

Appendix 2 (to the Executive Decision)

Draft letter from the Leader of the Council to :

Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
Post Point 18
Freepost RTJC-XBZZ-GJKZ
London SE1 2AA

March 1 2018

Dear Mayor Khan

London Mayor's draft London Plan – response from the London Borough of Havering

Thank you for consulting Havering on the Mayor of London's draft London Plan.

Havering welcomes the opportunity to comment on this important strategy because it recognises the importance of London having an up to date spatial strategy to provide a context for both plan making and development management.

The significance of the London Plan in terms of its role in underpinning other Mayoral strategies and Mayoral funding programmes (such as the Local Implementation Plan) is clearly understood. It forms another important 'driver' for Havering reviewing and commenting on the draft London Plan.

To that end, as you know, Havering is about to submit its own new Havering Local Plan for the plan period to 2031 aimed at ensuring there are enough new homes in the borough, that they have necessary physical and community infrastructure and that they are well located so as to provide a high quality residential environment for health and well-being and quality of life.

In line with the Council's over-arching 'Vision' statement, we have placed a great deal of importance in preparing the new Local Plan on ensuring that we are maintaining and creating sustainable communities in the borough. We are looking to secure the 'Good Growth' that you identify in your new Plan for Havering.

It is also a basic tenet of the Council's approach to planning in Havering that existing and new developments must be supported by the timely provision of infrastructure particularly facilities linked to transport and movement.

We are confident that we have based our new Local Plan on robust evidence and sound technical processes (for example, the way we have undertaken our assessment of housing need).

Havering's officers preparing the new Local Plan have engaged throughout its preparation with your own staff. We have been encouraged by the positive response(s) we have had and the generally supportive comments from yourself at the most recent stage of consultation (Regulation 19) in August and September last year.

Overview of Havering's comments on the draft London Plan

The principles that underpin our own Local Plan have informed and shaped Havering's comments on the draft London Plan.

Havering supports the concept of 'Good Growth' – planning for growth on the basis of its potential to improve the health and quality of life of all Londoners, to reduce inequalities and to make the city a better place to live, work and visit.

Notwithstanding this, Havering considers that :

- there are fundamental flaws underlying the housing targets in the draft London Plan meaning that they are both unrealistic and unachievable for Havering (and many other London Boroughs). These encompass matters such as how housing 'need' has been identified and the significant contribution towards housing delivery that is expected to come from 'small sites'
- the housing targets will be wholly incompatible with Havering being able to continue to safeguard the borough's open and suburban character and appearance and this will be to the detriment of Havering as a place where people want to live and businesses wish to invest. The provision of new homes in Havering in line with the targets in the draft London Plan will herald very damaging and irreversible change to the character of Havering
- the draft London Plan does not properly recognise nor make provision for the timely and effective delivery of the social and community infrastructure which is a fundamental component necessary to support the growth of sustainable communities and needed to ensure that individuals have health, well-being and a high quality of life
- the draft London Plan fails to recognise that the transport circumstances in Outer London Boroughs like Havering are very different from Central and Inner London. The Mayor of London's approach to matter such as modal shift and car parking provision must recognise that private car use will remain higher than in other parts of London because there is not the public transport infrastructure to support more journeys being made by this mode
- the draft London Plan is flawed because it is based on the provision of important transport infrastructure that is currently unfunded
- the draft London Plan has failed to recognise that key strategic transport infrastructure is necessary in Havering. The Council's response to the draft Mayor's Transport Strategy in autumn 2017 set out very clearly what this is and despite the Council continuing to press for these interventions with the Mayor and his Deputies it is highly disappointing and unsatisfactory that they are absent in the new draft London Plan

Havering's response has been prepared to reflect the Council Motion (January 2018) :

This Council notes with grave concern the proposals contained in the draft London Plan recently published by the Mayor of London which proposes a housing target of 1,875 new homes per annum for Havering over the next ten years, which represents a 60% increase on the figure included in the draft Havering Local Plan (1,170). This Council further considers the target as totally unacceptable, unachievable and unsustainable to the point of changing the unique and open character of our borough for the worse. This Council therefore agrees to recommend to the Executive to respond to the consultation, which ends on 1st March 2018, in the strongest possible terms'.

It also reflects the comments from Havering officers when they attended the London Assembly Housing Committee meeting on January 23 2018 (see below).

Havering's comments focus on the draft London Plan as it will affect Havering rather than on a pan – London basis.

Havering's key comments are set out in **Annexe 1 (attached)**.

They are complemented by further comments linked to the rest of the new London Plan which are set out in the attached schedule (**Annexe 2**).

As background, Havering's recent letter response in autumn 2017 to the draft Mayor's Transport Strategy is also attached (**Annexe 3**). Havering's comments on the transport aspects of the London Plan reflect this earlier response.

A transcript of the Housing Committee session (see above) is attached as **Annexe 4**.

Havering submits both this letter and the annexes nos. 1-4 as its formal response to the draft London Plan. Havering has not submitted a response using the on-line questionnaire.

Havering wishes to be involved in the Examination in Public into the draft London Plan.

Yours faithfully,

Councillor Roger Ramsey

Leader of the Council

Annexe 1 follows

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Draft London Plan (2017) – response from London Borough of Havering

Explanatory note

1. Key comments from the London borough of Havering are set out below. They should be read in conjunction with :
 - the accompanying letter from the Leader of Havering Council; and
 - its linked Annexes 2, 3 and 4 (Schedule of further comments, response to draft Mayor’s Transport strategy and Transcript of London Assembly Housing Committee on January 23 2018, respectively).

How the comments are arranged

2. For convenience, most of the commentary (below) has been assigned to particular chapters and policies in the draft London Plan and ‘headings’ provided to indicate the topics being addressed. (This approach is consistent with the format provided on the on-line response format).

Where necessary, specific policies are identified in **bold**.

Chapter 2 : Spatial development patterns

3. Havering welcomes the maintenance of Opportunity Areas in **Policy SD1 (Opportunity Areas)** and strongly supports the identification of the Havering part of London Riverside within the new **Thames Estuary Opportunity Area North and South** as it continues to deliver the very significant regeneration of this area in close partnership with yourself and your staff and several other important partners such as Network Rail.

Town Centre network

4. Havering is seeking to ensure that Romford remains a focus for businesses and new homes and it welcomes its identification within the Elizabeth Line East Opportunity Area.
5. Havering looks forward to working with the Mayor of London as we seek to deliver 5,300 new homes on key sites such as Waterloo Road, the former Ice Rink site and Bridge Close and realise the exciting opportunities at the Station Gateway site next to Romford Station. Havering is pleased to see its retained identification as a Metropolitan Centre in **Policy SD7 (Town Centre Network)**.

Chapter 3 : Design

6. Havering is very encouraged by the strong focus in the draft London Plan on delivering good design in **Policy D2 (Delivering good design)** as Havering is committed to ensuring that development in Havering is of the highest quality.
7. Given that Havering is an Outer London borough with an established suburban and largely low-rise character, Havering is very concerned that **Policy D8 (Tall buildings)** explicitly identifies a role for tall buildings in helping London to accommodate its expected growth. This is especially in the light of the expectations in the draft London Plan that Outer London will be the focus for a high proportion of the overall growth envisaged across London and the inevitability that this will adversely impact on the established character and appearance of areas like Havering.

8. Havering strongly considers that, as set out in the **Policy D8**, it is essential that a plan-lead approach to dealing with tall buildings is implemented and that the several impacts identified in section C of this policy are addressed in dealing with proposals.
9. Reference should also be made in this policy to large 'bulky' buildings as the use of a large 'foot-print' even when combined with a building of relatively modest height can have a significant adverse impact on townscape. This is especially the case in Outer London such as Havering where the form of buildings is generally much more domestic in scale reflecting their suburban setting.

Chapter 4 : Housing

10. Havering notes the draft London Plan's aspiration to achieve a level of housing supply and delivery that broadly meets London needs in **Policy H1 (Increasing housing supply)**.
11. Based on past performance, Havering considers this will not be achieved. For this reason the ambition of the draft London Plan in regard to the provision of new homes is fundamentally flawed.

The Strategic Housing Market Assessment (SHMA) for the new draft London Plan

12. As identified through its supporting pan-London Strategic Housing Market Assessment (SHMA), **Policy H1 (Increasing housing supply)**, the draft London Plan identifies a need for an additional 66,000 new homes per year across London and seeks to impose an annual target for new homes for Havering of 18,750 over a 10 year period (2019/20 – 2028/29). Havering objects that the draft London Plan seeks to arbitrarily distribute its overall identified 'need' across London without recognising local circumstances.
13. Havering's own 'Vision' recognises the importance of new homes. However, Havering objects to the housing targets set out in **Policy H1**.
14. There are concerns about the population / household and employment projections underpinning the draft London Plan and how these influence the outcome of its very ambitious housing targets by driving these upwards.
15. In short, these concerns include factors such as the choices that people will make about household size and whether they will be able to financially live in London and projected growth being linked to un-funded transport investment. The targets also seek to take account of earlier low house-building rates. There is a focus in the draft London Plan on providing homes for smaller households.
16. Whilst it is welcome that the draft London Plan recognises the importance of boroughs undertaking their own research on housing requirements to complement the London-wide SHMA under-pinning the draft London Plan (**footnote 36 to Policy H1**), it would have been much better for the draft London Plan to be prepared following meaningful prior engagement with boroughs so that the Mayor of London could have been appraised of important local context and this could have been reflected in them.
17. Havering engaged a specialist research consultancy to provide support on housing need for its work in preparing its new Havering Local Plan. Havering engaged Opinion Research Services (ORS) who are an independent social research practice that works with the public, voluntary and private sector. ORS provide specialist advice and intelligence to many other local authorities and have a highly regarded 'track record' in this specialist field including expert witness involvement in planning inquiries.

18. ORS has advised Havering that the draft London Plan overestimates housing 'need' because of the factors that have been taken into account in identifying it.
19. ORS conclude that, in particular, the draft London Plan projects too much household growth and this will 'skew' the apparent need for smaller properties. As a result, the draft London Plan housing policies give an inflated picture of household projections and are an unreliable basis for assessing housing need. As planning policies, they will lack necessary robustness and not meet the tests of 'soundness'.
20. Havering's Strategic Housing Market Assessment (SHMA) was undertaken jointly in 2016/2017 with its neighbours (London Boroughs of Barking and Dagenham, Redbridge and Newham) in line with good practice.
21. It identifies an annual housing need figure for Havering of 1,366 new homes per year over the plan period to 2031. Havering considers that this is a reasonable and robust assessment of housing need for this borough.
22. There was no objection to this part of Havering's Local Plan when the GLA commented upon it in September 2017. The partner boroughs engaged in the sub-regional SHMA with Havering support the work and the outcomes for the respective boroughs.
23. Havering's SHMA also addresses tenure matters and informs very considerably the approach it takes to the provision of market and affordable homes. Havering supplements its housing 'intelligence' derived from its SHMA with other information sources such as the borough's Housing Register and this enables Havering to try and ensure that our housing provision properly matches local needs.
24. For example, Havering's SHMA concludes that Havering requires a greater proportion of family homes (with 3 bedrooms) than the draft London Plan where the focus is on the provision of more 1 and 2 bed units in **Policies H7 and H12 (Affordable housing tenure and Housing size mix, respectively and Table 4.3 SHMA findings)**. It is understood that Havering is typical of several other Outer London boroughs.
25. The London Assembly Housing Committee meeting on January 23 2018 considered the draft London Plan. Annexe 4 is a transcript of the meeting and it will be seen that Assembly Members queried the approach in the draft London Plan to dwelling type and acknowledged the importance of appropriate dwellings being provided to reflect local circumstances in line with Havering's views.

The adverse impact of the housing targets on the established character of Havering

26. Not only will the SHMA in the draft London Plan result in the provision of dwellings that are unsuited to the needs arising in Havering, they will result in forms of development that are out of character with the established suburban context.
27. Havering is concerned that the draft London Plan will deliver inappropriate homes and development. It will discriminate against families and may result in more transient populations and less cohesive and mixed communities. This will be to the detriment of new residents in the new homes as well as the detriment of existing neighbourhoods and communities adjoining them.
28. Havering considers that the housing policies in the draft London Plan have not appraised or taken account of the suburban forms of development and character of Outer London.

29. The draft London Plan completely ignores that most of Havering comprises low – rise semi-detached and terraced properties of modest proportions in reasonably generous and well landscaped plots. This setting will be wholly unsuited to the introduction of taller and more dense building forms on tightly constrained parcels of land.
30. The underlying premise of the draft London Plan to intensification will result in very damaging consequences for Havering and other Outer London boroughs. It will threaten Havering’s remaining older properties, their landscaped and well-treed settings, result in the loss of bio-diversity and flood mitigation, introduce extensive hard surfaces and result in the incremental loss of the established street-scene.
31. Moreover, it is essential that the draft London Plan delivers places where people want to live. Havering is very concerned that the levels of new housing proposed, if they could be secured, will not provide this for their residents.

Annual housing targets for boroughs

32. The target for Havering identified in **Table 4.1** of the draft London Plan (see above), takes account of the 2017 Strategic Housing Land Availability Assessment (SHLAA) to identify capacity for new homes within each borough. Table 4.1 identifies a target for Havering of 18,750 new homes over a 10 year period (and an annualised target of 1,875 new homes per year).
33. This is significantly greater than the current London Plan target for Havering of 1,170 new homes per year.
34. Havering objects because it considers the targets for Havering to be unrealistic and unachievable based on delivery in this borough in recent years. In recent years, net housing completions in Havering have been : 2013/14 : 917 units, 2014/15 : 738 units, 2015/16 : 963 units and 2016/17 : 558 units.
35. The approach in the draft London Plan will result in a high proportion of speculative developments based on sites that would not normally be granted planning permission and this will result in the significant erosion of the character of the borough. As proposed, the targets will result in uncoordinated housing development that is not supported by local infrastructure (existing or planned), that has an adverse environmental impact and is detrimental to local communities and residents.

Accelerating housing delivery

36. **Paragraph 4.1.3** of the draft London Plan acknowledges that it is based on housing delivery doubling compared to current average completion rates and will require not only more homes being approved but a fundamental transformation in both how and where they are delivered.
37. Housing delivery in Havering has been reviewed in the course of preparing its new Local Plan. Havering anticipates that housing delivery will ‘step-up’ in the forthcoming period as proposals (such as those in the Housing Zones and our own twelve estates regeneration programme) are delivered.
38. Havering considers it is extremely doubtful, however, that it will match the proposed levels of delivery set out in Policy H1 of the draft London Plan. Havering strongly considers the targets to be unrealistic and unachievable over the period of the Plan.

- 39. Havering considers that it is more likely, and more realistic, that delivery for the next few years in this borough may be in line with the current London Plan expectations as a result of the greater levels of certainty that is linked to the implementation of the two Housing Zones and the Council's twelves estates regeneration programme.
- 40. Havering strongly considers that simply increasing the number of planning permissions for new homes is unlikely to secure the required outcomes.
- 41. The Mayor must prepare guidance and best practice advice alongside the draft London Plan to show how boroughs may secure improved housing delivery. Havering also notes that paragraph 4.1.3 identifies that to achieve the 'step-change' in housing delivery envisaged in the London Plan will require increased levels of funding albeit without identifying these.

Housing density

- 42. The intention to optimise housing density as part of the approach to increasing housing delivery is noted in **Policy D6 (Optimising housing density)**. Although the supporting text indicates that factors must be taken into account such as infrastructure and public transport and that a design-led approach is required, the policy includes a very clear thrust as to how housing delivery will be increased when it comments in **paragraph 3.6.1** that 'This will mean developing at densities above those of the surrounding area on most sites'.
- 43. It is an important omission that this policy makes no explicit reference to the importance of 'place-making' and schemes being designed to encourage community cohesion and inclusiveness so that residents feel safe, secure and settled.
- 44. These considerations are at the core of Havering's 'Vision' where there are specific themes for 'Places' and 'Communities'. As a result, the draft London Plan is likely to result in incremental additions to housing stock that bear no resemblance to their surroundings nor have any cohesiveness with them. They are highly unlikely to be attractive places to live and are unlikely to create neighbourhoods where residents feel settled and secure.
- 45. Havering considers that the outcome of **Policy D6** may be to introduce unsatisfactory and inappropriate high density schemes which are wholly out of character with existing neighbourhoods in this borough. They may provide unsuitable and unattractive places for new residents and have a poor 'fit' with existing places and communities.
- 46. Havering is also concerned that **Policy D6** is based on too great a reliance on public transport accessibility levels. Like many Outer London boroughs, accessibility levels (as set out in PTALs) may provide a somewhat simplistic picture and mask that beyond transport nodes, the real levels of public transport accessibility are generally low especially in Outer London boroughs like Havering. This reflects that the public transport network in Outer London is much less 'dense' such that journeys by public transport are not as easy to undertake as in Central and Inner London. In particular in Havering, there is marked absence of good quality, high frequency radial routes (essentially north – south) such that journeys by public transport between Romford and Rainham / London Riverside are very inconvenient and protracted. The practical difficulties of travelling between Rainham and Romford were commented upon by a London Assembly Member at the January Housing Committee meeting (see annexe 4 of the Havering response).

Housing supply must be supported by the timely provision of infrastructure

- 47. Havering would have expected the Mayor to take account of work undertaken in the preparation of the London Infrastructure Plan 2050 (2015) to inform the preparation of the draft London Plan.

48. Havering is very concerned that **Policy H1 (Increasing housing supply)** in promoting such high levels of housing delivery should acknowledge the importance that communities across London will place on new homes being properly supported by the timely and effective provision of infrastructure as this is essential for safe, convenient and enjoyable life.
49. The draft London Plan highlights the importance of transport infrastructure being provided (**Chapter 10 : Transport**). However, it should also set out very clearly that new homes must be accompanied by the timely delivery of schools, health facilities, community and social facilities. These will be essential to ensure the creation of settled, cohesive and inclusive communities.
50. Havering undertook the preparation of an Infrastructure Delivery Plan (IDP) to support the delivery of the Havering Local Plan and this clearly identifies the various types of infrastructure necessary for Havering for the plan period to 2031. The infrastructure requirements set out in the Havering IDP and the Local Plan reflect the housing targets in the **current** London Plan (1,170 new homes per year) and considerably more infrastructure will be needed to support the higher levels of growth proposed in the new London Plan.
51. Havering's IDP identified several key strategic transport infrastructure requirements and these are identified (below) in the context of Chapter 10 : Transport.
52. The IDP also looked at social and community infrastructure requirements that will arise over the plan period for the Havering Local Plan. This is because ensuring that new homes are supported by necessary social and community infrastructure is a key concern for our communities across the borough.
53. The provision is set out in full in the IDP. To illustrate the types and level of provision needed, the key elements are :
- a new leisure and sports centre in Romford
 - primary and community health 'hub' in Romford
 - new and expanded primary and secondary schools in Romford
 - primary health centre in Rainham
 - expansion of Havering College in Rainham
 - new and expanded primary and secondary schools in Rainham
 - health 'hubs' in north and central Havering
 - new and expanded primary schools in Harold Hill and South Hornchurch
 - new secondary school in Central Havering
 - new and improved leisure / sports facilities in Hornchurch and Rainham
54. Havering considers that the expectations in the community for the provision of social and community infrastructure linked to the significantly higher targets in the draft London Plan will be even greater. **Policy H1** should be very clear as the high importance of timely and effective infrastructure being provided alongside the new homes that the Mayor of London expects to be delivered.

Inappropriate reliance on small sites to deliver housing

55. The draft London Plan is clear in **Policy H2 (Small Sites)** that these must make a significantly greater contribution to new supply across London. The annual housing target for each borough in the new London Plan includes an element for small sites (0.25 hectares).

56. Boroughs are expected to recognise that the character of their areas will evolve over time and that appropriate locations will have to accommodate new homes. This is a major change from the current London Plan.
57. The draft London Plan has moved away from the 'old' methodology for assessing the potential contribution of small sites. In previous London Plans, the methodology for identifying the contributions that may come forward linked to small sites has been based around historic trends of completions. The draft London Plan is heavily reliant on sites having potential to accommodate more dense forms of development.
58. During the preparation of the draft London Plan, boroughs were not provided with an opportunity to comment on the small sites aspects of the GLA SHLAA in the way that they could for large sites. Instead, the 'small sites' component has been based on assumptions rather than robust evidence from boroughs.
59. Boroughs have had no opportunity to review and analyse the assumptions being made prior to the setting of the targets for small sites and this is unacceptable particularly given the impact that development on these sites will have on boroughs.
60. Closer liaison ahead of the targets being finalised would have provided the opportunity for the small sites element to be derived on a more robust and realistic basis that was better suited to individual boroughs.
61. This is a basic flaw in the procedural and technical aspects of preparing the SHLAA to underpin the draft London Plan.
62. Across London small sites are expected to contribute almost 40% of the projected annual delivery for London as a whole. However, for Havering, almost half its annual borough target comprises homes to be delivered on small sites (some 904 units out of 1,875).
63. This target bears no resemblance to the modest levels of new homes secured on small sites in recent years in Havering where typically the annual delivery has been around 150-160 new units each year.
64. Havering considers that the proposed small sites target for Havering will be missed by a very considerable margin and it will, therefore, be unachievable.
65. As a result, Havering strongly objects to **Policy H2 (Small sites)**. The Mayor should take the opportunity to engage with boroughs before the Examination to redress that boroughs were not properly engaged on this matter in the preparation of the draft London Plan.
66. Because of this flaw, the draft London Plan provides a very misleading picture of what will be achieved with small sites. This is a particular concern for Havering because of the very high level of reliance on delivery from small sites included within its overall target.
67. The requirement in **Policy H2 (Small sites)** that boroughs should afford these sites greater certainty by granting permission in principle is also a cause for concern when regard is given to the matters below.
68. Aside from concern about the 'factual' basis of **Policy H2 (Small sites)**, Havering strongly considers that the outcome from this policy will be unsuitable and inappropriate forms of development on sites that are in close, and inappropriate, proximity to existing dwellings.
69. There is a likelihood that the over-dependence on small sites may 'drive' new housing development to locations where such sites exist or can be assembled. In a large Outer

London Borough like Havering this will be likely to involve as established residential areas with large gardens.

70. As a result development on small sites will jeopardise the character and appearance of settled and established neighbourhoods and be detrimental to character and street-scene. Such sites and schemes will also be remote from other services and facilities that residents need for day to day living such as shops, surgeries and schools and may, therefore, be unsustainable.
71. Havering considers that it is likely that **Policy H2** will result in schemes which have been 'crammed' into their wider setting. The criteria set out in the policy are too broad and will adversely impact on the open character of suburban, low density, locations such as Upminster and Gidea Park.
72. As well as resulting in cramped schemes which erode existing character, it may result in new homes being poorly located relative to important considerations such as jobs, transport facilities and social and community resources.
73. Havering notes the strong support in the draft London Plan for the Green Belt in **Policy G2 (Green Belt)**. This accords with the approach in its own Local Plan. It will be unacceptable if an unintended consequence of a significant reliance on small sites in Outer London boroughs like Havering is to drive developers towards proposing development in the Green Belt because in practice small sites proved unable to meet the ambition of the London Plan.
74. The emphasis on good design in the draft London Plan in **Policy D2 (Delivering good design)** is strongly supported. It is noted that the draft London Plan seeks to mitigate some of the issues around small sites by boroughs preparing area design codes.
75. In practice this overlooks that boroughs are already under considerable pressure in regard to resources for plan-making and that securing and resourcing staff to produce these will be extremely challenging and, as a result, there may be an unintended consequence of creating an adverse impact on 'mainstream' plan preparation. The preparation of such codes may itself be protracted because of community concerns and they may lag behind such developments coming forward and so be out of step with the ambition of the draft London Plan.
76. Furthermore, such sites will be tightly constrained in regard to important matters such as pedestrian and vehicle access. They may therefore result in adverse implications for existing residents such as loss of privacy and overlooking. In Outer London locations like Havering, the development of small sites is also likely to result in additional highway congestion and reductions in air quality at a time when Havering is taking steps to tackle these issues through measures such as its Air Quality Action Plan.

The adequacy of infrastructure to support development on small sites

77. The Mayor's ambition to provide significant numbers of new homes must recognise that it is essential for new and improved infrastructure to be provided alongside these (see comments above).
78. The potential impact of the development of small sites for homes will impact adversely on local social and community infrastructure provision (including its funding).
79. Small incremental increases in local populations linked to the delivery of small sites will make robust infrastructure planning for these communities much more challenging and it

will be difficult for infrastructure providers (such as utility companies) to plan timely and effective provision. The development of small sites will not be a very cost-effective way of providing the infrastructure they require.

80. Havering strongly considers that the approach in the draft London Plan must be to secure a balance between the need for new homes and ensuring that new housing is part of sustainable communities based on ensuring the creation of high quality places which are properly, and effectively, provided with the 'hard' and 'soft' infrastructure needed to support them.
81. Havering is clear from its own work on preparing its new Local Plan that the community expects, and requires, all new development to be accompanied by facilities such as new schools and health and community facilities so that residents have ready access to these at an early stage.
82. Havering recognises that the pace of delivery on larger sites has been a concern in some cases and that this gives rise to the ambition to bring smaller and local developers and builders into the delivery of new homes to a greater extent.
83. This concern overlooks that the draft London Plan has traditionally placed a great deal of emphasis on the housing opportunities coming forward over several years within Opportunity Areas which have been acknowledged as the largest reservoirs of 'brownfield land' across London. It also overlooks that residential schemes on larger sites comprising several hundred units and the provision of infrastructure may comprise several phases and take several years to deliver (for example, the former Harold Wood Hospital site)..
84. Havering is very concerned, however, that the increased focus of the draft London Plan on smaller sites overlooks that the development of larger sites offers significant advantages such as the scope to deliver important 'place-making' that benefits communities and will achieve greater funding certainties through developer contributions. 'Set up' times on larger sites may be longer but once addressed the sites may deliver housing units more consistently and more reliably.
85. Focussing the draft London Plan on small sites rather than large ones will overlook that smaller developers and builders may be less resilient in the face of continuing economic uncertainty and may lack the technical resources of larger ones. These factors will militate against the delivery that the draft London Plan aims for and the quality of new homes that boroughs will want.
86. The draft London Plan does not acknowledge that existing communities will have concerns about a reliance on small sites especially if these are in settled and established neighbourhoods. It would be unfortunate if the housing aims of the draft London Plan cannot be secured because of opposition in local communities either to individual proposals or the efforts of boroughs to develop planning policy and guidance for them.
87. Small sites are unlikely to be able to make significant contributions to achieving the levels of affordable homes that the draft London Plan seeks. It is also likely that their ability to generate potential funds through Section 106 agreements for investing in the local community will be modest.
88. On balance, these unintended outcomes are likely to inhibit and work against the intention of the draft London Plan to secure 'Good Growth'.
89. Boroughs will be expected to implement **Policies H1 and H2** through the preparation and implementation of their own local plans. Many communities will be very unlikely to support

their local plans if they feel that the housing targets in them are unachievable and unrealistic and will have a very damaging effect on local context.

90. Boroughs will become caught in a cycle of unachievable targets and consequent under-delivery. Positive plan – lead development and resources for planning will be adversely impacted. As a result, the draft London Plan, as currently drafted, will hinder the preparation and delivery of borough local plans and will constrain the delivery of the intended outcomes such as significantly increased housing.

Chapter 6 : Employment

91. Havering supports the focus in the draft London Plan on protecting the most important employment land in **Policy E5 (Strategic Industrial Locations)**.

Chapter 8 : Green infrastructure and natural environment

92. More than half of Havering is Green Belt and our communities value it highly. Havering supports the very strong commitment to protecting the Green Belt from inappropriate development and recognise that its de-designation will not be supported in **Policy G2 (Green Belt)**.
93. As mentioned earlier, Havering is very concerned that the unrealistic and unachievable housing targets in the draft London Plan will result in increased pressure on the Green Belt as prospective developers identify difficulties with bringing forward satisfactory schemes in the built up areas.

Chapter 9 : Sustainable Infrastructure

Aggregates

94. Havering has borne the brunt of extensive mineral working for many years especially in the south of the borough. The adverse impacts have included noise, dust, vibration, traffic movements as well as despoiling of the rural Green Belt landscape. Some parts of the south of the borough have been severely affected by the cumulative impact of mineral working taking place on consecutive parcels of land with consequent long-lasting adverse impacts on amenity for residents.
95. Havering objects that the draft London Plan repeats the land-bank apportionment figures for minerals set out in the current London Plan (March 2015) in **Policy SI10 (Aggregates)** because this will result in the areas in the south of the borough continuing to suffer the adverse impacts arising from mineral working.
96. Havering welcomes that **paragraph 9.10.2** identifies that there is potential for mineral working elsewhere across London beyond the four boroughs identified in Policy SI10 (Aggregates). However, the draft London Plan should go much further so that these unidentified areas bear more of the burden for minerals working so that Havering can be released from the pressure to supply minerals. Similarly, the Mayor should take stronger steps to encourage the re-use and recycling of minerals (as identified in **paragraph 9.10.3**).

Chapter 10 : Transport

97. Havering commented extensively at the end of last year on the Mayor's Transport Strategy and the comments made then remain very apposite as far as the draft London Plan is concerned. Havering is submitting its response to the draft Mayor's Transport Strategy in full as annexe 3 in this response.
98. Havering recognises the close links between land-use planning and transport and the draft London Plan and Transport Strategy should complement each other in this regard. Havering commented previously about the respective timing for these being published.

The strategy towards securing modal shift

99. The draft London Plan brings forward the highly ambitious modal shift target set out in the Transport Strategy and that key elements of the draft London Plan including the approach to significantly increasing the delivery of new homes is linked to transport accessibility in **Policy T1 (Strategic approach to transport)**.
100. Havering strongly considers that the draft London Plan must recognise that Havering as an Outer London Borough is currently much less well served by public transport infrastructure and services than Central and Inner London. The travel characteristics, and resulting behaviours, found in Outer London boroughs like Havering are not reflected in the Mayor's latest strategies and because of this the policies are flawed.
101. In Outer London there is not the public transport 'offer' enjoyed by residents in Central and Inner London and, as a result, private transport is still seen as the more realistic and convenient travel choice.
102. Without a 'step-change' in public transport availability, there will always be a greater need for residents in Outer London to make more use of cars than public transport in comparison to residents in Central and Inner London.
103. The draft London Plan must take greater account of local circumstances including matters such as demographic profiles. It must recognize, for example, that Havering has an increasing number of older people. Many people here have little option but to rely on their car to get around for the purposes of daily life when this and much inferior public transport facilities and services are taken into account.
104. The recognition in the draft Mayor's Transport Strategy that the modal shift target will be difficult to achieve in Havering and other Outer London Boroughs should be recognised in the draft London Plan given its 'over-arching' role.

Car parking standards appropriate for Outer London

105. Havering considers that modal shift targets for Outer London will benefit from being more realistic and sensitive to, and appropriate for, the specific circumstances of boroughs (depending on their location and characteristics) rather than try and apply 'a one-size fits all' approach across all of London.
106. Where this can be supported with robust local evidence, then this should be reflected in the draft London Plan and Local Plan policies that are more sensitive to the circumstances in boroughs. Boroughs are best placed to decide appropriate car parking standards for their areas given their detailed knowledge of the issues and the nature of the localities.

107. It is inappropriate for the draft London Plan to require parking assessments to be undertaken against highest existing or planned PTALs. (**Policy T6 Car Parking including T6.1 Residential parking, T6.2 Office parking, T6.3 Retail parking, T6.4 Hotel and leisure uses parking and T6.5 Non-residential disabled persons parking and Tables 10.1-10.6 inclusive**).
108. Havering considers very strongly that it is inappropriate for the draft London Plan to be so heavily based on PTALs because they fail to recognise 'real' public transport accessibility in boroughs like Havering. As a result, the proposed car parking policies for Outer London do not relate to the travel patterns and behaviours of Outer London. They must take account of the issues identified above and must recognise that greater provision of spaces is appropriate in boroughs like Havering.
109. Further, Havering strongly objects to an approach to parking that is predicated on potential transport investment given the uncertainty linked to funding the draft London Plan as a whole and the significant pressures arising on Mayoral budgets as a result in the sharp fall in passenger revenues. Under this policy approach, when the transport investment in question fails to materialise, developments will have been built with wholly inappropriate parking provision and residents will be forced to park in adjoining streets to the detriment of safety, congestion and amenity.

The importance of better strategic transport connections in Havering

110. The Havering Local Plan sets out the Council's 'Vision' and strategy for future growth and sustainable development over the next 15 years up to 2031. It is envisaged in the Local Plan that at least 17,550 homes will be delivered in Havering over the plan period to 2031 with the provision of supporting infrastructure including significant transport investment and improvements. The Local Plan identifies most of this growth taking place in the two Strategic Development Areas at Romford and Rainham and Beam Park.
111. These areas closely align with the proposed Opportunity Areas in the new London Plan for Havering (Elizabeth Line East and Thames Estuary North and South) in **Policy SD1 (Opportunity Areas)**. It is encouraging that the policy recognises that change and growth in these areas will be secured and facilitated by enhanced infrastructure including that for transport. This very much accords with Havering's view and the draft London Plan is the opportunity to ensure that appropriate provision is made.
112. Havering supports that the draft London Plan highlights the importance of improved transport linkages in **Policy T3 (Transport capacity, connectivity and safeguarding)** as Havering strongly considers that improved connections in the borough will be the key to realising its growth potential.
113. Havering's new Local Plan identifies that Romford has the potential to accommodate some 5,300 new homes over the plan period. Havering has been encouraged by comments from your Deputy Mayors and officers that there is significant potential and opportunity in Romford, and that it should be a focus for development and enhanced transport facilities and services. The draft London Plan is the opportunity for this to be properly recognised.
114. The Rainham and Beam Park Housing Zone has the potential to deliver 3,000 new homes. It will benefit from a new station at Beam Parkway. This is well advanced and is currently going through the Network Rail "GRIP" process and is due to open in 2020.
115. Havering is already developing or progressing proposals with Transport for London to deliver transformational change within these areas to support the new residential

communities there and these include approved Liveable Neighbourhood schemes in Romford Town Centre and at the A1306 New Road Rainham.

116. Havering has previously discussed with your colleagues a number of key strategic transport interventions which are set out in its own Vision and strategy documents (such as the Havering Local Plan). These have been prepared and promoted to enable Havering to positively influence development and to respond to the draft London Plan and to demonstrate 'good growth'.
117. **Table 10.1** supporting **Policy T1** comprise a list of Indicative Transport Schemes to be progressed over the plan period. The 'balance' of schemes in Table 10.1 must recognise that a number of interventions are needed in Outer London to help achieve the draft London Plan's aims. Havering will continue to press the Mayor and his Deputies to commit to the strategic transport interventions it has identified as necessary in Havering through its Local Plan.
118. In particular, the draft London Plan is an opportunity to respond positively to the potential for 'good growth' in Havering and some key interventions must be included in this table. Specifically, Table 10.1 must include proposals to secure :
 - **A tram link between north and south Havering**
119. The draft Mayor's Transport Strategy included a commitment to improving connections to and from Opportunity Areas and Havering expects this to be reflected in the draft London Plan.
120. **Table 10.1** must include a potential tram link between Romford and Rainham and Beam Park along with potential for links further north beyond Romford to Collier Row. This work is currently the subject of feasibility studies. Havering expects to be discussing this with you later in Spring 2018.
121. Havering has good east west connections both in terms of the road network and also through bus and rail services but journeys between the north and south of Havering are very challenging and time consuming for our residents. This is because of the limited provision of public transport services and the routes involved. Havering residents have very little choice as to how they do this if they do not have access to a car. It makes journeys between the north and south of the borough very protracted and difficult.
122. It is understood that a London Assembly Member (who previously had connection to this borough) identified the very real difficulties that residents face when trying to journey between Romford and Rainham at the recent London Assembly Housing Committee meeting considering the draft London Plan.
123. Businesses are also badly affected. South of the A1306, there are 300 businesses located in the London Riverside Business Improvement District (BID). Businesses here say that attracting and retaining staff is very difficult because of the lack of public transport serving the area and the very limited 'penetration' by bus services.
124. Havering considers this project should also be included on the key diagram supporting the draft London Plan.
125. The identification of bus transit pilots in Opportunity Areas in **Table 10.1** is supported. Earlier this year, Havering officers met with TfL's Network Development team who are looking at bus access to the London Riverside region (including the BID area). Havering will work with both the Network Development team and the BID as this work progresses.

Havering and the London Riverside Business Improvement District (BID) have pressed for better bus penetration to the BID area and the strategy should include a firm commitment to deliver this.

- **Romford Town Centre**

126. The significant opportunities at Romford in regard to new homes and jobs are recognised in its designation within the Elizabeth Line East Opportunity Area in **Policy SD1 (Opportunity Areas)**. Progress is being made with this already with the delivery off the Romford Housing Zone and the development of important sites such as Bridge Close and land adjoining Romford station.
127. The delivery of the Romford TfL 'Liveable Neighbourhoods' scheme will also assist Romford to realise its considerable potential by tackling the issues presented by the Romford Ring Road.
128. Romford's Ring Road has a significant 'severance' effect and is perceived as a barrier to people who want to access Romford town centre by means other than the car. Sinking the Ring Road beneath ground, as well as providing development opportunities, will also secure significant public realm and environmental improvements.
129. **Policy T3 and Table 10.1** should include a proposal to remodel the Ring Road on the west side of Romford by putting this section of it in a tunnel. This will provide the opportunity to enlarge the area being addressed in the Housing Zone and overcome the visual barrier and severance impacts of the Ring Road.

- **Gallows Corner improvements**

130. Gallows Corner junction is a major highway intersection (in the form of roundabout junction) located in north east Havering.
131. It comprises a busy five arm junction linking the A12 Eastern Avenue and A12 Colchester Road with the A127 Southend Arterial Road, A118 Main Road, and Straight Road.
132. There is frequently severe congestion at the junction and on its approaches. It has poor resilience and often gives rise to disruption on the wider highway network in Havering. It has a poor record in regard to road safety and is linked to poor air quality. The junction causes major severance between Harold Hill and Romford and constrains residents in the former having convenient access to Romford and its facilities including transport. As a result, residents in some of the most disadvantaged parts of Havering are unable to enjoy the benefits elsewhere nor to have ready access to the jobs being provided in the south of Havering.
133. Havering is concerned that the planned improvement programme for Gallows Corner only addresses road safety.
134. **Policy T3 and Table 10.1** must include a commitment to tackle the fundamental issues at the junction (above) including the severance that it causes. It does not recognise that a more radical overhaul of the junction as well as tackling the matters mentioned would also have the potential to provide land for development including the provision of more new homes.

- **Crossrail 2 – eastern spur**

135. Havering welcomes the identification of the Growth Corridor focussed on the Elizabeth Line in **Policy SD1 (Growth corridors and Opportunity Areas)**. There are likely to be considerable benefits for the borough arising from the arrival of Crossrail / Elizabeth line services in 2018 / 19.
136. The commitment in the draft London Plan to Crossrail 2 is welcome but it is a big concern that the draft London Plan makes no mention of the potential scope for an eastern 'spur' off this scheme in **Policy T3 (Transport capacity, connectivity and safeguarding and Table 10.1 Indicative list of transport schemes)**.
137. The Thames Estuary North and South Opportunity Area is the largest concentration of Opportunity Areas in London. The draft London Plan identifies that it has the potential to accommodate over 250,000 new homes and 200,000 new jobs in **Policy SD1 (Opportunity Areas / paragraph 2.1.37)**.
138. Reference is made in **paragraph 2.1.42** to the Mayor assisting with extending Elizabeth line services into Kent via Bexley. This must be complemented by a commitment in the explanatory text to **Policy SD1 and in Table 10.1** to an eastern spur from Crossrail 2 that would extend through the whole of this Opportunity Area.
139. There would be potential for this to link into South Essex beyond Greater London. An eastern extension may help create thousands of new homes and jobs across East London and South Essex and attract investment into these areas. It may also develop synergy with the route identified for the Lower Thames Crossing project.

- **Beam Parkway Station**

140. **Table 10.1** must refer to the new station at Beam Parkway. This is a key component in the delivery of the wider regeneration of the area including the major housing scheme at Beam Park. Havering has been working very closely with the GLA, DfT, Network Rail and the Essex Thames-side line franchisee (C2C) as the new station is developed through the Network Rail detailed design "GRIP" process.
141. The delivery of the station will assist in securing the regeneration aims of the Thames Estuary North and South Opportunity Area in **Policy SD1 (Growth corridors and Opportunity Areas)**.
142. **Table 10.1** refers to further river crossings being brought forward including at Belvedere. Havering's comments on the draft Mayor's Transport Strategy expressed concern that the urgency to address severance issues in East London caused by the River Thames seems to have declined. This is confirmed by the indicated programme in the draft London Plan for this potential project in **Table 10.1** of 2030-2041 which is towards the latter end of the plan period and when most of the draft London Plan's growth would have been delivered.
143. The draft London Plan is quite clear that this region will accommodate most of London's growth over the plan period but the commitment to the delivery of further east London river crossings appears to be diminished.
144. Havering considers that the success of East London generally accommodating 'Good Growth' will be jeopardised by this. It is also likely to impact adversely on the successful delivery of the Thames Estuary North and South Opportunity Area (which the draft London

Plan recognises as the largest concentration of Opportunity Areas in the City in **Policy SD1 (Growth Corridors and Opportunity Areas / paragraph 2.1.37)**.

145. The draft London Plan must identify the delivery of river crossings in east London as a priority. The draft London Plan must make quite clear that crossings at **both** Gallions Reach and between London Boroughs of Bexley and Havering are necessary to ensure that there is greater resilience across all of East London rather than a single new crossing becoming the 'fall-back for the Dartford Crossing.
146. The Mayor's strategies (draft London Plan and draft Transport Strategy) should take every possible measure to avoid uncertainty over the possibility of a crossing between London Boroughs of Bexley and Havering resulting in blight in the wider London Riverside area since this will significantly prejudice its successful regeneration. Havering is seeking to deliver extensive new homes and jobs within this part of the borough (including the implementation of a Housing Zone) as well as securing a 'step-change' in the environment and it is essential that long term doubt over a crossing does not threaten this.
147. A bridge crossing between Bexley and Havering should reflect the transport characteristics of Outer London and avoid an inappropriate focus on accommodating public transport.
148. The commitment to increasing bus services in **Table 10.1** is welcomed. Havering particularly wishes to see improvements to services to the Queens Hospital in Romford. Since it opened in 2007, the number of bus services serving it has more than doubled. Havering welcomes the progress TfL London Buses has made delivering these additional service improvements.
149. The forthcoming reconfiguration of patient services between the Queens and King Georges Hospitals in Havering and Redbridge, respectively, will result in significant pressures on the transport infrastructure supporting the hospitals including the adjoining highway network. The parts of the Romford Ring Road adjoin the Queens Hospital are already very congested particularly during the daily peak periods.
150. Some parts of Havering are still poorly connected to the hospital by bus services and patients may need to use more than one bus service to get there.

Chapter 11 : Funding the London Plan

151. Havering recognises fully the significant challenges to funding the draft London Plan as identified in **Chapter 11 : Funding**.
152. Havering strongly supports scrutiny of potential new funding sources as set out Potential Options for raising the required funding.
153. Havering is very concerned to note that much of the transport infrastructure needed to deliver 'Good growth' is unfunded and this suggests that securing the deliverability of the draft London Plan may be challenging.

London Borough of Havering
February 28 2018

Annexe 2

Draft London Plan (2017) – response from London Borough of Havering (February 2018)

This schedule should be read in conjunction with the letter and its annexe (Annexe 1) from the Leader of the Council to the London Mayor dated March 1 2018.

The Havering response to the London Plan also includes the Council's formal submission response to the draft Mayor's Transport Strategy (autumn 2017). This is included in the Council's submission as annexe 3.

Havering officers attended the January 2018 meeting of the London Assembly Housing Committee. The agenda dealt with the new draft London Plan and Havering officers contributed to the discussion. The transcript includes commentary from officers on several important topics which are dealt with in the Council's response. For that reason, the transcript of the session is included in the submission as annexe 4.

In total, Havering's response to the London Plan comprises : the letter dated March 1 2018 and its annexe together with this schedule, the response to the Transport Strategy (Annexe 3) and the London Assembly Housing Committee Transcript (Annexe 4)..

Chapter and Policy	Subject	Commentary from London Borough of Havering
Introducing the Plan		
A new Plan	A new Plan	Paragraph 0.0.20 The preparation of the Havering Local Plan has been done against and is underpinned by a robust evidence base. It is noted that the policies in the draft London Plan 'are supported by a proportionate evidence base'. It is essential that this properly takes account of data evidencing the demographics and characteristics of

		<p>individual boroughs rather than an generalised pan-London picture so that the Mayor and boroughs can develop and implement policies that are properly suited to the land-use and transport issues arising in them.</p> <p>Paragraph 0.0.27</p> <p>It is noted that the Integrated Impact Assessment includes a Sustainability Assessment. Nevertheless, there are strong concerns about how sustainable the draft London Plan is given the highly ambitious housing targets and that much of the underlying infrastructure that the Mayor regards as necessary to support the draft London Plan is currently unfunded.</p>
<p>Chapter 1 : Planning London's Future (Good Growth Policies)</p>		
<p>Policy GG1</p>	<p>Building strong and inclusive communities</p>	<p>Paragraph 1.0.1</p> <p>The draft London Plan should recognise that public transport provision across London varies considerably and that the network of public transport services in Outer London is less dense. Accordingly, the draft London Plan must recognise that to seek to achieve car free developments across London is inappropriate. Some groups in the community will be at much greater disadvantage without a car such as younger or older persons. The draft London Plan should reflect this with more flexibility towards these groups and highlight the potential opportunities arising from car sharing and electric / hybrid vehicles.</p>
<p>Policy GG2</p>	<p>Making the best use of land</p>	<p>Paragraph 1.2.5</p> <p>The introduction to this policy promotes directing growth to the most accessible and well-connected places, including prioritising the redevelopment of brownfield sites. However, the costs of clearing brownfield land may be prohibitive to developers.</p> <p>The London Plan should explain how the Mayor will incentivise redevelopment of brownfield sites in order to secure the other aims and objectives of the draft London Plan such as protecting the Green Belt and open spaces.</p>

<p>Policy GG3</p>	<p>Creating a healthy city</p>	<p>Paragraph Criteria F and paragraph 1.3.3</p> <p>The draft London Plan refers to the need for new buildings to be well insulated and sufficiently ventilated to prevent the health problems associated with damp/cold.</p> <p>The draft London Plan should also highlight the importance of improving existing housing and making provision for renewable energy.</p>
<p>Policy GG4</p>	<p>Delivering the homes Londoners need</p>	<p>Criteria C and paragraph 1.4.4</p> <p>The draft London Plan should reference lifetime homes and the ability of any housing growth supplied to be adapted in the future to maintain independent living.</p>
<p>Policy GG5</p>	<p>Growing a good economy</p>	<p>Criteria F</p> <p>The draft London Plan should recognise that London consists of a number of regions and most of these do not fall under the '24-hour city' description. The text should avoid inferring that a 24 hour economy is appropriate across all of London since this may be inappropriate in smaller centres in Outer London because of their proximity to adjoining residential areas.</p>
<p>Policy GG6</p>	<p>Increasing resilience</p>	<p>Paragraph 1.5.4</p> <p>The draft London Plan should mention the London Resilience Partnership as the overarching body responsible for resilience.</p> <p>Paragraph 1.5.6</p> <p>The draft London Plan should include reference to the provision of housing encompassing resilience to cater</p>

for changing needs within a population (younger people compared with older people's needs).

Chapter 2 : Spatial Development Patterns

	Introduction text	<p>Paragraph 2.0.3</p> <p>Havering is very concerned that the draft London Plan identifies that 'the suburban pattern of development has significant potential for appropriate intensification over time, particularly for housing.' As addressed in Annexe 1, the approach in the draft London Plan towards development of small sites will greatly erode the established character and appearance of Havering. There is little capacity for intensification of suburban areas without detrimental impacts on local communities, heritage, character and green infrastructure. It will also lead to a loss of much needed family homes and amenity space for residents.</p>
Policy SD1	Opportunity Areas	<p>The policy is supported in principle and Havering welcomes the potential opportunities that may arise from the interventions indicated subject to them delivering outcomes that are best suited to Havering.</p>
Policy SD2	Collaboration in the wider south- east	<p>Havering recognises the strong importance of the Mayor of London working with authorities across the wider south –east. It strongly supports and encourages the Mayor engaging in collaborative regional working through his planning activities. This is especially important in regard to housing delivery and infrastructure provision in the light of the unrealistic targets in the draft London Plan and the significant requirements they would generate for infrastructure (which are currently unfunded).</p> <p>As well as being involved in the Thames Estuary North and South Opportunity Area, Havering wishes to be considered in discussions linked to the infrastructure growth corridor linking to Essex (Chelmsford and Colchester) as there may be opportunities for Higher Education, Artificial Intelligence and Big Data.</p>
Policy SD6	Town Centres	<p>Havering's town centres are very important to local communities and the Council wants to support their vitality and viability. The overall aims of the policy are supported. The Council will expect to be able to identify how and where higher density developments are accommodated rather than there be a blanket</p>

		<p>assumption.</p> <p>Havering is developing an Economic Development Strategy to identify how Havering’s town centres can be supported. Havering also undertakes regular town centre health checks.</p> <p>Havering’s larger town centres already provide a range of functions including employment, leisure, education and culture, night-time economy, and through these functions, as well as the provision of transport infrastructure and a good range of retail and hospitality and should be in a good position to survive the changes in the retail sector.</p> <p>The draft London Plan should recognise that the position with smaller town centres may be more challenging even with the additional growth that the Mayor proposes for them. The proposals suggested in the draft London Plan will require considerable resources which are not currently available within the local authority and are unlikely to be sufficient to support some of the smaller peripheral town centres.</p>
Policy SD7	Town Centre network	<p>Criteria F</p> <p>The draft London Plan says that Local and neighbourhood centres should focus on providing convenient and attractive access by walking and cycling to local goods and services needed on a day-to-day basis.</p> <p>This may be unrealistic in smaller centres in Outer London boroughs including in Havering as these rely more heavily on customers using cars to get to and from them.</p>
Policy SD8	Town centres : development principles and Development Plan Documents	<p>Criteria A (4)</p> <p>The draft London Plan says that boroughs should realise the full potential of out of centre retail parks to deliver housing growth, and connect to public transport networks.</p> <p>The draft London Plan should recognise that edge of town or out of town centres such as those in Outer London (including those in Havering) are successful because they have extensive and free car park provision. If this were reduced not only would they be in danger of reducing their competitiveness they may also start to compete with the recognised town centres some of which are clearly already struggling.</p>

Policy SD9	Town centres : Local partnerships and implementation	<p>Criteria A</p> <p>The draft London Plan says each town centre should have a strategy produced in partnership at the local level in a way that is inclusive and representative of the local community.</p> <p>The draft London Plan should recognise that this may not be a realistic prospect in the case of very small centres. In some of these, capacity is lacking within the business community to engage in a series strategy development process and it would require considerable resources from boroughs which are not currently available.</p> <p>The draft London Plan should recognise that boroughs will have concerns about how they resource partnerships.</p> <p>Targeted Article 4 Directions are supported but may already be too late.</p>
Policy SD10	Strategic and local regeneration	<p>Boroughs should identify strategic areas for regeneration based on a thorough understanding of the demographics of the community and their needs.</p> <p>How much free reign will individual boroughs have to specify these SAR's if the local needs conflict with the overarching principles for growth in London?</p>
Chapter 3 : Design		
Policy D1	London's form and characteristics	<p>Please refer to Annexe 1 submitted with the Havering response letter where there is extensive commentary on the importance of new development(s) properly reflecting the form and characteristics of existing neighbourhoods and local context. Havering strongly supports the requirement that new development should respond to local context, identity and character of the locality but is concerned that this may be fundamentally incompatible with the intention in the draft Plan to intensify and increase density. Havering is</p>

		<p>very concerned that the pressure to meet increased housing needs will result in a profusion of poor design which will erode the character and appearance of the borough.</p> <p>The draft London Plan should refer to the provision of lifetime homes, offering opportunities for future adaptation to facilitate independent living for longer, particularly within an ageing population.</p>
Policy D2	Delivering good design	The draft London Plan should fully explain what is meant by 'optimised' to explain what this means over and above the existing use and character of an area.
Policy D3	Inclusive design	<p>Paragraph 3.3.5</p> <p>This is a very positive statement around emergency evacuation linked to the DDA.</p>
Policy D4	Housing quality and standards	Havering strongly considers that the policy should retain reference to safeguarding 'gardens' because of their vital contribution to the character and setting of Havering as well as their contributions to amenity, health, biodiversity and flood risk management.
Policy D5	Accessible housing	<p>Paragraph 3.3.1</p> <p>The draft London Plan should also refer to other forms of accessibility needs, e.g. blind, learning disabled, autistic spectrum disorders etc.</p> <p>The preparation of the draft London Plan (and linked items) should recognise the importance of engagement with groups with particular characteristics and / or requirements eg elderly people or those with disabilities.</p>
Policy D6	Optimising housing	Please see Annexe 1 where there is extensive commentary on the importance of new development respecting and reflecting existing character and appearance. The draft London Plan should recognise that

	density	<p>higher density may not always be the optimal solution when important factors such as local character and setting are taken into account.</p> <p>The policy should make clear that where overdevelopment is proposed – if development is out of context with its surroundings in terms of character and appearance, involves a loss of amenity space and / or is poorly provided with public transport accessibility, then such planning proposals should be resisted.</p> <p>The policy needs to be more firmly worded to enable inappropriate developments to be refused.</p> <p>The policy should make it clear that local context includes cultural and heritage assets.</p> <p>Paragraph 3.6.4</p> <p>The draft London Plan should recognise that strategic transport improvements will not always improve transport accessibility (the PTAL factor) particularly where local transport improvements are not delivered alongside them. The delivery of Elizabeth line services in Havering does little to improve the limited public transport provision in Havering in areas away from the rail corridor.</p>
Policy D7	Public realm	<p>The draft London Plan should also include reference to the potential for well designed and maintained public realm to promote and enhance mental health and wellbeing.</p> <p>The draft London Plan should recognise the importance of maintenance of the public realm. Development proposals should consider that future methods of street cleansing of the public realm will likely be cleaned mechanically. The draft London Plan should reference the importance of construction methods for footways and public spaces being constructed sufficiently to accept vehicle weights.</p>
Policy D8	Tall buildings	<p>Please also refer to Annexe 1 submitted with the Havering response letter where there is commentary on the importance of a plan-lead approach to tall buildings.</p> <p>Criteria C2 (a)</p> <p>It may be inappropriate for the draft London Plan to address construction detailing and safety are not</p>

		normally considered at the planning stage. These are covered by the Building Regulations.
Policy D10	Safety, security and resilience to emergency	<p>Paragraph 3.3.5.</p> <p>This is a very positive statement around emergency evacuation linked to the DDA.</p> <p>Paragraph 3.10.1</p> <p>Reference should be made to all London Boroughs having a Borough Risk Register</p>
Policy D11	Fire safety	<p>The need for LPA's to assess Fire Statements will have resource implications including for the London Fire Brigade.</p> <p>The draft London Plan should refer to Dame Judith Hackitt's independent review of building regulations and fire safety following Grenfell Tower as it will have major impact on future construction.</p>
Policy D12	Agent of change	The policy places the responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new noise-sensitive development rather than the source of the noise. It also recommends that Boroughs should refuse development proposals that have not clearly demonstrated how noise impacts will be mitigated and managed. This approach generally reflects current practice in Havering and is supported.
Policy D13	Noise	Policy D13 suggests that eligible LAs should identify and nominate existing and proposed Quiet Areas to DEFRA although there is no legal requirement to do so. This would be done with/through planning and as a result of the pending Havering Local Plan.
Chapter 4 : Housing		

<p>Policy H1</p>	<p>Increasing housing supply</p>	<p>Please refer to Annexe 1 submitted with the Havering response letter where there is extensive commentary about increasing housing supply in Havering to the unachievable and unrealistic levels set out in the new London Plan. These encompass concerns about the background to the SHMA, the reliance on ‘small sites’, the absence of any meaningful engagement with boroughs on ‘small sites’, and the significantly detrimental impact on Havering’s character and appearance that will result. The commentary also identifies that the increased housing targets will place a burden on existing infrastructure including social and community facilities. They will also increase the demand for social care.</p> <p>Paragraph 4.1.6</p> <p>Havering supports the recognition in the draft London Plan to the importance of ensuring that homes in London should be available for Londoners before anyone else. The significantly increased housing delivery numbers set out in the London Plan may exacerbate the problem of homes being purchased / acquired by ‘absent’ owners including overseas investors.</p>
<p>Policy H2</p>	<p>Small sites</p>	<p>Please refer to Appendix 1 submitted with the Havering response letter where there is extensive commentary about increasing housing supply from small sites in Havering. In particular, Havering objects to how the ‘small sites’ component has been assessed, the lack of engagement with boroughs before including this in the London Plan and the implications for Havering’s existing character and appearance of small sites being developed to the extent envisaged. Havering is also concerned at the lack of infrastructure that will support such developments.</p> <p>Criteria D (2) (a)</p> <p>The policy refers to a presumption in favour of development on small sites within 800m of town centres where increased density of existing homes is proposed. This overlooks that some of these areas may be relatively low in PTAL terms.</p> <p>There should be a recognition that in order to maintain an adequate mix of unit sizes and types a presumption in favour of conversions could have a negative impact on the range of housing supply as well as other negative impacts on existing dwellings.</p>

Policy H4	Meanwhile use	This is supported. Will the Mayor of London make funding available to boroughs who could provide this interim solution and what powers will local authorities be given over private landholders to use the land
Policy H5	Delivering affordable housing	The policy should recognise the importance of housing being provided for 'key workers' (including teachers)
Policy H6	Threshold approach to applications	<p>The 'fast-track route' approach in this policy is supported in principle. There will also need to be a clear mechanism in place to ensure that these new homes are fit for purpose; in terms of housing need, size and location.</p> <p>Havering continues to struggle with delivering 35% affordable housing reflecting low residual land values in the borough. Havering expects the 50% target on public land to be challenging to secure.</p> <p>The impact of Brexit may well impact both on the level of funding available and the possible changes to the property markets in Central London due to a cooling of demand, with a resulting impact on other boroughs. This is impossible to quantify at this stage, but would need to be kept under review over the life of the Plan.</p>
Policy H14	Supported and specialised accommodation	<p>Havering supports this policy in principle.</p> <p>In many areas, demand will increase (particularly in SEND) and there is no estimate here as to what boroughs may have to develop to meet that increasing demand. The pressure this may place on boroughs will be significant.</p> <p>The draft London Plan should also refer to care leavers and ex-offenders.</p> <p>This is the only policy in the draft London Plan to refer to mental health issues. With one in 4 people likely to experience a mental health issue in their lifetime, there is currently insufficient reference to the potential</p>

		for well-designed amenity space, environments and homes to promote improved mental health and wellbeing. Havering considers that the issue of mental health should be expanded and strengthened throughout the London Plan. Reference should also be made to dementia related illnesses.
Policy H15	Specialist older persons housing	<p>References in the draft London Plan to the need for older peoples housing are noted. The draft London Plan should recognise the issue faced by boroughs to meet demand from that sector of the community where the burden falls on the local authority to provide and fund solutions.</p> <p>Paragraph 4.15.10</p> <p>The draft London Plan comments that ‘if the rates of supply and demand remain constant it should be possible to meet potential demand for both care home beds and dementia care home beds’ it does not differentiate between the privately funded market and that part of the demand that is met by London borough budgets.</p> <p>If demand increases and funds of local authorities diminish there will be a crisis in the market for local authorities. In Havering, there is apparently a surplus of capacity for residential and nursing beds but the market that the borough can access is diminishing. This situation will worsen as budgets are constrained whilst demand increases.</p>
Policy H16	Gypsy and traveller accommodation	<p>Havering strongly considers that boroughs should be able to identify targets for gypsies and travellers based on up to date assessments and in line with the current Government planning policy.</p> <p>The proposed policy will introduce artificially high ‘need’ within London relative to neighbouring districts outside London.</p>
Chapter 5 : Social Infrastructure		
Policy S1	Developing London’s	Havering recognises and strongly supports the emphasis in the draft London Plan on ensuring that there is an appropriate provision of social and community infrastructure available to communities. The provision of timely

	social infrastructure	<p>and necessary infrastructure is a key component in securing the delivery of the 'good growth' agenda.</p> <p>A similar reference should be included in this policy to the one in Policy S5 Sports and Recreation Facilities about taking account of the local and sub-regional level when considering need.</p> <p>The Mayor should identify and provide direct funding to support the provision of necessary infrastructure linked to the targets for development included in the London Plan.</p>
Policy S2	Health and social care facilities	<p>Paragraph 5.2.4</p> <p>As with Policy S1, Havering recognises and strongly supports the importance of health and social care facilities being provided in a timely and effective manner.</p> <p>Reference is made to Sustainability and Transformation Plans (STPs). The STP for East London describes the types of actions that should be taken but not specific commitments.</p> <p>The draft London Plan should explain how the Mayor will engage with NHS Estates to ensure that the aims and objectives of managing estates focus on providing the right services for people in east London. This section of the London Plan should go further in describing the partners who will be engaged in early discussions re the use of NHS assets, such as patient representative groups (such as Health and Well-being Boards, Healthwatch and/or voluntary organisations), also professional groups, such as Association of Directors of Public Health.</p>
Policy S3	Education and childcare facilities	<p>Havering supports the policy in principle.</p> <p>Criteria B</p> <p>The criteria set out under (B) could be viewed as being an ideal framework to assist boroughs in creating new provision. There needs to be a balance that acknowledges that not all new schools will be able to meet the standards as set out and that in some instances necessary new schools should not be delayed if a site does not meet the criteria set out.</p>

Paragraph 5.3.5

The draft London Plan refers to data from the Projected Demand for School Places (2015) from the GLA Intelligence Unit. This data is too old to be representative of London now.

The draft London Plan should take a balanced approach to land-uses. There is no mention regarding how boroughs will be able to identify land suitable for new school provision that would otherwise be prioritised for housing. It will be difficult for boroughs to secure land for new schools with so many different priorities for the limited land in London.

Furthermore, the focus in the draft London Plan on small sites being expected to deliver a significant proportion of new homes will reduce the likelihood that housing developments will facilitate to co-locating education provision to meet the demand in school places generated by the new housing.

Paragraph 5.3.6

The identification of the need to increase provision for Special Educational Needs and Disability is supported.

Paragraph 5.3.8

The draft London Plan should give greater consideration could be given to strengthening links with Higher Education particularly in those neighbourhoods with there is no tradition of Higher Education including in this borough.

This part of the draft London Plan should identify the need for developers to set aside part of a site in order to provide new school provision making clear that any developer giving up part of a site will not be making a financial tariff/S106 contribution for education purposes.

Havering notes that the Mayor of London is committed to the retention of the Green Belt. Notwithstanding this, in the light of difficulties in finding suitable sites for schools in the built up area, consideration could be given to the draft London Plan recognising the potential opportunity for educational use in the Green Belt in very special circumstances where it can be robustly demonstrated that there are no suitable alternative sites within the appropriate education planning area and there is a demonstrable need or demand for additional school places.

		<p>The draft London Plan does not refer to the need for provision for Looked After Children (LAC). The emphasis for LAC is both on local provision where appropriate and on provision out of area where CSE???? or issues like gang influence occur making it preferable to place out of the immediate location.</p> <p>The draft London Plan should also recognise that support for children as they get closer to adulthood (such as semi-independent provision) is also an accommodation based issue. There should be reference to how these growing challenges are going to be met.</p> <p>The policy should acknowledge the importance of funding for education and the challenges and constraints linked to that.</p>
<p>Policy S5</p>	<p>Sports and recreation facilities</p>	<p>Criteria A (1)</p> <p>Havering supports the reference to the importance of sports and recreational facilities being assessed on both a local and sub-regional level.</p> <p>Criteria B (2)</p> <p>Havering supports the reference to encouraging the co-location of facilities. It can provide potential cost savings and better ‘joined-up’ delivery of services.</p> <p>Criteria B (3)</p> <p>Reference is made to potential difficulties with sports lighting. Sports lighting can be designed to minimise light spillage. Planning conditions can address this satisfactorily.</p> <p>Paragraph 5.5.2</p> <p>The draft London Plan refers to the shortage of swimming pools, artificial grass pitches and sports halls across London and that there is unmet demand.</p> <p>The Mayor of London may wish to note that Havering is taking a very pro-active approach to addressing these</p>

		<p>issues.</p> <ul style="list-style-type: none"> • Havering opened a brand new swimming pool opening in Romford town centre this month (Sapphire Ice and Leisure). • Havering is also investing an additional £29m through its leisure management contract in to refurbishing sports facilities including, subject to planning, building a brand new Hornchurch Sports Centre that will include a modern, fit for purpose new swimming pool, that ensures provision of a swimming facility for 50-60 years. • Havering is working with the Football Association (FA) and the Football Foundation to look at increasing the number of 3G AGP's in Havering.
<p>Policy S7</p>	<p>Burial space</p>	<p>Paragraph 5.7.1</p> <p>The draft London Plan is correct to recognise that inner/central London Boroughs seeking burial space within outer London Boroughs may cause social friction and risk undermining social integration and community cohesion</p> <p>The draft London Plan could help signpost faith groups who may have specific burial needs towards existing provision that would better meet their requirements.</p> <p>Paragraph 5.7.2</p> <p>The re-use of graves has not so far been considered in Havering. The draft London Plan should acknowledge that this approach is likely to be very controversial across London.</p> <p>Paragraph 5.7.4</p> <p>Havering recognises that parkland burial grounds offer opportunities for burials. The London Plan should recognise that there are constraints to such provision including funding and securing the provision of supporting infrastructure and on-going monitoring regimes such as water table monitoring. would take considerable investment and not necessarily be cost effective. There are also lots of practical issues in</p>

		managing burials in parkland such as the clash of expectations between park users and bereaved families.
Chapter 6 : Economy		
Policy E1	Offices	<p>As above, Article 4 Directions could be a helpful tool but in many cases it may be too late.</p> <p>Some remaining office space in Havering following the use of permitted development rights is of low quality. There is demand for higher quality space from office – based businesses but the anticipated rental levels may be insufficient for developers to promote large-scale speculative commercial workspace. Demands for lower cost and affordable workspace could exacerbate the situation. Havering has relatively low cost office accommodation but occupiers want high quality at low cost.</p> <p>The policy also states that boroughs should support redevelopment proposals for surplus office space to housing. In Havering, there have been significant reductions in the quantum of office floorspace and it may now be necessary to consider incorporating employment space in new mixed use developments.</p> <p>Paragraph 6.1.4</p> <p>The text could go further to positively promote north east London as providing opportunities for office employment (as well as west and south London) – taking into account Crossrail and transport opportunities from Essex/Suffolk.</p>
Policy E3	Affordable workspace	<p>References to the links between employers and schools, colleges and Higher Education is supported as this is critical to meet the new technical education reforms and to deliver a full impartial IAG (???) service to young people. This also links into the growth of Apprenticeships and work experience.</p>
Policy E5	Strategic Industrial	<p>References to boroughs needing to develop policies to protect and intensify the functions of SILs and</p>

	Locations (SILs)	including access improvements and digital connectivity are supported. This is required in Rainham but Havering remains reliant on support from the Mayor for resources to enable the planning and regeneration functions.
Policy E8	Sector growth opportunities and clusters	<p>Opportunities for logistics and engineering in the vicinity of the Centre for Mechanical and Engineering Excellence may be investigated at Rainham but will benefit from linked infrastructure investment. This seems to be acknowledged in the Implementation paragraph 6.8.6, but this does not say how the strategic infrastructure and upgrade plans could be implemented.</p> <p>Criteria E</p> <p>Havering very strongly supports the recognition afforded to the role of Higher Education as it has ambitions to locate a Higher Education provider in the borough.</p>
Policy E11	Skills and opportunities for all	<p>Havering very strongly supports development proposals being used to seek employment and skills development, apprenticeships and other education and training opportunities during construction and at the end phase. The potential advantages arising from cross borough arrangements are noted but the London Plan should acknowledge that boroughs will inevitably wish to seek to retain the best opportunities for their own residents.</p> <p>Paragraph 6.11.1</p> <p>The draft London Plan should afford priority to boroughs where there are examples of generationally-inherited higher rates of low-skilled low-paid work.</p>
Chapter 7 : Heritage and Culture		
Policy HC3	Strategic and local views	Havering supports this policy as the borough has a number of key views that should be protected e.g. the view from Havering Ridge down towards Romford, the rest of the Borough and across the Thames.

Policy HC7	Protecting public houses	Havering supports this policy as the borough has lost a number on notable public houses in recent years.
Policy HC6	Supporting the night-time economy	<p>The policy is supported in principle and Havering recognises that London cannot readily function without certain activities such as distribution, transport and services taking place around the clock.</p> <p>However, the draft London Plan must recognise that London varies very considerably and that policy approaches which may be relevant to Central and Inner London may not be appropriate in Outer London where there is a valued and established suburban character and different expectations regarding the role and function of town centres.</p> <p>Havering would support the provision of a night time economy focussed on a wide range of complementary uses that generate footfall and do not give rise to adverse environmental impacts. It is concerned that the night-time economy must not be an ‘umbrella’ approach to the expansion of uses such as bars and public houses where this can give rise to anti-social behaviour and adverse environmental impacts.</p> <p>The policy refers to using open spaces and the public realm at night. The draft London Plan should recognise that this may impact on cleaning and maintenance activities and environmental amenity where there are homes in close proximity</p> <p>The recognition afforded to making the night-time economy more enjoyable and inclusive is strongly supported. Havering has an older population and many older persons find town centres at night unattractive and unappealing.</p>
Chapter 8		Green Infrastructure and the Natural Environment
Policy G2	London’s Green Belt	Please refer to Annexe1 submitted with the Havering response letter.

Policy G5	Urban greening	<p>Paragraph 8.5.2</p> <p>The policy is supported in principle but the draft London Plan must recognise that the provision of additional street trees will place additional burdens on the maintenance budgets of boroughs which are already very stretched.</p>
Chapter 9 : Sustainable Infrastructure		
Policy SI1	Improving air quality	<p>The policy is supported in principle as Havering is committed to securing improvements in air quality in the borough. Havering has published its draft Air Quality Plan for public consultation.</p> <p>Criteria A 3</p> <p>The ‘Air Quality Positive’ aim for large-scale redevelopment areas such as Opportunity Areas and developments subject to an Environmental Impact Assessment is supported. The London Plan should provide more information on how it will apply in practice to the design of new developments.</p> <p>The Mayor should consider the impact and implications for boroughs in terms of how they will resource this further work when resources are already under pressure.</p> <p>Criteria A (5) and paragraph 9.1.4</p> <p>The proposed requirement for Air Quality Assessments to be submitted for all major developments and for a preliminary Air Quality Assessment to be carried out before designing the development is supported.</p> <p>Paragraph 9.1.8</p> <p>The draft London Plan should recognise that particular care should be taken not only with developments that are in Air Quality Focus Areas but also with developments in any area of existing poor air quality.</p> <p>The draft London Plan should also recognise that tackling omissions will be costly and there could be</p>

		additional cost implications for small businesses and fleet operators (including Councils) that may be passed on to end-users / customers.
Policy SI5	Water infrastructure	<p>Paragraph 9.5.7</p> <p>The draft London Plan should identify which are the groups that are ‘vulnerable’ in the context of water bills rising in cost.</p>
Policy SI6	Digital connectivity	<p>The draft London Plan should highlight the importance of opportunities being take to ‘future proofing’ in development areas and / or for individual proposals. The opportunities afforded by such schemes including ‘empty’ conduits which may then accept fibre and other cables should be referenced.</p> <p>Boroughs should make sure that new developments are provided with infrastructure. However the infrastructure in some places, such as Rainham is currently not adequate, so this needs to be supported prior to/in addition to organisation within individual buildings.</p> <p>In the section 11.1.44 on digital infrastructure provision, it states that decisions on where to invest in infrastructure are determined on a demand-led basis. However it does not say whether this takes into account the needs of businesses as well are residential areas. We will not be able to develop the industry improvements in Rainham associated with greater intensity of development without improvements in digital infrastructure in the area.</p>
Policy SI10	Aggregates	<p>Paragraph 9.10.2</p> <p>Please see Annexe 1 submitted with the Havering response letter as this sets out commentary on the importance of exploring the scope for mineral working in areas outside the four boroughs identified in the policy for land bank apportionment purposes. This is in recognition of the harm that has been done to Havering’s Green Belt and the adverse implications from working minerals such as environmental damage, loss of amenity for residents and traffic problems.</p> <p>Havering recognises that minerals can only be worked where they occur and that London needs an adequate</p>

		supply of construction materials. The scope for minerals winning in areas outside the four boroughs identified for apportionment purposes in paragraph 9.10.2 is welcomed and the Mayor should be much more proactive in seeking to ensure that opportunities from potential sources in areas like the Lee Valley are maximised. This would be a more equitable way than concentrating minerals operations in boroughs like Havering which have borne the brunt of extraction for many years and suffered the adverse environmental and traffic impacts.
Policy SI11	Hydraulic fracturing (fracking)	<p>Paragraphs 9.11.3 and 9.11.4</p> <p>These statements could be strengthened to add weight to refusals for fracking on Green Belt land in Havering and other outer London areas – i.e. “applications would not be considered unless there is a case made for exceptional opportunity for both the borough and London as a whole to benefit long term.</p>
Policy SI14	Strategic Waterways – strategic role	Havering strongly supports the policy as it recognises the importance of London’s waterways as multi-functional assets including the several topics identified in paragraph 9.14.2 such as transport, recreation, natural habitats and their cultural and heritage importance.
Policy SI15	Water transport	<p>Havering strongly supports the policy as it recognises the importance of the river Thames in transport terms.</p> <p>Criteria D</p> <p>Havering supports the policy to protect existing safeguarded wharves and the need for boroughs to identify new locations for wharves.</p> <p>Havering would like to see greater use of the river for freight and it made this point in its response to the draft Mayor’s Transport Strategy in autumn 2017.</p> <p>Para 9.15.1</p> <p>Havering welcomes the Mayor of London’s intention to work with relevant partners to increase the number of people travelling by the river on passenger and tourist services. Havering would like to see feasibility work carried out to extend river passenger services eastwards to Havering and beyond.</p>

		<p>Para 9.15.2</p> <p>Havering welcomes that the Port of London Authority and Transport for London will be developing a Pier Strategy for London to promote extending river services further east.</p> <p>Para 9.15.4</p> <p>Havering recognises the advantages of maximising use of the river to transport freight including reducing the number of HGV's on the strategic road network.</p> <p>Whilst Havering welcomes the Mayor's intention to bring inactive sites into use, the London Mayor must recognise that in some cases (in particular with Phoenix and Halfway Wharf in Havering) significant funding will be required to bring these wharves up to a suitable standard for further re-use.</p>
Policy SI16	Waterways – use and enjoyment	Havering supports the policy.
Policy SI17	Protecting London's waterways	Havering supports the policy.
Policy SI17	Reducing waste and supporting the circular economy	The significant growth identified in the draft London Plan will have significant resource and cost implications for London Boroughs in terms of greatly increased waste disposal costs.
Chapter 10 : Transport		

Policy T1	Strategic approach to transport	<p>Please refer to Annexe 1 submitted with the Havering response letter where there is extensive commentary about the need for strategic transport infrastructure interventions in Havering if the draft London Plan’s ‘good growth’ agenda is to be delivered.</p> <p>The annexe also highlights Havering’s concerns that the modal shift targets for the borough are misplaced and inappropriate having regard to the provision of public transport facilities and network.</p> <p>Para 10.1.3</p> <p>It is welcome that the Mayor of London will work with partners to minimise the number of delivery trips on the road network. Havering is keen to explore the opportunities available to make greater use of the river for freight transport.</p>
Policy T2	Healthy streets	<p>Havering supports the principle of ‘Healthy Streets’ whilst recognising that such proposals must be developed and implemented with a full recognition that transport and movement in Outer London is very different to that in Central and Inner London. PTAL levels across most of Havering are generally very low. The absence of strong public transport routes on a north-south basis results in a heavy reliance on the private car for most trips.</p> <p>The draft London Plan should recognise that a ‘one size fits all’ approach to the implementation of ‘Healthy Streets’ projects must be tailored to take account of the particular circumstances in Outer London such as Havering.</p> <p>Paragraphs 10.2.1 to 10.2.7</p> <p>Havering welcomes that the ‘Healthy Streets’ approach has a particular focus on improving health and reducing health inequalities.</p>
Policy T3	Transport capacity, connectivity	<p>Please see Annexe 1 submitted with the Havering response letter in which extensive commentary is provided on the transport interventions that should be included in Table 10.1 in order to support the delivery of the ‘good growth’ agenda and to address the limitations of the existing public transport network in Havering which</p>

	and safe guarding	will continue to force many trips by private car in the absence of realistic alternatives..
Policy T5	Cycling	<p>Paragraph 10.5.5</p> <p>Havering supports facilities for disabled cyclists being included within wider facilities for cyclists.</p>
Policy T6B	Car parking	<p>Please see Appendix 1 submitted with the Havering response letter where there is extensive commentary on how the particular transport circumstances of Outer London boroughs like Havering should be fully reflected in the development and application of parking standards.</p> <p>Havering is concerned that basing car parking provision on PTALs is inappropriate in Outer London. PTAL levels reflect the availability of public transport journeys to central London rather than being representative of the relatively limited available public transport accessibility for journeys within Havering and out into Essex. PTALs do not realistically reflect accessibility for the journeys that local residents need to make on a regular basis to local facilities and services. This reflects why part of the borough with high PTALS such as Romford and Upminster and with good access into central London still require more local journeys to be undertaken by private car.</p> <p>Outer London boroughs like Havering have more cars per household than the average in Greater London as a reflection of how journeys are made in the borough. Havering strongly considers that boroughs are best placed to determine appropriate parking standards for their areas given the detailed knowledge and understanding they have of the issues and the localities.</p>
Policy T7	Freight and servicing	<p>Havering considers that the policy should more explicitly recognise and promote the opportunities for the river Thames to be used for freight. Havering commented on this in its response to the draft Mayor's Transport Strategy in autumn 2017).</p> <p>Criteria C</p> <p>Havering supports safeguarding of wharves.</p>

Policy T8	Aviation	<p>Criteria C</p> <p>Havering supports the environmental impacts of aviation being acknowledged and the assessment of airport expansion schemes. Environmental impacts arising from aircraft using London City Airport continues to be an issue of great concern for some Havering residents. The Council is committed to maintaining its 'watching brief' on aviation matters so that it can safeguard Havering's environment.</p>
Policy T9	Funding transport infrastructure through planning	<p>Paragraph 10.9.4</p> <p>It is welcome that the Mayor will apply the proceeds from Mayoral Community Infrastructure Levy (MCIL2) to fund other strategic transport projects for which there is a significant funding gap.</p> <p>Given the level of growth anticipated in outer east London over the lifetime of the London Plan the Mayor should consider Havering's key strategic transport aspirations as part of the MCIL funding regime.</p>
Chapter 11 : Funding		
Policy DF1	Delivery of the Plan and Planning Obligations	<p>Please also see Annexe 1 of the Havering response letter where there is extensive commentary about the importance of social and community infrastructure facilities being provided to support new homes and communities.</p> <p>The London Plan should recognise that whilst physical infrastructure can be planned/funded, this does not necessarily mean that it will be resourced. Historically, for example, there have been difficulties in recruiting General Practitioners (GPs) to Havering. This has meant that, whilst Havering has lower level need compared to inner London boroughs, there has been a greater challenge in meeting the need.</p> <p>The delivery of homes envisaged in the draft London Plan will increase the demand for sports and social /</p>

		<p>community infrastructure and this should be recognised. There should be a specific section on funding for sport.</p> <p>The section on Transport should recognise that safer walking and cycling routes will require increased funding.</p> <p>The section on funding for culture should set out a Mayoral commitment to securing improved funding for culture such as statutory funding.</p> <p>The draft London Plan needs to recognise that funding and resources in boroughs is currently tightly constrained and will remain so. The responsibilities set out in the draft London Plan for London Boroughs in terms of plan making and preparation, as well as the preparation of specific items such as design codes, will be demanding.</p> <p>The Mayor should look to assist and / or provide appropriate resources and guidance so that boroughs can meet these challenges effectively and efficiently without compromising on their other planning activities and functions.</p>
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London Borough of Havering

February 28 2018