infrastructure and development.

12.1.17 The Council recognises that the provision of infrastructure will encompass several stakeholders and collating a number of funding ‘pots’. This may make it challenging for timely infrastructure provision to be secured. There may be instances where adjustment of priorities or phasing of development must be explored to militate against this.

12.1.18 The Council will, where necessary, combine funding ‘streams’ to assist in the provision of infrastructure especially where this provides greater certainty over delivery.

12.1.19 Table 7.2 of the IDP identifies (in its final column) that whilst some infrastructure will be funded by a sole provider (such as Transport for London), other programmes and projects will be secured through a combination of several funding ‘streams’.

12.1.20 The Council considers that this approach can be beneficial where it reduces the ‘burden’ on a single funding source. It is recognised that this approach can take longer to ‘set up’. It may prolong delivery times and add emphasis to the importance of a co-ordinated approach to infrastructure provision.

12.1.21 Table 7.2 of the IDP illustrates that to secure and optimise infrastructure funding contributions will be sought from stakeholders such as:

- Central Government
- Mayor of London (through Greater London Authority and Transport for London programmes and projects)
- Developer contributions (including planning obligations and Havering’s CIL)
- LB Havering capital funding
- Direct charges (such as utilities)
- Lotteries and charities (particularly for environmentally based infrastructure)

**How infrastructure to support the Local Plan will be secured through other strategies and specific proposals**

12.1.22 The Local Plan identifies several other planning and regeneration strategies and initiatives that are being progressed in Havering alongside the preparation of the Local Plan. They will support and complement the implementation of the Local Plan. Some of these will secure the Council’s ‘Vision’ and bring forward necessary infrastructure.

12.1.23 The Local Plan highlights the designation of two Housing Zones in Havering in Romford and Rainham and Beam Park to ensure that development in these areas is supported by a range of planning and financial measures that will help secure necessary infrastructure.

12.1.24 Havering’s Housing Zone programmes are to be funded by a combination of local authority funding, GLA funding (in the form of direct and recoverable grant, and external funding.
12.1.25 Development in the Housing Zones in Havering will benefit particularly from finance linked to their delivery being used to secure physical infrastructure in advance of, or parallel to, developments.

12.1.26 This will enable the Housing Zones to become the focus of each of the Strategic Development Areas in Romford and Rainham and Beam Park. Paragraph 3 of the Executive Summary of the IDP notes that: ‘HZ funding will be used to predominately to deliver physical infrastructure in advance or in parallel to developments which will significantly improve 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 is one of only a few London Boroughs with funding secured for more than one Housing Zone. It is understood that this reflects recognition by the former Mayor of London of the opportunities in Havering and the positive approach taken to delivery of the initial Housing Zone allocation for Rainham and Beam Park.

12.1.27 Section 3 of the IDP deals specifically with how infrastructure will be funded having regard to the sources identified in paragraph 1.22 above.

21.1.28 A specific section of text (paragraphs 3.5 – 3.14 highlights the role of funding secured from the Mayor of London. Within these paragraphs 3.5 – 3.11 (inclusive) provide extensive detail on the funding to be secured for infrastructure through the Housing Zones programme(s). Paragraphs 3.9 and 3.10 identify that the funding from the Mayor of London for the Rainham and Beam Park and Romford Housing Zones is scheduled to be circa £31m and £35m, respectively. The former includes circa £9m for the Beam Park station which will be at the heart of the Rainham and Beam Park Strategic Development Area.

12.1.29 Furthermore, because the Council has entered into Joint Venture partnerships in each of the Housing Zones, it has increased confidence that development will be delivered and that it will be accompanied by the infrastructure necessary to complement and support this.

12.1.30 As identified previously, the key elements of social and transport infrastructure needed to support the Local Plan are set out in the Local Plan in the key features ‘box’ of Section 5 Borough-wide Strategy for Growth.

12.1.31 In regard to education facilities for Romford it highlights delivery of a new early years and schools expansion programme. They are also addressed in Policy 1 Romford Strategic Development Area under the heading Social Infrastructure.

12.1.32 The Council’s Joint Venture scheme for the redevelopment of Bridge Close will assist it in securing the necessary school provision on this important site.

12.1.33 In the case of the Rainham and Beam Park Strategic Development Area (Policy 3), the Council is intending to secure the infrastructure necessary for this key site through its development management of proposals for the Beam Park site with the respective developers (in this case Countryside Properties PLC and L&Q Housing).
12.1.34 A comprehensive scheme for the redevelopment of the 32 hectare Beam Park site (encompassing land in LBs Havering and Barking and Dagenham) has been approved subject to legal agreements being completed. It is currently expected that that legal agreements will be completed before the end of the year and the planning permission will be issued. It is understood that in anticipation of this, the developer has erected a ‘show-home’ and marketing suite at the site and is commencing other preliminary works to support the development of the site.

12.1.35 The Beam Park scheme provides for a total of 2,900 new homes across the overall site. The scheme brings forward the delivery of specific infrastructure items through various means:

- as components which are integral to it (such as the new station at Beam Park)
- the developer committing to parts of the site being used for specific facilities (such as the school and health provision)
- through funding to enable the provision of necessary infrastructure improvements within the scheme and beyond it

12.1.36 In summary, the developers are required to provide the following infrastructure related items:

- A site for a school and nursery (0.8 hectares / 3 form entry primary school). The playing fields / sports facilities of the school will be available to the wider community on a dual-use basis.
- Provision and lease of a healthcare facility (not less than 1,500sqm). This facility reflects close co-operation with the Clinical Commissioning Group and will enable the CCG to co-locate a range of health and social care facilities / multi-disciplinary medical and support teams in a single building.
- Provision and lease of a multi faith place of worship / community facility (minimum of 800sqm) within LB Barking and Dagenham
- Provision to ‘shell and core’ of a new railway station at Beam Park on the C2C (London Fenchurch Street – Tilbury-Southend railway line to open in 2020
- Provision and management of open space

12.1.37 Additionally, the developers for the Beam Park proposal are required to make financial contributions for the following infrastructure themed items:

- Mayoral CIL contribution (£1.1m)
- Education contribution for secondary and 16+ education places (£1.8m)
- Public transport mitigation measures including provision for bus services to respond to growing demand as development progresses (£2.7m)
- Sport and recreation to provide for a full sized ‘3G’ pitch in the nearby vicinity of the development (£0.12m)
- Support the delivery of the Beam Parkway ‘Liveable Neighbourhoods’ transformation scheme (£0.56m)
- Planning, implementation and costs of highways improvements (encompassing bus facilities and a traffic light controlled junction) adjoining the site
- Air quality monitoring station installation on the A1306 (£0.12m)
• Implementation of new controlled parking zones within the site and to the north of it (including contribution towards costs for residents) (£0.12m)

12.1.38 The Council is confident that some infrastructure improvements and / or provision that will support growth and change in Havering will occur because it is linked to the current and planned programmes and projects of other important stakeholders. In several instances, these are long established initiatives that happen outside of the Local Plan process and are not dependent upon it. Nevertheless, the delivery of the Local Plan and the development it brings forward will benefit significantly from the delivery of these initiatives.

12.1.39 For example, Havering will benefit from the arrival of Crossrail / Elizabeth line rail services from 2020 onwards and this will improve accessibility to / from Havering.

12.1.40 As a result of Crossrail, Havering will benefit also from the linked infrastructure investment that the Government and Mayor of London are making to the Crossrail stations and in their adjoining areas through measures such as the Crossrail Complementary Measures package of public realm improvements. Within Havering this will encompass remodelling of the public areas of the stations (Romford, Harold Wood and Gidea Park) and public realm works to better integrate the stations into their environs. The delivery of the Complementary Measures programme in Havering is currently underway.

12.1.41 The Council has strongly supported the Mayor of London through his Major Schemes programme (now branded as ‘Liveable Neighbourhoods’). These are funded by the Mayor of London alongside his Local Implementation Plan funding ‘stream’ with the intention of bring about ‘transformational change’ in public realm and transport and movements.

12.1.42 Extensive parts of the centres of Romford, Hornchurch and Rainham have already benefitted from these Mayoral funding programmes in the last few years.

12.1.43 In Romford, this work has encompassed public realm schemes for Western Road, Victoria Road, South Street and The Battis (the pedestrian link between South Street and Waterloo Road). In Hornchurch, this work has encompassed extensive areas of the High Street in the centre of the town. In Rainham, this has encompassed areas focussed on the High Street.

12.1.44 The Local Plan recognises that further significant Mayoral investment is planned for the A1306 Beam Parkway scheme and public realm improvements in Romford Town Centre. Again, these are infrastructure improvements being recognised by the Local Plan and the IDP but which are not dependent upon it for their delivery. As with the Crossrail initiatives (above), this provides the Council with a high level of confidence that they should be delivered and will support and complement nearby development.

12.1.45 Havering receives some £3m per year funding from the Mayor of London for a range of other transport projects and programmes (as identified in Table 7.2 of the IDP). This enables it to deliver a wide range of transport improvements and
undertake feasibility studies into longer term projects. The latter includes scoping work for projects such as the Rainham Creek Bridge and the strategic transport projects identified in the IDP such as feasibility work on improved north-south connections and remodelling the Gallows Corner interchange.

12.1.46 Importantly, alongside these initiatives, the Council remains committed to investing its own funding in securing and delivering infrastructure improvements to support the community in Havering.

12.1.47 The Council’s ‘Ambitions’ regeneration programme in Harold Hill saw the provision of a ‘learning village’ and investment in improved leisure and community facilities at the Central Park leisure centre and the adjoining ‘Myplace’ youth and community facility. The Central Park leisure centre has recently been complemented by a £1m extension to provide a larger gym facility.

12.1.48 In early 2017, the Council opened a new sports facility at Noak Hill in Harold Hill on the site of a former school. The Sports Centre includes a full size artificial 3G pitch, grass football pitches, four outdoor tennis courts, netball courts, group exercise studio and a sports hall.

12.1.49 Table 7.2 of the IDP identifies the provision of a new leisure facility in Romford and the Sapphire leisure centre opened earlier this year following significant investment by the Council (circa £28m). The Sapphire centre is an iconic and innovative facility in the heart of Romford with convenient access to / from public transport services. It provides a 25m swimming pool with moveable floor (8 lanes), a learner pool, 100+ station gym, 2 exercise studios, sauna and steam facilities and a full size ice rink. The facility is supported by a full range of ancillary features including refreshments facilities. The site of the centre is constrained by adjoining development and many design features of the building are innovative including the ice rink being located on the third floor.

12.1.50 Work has recently begun on the provision of a new sports and leisure centre in Hornchurch which will replace the existing Hornchurch Sports Centre when completed in 2021. The new facility represents a £23m investment by the Council. When finished it will include a 25m swimming pool (8 lanes), 20m learner pool (with diving facilities), 100+ station gym, 3 exercise studios and ancillary facilities including refreshment facilities.

12.1.51 Table 7.2 identifies the Bretons Outdoor Sports Centre in Hornchurch. The Council is undertaking feasibility work to enhance and broaden the provision of facilities at the site and to secure the long term future of the listed buildings and structures. The proposals are likely to include the introduction of uses that will complement the heritage importance of the site and secure the future of the heritage assets, expanded outdoor sports use (comprising pitches, angling and triathlon) and provision of a creative ‘hub’ for arts activities.

12.1.52 The Council is currently consulting on its financial budget proposals for the next three years and this includes a significant increase in funding proposed to be allocated to highways improvements and maintenance (£30m over the three year period).
The priority infrastructure needed for the Local Plan

12.1.53 The explanatory text in Section 6 of the IDP recognises that some infrastructure items will have a 'particularly high priority and should be provided within the first five years of the plan'.

12.1.54 The recognition of the importance of delivery in the first five years of the plan period is consistent with the advice from the Planning Inspectorate in 2009 in 'Local Development Frameworks: Examining Development Plan Documents: Learning from Experience.'

12.1.55 The prioritisation identified in the IDP is consistent with the intended spatial pattern of development in Havering. It recognises the importance of infrastructure to make development sustainable.

12.1.56 The IDP says that 'these comprise infrastructure required to make up existing deficiencies in provision together with infrastructure needed to allow early development to proceed. The latter relates mainly to areas designated in the Local Plan as locations for substantial growth in the early phases of the Plan.'

12.1.57 The IDP recognises ‘priority infrastructure as:
- Infrastructure that would be needed regardless of additional development, i.e. to make up existing deficiencies in provision; and
- Critical infrastructure needed to allow early development to proceed, without which it might be unacceptable for development and occupation to take place. This relates mainly to areas designated in the Local Plan as locations for substantial growth in the early phases of the Plan, especially the Rainham and Beam Park and the Romford SDAs, each of which is expected to deliver over 4,000 new dwellings.

12.1.58 Paragraphs 6.5 – 6.125 of the IDP clearly sets out the priority infrastructure needed for the two Strategic Development Areas and for the rest of Havering. Table 7.2 of the IDP identifies the main infrastructure projects in support of the Local Plan and the tables that follow are derived from this.

12.1.59 The tables (below) identify the:
- priority infrastructure for the Strategic Development Areas
- funding and delivery mechanisms for these
- the key agencies involved in delivery

### Priority infrastructure for Romford

<table>
<thead>
<tr>
<th>Type of infrastructure</th>
<th>Funding source(s)</th>
<th>Delivery agency and mechanism(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Crossrail services for Romford</td>
<td>Government and Mayor of London (TfL)</td>
<td>TfL</td>
</tr>
<tr>
<td>Romford Station</td>
<td>Mayor of London (TfL)</td>
<td>TfL and LBH</td>
</tr>
<tr>
<td>Improvements linked to Crossrail (including Complementary Measures and southern entrance)</td>
<td>Mayor of London / ‘Liveable Neighbourhoods’ scheme funding</td>
<td>TfL and LBH (through ‘Liveable Neighbourhoods’ scheme)</td>
</tr>
<tr>
<td>Better east – west links and improved accessibility into Romford Town Centre</td>
<td>Mayor of London / ‘Liveable Neighbourhoods’ scheme funding</td>
<td>TfL and LBH (through ‘Liveable Neighbourhoods’ scheme)</td>
</tr>
<tr>
<td>Improved permeability of Ring Road</td>
<td>Mayor of London / ‘Liveable Neighbourhoods’ scheme funding</td>
<td>TfL and LBH (through ‘Liveable Neighbourhoods’ scheme)</td>
</tr>
<tr>
<td>Romford Market and Town Centre Public Realm improvements</td>
<td>Mayor of London / ‘Liveable Neighbourhoods’ scheme funding</td>
<td>TfL and LBH (through ‘Liveable Neighbourhoods’ scheme)</td>
</tr>
<tr>
<td>New and expanded primary and secondary schools</td>
<td>Department for Education / LBH and developer contributions</td>
<td>TBC</td>
</tr>
<tr>
<td>New primary and community care hub in Romford Town Centre</td>
<td>NHS England</td>
<td>CCG and LBH / Joint Venture (TBC)</td>
</tr>
</tbody>
</table>

**Priority infrastructure for Rainham and Beam Park**

<table>
<thead>
<tr>
<th>Type of infrastructure</th>
<th>Funding source(s)</th>
<th>Delivery agency and mechanism(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>New Beam Park station</td>
<td>Mayor of London (TfL and GLA Housing Zone) and developer contributions</td>
<td>TfL and LBH</td>
</tr>
<tr>
<td>Beam Parkway improvements and improved connectivity within London Riverside</td>
<td>Mayor of London ‘Liveable Neighbourhood scheme funding / developer contributions</td>
<td>TfL and LBH through ‘Liveable Neighbourhoods’ scheme</td>
</tr>
<tr>
<td>New and expanded primary and secondary schools</td>
<td>Department for Education / developer contributions</td>
<td>LBH</td>
</tr>
</tbody>
</table>
Primary care facilities in Rainham and Beam Park | Developer contributions / CCG |
Utilities |
Flood protection |

**Priority schemes elsewhere in Havering**

<table>
<thead>
<tr>
<th>Type of infrastructure</th>
<th>Funding source(s)</th>
<th>Delivery agency and mechanism(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Improvements at Harold Wood and Gidea Park stations linked to Crossrail</td>
<td>Mayor of London (TfL)</td>
<td>TfL and LBH</td>
</tr>
<tr>
<td>Improvements and maintenance to highway structures and movement network(s)</td>
<td>Mayor of London (TfL) / Havering</td>
<td>TfL and LBH</td>
</tr>
<tr>
<td>New and expanded primary schools in Harold Hill and South Hornchurch and Secondary schools in Central Area</td>
<td>Department for Education / Havering and developer contributions</td>
<td>LBH</td>
</tr>
<tr>
<td>New primary care hub in Heaton ward</td>
<td>NHS England /</td>
<td>CCG</td>
</tr>
<tr>
<td>Feasibility studies into strategic transport improvements / interventions</td>
<td>TfL</td>
<td>TfL and LBH</td>
</tr>
</tbody>
</table>

12.1.60 The earlier sections of this response have highlighted that significant infrastructure provision and improvement for Havering will be brought forward alongside the delivery of the Local Plan through the implementation of other important strategies and initiatives. The funding and delivery columns of the tables above confirm the role of other agencies in funding and delivering priority infrastructure. The Council consider that this affords it and other stakeholders with a reasonable degree of confidence that the priority infrastructure identified as necessary to support the Local Plan will be delivered concurrent with the Local Plan.
12.1.61 The remainder of the infrastructure in Table 7.2 that is not is earmarked as ‘priority’ is assigned to be delivered in specific 5 year periods (2016-2021, 2012-2026 and 2026-2031).

12.1.62 Not all this infrastructure is essential for the Local Plan to be delivered. Some of it encompasses improvements / maintenance to existing facilities or is relatively minor in scale.

12.1.63 Some infrastructure will depend on funding from organisations who will find it challenging to allocate funding during prolonged periods of considerable economic uncertainty. It is recognised that some items may need to be deferred in the event of funding constraints or other matters arising. In these circumstances, the Council acknowledges that it may need to further re-assess infrastructure priorities and its phasing of delivery.

12.1.64 The IDP is intended to be a dynamic document and will be monitored and reviewed on a regular basis. It is likely that as a result of this, infrastructure items may need to be added to the IDP and / or amended. The annual Authority Monitoring Report will identify progress on securing and delivering infrastructure.

12.1.65 The Council has made clear in the Local Plan, and through its comments at the Examination hearings, that it envisages that it will bring forward an early review of the Local Plan. In addition to considering planning policies of the Local Plan, the Council intends that this will provide an opportunity to re-assess the relationship between infrastructure, development and the Local Plan and to ensure that there is a good ‘fit’ between them. In recognition of the importance of timely and effective infrastructure provision, the Council will take into account progress on infrastructure delivery in considering a review of the Local Plan.

Ensuring infrastructure is brought forward and delivered

12.1.66 The Local Plan will be a strategic context for the delivery of infrastructure. The Council will use it and its supporting documents to promote and secure the timely and effective delivery of infrastructure by continuing to work collaboratively with other stakeholders who have a key role in facilitating growth and change in Havering.

12.1.67 This has been evidenced by the wide range of project delivered by working successfully in partnership with the Mayor of London including the on-going delivery of the two Housing Zones and transformational schemes and projects secured through Major Schemes and Liveable Neighbourhoods funding. The considerable infrastructure ‘benefits’ being secured through the Beam Park planning application demonstrate the Council’s commitment to working with parties such as the Clinical Commissioning Group to secure up to date and fit for purpose medical facilities to support existing and planned communities.

12.1.68 The Council will continue to work closely with stakeholders responsible for infrastructure such as the Mayor of London, adjoining boroughs, the Clinical Commissioning Group and NHS Commissioning Board on infrastructure matters.
where the Local Plan (and the supporting IDP) identifies that particular infrastructure is required.

12.1.69 The Council will use the Local Plan, and the IDP, to highlight the importance of infrastructure in the preparation of further planning policy and guidance documents such as the forthcoming Masterplans for Romford Town Centre and, in due course, Rainham and Beam Park.

12.1.70 The Council will continue to utilise the delivery of important programmes such as the Housing Zones and Twelve Estates regeneration programme to ensure that they are accompanied by the provision of necessary and timely infrastructure needed to support them.

12.1.71 As has been evidenced with Beam Park, the Council will also continue to ensure that infrastructure is taken into account and secured through the delivery of its development management role when discussing potential schemes with developers and then dealing with planning applications.

12.1.72 From its planned adoption in 2019, the Havering Community Infrastructure Levy (CIL) will provide the scope for the Council and its partners to develop improved mechanisms for infrastructure planning and delivery.

12.1.73 It is anticipated that in delivering its CIL, the Council will develop new mechanisms and processes to consider infrastructure and the administration of CIL funding. This will assist in making clear to stakeholders the relative priorities for infrastructure and how they will enable the Local Plan to be delivered.

12.1.74 The Council is currently implementing remodelling of its planning service and this will include a dedicated team of staff involved in infrastructure planning and delivery and monitoring. It will be important for this team to work alongside and inform planning policy preparation.

The role of other agencies and organisations in infrastructure provision
12.1.75 Other agencies have strongly supported the preparation of the IDP to help establish the infrastructure requirements of Havering over the plan period. The IDP recognises that a large number of agencies will be involved in infrastructure provision over the plan period.

12.1.76 The IDP recognises that if the required infrastructure is to be available to serve new developments as and when they come on stream, then there will need to be substantial collaboration between agencies to ensure their individual plans and programmes are designed and funded to bring this about.

12.1.77 The Council will have a key role in this. The Council will seek to ensure effective and timely delivery of infrastructure to support the Havering Local Plan by such measures as:
  • seeking to optimise the planning processes of the agencies involved in infrastructure
  • collaborative working with neighbouring agencies and authorities
- transforming delivery mechanisms of agencies involved in infrastructure provision
- Exploring scope for co-location opportunities of services or the use of shared facilities.

12.1.78 The Council will encourage dialogue between developers and infrastructure providers to ensure that necessary infrastructure is secured at the appropriate time to support Havering’s growth and to provide the facilities to support communities in Havering.

12.1.79 The Council is confident that with the support of the relevant infrastructure providers and other stakeholders, its approach to infrastructure provision combining policies to protect existing provision, identification of specific facilities needed in the key growth areas, an embedded ‘live’ IDP (and other complementary strategies and studies) should strike an appropriate balance between securing certainty of provision and a reasonable degree of flexibility.