

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
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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