

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>

Policy GG3	Creating a healthy city	<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>
Policy GG4	Delivering the homes Londoners need	<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>
Policy GG5	Growing a good economy	<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>
Policy GG6	Increasing resilience	<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	<p>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.</p>
Policy D13	Noise	<p>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.</p>
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		

<p>Policy T1</p>	<p>Strategic approach to transport</p>	<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>
<p>Policy T2</p>	<p>Healthy streets</p>	<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>
<p>Policy T3</p>	<p>Transport capacity, connectivity</p>	<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>
--	--	--

London Borough of Havering

February 28 2018