

# CABINET

<b>6.30 p.m.</b> <b><u>Please note time</u></b>	<b>Monday</b> 9 October 2006 <b><u>Please note day</u></b>	Council Chamber Town Hall
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Members 9: Quorum 5

## **Councillor Michael White**

Councillor Steven Kelly (Deputy Leader)

Councillor Michael Armstrong

Councillor Peter Gardner

Councillor Andrew Curtin

Councillor Barry Tebbutt

Councillor Paul Rochford

Councillor Eric Munday

Councillor Roger Ramsey

Councillor Geoffrey Starns

## **Leader of the Council (Chairman)**

Sustainable Communities

Housing & Regeneration

Public Safety

Public Realm

StreetCare & Parking

Environmental & Technical Services

Performance & Corporate

Resources

Children's Services

***For information about the meeting please contact:  
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## **AGENDA**

### **1 ANNOUNCEMENTS**

On behalf of the Chairman, there will be an announcement about the arrangements in case of fire or other events that might require the meeting room or building's evacuation.

### **2 APOLOGIES FOR ABSENCE (if any) - receive.**

### **3 DECLARATION OF INTERESTS**

Members are invited to declare any interests in any of the items on the agenda at this point of the meeting. Members may still declare an interest in an item at any time prior to the consideration of the matter.

### **4 MINUTES**

To approve as a correct record the minutes of the meeting held on 20 September 2006, and to authorise the Chairman to sign them (to follow when available)

### **5 HAVERING LOCAL DEVELOPMENT FRAMEWORK: APPROVAL OF SUBMISSION CORE STRATEGY AND SITE SPECIFIC ALLOCATIONS DEVELOPMENT PLAN DOCUMENTS AND PROPOSALS MAP**

Stephen Evans  
Chief Executive



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**MEETING****DATE****ITEM****CABINET****9 October 2006****5**

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**Cabinet Member: Cllr Michael Armstrong**

**Relevant Overview & Scrutiny Committee: Culture and Regeneration**

### **REPORT OF THE CHIEF EXECUTIVE**

**SUBJECT: HAVERING LOCAL DEVELOPMENT FRAMEWORK:  
Approval of Submission Core Strategy and Site Specific  
Allocations Development Plan Documents and Proposals Map.**

#### **SUMMARY**

Members have previously been advised that the Planning and Compulsory Purchase Act (2004) requires the Council to replace its Unitary Development Plan (UDP) with a Local Development Framework (LDF). Havering's LDF will consist of a collection of Local Development Documents (LDDs) which will set out the planning policies for the borough up to 2020. In line with the Council's Local Development Scheme, it is the Core Strategy and Site Specific Allocation Documents which are being prepared first and several reports have been considered by Cabinet as key 'milestones' have been reached in the delivery of these.

The Core Strategy will set out a Vision and strategic planning objectives for the future of the borough as well as borough wide core and development control planning policies. It will provide the framework for all the other LDDs brought forward under the umbrella of the LDF. The Site Specific Allocation document will set out where there are specific allocations for individual sites such as sites allocated for

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housing other than sites which will be included in the Romford Action Plan and Joint Waste documents which are being progressed separately. In addition, a Proposals Map must be prepared and approved which shows the designations and sites referred to in the Core Strategy and Site Specific Allocations DPDs. A draft version will be available for Cabinet and a final proof available for Full Council.

The report outlines the extensive public consultation undertaken on the Core Strategy and Site Specific Allocations document at the Preferred Options stage from November 2005 to February 2006 and includes (Appendix 1c) a comprehensive assessment of all the representations submitted from the public and organisations.

Details are set out in the report of where changes are proposed compared to the Preferred Options to enable the preparation of the Submission versions of the Core Strategy and Site Specific Allocations documents (Appendices 2 and 3). Subject to Member approval these will be submitted to the Secretary of State in October 2006 with the timetable thereafter including Independent Examination in Spring 2007 and adoption as formal Council policy in late 2007. Finally, it is recommended that the Submission Core Strategy and Site Specific Allocations documents be adopted for the purposes of development control pending their formal adoption.

## **RECOMMENDATIONS**

1. To recommend to the Council that Appendices 18, 19 and 20 of the Statement of Compliance (attached as Appendices 1a-1c) is approved which includes the Council's suggested response to the consultation feedback on the Preferred Options and the minutes of the Preferred Options Focus Groups.
2. To recommend to the Council that the Core Strategy Submission Development Plan Document (DPD) (attached as Appendix 2) be approved.
3. To recommend to the Council that the Site Specific Allocations Submission DPD (attached as Appendix 3) be approved.
4. To recommend to the Council that a Proposals Map which shows the designations and site allocations set out in the Core Strategy and Site Specific Allocations DPDs be approved.
5. To recommend that Council notes the tests of 'soundness' and the commentary on how the DPDs comply with them provided in Appendix 4. The inspector at the examination will test the Core Strategy and Site Specific Allocation DPDs against these tests before issuing recommendations in a binding report.
6. That the Final Sustainability Appraisal Reports to accompany the Core Strategy and Site Specific Allocation Submission DPDs be approved by the Lead Member for Regeneration and Planning.

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7. To recommend to the Council that the Core Strategy and Site Specific Allocations Submission DPDs be considered in conjunction with, and where appropriate complementary to, Havering's existing UDP ( adopted in March 1993), with the weight attached to each policy in the decision making process dependent on the nature and number of the representations received during the Submission consultation period in accordance with the principles set out in the Government's guidance note 'The Planning System: General Principles'.

<b>REPORT DETAIL</b>
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## **Introduction to Local Development Frameworks**

### **Background**

1. In September 2004 the Planning and Compulsory Purchase Act 2004 was enacted. This brought in a new system of development planning, requiring Havering to replace its current Unitary Development Plan (UDP) with a Local Development Framework.
2. Havering's Local Development Framework will consist of a collection of Local Development Documents (LDDs) which collectively will set out the planning policies and sites for the borough up to 2020. Havering's Local Development Scheme sets out the timetable for producing these Local Development Documents and has been approved by the Secretary of State. It was adopted by Full Council in June 2005. It has been revised since in response to the preparation of the Joint Waste Development Plan Document which is being prepared with the London Boroughs of Barking and Dagenham, Newham and Redbridge.
3. The Local Development Scheme identifies that the Core Strategy and Site Specific Allocations Development Plan Documents (DPDs) will be prepared first. The former will set out the Vision and strategic objectives for the future planning of the borough as well as strategic and detailed borough wide planning policies and provide the framework for all the other LDDs. The Site Specific Allocations document will set out where there are specific allocations for individual sites such as sites allocated for housing, other than sites which will be included in the Romford Area Action Plan and Joint Waste Development Plan Documents. Whilst the Core Strategy sets out the broad locations for land use, the Site Specific Allocations document sets out the sites in detail.

### **Key stages in the preparation of these documents so far**

4. The process of adopting the Core Strategy and Site Specific Allocation Development Plan Documents (DPDs) involves a number of statutory phases and has to include extensive consultation in line with the Council's adopted

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Statement of Community Involvement. Initially, in 2004, Issues and Options were prepared in consultation with the community and other stakeholders. In the light of the feedback received on these, the Council identified Preferred Options for the policies and sites for the future planning of the borough and consulted on these from November 2005 to February 2006.

- 5 This report highlights the changes proposed in response to the feedback on the Preferred Options and now brings forward recommended Submission Core Strategy and Site Specific Allocations Documents for Member approval. It also seeks member approval for a proposals map covering the whole borough. This is necessary to show the designations and sites contained within the Core Strategy and Site Specific Allocations DPD, and will be submitted alongside them. A draft of this map will be available to view at Cabinet and a final proof for Council.

### **Content and structure of this report**

6. The rest of this report is set out in four main sections as follows :
  - Summary of the consultation process on the Preferred Options
  - Changes recommended to the Core Strategy and Site Specific Allocations DPDs to produce the Submission documents in Appendices 2 and 3
  - Review of the Sustainability Appraisal process
  - Next steps

### **Summary of the consultation process on the Preferred Options for the Core Strategy and Site Specific Allocations documents.**

7. In accordance with the Council's Statement of Community Involvement the Core Strategy and Site Specific Allocations Preferred Options were consulted on from 30 November 2005 to 24 February 2006.
8. Consultation on the Preferred Options was required to satisfy Regulation 26 of the Town and Country Planning (Local Development) (England) Regulations 2004.
9. The consultation was undertaken in the following way:
  - The centrepiece of the consultation was a questionnaire summarising the Preferred Options in 28 questions. The questionnaire included space for respondents to include detailed comments in addition to responding to the questions.
  - Direct mailing of questionnaires and e-mailing of link to online questionnaire to all those on the Council's established LDF database;
  - Distribution of questionnaires to libraries, public advice and service centre, council offices and leisure centres in the borough;
  - Direct mailing of the questionnaire to households that requested them;

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- On-line consultation via the Council's website.
  - Access, Age Concern, Environment, Health, Heritage, Housing Association and Residents Focus Groups
10. The consultation was publicised in various ways: posters displayed in the local libraries, leisure centres and council buildings; coverage in 'Living in Havering' and Havering Business Focus; a press release was also sent explaining the consultation process and an advert placed in the Yellow Advertiser. Staff also attended each Area Committee to explain the consultation and how people could respond.

### **Overview of the response**

11. 245 individual questionnaires were returned to the Council by members of the public (see para.14 below).
12. A total of 4530 individual points of representation were received on the detailed wording of the Preferred Options reports (see para.16 below).
13. The Statement of Compliance covers all the consultation undertaken so far in preparing the Core Strategy and Site Specific Allocation DPDs. It therefore includes materially previously reported to cabinet at the options stage. For this reason only those parts of the Statement of Compliance which deal with the feedback received to the Preferred Options consultation appended to this report. Therefore Appendix 1 gives a detailed account of the questionnaire response (Appendix 1b) and the representations received from members of the public and organisations (Appendix 1c) along with the Council's recommended response. The following section of this report highlights the key features of the consultation responses.

### **Questionnaire response**

14. 62% of the questionnaires received were from south Havering and nearly all of these had identical responses to the questions. Questionnaires from south Havering objected to half of the Preferred Options as follows:
- To allow business, industrial and warehousing uses in the borough's regionally important industrial areas but prioritise high technology and advance manufacturing uses in Beam Reach (93% against)
  - To retain and protect business, industrial and warehousing uses in the locally important industrial areas but, where appropriate, release industrial sites for other uses which in most cases will be housing (97% against)
  - To retain the Romford Office Quarter but allow the introduction of new mixed use development including new housing provided there is no net loss of office space (94% against)
  - To require that where 15 or more new homes are built on a single site, or on new housing sites over 0.5 hectare, 35% should be affordable for people on low and average incomes (94% against)

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- To, where appropriate, seek improvements to public transport with new developments. Also, in line with existing policy, to require less car parking in areas with good public transport links and ensure that developments take account of the needs of pedestrians and cyclists (95% against)
  - To remove five sites which the Council considers do not make a contribution to the Green Belt (95% against)
  - To allow the loss of a community facility unless it can be demonstrated that there is a need locally for the current uses or any alternative use (96% against)
  - To allow housing and where appropriate community facilities to be built on redundant employment sites (94% against)
  - To allow the release of limited areas of poor quality or underused areas of open space to help fund the provision of high quality parks, playing fields and open spaces across the borough (97% against)
  - To promote Hornchurch as a cultural centre and seek to diversify the night time economy of Romford through encouraging arts and cultural uses. Also, to generally diversify evening and night time entertainment throughout the borough so that the borough's town centres cater for all groups and ages in the community (92% against)
  - To insist that only waste generated within East London and a fair share of waste from Central London is managed within Havering (96% against)
  - To only incinerate or landfill that waste that cannot be composted or recycled (93% against)
  - To wait until the Council has responded to the Mayor of London's new minerals extraction target until showing where mineral reserves may exist and in the meantime to assess the suitability of proposals through the planning applications process (93% against)
  - To require higher environmental standards during mineral extraction and for the restoration of minerals sites (92% against)
15. These responses skew the result of the questionnaire consultation. Questionnaires from the rest of the borough objected to 3 of the Preferred Options put forward. The three Preferred Options objected to were:
- A. Removal of 5 sites from the Green Belt. The Preferred Options proposed to remove:
- Tay Way
  - Whitworth Centre
  - Part of Lot 7 Hornchurch Airfield
  - Spring Farm Car Park
  - Rush Green Open Space
- The recommended submission Core Strategy no longer proposes to remove Spring Farm Car Park and Rush Green Open Space from the Green Belt. However, it considers that there are exceptional circumstances justifying the removal of the other three. In addition it

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also proposes the removal of part of the Mardyke Farm site from the Green Belt. The reasons for this are covered later in this report.

- B. The Preferred Options included allowing the release of limited areas of poor quality or underused areas of open space to help fund provision of high quality park, playing fields and open spaces across the borough. The submission approach proposes to continue this Preferred Option.
- C. The Preferred Options included provision for the loss of community facility where there is no need for the current use or any alternative use. The submission approach proposes to continue this Preferred Option.

### **Detailed responses to Preferred Options documents**

- 16. Overall 1560 members of the public and 60 organisations made representations on the consultation documents. These responses comprised a total of 4530 points on the detailed working of the Preferred Options reports. Many representations included in this total relate to both the Core Strategy and Site Specific Allocations documents. Some respondents submitted more than one representation.
- 17. Of the public responses, 514 representations objected to 5000 new homes in London Riverside and 526 representations objected to 8000 new homes in Havering. All these representations also objected to loss of Green Belt. Within these 1040 responses additional representations were received objecting to new housing in the following locations :
  - 372 to Dovers Corner
  - 90 to Harold Wood Hospital
  - 185 to Elm Park
  - 40 to Como Street
  - 209 to St George's Hospital

A further 475 representations were received objecting to the loss of St George's Hospital

15 representations were received supporting the removal of the Cardrome from the Green Belt.

- 18. Appendix 1a of this report gives a detailed account of the feedback received from the several focus groups.

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### **Recommended changes to the Preferred Options Core Strategy and Site Specific Allocations documents to prepare the Submission documents**

19. Staff have considered every response received on the Preferred Options and the feedback received at the focus groups. As a result of this, staff propose a number of amendments to the Core Strategy and Site Specific Allocations Preferred Options to be reflected in the recommended Submission documents included in Appendices 2 and 3. Apart from these changes, the proposed Submission documents are faithful to the policy approaches and sites contained within the Preferred Options documents. The key recommended changes are as follows:

#### **Core Strategy Vision and objectives**

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- 20. The Vision and objectives have been revised so that they now recognise the importance of Havering's latest adopted Community Strategy as the overarching context for the Core Strategy. This is in response to advice from the Government Office for London about the need for the Core Strategy to be very clearly tied to the adopted Community Strategy.
- 21. To achieve this staff have:
  - Clearly stated the Community Strategy vision, mission and key themes as a preface to the Vision in the Core Strategy;
  - Re-ordered and grouped the Core Strategy Vision and Objectives under new headings;
  - Made a number of minor revisions to the wording of the Core Strategy Vision and Objectives. Some of these amendments are also necessary to ensure greater consistency with other existing documents such as the Romford Urban Strategy, Havering's Supporting People Strategy, the GLA London Plan. These documents have been prepared in parallel with the LDF and the opportunity has been taken in the Submission documents to fully reflect these as they provide an important context for the LDF and reinforce much of its strategy. The revisions have also enabled the Submission Core Strategy and Site Specific Allocations documents to better accord with the Government's definition of Culture and its important role in improving quality of life for individuals and the community generally.
- 22. Staff consider that the changes make the Council's strategy clearer. They are consistent with the approach Members previously approved for the Core Strategy and Site Specific Allocations documents that were the subject of the Preferred Options consultation.

**Cabinet, 9 October 2006****Recommended Changes to Core Strategy Core Policy 14 : Green Belt****(A) Mardyke Farm (part)**

23. Staff suggest that part of the Mardyke Farm site is removed from the Green Belt to deliver the following exceptional benefits:
- The complete remediation of the Mardyke Farm Landfill Site, to a higher specification than would otherwise be achieved under the approved restoration scheme.
  - The creation of a high quality public open space on the retained Green Belt land, providing a mix of formal and informal parkland, open space and sports facilities, greatly improving the environment and amenity of this part of the 'Dagenham Corridor'.
  - Creation of a sustainable new community by:
    - providing a more mixed and more balanced community than could be achieved via the redevelopment of the Mardyke Estate alone, through the provision of a wider variety of dwelling tenures, sizes and types, particularly houses rather than flats
    - enabling the decanting of residents from the Mardyke Estate during its redevelopment, without recourse to off-site decanting for those residents who wish to continue living in the development .
    - making much better social provision in the form of improved public transport, shops, services and community facilities.
24. Staff consider that these reasons constitute in combination exceptional circumstances justifying the removal of part of the site from the Green Belt. Further detail is provided in the Core Strategy in Core Policy 14 and in the Site Specific Allocations in SSA14.

**(B) Whitworth Centre and Broxhill Centre**

25. The Preferred Options proposed to remove the Whitworth Centre from the Green Belt and identify the Broxhill Centre as a Major Developed Site in the Green Belt. Staff now consider that the openness of the Green Belt can be better maintained and enhanced by treating these two sites together. Therefore, staff suggest retaining the Broxhill Centre in the Green Belt and allocating it for public open space and playing fields including the re-provision of the redundant playing fields from the Whitworth Centre site. This would enable the Whitworth Centre site to be removed from the Green Belt and to be developed to its full potential. Further detail is provided in the Core Strategy in Core Policy 14 and in the Site Specific Allocations in SSA2.

**(C) Spring Farm Car Park**

26. Staff suggest that the Spring Farm Car Park site should remain in the Green Belt .

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(D) Rush Green Open Space

27. Staff suggest that the Rush Green Open Space site should remain in the Green Belt .

(E) Quarles Campus

28. Staff suggest identifying the Quarles Campus as a Major Developed Site in the Green Belt following a representation received from Havering College.

**Other Changes Recommended to Core Strategy and Development Control Policies**

(A) CP4 Town centres, CP5 Culture, DC15 Locating retail and service development, DC19 Locating cultural facilities

29. In response to the GLA and GOL, Core Strategy policy now 'requires' rather than 'encourages' retail, services and the more intensive leisure and recreation facilities to follow the sequential approach to locating in town centres where appropriate.

(B) DC2 Housing mix and density

30. In response to the GLA the Core Strategy policy now sets out indicative mix for market housing with regard to GLA Housing Requirements Study.

(C) DC50 Sustainable design and construction

31. In accordance with the Council's recently adopted Interim Planning Guidance (September 2006) the Core Strategy now 'requires' rather than 'encourages' major development to be of a high standard of sustainable design and construction and to incorporate on-site renewable energy equipment to reduce predicted CO2 emissions by at least 10%

(D) DC66 Tall buildings and structures

32. In response to GLA the Core Strategy now includes a policy on tall buildings and structures.

(E) DC67 Buildings of Heritage Interest

33. In response to feedback from the Heritage Focus Group this policy states that the Council will take into account the contribution that other buildings of historical and/or architectural interest make to heritage.

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### Annex 3 Core Strategy

34. In response to advice from the Government Office for London a housing trajectory has been included which charts actual and forecast completions against historic and future housing provision targets.

### **Recommended changes to the Site Specific Allocations Document**

35. The following sites are recommended to be deleted from the Preferred Options document in the preparation of the Submission document:
- Roneo Corner-deleted so as not to prejudice imminent planning application
  - Aherns Crow Lane-planning permission approved
  - Oldchurch Hospital-planning permission approved
  - North St Bus Garage-Core Strategy now sets out Council's approach to protecting land for transport facilities across the borough and for all travel modes.
36. The detail for the following sites is recommended to be changed:
- Broxhill Centre combined with Whitworth Centre site
  - Beam Park Station-incorporated within Beam Park site
  - Upminster Cemetery and Crematoria-now treated as one site
37. The following site is recommended to be added:
- Mardyke Development - see recommended change for Core Policy 14, Green Belt

### **Sustainability Appraisal process**

38. The Sustainability Appraisal (SA) is a requirement that the Council has to satisfy under Sections 19 (5a and b) of the Planning and Compulsory Purchase Act. This appraisal helps to ensure that the Council promotes sustainable development through the better integration of sustainability considerations in the preparation of the Core Strategy and Site Specific Allocations Development Plan Documents. Ensuring that the Core Strategy and Site Specific Allocations documents are underpinned by sound sustainability principles has been a key objective throughout the preparation. This has to be continued into the preparation of the Submission versions of these technical documents which support the Core Strategy and Site Specific Allocations documents.
39. The structure of the SA reports to be prepared for the Submission documents will be in line with that suggested in Figure 20 of 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks-consultation paper-Office of the Deputy Prime Minister-2004'. Each will bring together the

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environmental, social and economic baseline and sustainability appraisal framework presented in the scoping report as reported to Cabinet, the initial sustainability appraisal of options/sites as reported to Cabinet on 18 July 2005, the sustainability appraisal of the Preferred Options/sites, and an appraisal of significant changes within a single sustainability appraisal report. The report will, therefore, show the whole sustainability appraisal process from establishing the appraisal framework with regard to the main sustainability issues identified from an analysis of the baseline data, to the assessment of initial options and mitigation measures, to the identification and subsequent assessment of Preferred Options. It will also include an assessment of the significant changes made to the Site Specific Allocations DPD in preparing the Submission document. Staff consider that none of the changes made in preparing the Submission Core Strategy are significant and therefore no further Sustainability Appraisal of this is necessary.

40. Staff recommend that the Lead Member for Regeneration and Planning approve the Final Sustainability Appraisal Reports for the Core Strategy and Site Specific Allocations documents.

### **Next Steps**

41. Regulation 28 of the Town and Country Planning (Local Development) (England) Regulations 2004, require that the Core Strategy and Site Specific Allocations Development Plan Documents, the Final Sustainability Appraisal Reports and the Statements of Compliance are submitted to the Secretary of State for an Independent Examination with an Inspector appointed by the Secretary of State. This is scheduled to take place in May 2007. As soon as is reasonably practicable after the documents have been submitted, the Council must make these documents available for inspection at the Council libraries, offices and leisure centres, and in the Public Advice and Service Centres, publish the documents on the Council website, send the documentation to the organisations and individuals on its LDF database and publish details of consultation in an advert in a local newspaper. This period of consultation must last no more or no less than six weeks and staff suggest it should take place from 30 October 2006 to 11 December 2006. Representations received during this period will be considered by the Inspector at the Independent Examination. Consequently there is little or no scope for changes to either DPD between the submission of the documents and the examination.
42. During the examination the Inspector will be testing the 'soundness' of the DPDs against the tests of soundness presented in Planning Policy Statement 12-'Local Development Frameworks', before issuing recommendations in a binding report. The Submission DPDs and Final Sustainability Appraisal Reports have been prepared with regard to these tests. The soundness tests fall into three categories: Procedural Tests; Conformity Tests and Coherence, Consistency and Effectiveness Tests. For Member's information the tests of soundness are provided in Appendix 4 and a commentary is provided to illustrate how staff consider that the Core Strategy and Site Specific Allocations DPDs meet these.

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43. Due to the substantial public consultation that has taken place on them, staff consider that the Core Strategy and Site Specific Allocations documents should be afforded significant weight as material planning considerations. It is recommended that in addition to their Submission to the Secretary of State as under the LDF process, they should be approved for development control purposes, including discussions with potential developers, pending the formal adoption of the LDF in late 2007. In some areas the new policies represent a significant updating of existing policies, particularly in terms of design, transport, and culture. Staff, therefore, consider that it is timely for those Members (Regulatory Services, and Culture and Regeneration Overview and Scrutiny Members) charged with applying and scrutinising these and any future new planning policies to refresh their knowledge and skills in these areas through targeted training. Staff also consider that Regulatory Services and Culture and Regeneration Overview and Scrutiny Members would benefit from training on the mechanics of the new LDF system to ensure that the intended outcomes of policies are delivered and scrutinised. Staff recommend that a report is presented in to cover this in more detail in due course. Appropriate training will, of course, also take place with 'in-house' staff responsible for the implementation of the LDF and the Council's wider planning and regeneration agendas.

**Financial Implications and risks:**

38. The printing and postage costs of the consultation on the Submission documents will be met within the Development and Transportation Planning budget. The costs of the Independent Examination are expected to be lower than the cost for an Inquiry under the former UDP system (which the LDF replaces) because the format of the LDF Examination will be less 'adversarial'. As a result, it is anticipated that the Council's case will be 'led' by staff and there may be less need for specialist legal representation (which formed a significant part of the costs of a UDP Inquiry). Staff consider that, on this basis, adequate provision is available within the Development and Transportation Planning budget for the cost of the Examination. It is expected that the cost of the Council's approach to the Broxhill and the Whitworth Centre sites will also largely rely on existing Council staff although there may be some external input used to prepare supporting material (such as visual presentation material) to fully demonstrate the opportunity here. The cost of this cannot be known at this stage but would be met, in the normal manner, from pre-sales expenditure chargeable against capital receipts generated by the Council's Property Strategy. The proposed Member training has not yet been finalised but may involve a combination of approaches using staff, and possibly, some external facilitators. If the latter is used then the cost is proposed to be met from the existing Member training budget.

**Cabinet, 9 October 2006****Legal Implications and risks:**

39. The Submission DPDs been prepared to satisfy Section 19 (1) and (2) of the Planning and Compulsory Purchase Act 2004 and Regulation 28 of The Town and Country Planning Regulations 2004. The Final Sustainability Appraisal Reports have been undertaken as part of the Sustainability Appraisal process which is necessary to satisfy European Union Directive 2001/42/EC, and Sections 19 (5) a and (5) b of the Planning and Compulsory Purchase Act 2004.
40. Section 20 of the Planning and Compulsory Purchase Act states that the purpose of the Independent Examination is to determine in respect of the DPD whether it is 'sound'. The tests of 'soundness' are contained in PPS12. The The Submission DPDs and Final Sustainability Appraisal Reports have been prepared with regard to these tests (see paragraph 37). If a DPD is considered unsound by the Inspector he/she will issue a set of binding recommendations. The Council must incorporate any changes received by the Inspector and then adopt the DPD.

**Human Resources Implications and risks:**

41. None

**Reasons for the decision:**

42. See legal implications.

**Alternative options considered:**

43. The alternative options were reported to 18 July Cabinet.

**Equalities and Social Inclusion implications:**

44. The purpose of Sustainability Appraisal is to promote sustainable development through better integration of sustainability considerations into the preparation and adoption of Local Development Documents. As well as Environmental objectives Havering's Sustainability Appraisal Objectives include:
- Secure equality of access to services and facilities
  - Foster community identity and participation
  - Reduce poverty & social exclusion
  - Improve health & welfare and reduce health inequalities
  - Improve lifelong learning & skills
  - Ensure people have access to good quality affordable housing
  - Reduce crime and increase community safety

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**STEPHEN EVANS**  
**Chief Executive**

**Background Papers List**

LB Haverling LDF Initial Options (2004)  
LB Haverling LDF Issues and Options (2005 / 06)

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**Appendix 1a (Appendix 18 of Statement of Compliance)**

**Preferred Options Consultation  
Focus Group Notes**

# Havering's Local Development Framework

## Public response to the Core Strategy and Site Specific Allocations Preferred Options Consultation



**Public response to the Core Strategy Preferred Options  
November 2005 to February 2006**

Public consultation on Havering's Local Development Framework commenced in November 2004 when an issues paper was published. This was followed by consultation on an options questionnaire during August and September 2005. This report provides a run down of the consultation on the preferred options questionnaire which was out for consultation from November 2005 to February 2006.

The consultation aimed to achieve the following key objectives:

1. To seek the community's input into the Core Strategy Preferred Options
2. To satisfy Regulation 26 of the Town and Country Planning (Local Development) (England) Regulations 2004
3. To generally encourage involvement by the community in Havering's planning process

This report details the responses of the public to the Local Development Framework Preferred Options obtained from the responses to the consultation booklet and how these have been addressed in preparing the Submission Core Strategy.

**Consultation methodology**

The consultation was undertaken in the following way:

- Direct mailing of consultation questionnaires and emailing of link to online questionnaire to all those on our established database;
- Distribution of consultation questionnaires to libraries, council offices and leisure centres in the borough;
- Direct mailing of the booklet to households that requested them;
- On-line consultation via the Council's website.
- Officer presentations at all the Area Committees

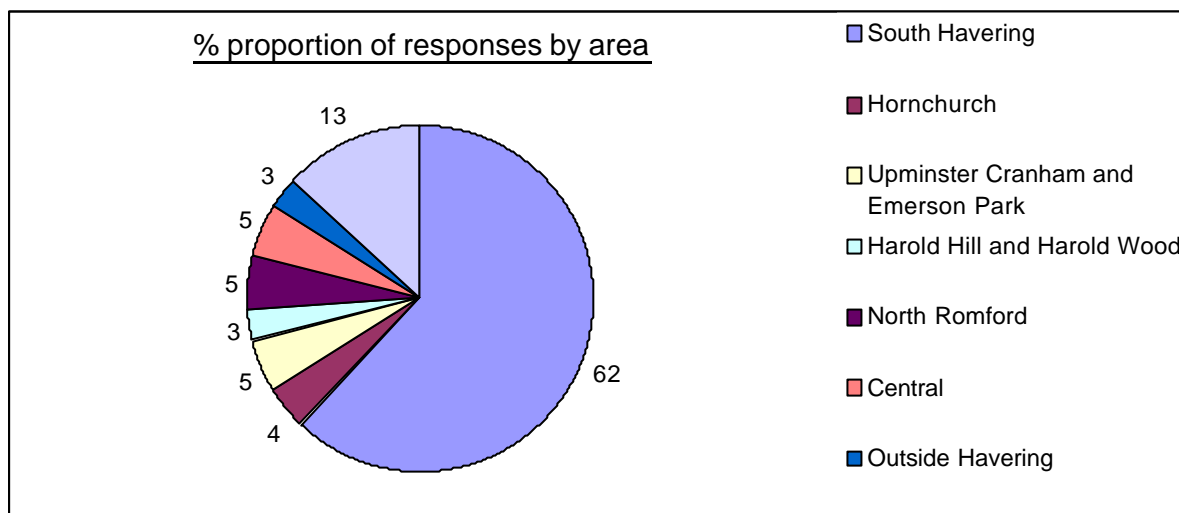
The consultation was publicised in various ways: posters displayed in the local libraries, leisure centres and council buildings; coverage in Living in Havering and Havering Business Focus; a press release was also sent out and an advert published indicating the beginning of the consultation. An on-line questionnaire was available on the Council's website.

**Responses to the Questionnaire**

245 individual questionnaires have been returned to the Council. These were from the following areas:

**Table and Chart 1 - Responses by area**

	South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total
%	62	4	5	3	5	5	3	13	100



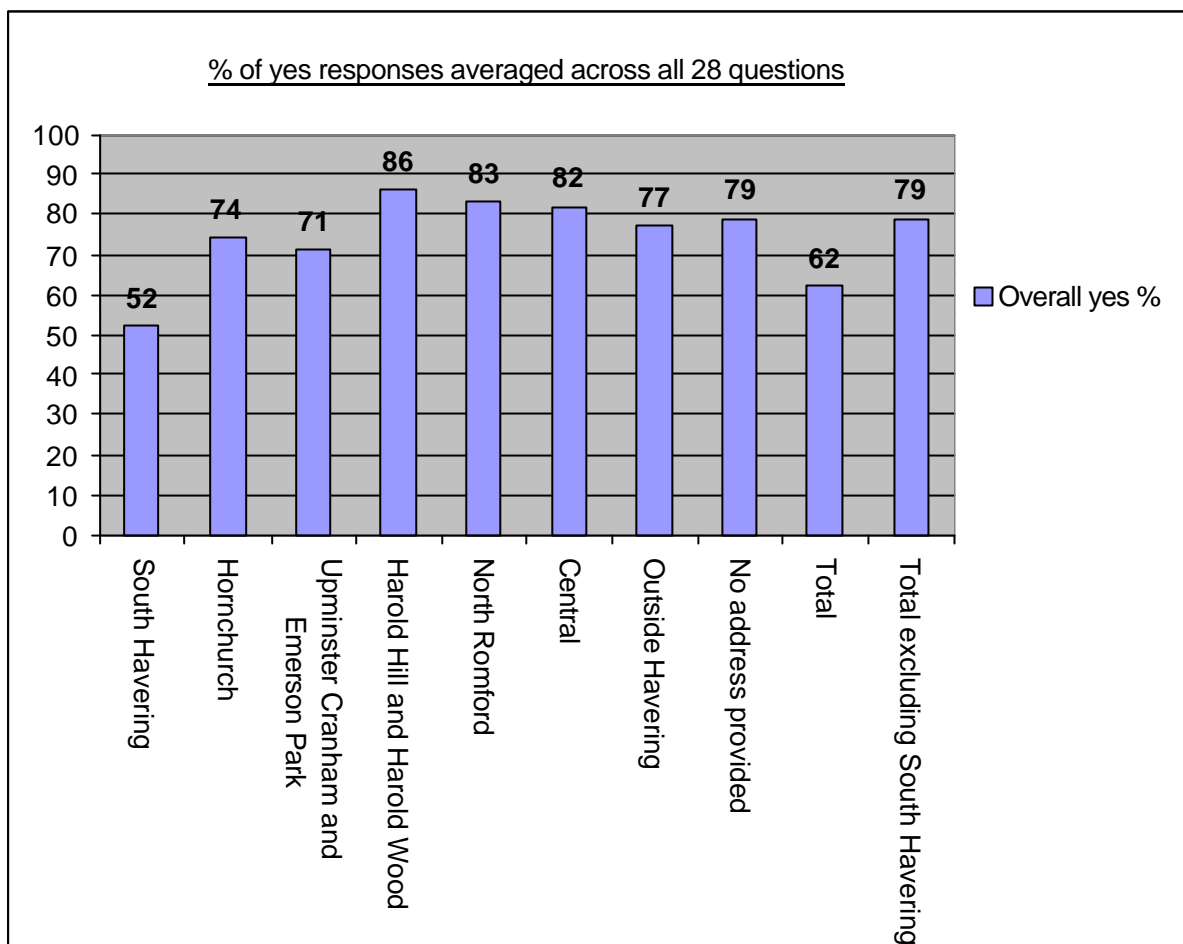
This shows that well over half of all the questionnaires returned were from South Havering. Moreover over 90% of these questionnaires were answered similarly. Throughout the following analysis the results of the feedback are presented not only at a borough level but also on an area basis.

The questionnaire asked people whether they agreed with the preferred options or not. The 28 preferred options were chosen from the original set of 28 options presented in the earlier options questionnaire.

The following table shows that when aggregated across all 28 questions the majority of people in all parts of the borough agreed with the preferred options. This ranged from a slight majority in South Havering (52%) to an overwhelming majority in Harold Hill and Harold Wood (89%).

**Table and Chart 2 - % of the 28 preferred options each respondent supported by area**

	South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total excluding South Havering
Overall yes %	52	74	71	86	83	82	77	79	62	79

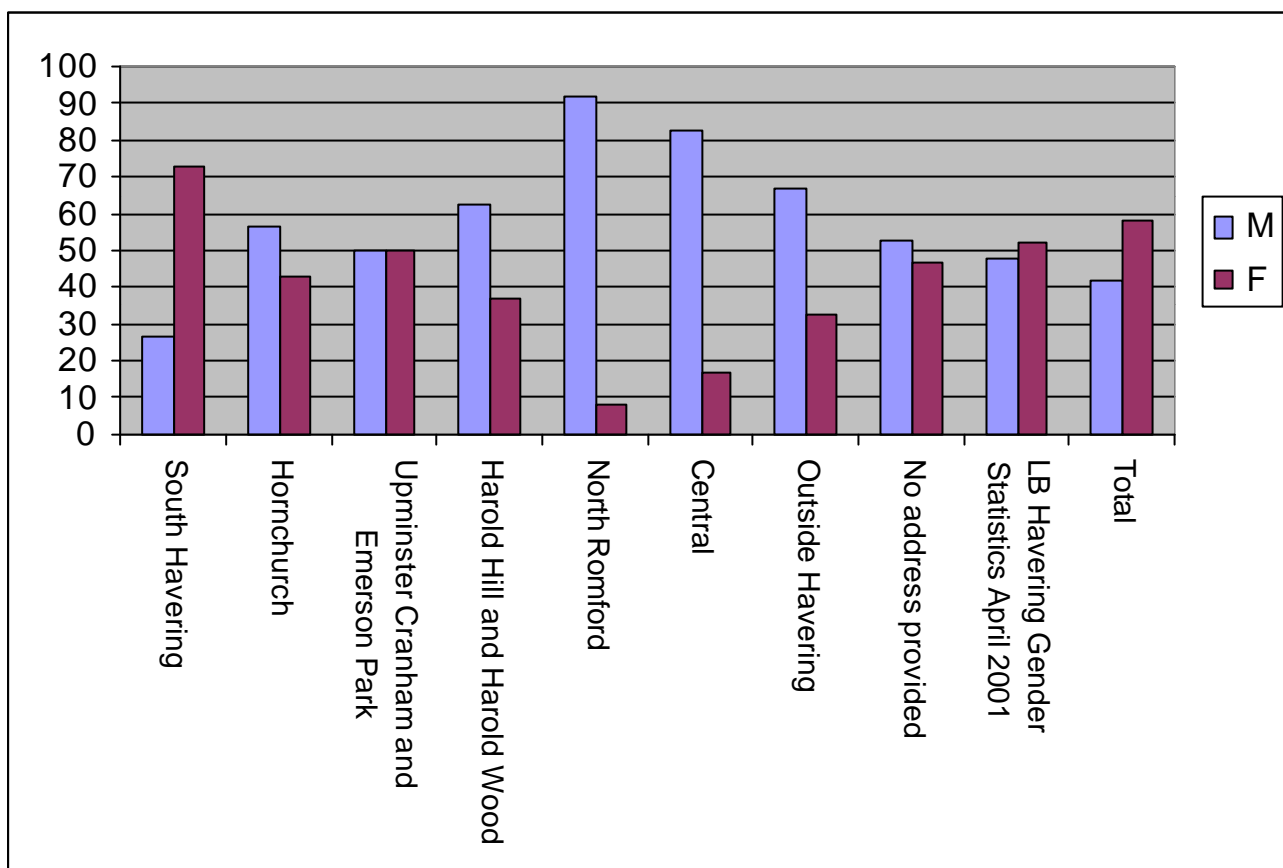


However it is more meaningful to analyse the public response to each of the individual questions, which the aggregated figure hides. First of all however the demographic of the response in terms of age, gender and ethnicity is analysed.

**Demographic of respondents**

Table and Chart 3 – Gender of respondents by area (percentage)

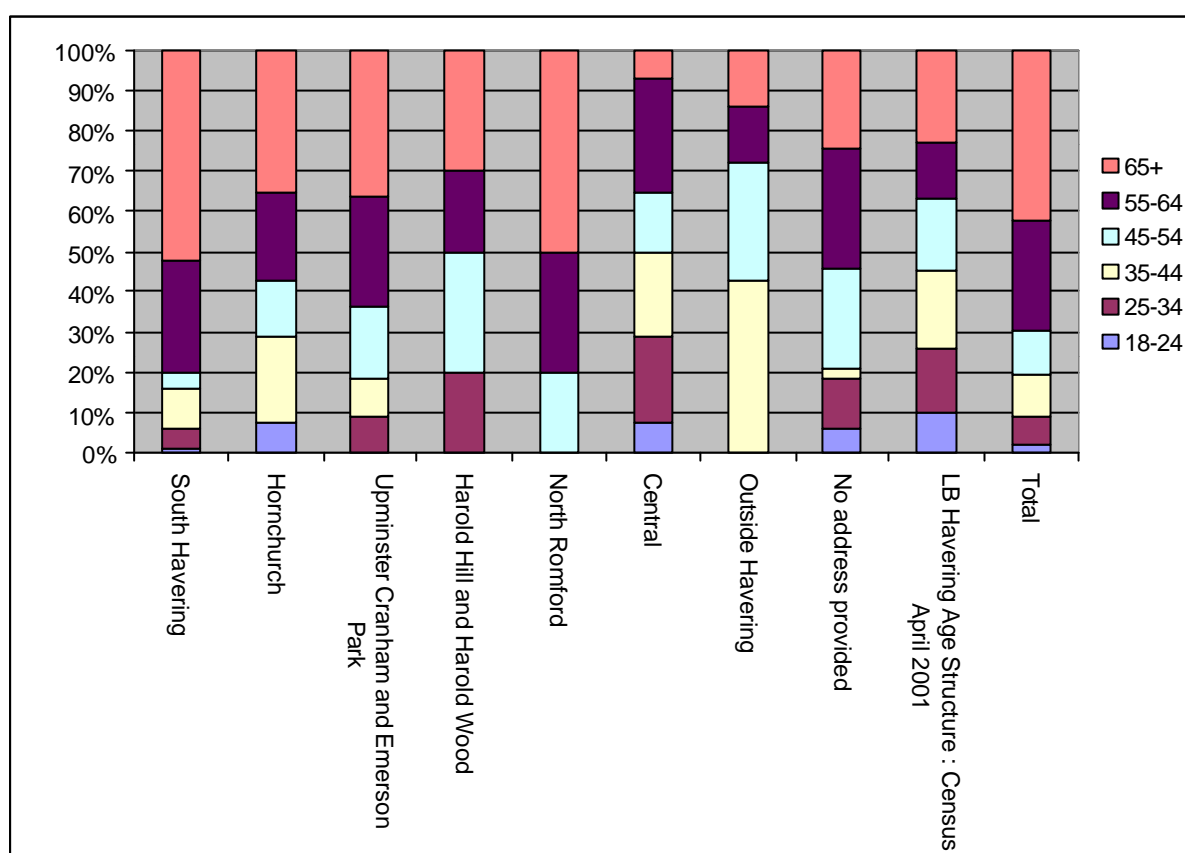
	South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	LB Havering Gender Statistics April 2001	Total
Male	27	57	50	63	92	83	67	53	48	42
Female	73	43	50	37	8	17	33	47	52	58



Overall the gender split was similar to the Borough demographic, but on an area basis the gender split varied greatly from one to the next.

**Table and Chart 4 – Age of respondents by area (percentage)**

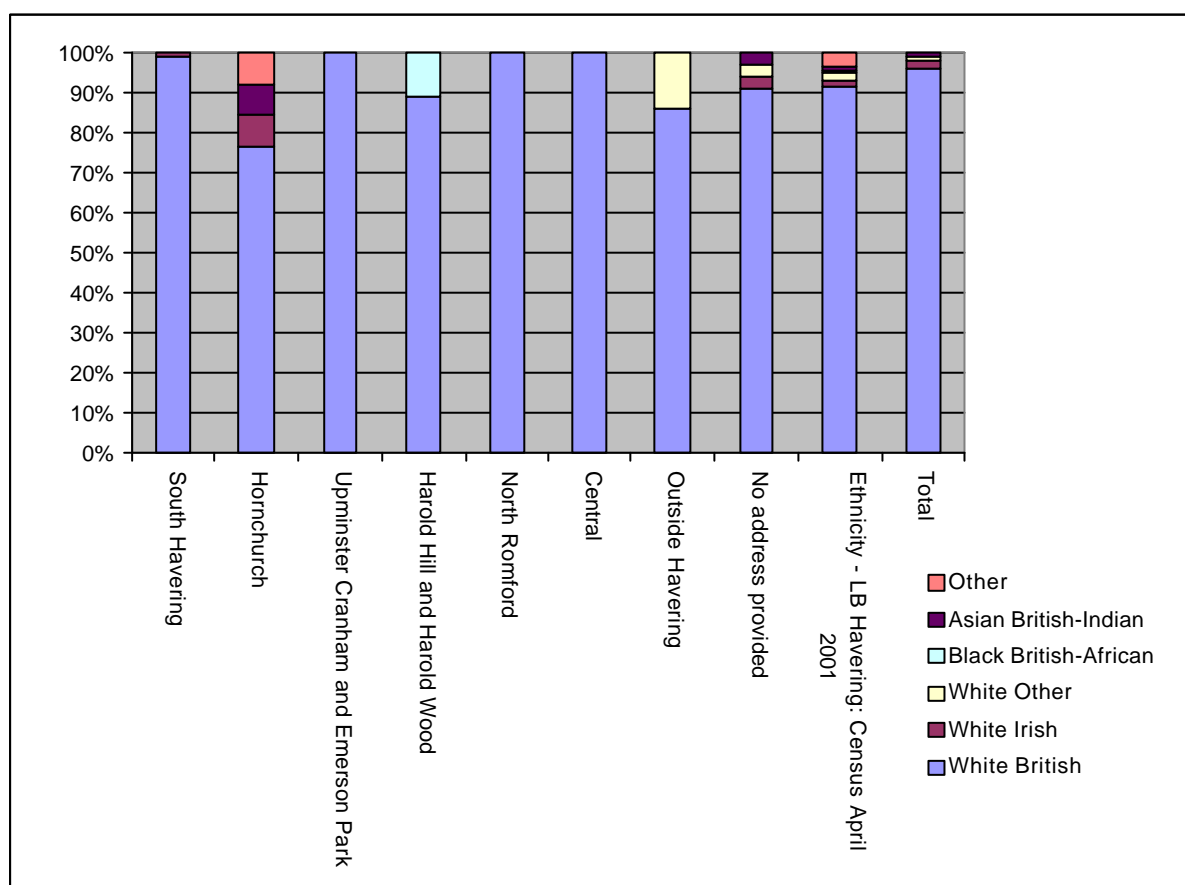
	South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	LB Havering Age Structure : Census April 2001	Total
18-24	1	7				7		6	10	2
25-34	5		9	20		21		12	16	7
35-44	10	21	9			21	43	3	19	10
45-54	4	14	18	30	20	14	29	24	18	11
55-64	28	21	27	20	30	28	14	30	14	27
65+	53	35	36	30	50	7	14	24	23	42



Overall a disproportionate high response was received from the 55-64 and 65+ age groups and consequently a lower response was received from age groups below these. On an area basis South Havering and North Romford had the oldest response whilst the response from North Romford and Hornchurch was closer to the borough demographic.

**Table and Chart 5 – Ethnicity of respondents by area (percentage)**

<b>Groups</b>	South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Ethnicity - LB Havering: Census April 2001	Total
White British	99	77	100	89	100	100	86	90	92	96
White Irish	1	8						3	1.5	2
White Other							14	3	1.6	1
Black British- African				11					0.6	
Asian British- Indian		8						3	1.2	1
Other		8							3.6	



Overall the ethnicity of respondents was similar to the Borough demographic with small variations between areas.

## **The public response to each of the 28 preferred options**

What follows is a run down of the public response for each of the 28 preferred options. Many respondents as well as saying whether they agreed with each of the 28 preferred options also provided additional comments. These comments are provided after the preferred option they relate to. A summary of the Council's approach in the submission document for each preferred options is also given.

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## **ECONOMY**

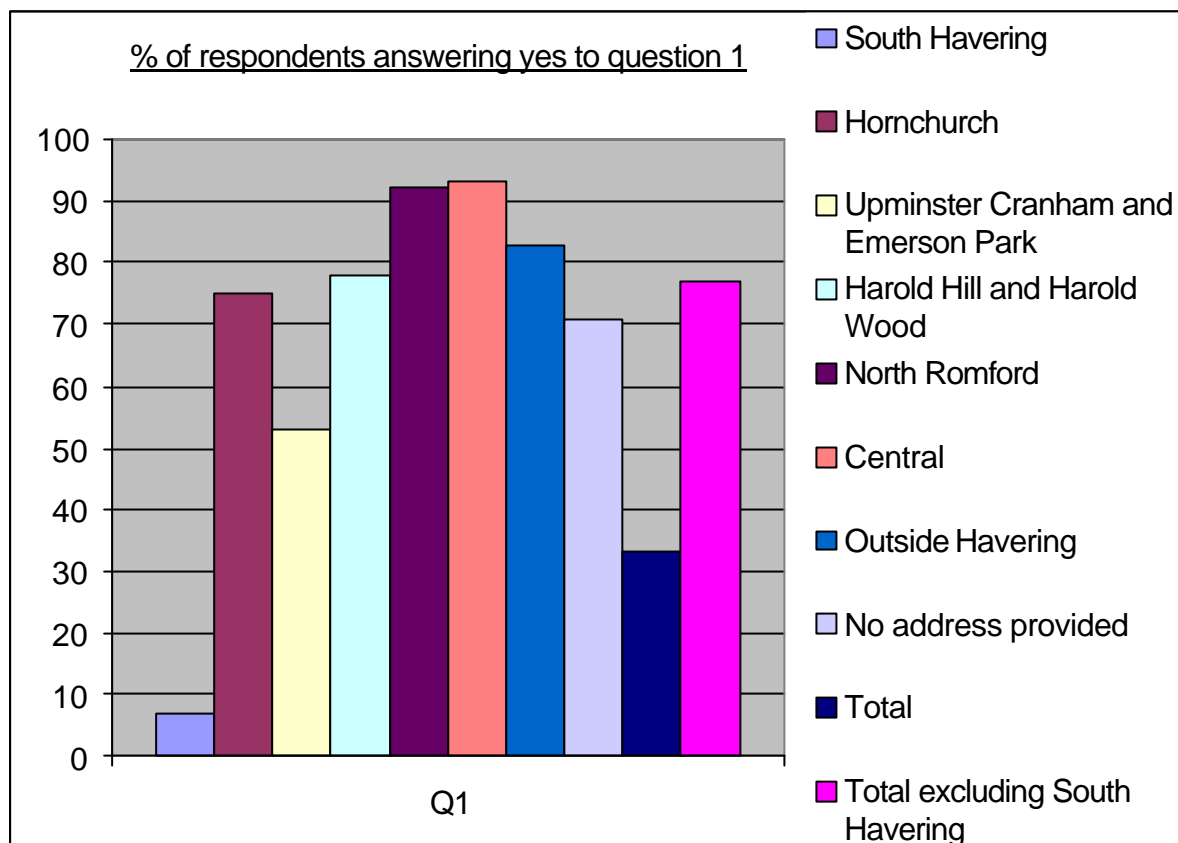
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### **Question 1**

Our preferred option is to allow business, industrial and warehousing uses in the borough's regionally important industrial areas but prioritise high technology and advance manufacturing uses in Beam Reach. Do you agree YES/NO?

**Table and Chart 6 – % of respondents answering yes to question 1, by area**

South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total excluding South Havering
7	75	53	78	92	93	83	71	33	77



**Additional comments on question 1**

South Havering

- Regeneration is difficult in Havering with constant dumping and industrial plants being built. Participation with the local people is essential in understanding what the area requires.

Hornchurch

- Why prioritise high tech, what is it anyway, it usually has a low employment level.

Harold Hill and Harold Wood

- Hi –tech businesses need to be brought to Harold Hill.

North Romford

- Proposals for business development should be conditional on green travel plans and public transport accessibility.
- High value business, industrial and warehousing uses need adjustment to resolve conflicts with regeneration and enhancement policies.
- High value uses are required for the whole London Riverside Employment Area (LREA) with specific designation of key riverside areas for advanced and high tech businesses.
- Poor quality low value business uses in Rainham conflict and undermine the London Thames Gateway Development Corporation (LTGDC) Strategy, which aims to improve the area.

- A policy is required to reduce existing industrial blight and prevent future blight in the Rainham area including power pylons and waste incineration.
- Council commitment to the LREA is in doubt without an interim UDP amendment.
- Suggest including a policy to attract high technology jobs in Harold Hill.

### **The Submission approach**

There was widespread support for this preferred option, apart from in South Havering where only 7% of respondents supported this option.

This preferred option has been carried forward and consolidated as Core Policy 3 – Employment. This aims to protect Main Employment Areas for business, industrial and some warehousing uses and prioritise high technology and advanced manufacturing uses in the Beam Reach Business Park and other business and industrial uses which provide a similar quantity and intensity of employment.

Many respondents were concerned about the quality of employment uses in Rainham, particularly low value business uses. The Council is taking forward a separate Joint Waste Development Plan Document. Core Policy 11 ‘Sustainable Waste Management’ seeks to ensure that only waste management facilities that manage a proportionate amount of commercial and domestic waste arising in the East London Waste Authority Area will be allowed in Havering and result in Havering proportionally managing no more of central London’s waste than any other non-central London Borough.

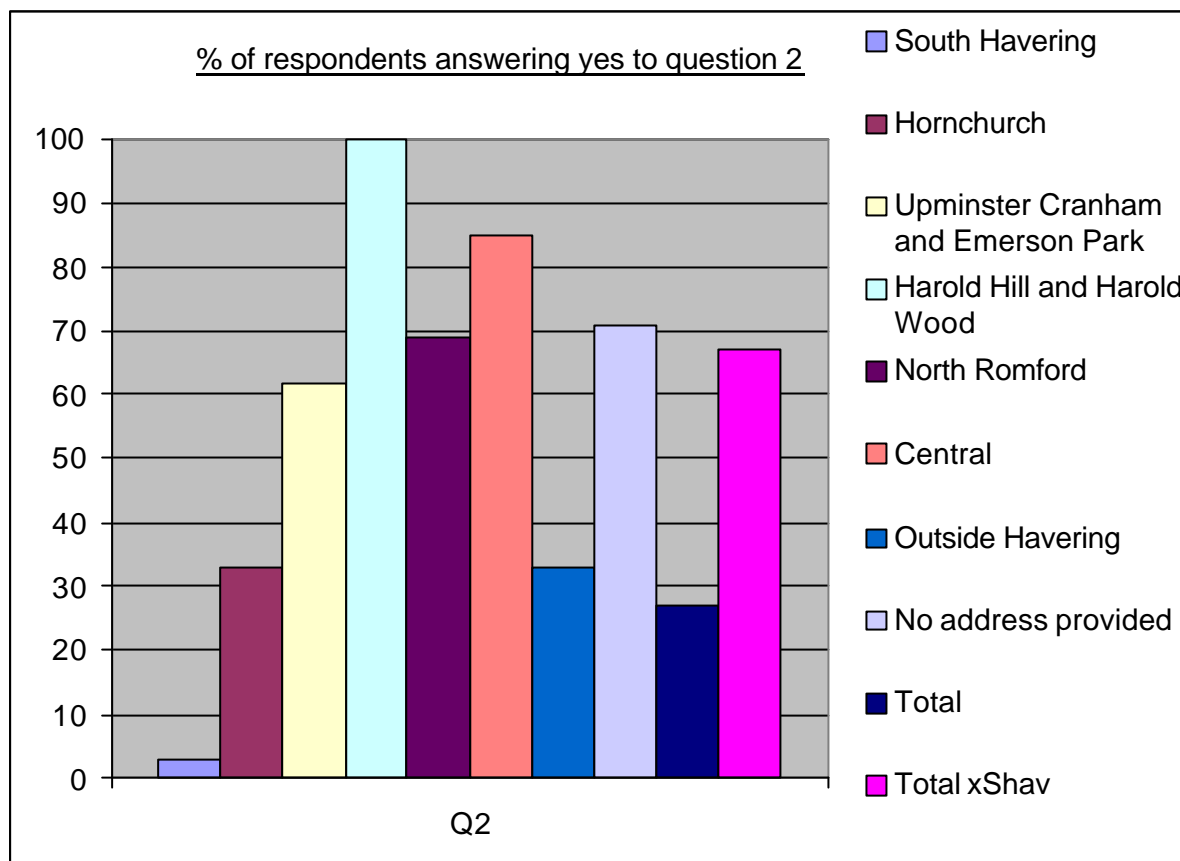
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### **Question 2**

Our preferred option is to retain and protect business, industrial and warehousing uses in the locally important industrial areas but, where appropriate, release industrial sites for other uses which in most cases will be housing. Do you agree YES/NO?

**Table and Chart 7 – % of respondents answering yes to question 2, by area**

South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total xShav
3	33	62	100	69	85	33	71	27	67



### **Additional comments on question 2**

#### South Havering

- To ensure that the environment improves some existing industry in the area should also relocate.
- Businesses should be encouraged to take up redundant sites. We do not want Rainham to become a dormitory town.
- It would be more suitable if other industry was sought for redundant sites, otherwise the population will increase, but there will not be the necessary employment in the local area to match the population rise.

#### Harold Hill and Harold Wood

- Council should concentrate on its regionally important sites. Other less important sites should be reviewed to see if their use should be controlled or if all or part could be released for other activities. For example the Harold Wood industrial estate now attracts 30/40 ton trucks which are inappropriate for the local roads, have to pass the primary school and are too heavy for the bridge over the river. This could be a site where the business activity could be reviewed and modified to be more in line with current local conditions.

#### North Romford

- Until resources for adequate infrastructure and services can be guaranteed, release of industrial sites for housing is premature.
- Brownfield sites which are developed, require an ecological survey due to the potential value of the biodiversity in that area.

Central

- Business could be put off these areas by low grade housing.

No address

- This preferred options is not supported in the central areas.

Outside borough

**The Submission approach**

There was a mixed response to this preferred option. Only 3% of South Hornchurch respondents support it whilst in Harold Wood and Central there was significant support. In South Hornchurch there was concern about releasing redundant sites for housing, respondents felt other employment uses could be secured, and provide a valuable source of local employment. However the submission approach releases approximately 7 hectares of secondary employment land as set out in Core Policy 3 – ‘Employment’. These sites are poor quality with access and environmental issues, and the Council considers they can be released to help balance forecast employment land demand against supply in line with the Greater London Authority’s approach of managed transfer.

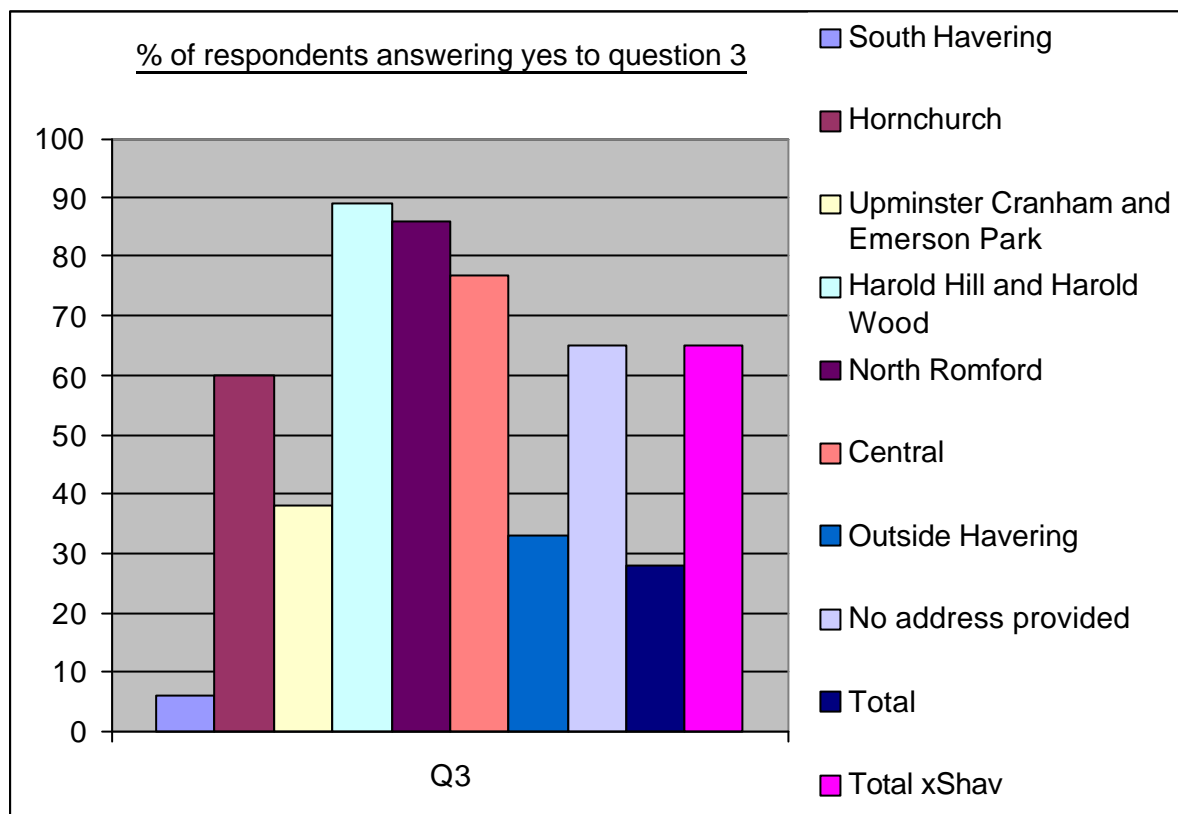
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**Question 3**

Our preferred option is to retain the Romford Office Quarter but allow the introduction of new mixed use development including new housing provided there is no net loss of office space. Do you agree YES/NO?

Table and Chart 8 – % of respondents answering yes to question 3, by area

South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total xShav
6	60	38	89	86	77	33	65	28	65



### **Additional comments on question 3**

#### **North Romford**

- 50% affordable housing as advocated by the GLA, is worthy of consideration for town centres and transport nodes.
- Development briefs and design statements should be required for all sites of 50 units and over in consultation with the local community.
- Only high quality residential development that integrates buildings with the public realm should be considered as part of new residential development. Additionally non-car residential development should be considered at major transport nodes.
- Brownfield sites which are to be developed, require careful ecological consideration due to the potential value of biodiversity in that area.
- The office quarter should remain in the centre of town.

#### **The Submission approach**

Again there was a mixed response to this question with only 6% of South Hornchurch respondents supporting this option and 38% in Upminster, Cranham and Emerson Park, however there was stronger support in the rest of the Borough including Central Romford. The submission approach set out in Core Policy 3 – Employment, seeks to focus office development within Romford and the District Centres but the future approach to the Romford Office Quarter will be resolved during the preparation of the Romford Area Action Plan.

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## Housing

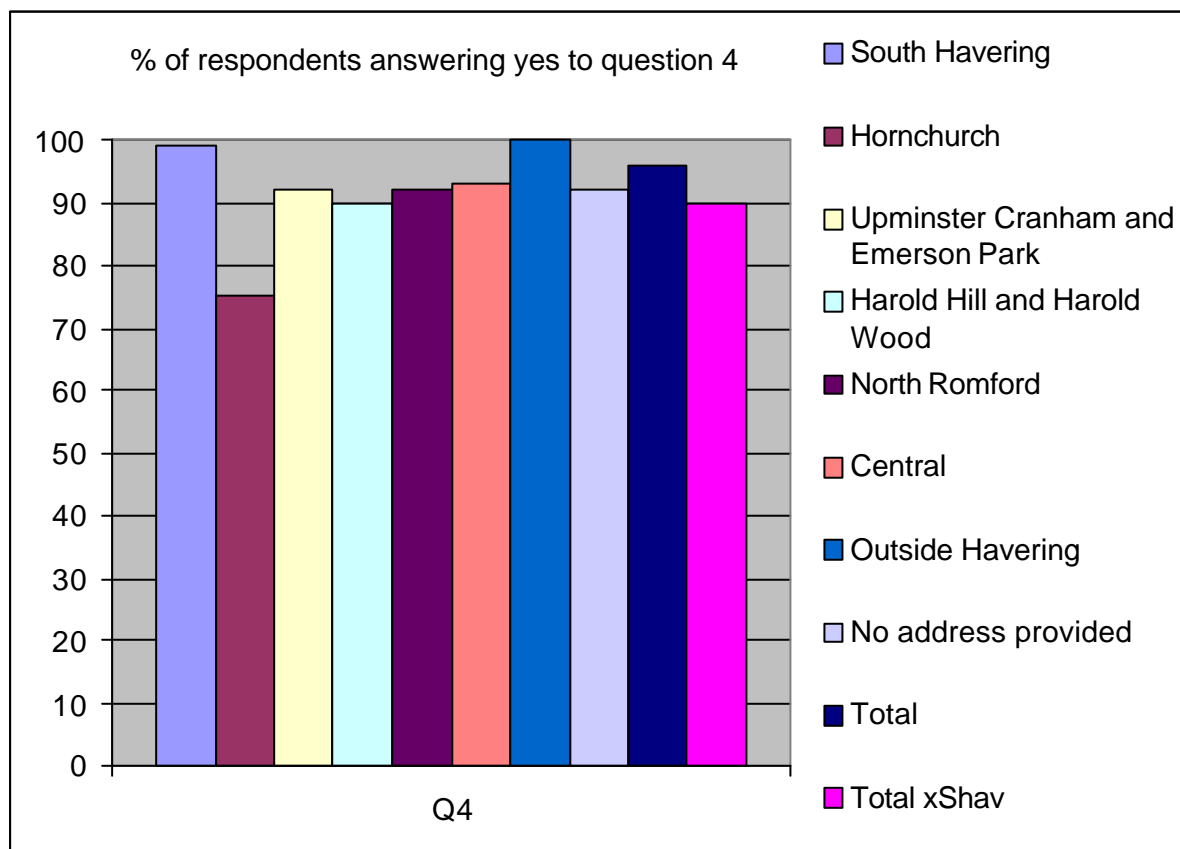
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### Question 4

Our preferred option is to achieve attractive mixed and balanced communities with the right sizes and types of homes in the right locations. Do you agree YES/NO?

Table and Chart 9 – % of respondents answering yes to question 4, by area

South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total xShav
99	75	92	90	92	93	100	92	96	90



### Additional comments on question 4

#### South Havering

- Young couples should be the target population; they will require gardens for their families. Blocks of flats are therefore not considered appropriate.
- Young couples should be the target population; they will require gardens for their families. Blocks of flats are therefore not considered appropriate.

## Cabinet 9 October 2006

- If too many flats are built, then couples who can afford it (when they have children), will move elsewhere to a house with a garden. High proportions of flatted schemes will result in an age imbalance between couples, families and older people in an area.
- No more tower blocks or dense housing.
- No tower blocks, dense ghettos at Dovers corner or anywhere else in Rainham.
- Flats are continually being built, after 20 years no one wants to live in them, additionally these typically have no car parking facilities or play areas.
- No more housing in Rainham.
- No more housing in Havering.
- No tower blocks in Havering.
- Opposed to flats.
- Prefer houses with gardens, no flats.
- The proposed mixed use development should include houses and not just apartments.
- Flats only in town centres, all other accommodation elsewhere should be houses with gardens.
- Oppose plans to build up to 8,000 new homes in the borough.

### Hornchurch

- Should only allow sustainable development which would not house the whole of east London but our own younger generation and particularly key workers.
- Don't need more housing for more people who do not already live in the borough. People from outside the Borough should not be given priority in Havering.

### Upminster and Cranham

- Housing is being built wherever there is a spare inch of ground, there's too much cramming in and overcrowding, houses are being allowed to be built out in fields where no house stood before which is wrong.
- Strictly examine old infill plots for housing whether in or outside the Green Belt, especially if not making contribution to the Green Belt.
- Density of new housing estates is too high. These densities impinge on gas, electricity, water and soil disposal thus creating more roadworks. To increase supply and delivery an effort must be made to reduce the population which would create the savings of the earth's resources.

### Harold Hill and Harold Wood

- Why protect Emerson Park. High earning professionals do not generally live in the borough, this is very sycophantic. Should also stop the waste of leaving sheltered housing empty. The housing review has been going on for years.
- The strategy of using special policies to protect the character of Emerson Park et al in order to protect high earning professionals should be questioned. Create a vicious circle in which resources are funnelled into protect areas at the expense of others. Experience in London has shown that the influx of high earners into a district has a positive effect which reduces the need for Council financed regeneration schemes and they should be encouraged throughout the borough.

### North Romford

## **Cabinet 9 October 2006**

- There should be a presumption that with sustainable design and construction visible differences between market housing, affordable housing and key worker housing will be eliminated.
- Proposed mixed use development in the LTGDC industrial areas should be restricted to medium rise. Three to four storeys should be the maximum permitted outside of district and local centres. Low rise development can achieve national targets. Windfall development should be counted against regional and national targets.

### **Central**

- High quality designs should only be considered.

### **No address**

- No more flats and small houses or other high density development.
- “Granny flats” should be considered for the elderly as they are living longer.
- Is there a possibility of redesigning existing housing stock to make it more attractive and at the same time serve the same purpose?
- Would not like to see any more high density buildings in Romford.

### **The Submission approach**

There was widespread support for this preferred option. Widespread concern was expressed about too much flatted development, the quality of new housing and general town cramming issues. The submission approach seeks to address this by demanding that developers take a design led approach to new housing by ensuring that residential densities are the product of scheme requirements and not vice versa. Therefore Development Control policy DC2 sets out the desired mix required to meet housing need and sets density ranges related to public transport accessibility levels and the setting of a site. This identifies that more three bed homes are needed than one bed for example. Development Control policy DC3 demands that developers address a range of Development Control policies focused on ensuring that new homes are of a high standard of design and layout.

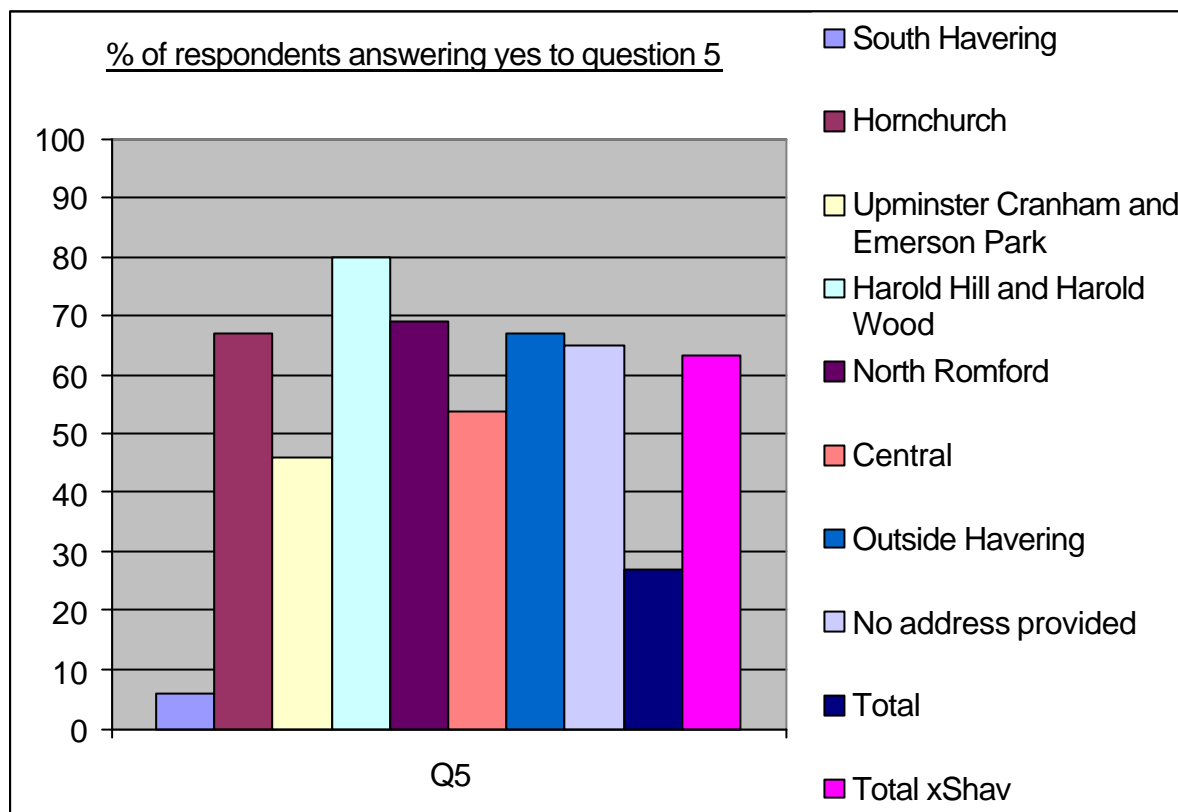
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### **Question 5**

Our preferred option is to require that where 15 or more new homes are built on a single site, or on new housing sites over 0.5 hectare, 35% should be affordable for people on low and average incomes. Do you agree YES/NO?

**Table and Chart 10– % of respondents answering yes to question 5, by area**

South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total xShav
6	67	46	80	69	54	67	65	27	63



### **Additional comments on question 5**

#### South Havering

- Provide low cost housing for the people of Havering and not from those from inner London.

#### Hornchurch

- Gidea Park etc should definitely not escape affordable housing. They would then be affected as are everyone else by loss of facilities and open spaces.

#### Harold Hill and Harold Wood

- Formula for delivering affordable housing is unbalanced. More new homes will be built below the thresholds. Need a broader view of housing development across the borough without thresholds, and measures put in place to stop developers circumventing the thresholds.

#### North Romford

- Major new development should be required to provide access to public transport within a reasonable walking distance.
- GLA targets of including affordable homes in developments of 10 or more units should be adopted, as development will come forward in small sites.

#### Central

- Planning gain should be considered from all types of development and not just housing.

#### No address

## **Cabinet 9 October 2006**

- The threshold for affordable housing is too high. Measures should be in place to ensure that developers who build 14 houses on a site cannot return at a later date to build another 14 and avoid the affordable housing threshold.

### **Outside borough**

- The affordable housing threshold should be increased to 50%.

### **The Submission approach**

There was majority support for this preferred option except in Upminster, Cranham and Emerson Park and in South Hornchurch where there was little support. Comments were provided on both sides of the argument. Some thought the threshold was too high and affordable housing should be sought from all forms of development whilst others were concerned about who the affordable housing was for. The submission approach set out in Development Control policy DC6 seeks to ensure 35% of all new homes provided on sites of 0.5 hectares of 15 units or more are affordable.

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## **Transport**

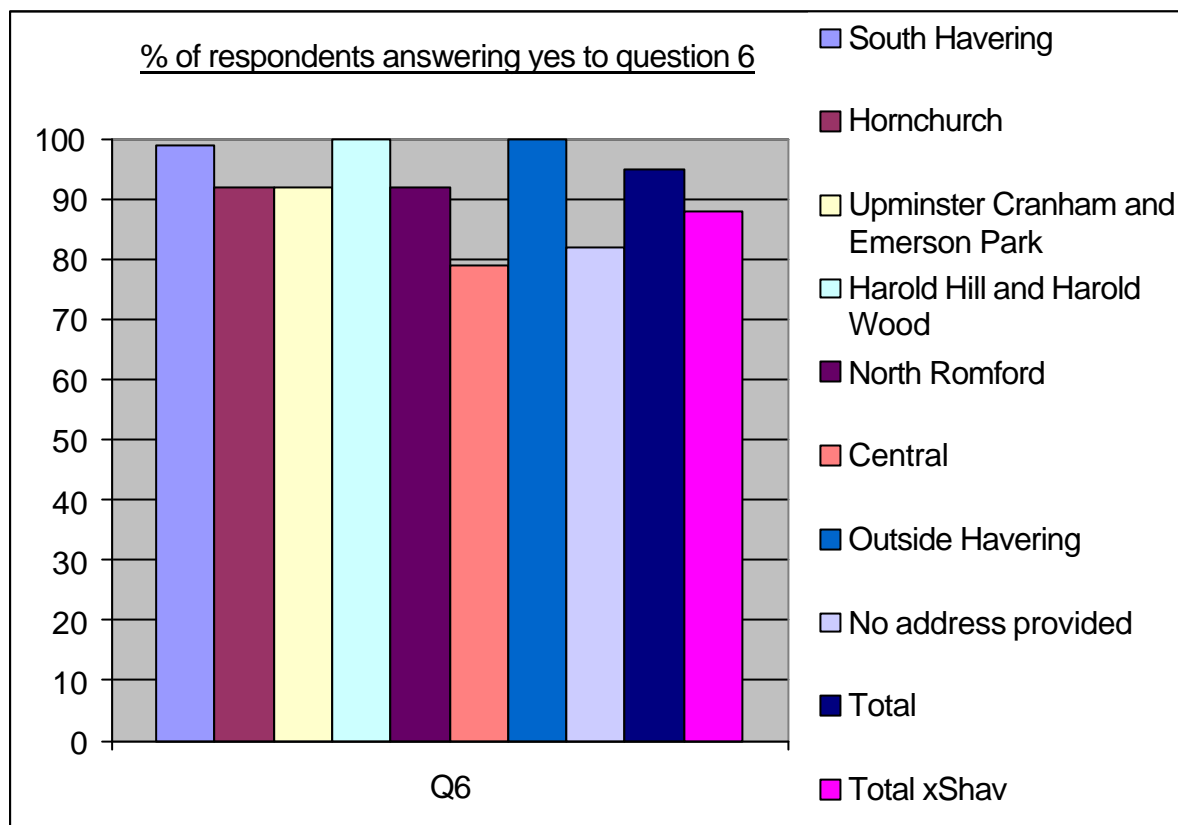
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### **Question 6**

Our preferred option is to group together buildings and activities which attract a lot of visitors or shoppers in areas with good public transport links, to avoid people having to make separate journeys to for example the gym and the supermarket. Do you agree YES/NO?

Table and Chart 11 – % of respondents answering yes to question6, by area

South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total xShav
99	92	92	100	92	79	100	82	95	88



### **Additional comments on question 6**

#### South Havering

- Public transport will need to be free to stop people using their cars. While decreasing car parking spaces will push people to shop at Lakeside.

#### Hornchurch

- Transport will grow if you keep squashing more and more people into the Borough. Public transport will only get used out of choice when it is clean, safe, and not covered in graffiti. 500 new homes means 500 new cars.
- New roads are built on the same frontline as before, should plan for future road improvements also.

#### Upminster and Cranham

- Parking of vans on all roads should be prohibited; there are too many and they are becoming larger and thus more of a nuisance.

#### Harold Hill and Harold Wood

- Makes sense to group shopping facilities with good public transport links, but the Council should not close its eyes to the possibility of improving links to other less well served parts of the borough. This can become a vicious circle leading to overdevelopment in one area at the expense of others. Measures should be put in place to protect these 'smaller' but critical services for these unable to take advantage of centralisation.

#### North Romford

## **Cabinet 9 October 2006**

- Major new development should be required to provide access to public transport within a reasonable walking distance.
- Policies should promote car free residential development at major transport nodes.
- Policies must require best practice design of cycle, pedestrian and motorised interfaces by consulting expert groups.
- Possibilities of improving water related transport links. This is relevant to the future of LREA river related development and requires a policy commitment.
- In a borough as big as Havering car parking facilities are essential.

### **Central**

- Cycling routes in the borough need more thought and should be developed as a matter of course, across the borough.

### **No address**

- Agree with the principle, however, this has the potential to adversely impact on shops and facilities in out of town locations. Measures should be put in place to protect these services for those unable to take advantage of centralisation.

### **Outside borough**

- Agree, however, public transport in the area need improving.
- All new residential developments should have more parking required.
- Grouping these facilities will result in those who live in the outskirts having to do more travelling.

## **The Submission approach**

There was widespread support for this preferred option, however respondents were concerned that for this approach to be successful the quality of public transport needs improvement and care needs to be taken to ensure that some areas don't develop at the expense of other smaller centres. The submission approach set out in Core Policy 4 'Town Centres' seeks to address this by promoting and enhancing the network of town centres and Core Policy 9 'Reducing the need to travel' seeks to reduce the need to travel by co-locating major trip generating retail, service, leisure, art, entertainment, office, and community uses in places with good public transport accessibility. Submission Core Policy 10 'Sustainable Transport' seeks contributions to improvements to public transport accessibility and capacity where this is necessary to serve the new development. This will be particularly important in areas of poor public transport accessibility.

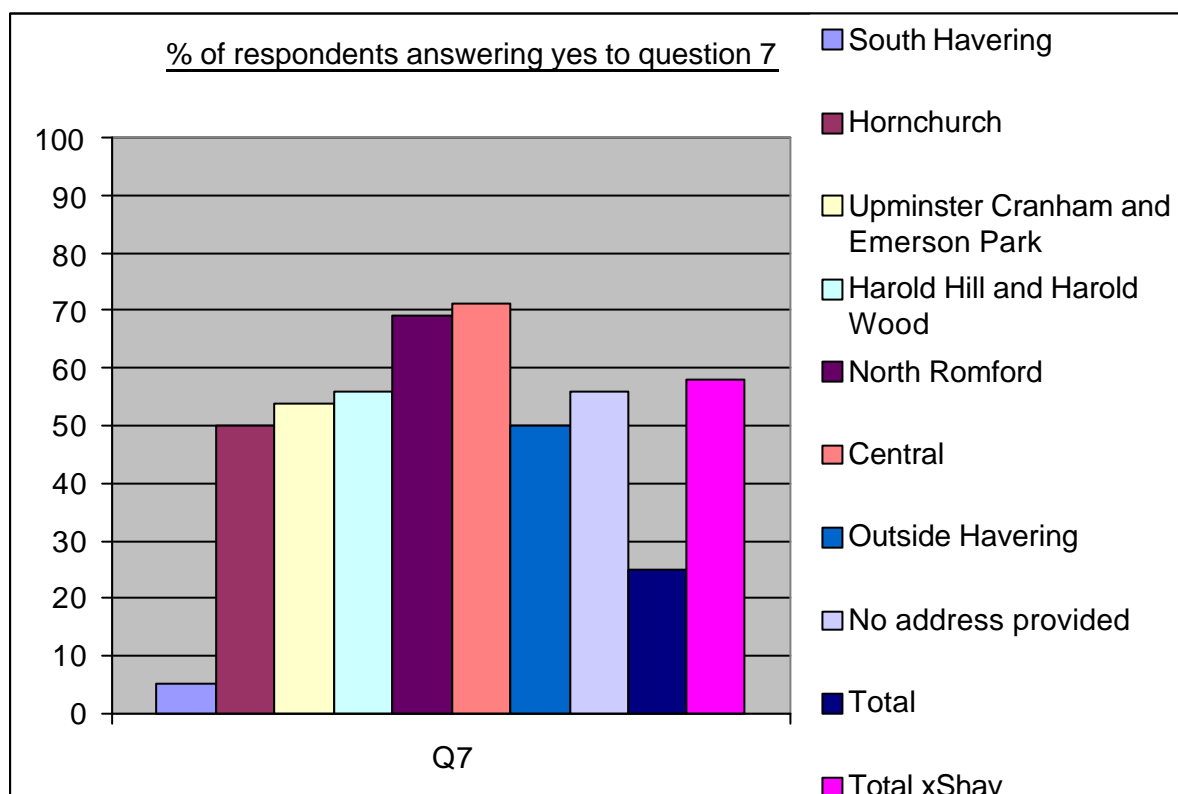
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## **Question 7**

Our preferred option is to where appropriate; seek improvements to public transport with new developments. Also, in line with existing policy, to require less car parking in areas with good public transport links and ensure that developments take account of the needs of pedestrians and cyclists. Do you agree YES/NO?

**Table and Chart 12 – % of respondents answering yes to question 7, by area**

South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total xShav
5	50	54	56	69	71	50	56	25	58



### **Additional comments on question 7**

#### **South Havering**

- Concerned that shoppers will go to Lakeside where there is free parking.
- This question has two separate parts. The borough needs better public transport while at the same time needs car parks to access them. Parking near housing is always a requirement.
- There should be at least 1 car parking space per unit.
- Public transport should run at times required and not just at peak hours.
- There are almost no cyclists, nor will there ever be in Havering. Only a very limited age range would ever cycle and then only in good weather.
- Public transport to all hospitals in the borough require essential improvement, currently most are inaccessible.

#### **Harold Hill and Harold Wood**

- Reducing car parking is not a good idea in an expanding area

- Lack of parking is a growing symptom of infills. To counter this there should be a minimum number of parking spaces for every new development irrespective of location/transport links. Developers should either be obliged to provide adequate parking spaces or make a contribution to the provision of public transport.

**North Romford**

- Ecological implications should be considered as part of any park and ride proposals.
- The release of surplus land following the completion of the CTRL that has no assigned use in the Preferred Options should be subject to full public consultation.
- To relieve pressure on North Street Roundabout with the link road by placing traffic lights at the end of Mawney Road which would allow traffic to turn left or right on the link road.
- Development of light railway or tramway to link Harold Hill with central Romford further links from Collier Row to central Romford also taking over Upminster to Romford railway and incorporating it into the system.

**No address**

- Increasing the densities of sites has resulted in the loss of car parking spaces. Minimum numbers of parking spaces per development should be in place, irrespective of transport links. Seeking improvements is not acceptable, the local authority should be insisting.
- Increasing the densities of sites has resulted in the loss of car parking spaces. Minimum numbers of parking spaces per development should be in place, irrespective of transport links. Seeking improvements is not acceptable, the local authority should be insisting.
- Disagree, there is already a shortage of car parking in the area, this is why people go to Lakeside shopping centre.

**Outside borough**

- TfL routes should be more accessible, more frequent and serve more areas and new developments.

**The Submission approach**

The response to this preferred option was mixed. South Havering residents emphatically rejected this option. Generally respondents thought the question was doubled edged, they agreed public transport should be approved but didn't necessarily agree that the corollary of this should be less car parking. The submission approach set out in Core Policy 10 'Sustainable Transport' addresses this by where appropriate relating car parking standards to public transport accessibility whilst ensuring sufficient car parking is provided for those who want to travel by car. It also seeks contributions (it can not require them) to improvements to public transport accessibility and capacity where this is necessary to serve the new development. Finally it seeks to ensure that developments in their design and layout are friendlier to pedestrians and cyclists and minimize the distance to public transport nodes.

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**Environment and Heritage**

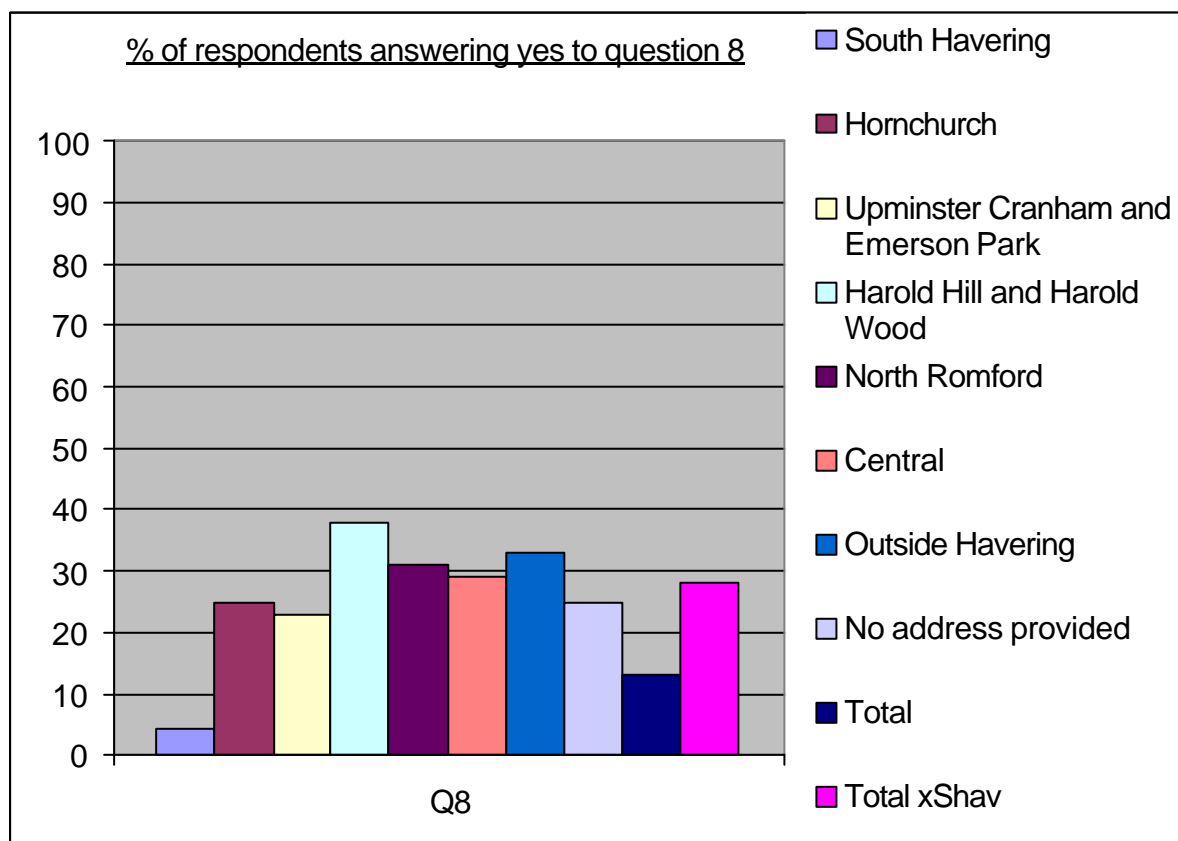
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**Question 8**

Our preferred option is to remove five sites which the Council considers do not make a contribution to the Green Belt. Do you agree YES/NO?

Table and Chart 13 – % of respondents answering yes to question 8, by area

South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total xShav
4	25	23	38	31	29	33	25	13	28



**Additional comments on question 8**

South Havering

- Green Belt land should always be protected.
- We should protect all Green Belt land.
- Havering's green spaces should be maintained.

## Cabinet 9 October 2006

- We need to maintain and retain all of the open spaces in Havering to sustain biodiversity and a high quality environment.
- OS grid references should have been given for this item. If these are agreed to, it will not be long before another list is suggested. In any case all sites should be assessed on their own merits.

### Hornchurch

- The wording includes 'consider' which could have a number of different explanations i.e: is it or is it not at this current time Green Belt land, if so the wording is written in a way to try and imply that it is not Green Belt land but that it is Green Belt land. Also one of the sites is Hornchurch Airfield, which over the past couple of years has already had a new residential estate built there. If removing this site and building on the Airfield goes ahead again when will removing on the Airfield and building on the m stop, when there is no more Airfield for future generations of children to enjoy? No more areas of Green land for Havering?
- Leave the Green Belt alone, do not build on any of it.
- Need open space not endless concrete
- I strongly oppose the removal of sites from the Green Belt. I note you have added a further site to the list since the consultation. People who responded opposed Option 8 but the Council has not considered their views. Each site needs to be individually assessed rather than simply adding in sections piecemeal and without consultation.

### Upminster and Cranham

- Must keep the Green Belt and extend wherever possible. No building in the Green Belt

### Harold Hill and Harold Wood

- Who will benefit financially from the sale of GB sites? Releasing land could impinge on environmental and heritage land.
- Detailed plans need to be seen.
- Council highlights importance of Green Belt in separating Romford from Brentwood and this highlights the importance of fully protecting Maylands Fields.
- Council needs to explain its criteria for deciding what is a 'positive contribution'. A site's contribution may appear to be quite different to experts as distinct from local residents who enjoy its amenity. Any losses should be mitigated by the creation of green sites elsewhere in the borough.

### North Romford

- Strong LDF protection and enhancement policies are required to control non green belt uses and the progressive coalescing of rural buildings, which UDP policies have failed to control.
- Approvals for accommodation for essential agricultural purposes should include a condition to prevent future application for non-agricultural residence.
- With the exception of Tay Way, Spring Farm Car park and Lot 7 Hornchurch Airfield, the green belt boundary should not be changed.
- New residential development in the Green Belt should not be permitted unless a genuine need exists.
- Traveller and Gypsy sites must be located within the urban area.

## **Cabinet 9 October 2006**

- Allotment sites should be protected and promoted.
- Why are Reed Green allotments being deleted?
- Totally opposed to building in the green belt.

### **Central**

- In no way should the Green Belt in Rush Green be removed. The area has already lost most of its open space and what is left is minimal. This is the majority view of the local residents. Why does the preferred option not protect all open spaces as an alternative?

### **No address**

- "Contribution" needs to be defined, also would the loss of these sites result in the creation of open spaces elsewhere in the borough?
- "Contribution" needs to be defined, also would the loss of these sites result in the creation of open spaces elsewhere in the borough?
- Disagree, green belt should be protected in keeping with earlier local authority promises.
- Disagree, deletions in the green belt are bad, once gone the Green Belt can never be recovered.
- We should make every effort to retain our Green Belt.
- Disagree, unhappy to lose any green space. Once lost green space is never regained.

### **The Submission approach**

There was opposition across the borough to this preferred option, and the additional comments underline this. The Council has revisited the sites it wishes to remove from the Green Belt and has now decided to retain the Spring Farm Car Park and Rush Green Open Spaces within the Green Belt. It has also changed its approach to the Whitworth Centre so that it is dealt with, with the Broxhill Centre site with a view to reducing the combined impact on the openness on the Green Belt in this area. In addition the Council considers that there are special circumstances justifying the release of part of Mardyke Farm site from the Green Belt. The reasoning for this is set out in Core Policy 14 'Green Belt' and in the Site Specific Allocations Document, both of which can be viewed online.

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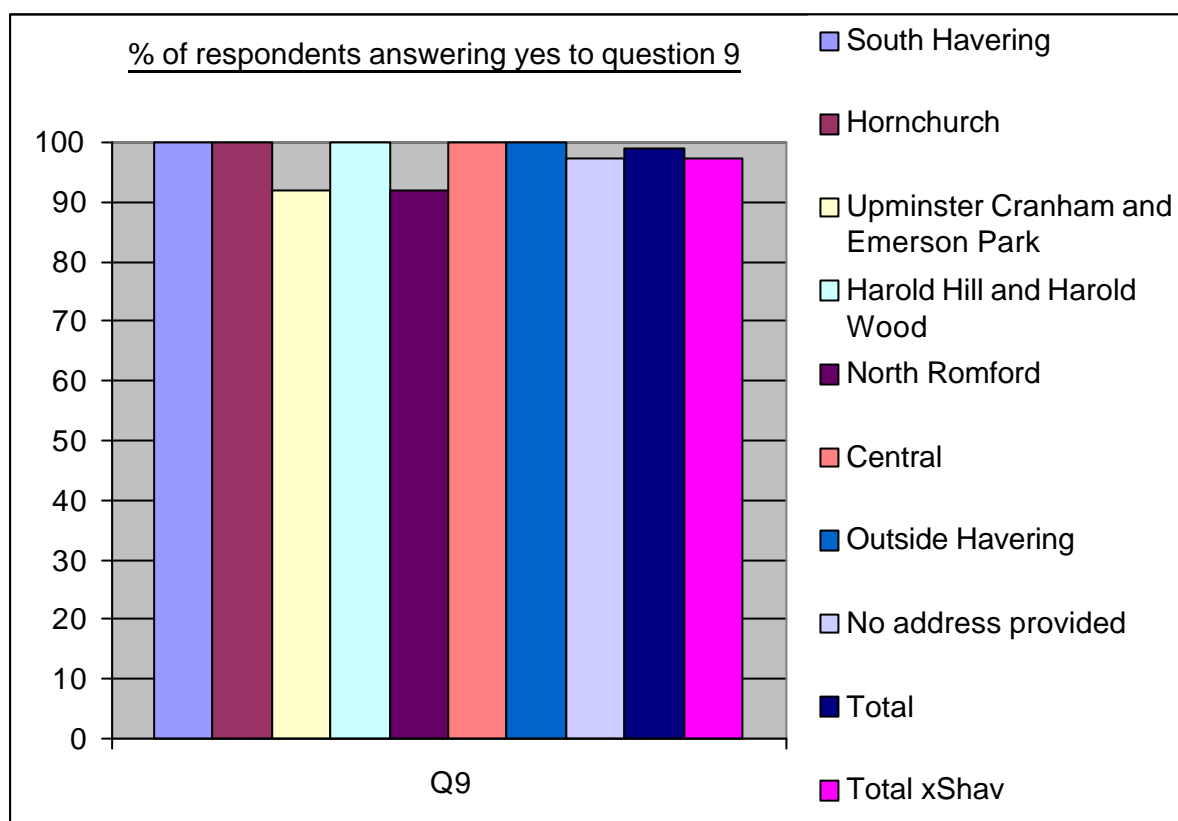
### **Question 9**

Our preferred option is to protect designated sites of nature conservation importance and where appropriate protect and enhance priority species and habitats. Do you agree YES/NO?

**Table and Chart 14 – % of respondents answering yes to question 9 by area**

South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total xShav

100	100	92	100	92	100	100	97	99	97
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### **Additional comments on question 9**

#### **Harold Hill and Harold Wood**

- Should be explicit policy protection for all designated sites and Green Chains, to close loopholes exploited at Maylands Fields. Council should support the Mayor of London in lobbying the ODPM for a nature conservation order to give non-statutory sites better legal protection.

#### **North Romford**

- Protection and safeguarding of existing local, regional and national environmental designations and of sensitive sites is required, protection of species should also be included in the LDF.
- Policies should reflect the Strategic UK importance of the Thames Terrace flora and fauna, particularly on brownfield sites. Expert specialist advice should also be sought from the Havering Wildlife Partnership and Heritage Groups.

#### **No address**

- There should be greater policy protection for designated sites and green chains, this would help to close loopholes as those exploited at Maylands Fields. The Council should support the Mayor of London is lobbying the ODPM for a Nature Conservation Order to give non-statutory sites greater legal protection.
- Agricultural use of sensitive locations should be screened by a way of environmental assessment.

### **The Submission approach**

There was strong support for this preferred option across the Borough. This preferred option has been taken forward as Core Policy 16 'Biodiversity and Geodiversity' and seeks to protect and enhance the borough's biodiversity and geodiversity, in particular priority habitats, species and sites. In implementing this policy the Council will have regard to the UK, Greater London Authority and Havering Biodiversity Action Plans.

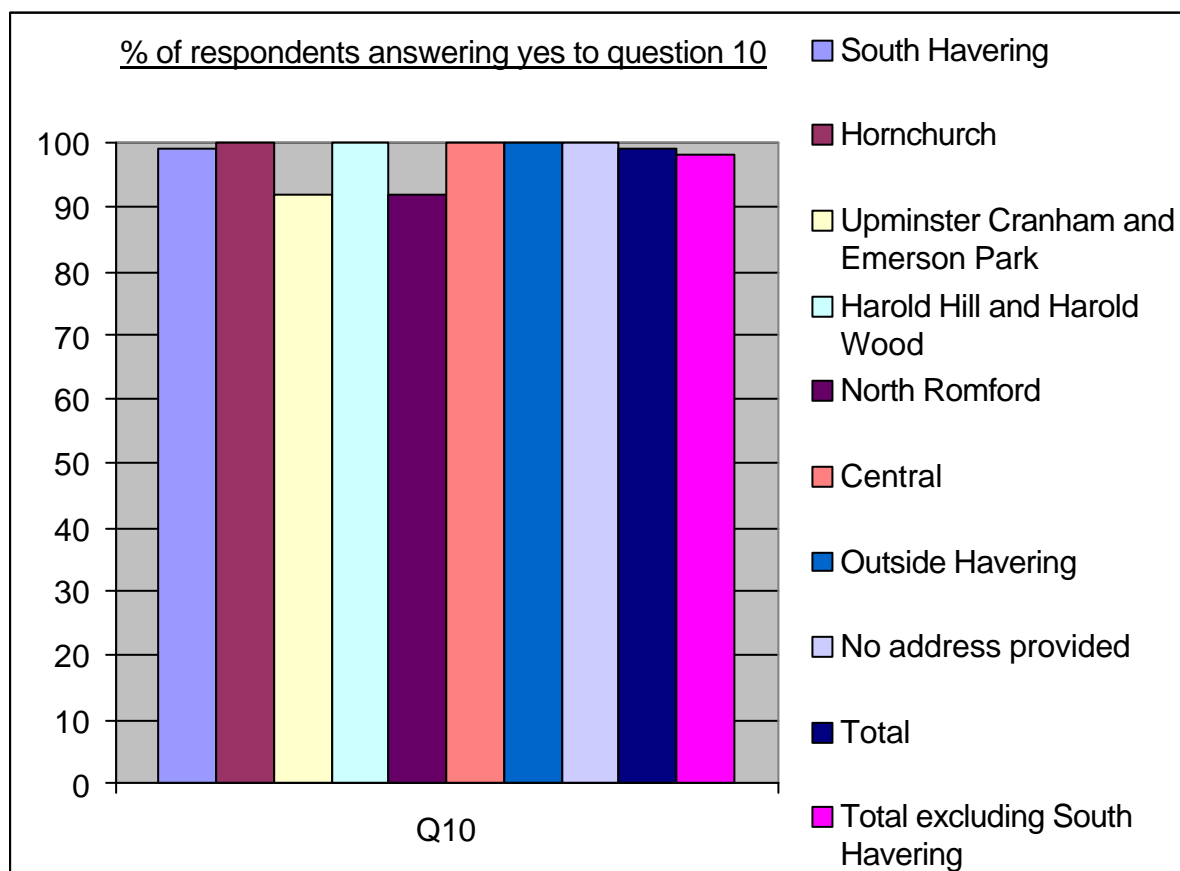
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### **Question 10**

Our preferred option is to continue to conserve sites and buildings of special historical or archaeological importance. Do you agree YES/NO?

**Table and Chart 15 – % of respondents answering yes to question 10 by area**

South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total excluding South Havering
99	100	92	100	92	100	100	100	99	98



### **Additional comments on question 10**

**North Romford**

- A requirement to take the residents and heritage groups concerns into account (LSP and Sustainable Communities Plan) should be inserted into policies.
- Protection to extend buildings and sites of interests of significance to local people should extend regardless of compatibility with historic or heritage criteria.

**Central**

- The LDF needs to ensure that historic buildings are not just conserved but also restored / maintained to stop deterioration.

**No address**

- RAF Hornbridge should be considered as a site of having special historical or archaeological importance.

**The Submission approach**

There was strong support for this preferred option across the Borough. This preferred option has been taken forward as Core Policy 18 'Heritage' which states that all new development affecting sites, buildings, townscapes and landscapes of special architectural, historical or archaeological importance must preserve or enhance their character and appearance. Development Control policy 67 explains that the Council will also take into account the contribution that other buildings of historical and/or architectural interest make to heritage.

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**Design**

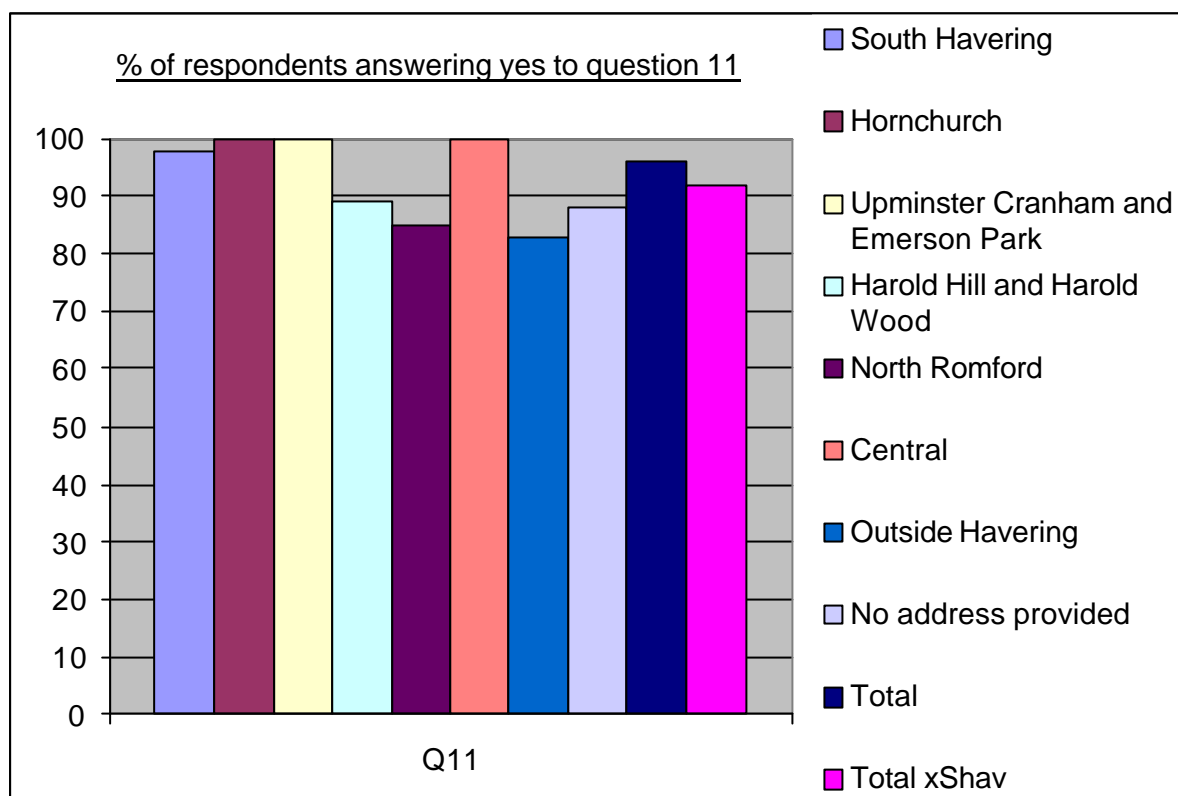
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**Question 11**

Our preferred option is to encourage developers to address new urban design criteria that focuses on the way a development looks, functions and relate to the surrounding environment; encourage developers to build to a higher standard than the minimum disability standards; and encourage applicants to create a safe and secure environment. Do you agree YES/NO?

**Table and Chart 16 – % of respondents answering yes to question 11 by area**

South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total xShav
98	100	100	89	85	100	83	88	96	92



### **Additional comments on question 11**

#### South Havering

- The LDF should be insisting not just encouraging.
- These design criteria need to be enforced.
- The local authority should be insisting and not encouraging, developers will only provide something if they have to.

#### Harold Hill and Harold Wood

- Proposed criteria should be a prerequisite of all new developments and not a point of negotiation. Merely encouraging developers to adopt these standards when other boroughs are insisting on them will encourage developers to see Havering as a soft target. Policy should insist that all new builds comply with the EcoHomes excellence standard.

#### North Romford

- Designs should be flexible to meet the needs of the population i.e. be easily adaptable to cater for disability. Policies should also encourage attractive and innovative design i.e. landscaped Home Zones, pedestrian priority suburban streets and play streets over concealed parking.
- Applicants for telecommunications should in the spirit of the Communities Plan and the LSP be required to consult residents.
- It is preferable that gated communities are avoided.

#### Central

- The LDF should insist that builders build to a higher standard than 'minimum home requirements, which would be better in the long term.

- High standard design and finish is essential to the local area. A recent development at Oldchurch hospital is an example of poor design. It reinforces preconceptions that Romford is a low grade centre as opposed to somewhere like Brentwood.

**No address**

- The Council should be insisting on this criteria for all new development, otherwise Havering will be seen as a soft target by developers.
- Urban design criteria has resulted in the cramming of small units on small sites with inadequate parking facilities. This results in low quality, high density “rabbit hutches” which are out of character with the existing character of Havering.
- “To encourage” will not result in action by developers, consider revising.
- This is important, however, good design was not considered as part of the new health centres in the area which are monstrous.

**The Submission approach**

There was strong support for this preferred option across the Borough. However many respondents were concerned that the preferred approach was to encourage rather than require. This preferred option has been taken forward as Core Policy 17 ‘Design’ which now requires high quality design, rather than encouraging it. This is supported by Development Control Policies 61 ‘Urban Design’, 62 ‘Access’ and 63 ‘Crime’ which require rather than encourage a high standard of design, inclusive access and safer environments.

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**Community Facilities**

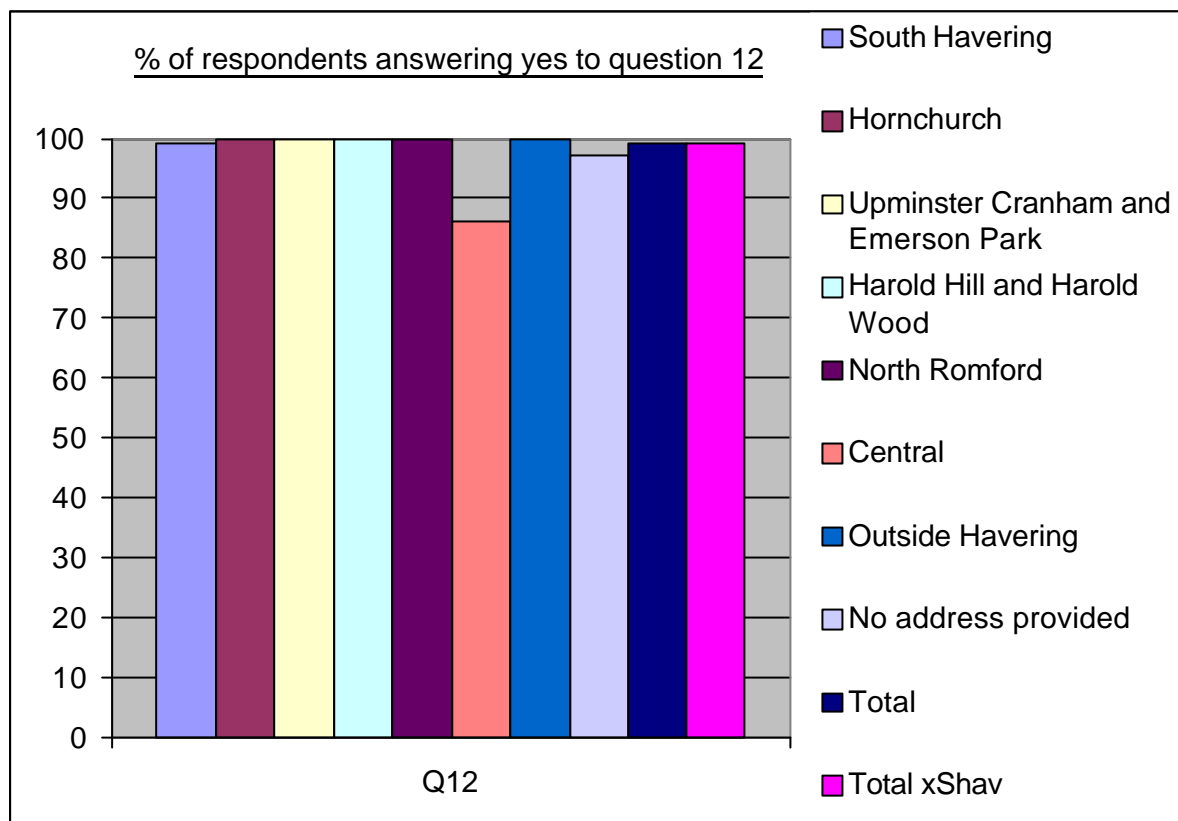
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**Question 12**

Our preferred option is for community facilities to be built close to uses such as housing and retail to make them more convenient and accessible. Do you agree YES/NO?

**Table and Chart 17 – % of respondents answering yes to question 12 by area**

South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total xShav
99	100	100	100	100	86	100	97	99	99



### **Additional comments on question 12**

#### South Havering

- Provide more medical facilities for the area.
- Community facilities are necessary to engender community spirit and should be encouraged.

#### Harold Hill and Harold Wood

- Need provision of more schools near houses so that the distances from homes to schools can be reduced.

#### North Romford

- Allotment sites are being lost. Existing sites should receive more help to maintain higher standards to enable waiting lists for plots to be reduced.

#### Central

- It is not fair that residents have to live next door to a teenage offender centre which has just replaced a terraced house. This reduces the quality of our lives.

#### No address

- Disagree, because there is no parking provided in these areas i.e. doctors surgeries.

### **The Submission approach**

There was strong support for this preferred option across the Borough. This preferred option has been taken forward as Core Policy 8 'Community Facilities'

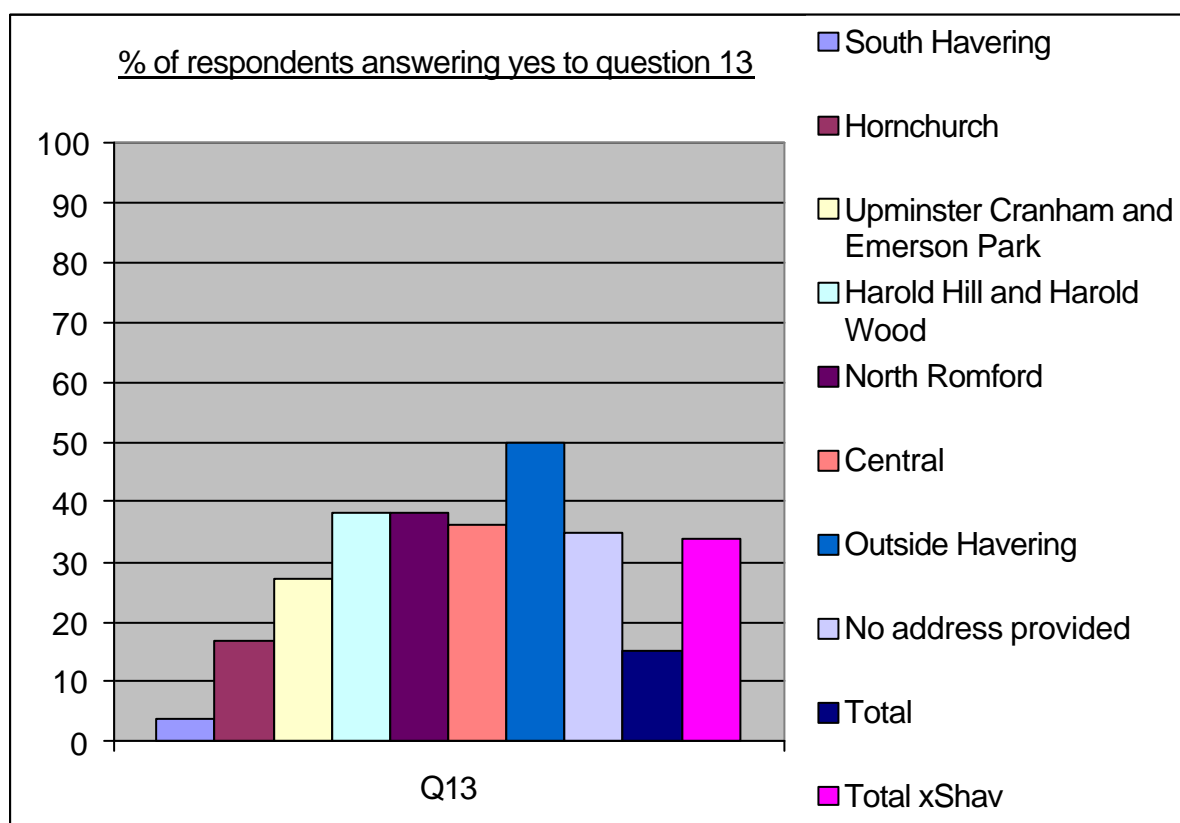
which seeks to ensure all new community facilities are located in places accessible by all forms of transport, including walking and cycling and that the development itself is accessible to all groups. It also seeks to ensure the major developments provide facilities to meet new demand, especially in London Riverside and Romford where significant growth in the number of residents is planned. Supporting Development Control policy DC26 'Location of Community Facilities' explains that the preferred locations for new community facilities will be Romford, the District Centres and Local Centres.

### **Question 13**

Our preferred option is to allow the loss of a community facility unless it can be demonstrated that there is a need locally for the current uses or any alternative use. Do you agree YES/NO?

**Table and Chart 18 – % of respondents answering yes to question 13 by area**

South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total xShav
4	17	27	38	38	36	50	35	15	34



### **Additional comments on question 13**

South Havering

- Do not agree, this option could be abused.
- Public participation is essential as part of this option.

Hornchurch

- No facilities should be shut. Leave St George's Hospital alone. Aging population will need this facility.
- Who decides?
- There should be no loss of halls, shops or green areas.
- Older residents in the borough are finding it increasingly more difficult to find meeting places in the borough.

Harold Hill and Harold Wood

- Wording should be reversed so that the 'need' to show the facility is not needed.

North Romford

- There are currently not enough community facilities in Havering.

Central

- It is considered that this question is worded incorrectly, not should be inserted before "allow" and no should be inserted before need.

No address

- The onus should be on the local authority to justify the loss of community facilities.
- Disagree, the future loss of St George's and Harold Wood hospitals will create huge pressure on facilities and congestion in the new Romford/Old Church hospitals. This has been exacerbated by the high density redevelopment of the present Oldchurch site.
- There are currently not enough community facilities in the borough, there is no justification in removing them.
- Provided that sufficient consultation has been carried out with the community.

Outside borough

- 'Demonstrate' and 'need', a minority may still rely on these services, particularly the elderly who may have limited alternatives.

**The Submission approach**

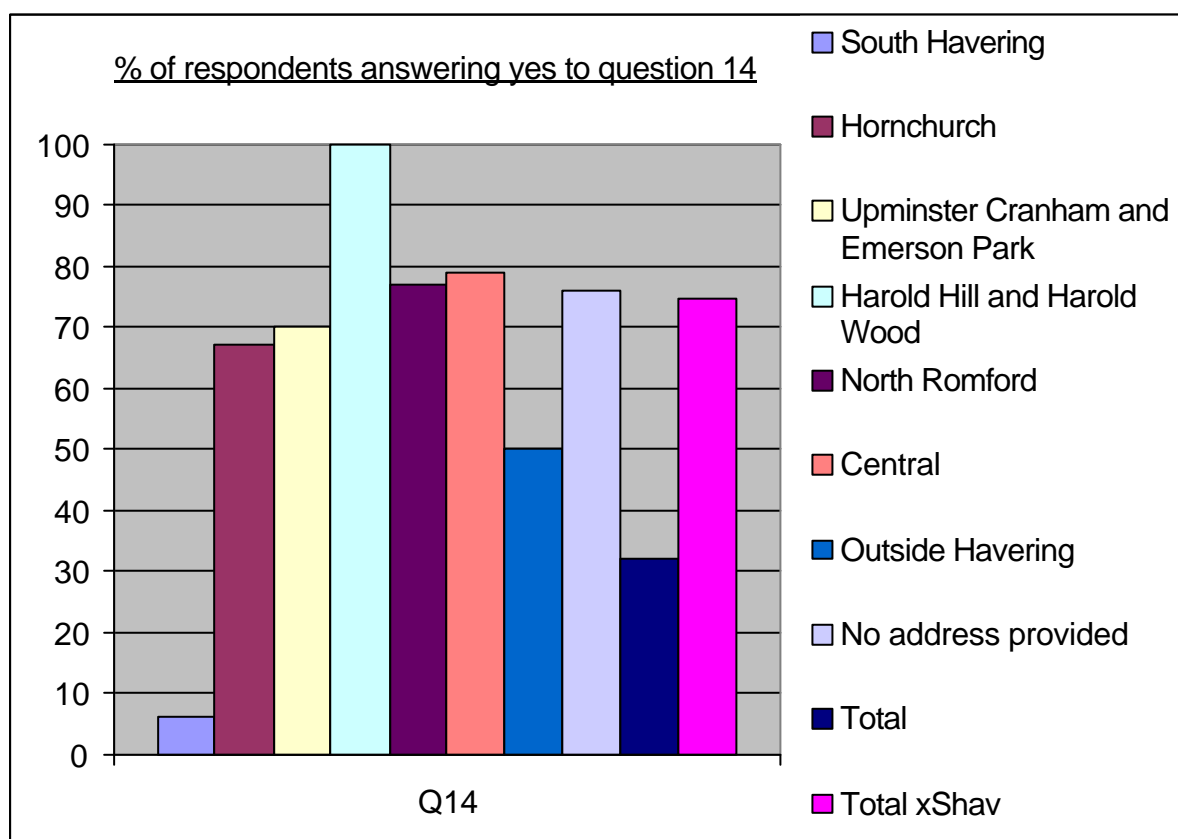
There was opposition across the Borough to this preferred option. Many respondents felt that as worded the preferred option was open to abuse and that proof should be sought that the facility was not needed rather than needed. Consequently Core Policy 8 'Community Facilities' states that the Council will work in partnership with other bodies to ensure that a suitable range of community facilities are provided to meet and existing and forecast demand (amongst other things) by retaining or re-providing community facilities where a need exists. Supporting Development Control policy DC27 'Protecting Community Facilities' states that Planning permission which involves the redevelopment of a community facility will be granted where it can be demonstrated that there is no longer a need for the facility affected, either in its current use or any alternative use or where suitable alternative provision is made in the locality'

**Question 14**

Our preferred option is to allow housing and where appropriate community facilities to be built on redundant employment sites. Do you agree YES/NO?

Table and Chart 19 – % of respondents answering yes to question 14 by area

South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total xShav
6	67	70	100	77	79	50	76	32	75



**Additional comments on question 14**

South Havering

- Agree, this should not include flats.
- It would be better if other industry was sought for redundant sites to provide jobs to meet the proposed new housing and increase in population.

Hornchurch

## **Cabinet 9 October 2006**

- This is ok provided we can't get new employment on the site.

### **North Romford**

- A policy commitment should be made to the continued involvement of all residents. The direct engagement and empowerment of whole communities should be a requirement.

### **Central**

- It is not considered a positive approach that the LDF is not aiming to regenerate the businesses in that area, instead opting for a housing estate without any local jobs.

### **No address**

- Disagree, more efforts should be made to attract local employment.

### **The Submission approach**

There was support for this preferred option across the borough apart from in South Havering where there was strong opposition. There was concern expressed by respondents that this approach would involve the loss of jobs and did little to help the local economy. However the intention is only to release genuinely redundant employment land and to ensure that enough land remains to satisfy demand.

Therefore Core Policy 3 'Employment' seeks to ensure that a range of employment sites will be available to meet the needs of business and provide local employment opportunities by releasing 34 hectares of employment land for the Main and Secondary Employment Areas and protecting the remaining supply of designated land for business, industrial and some warehousing uses. To put this into perspective there are currently 51 hectares of vacant employment land in Havering. Supporting Development Control policies DC 9 'Main Employment Areas' and DC10 'Secondary Employment Areas' offer stronger protection the remaining designated employment sites than they currently have in the Unitary Development Plan.

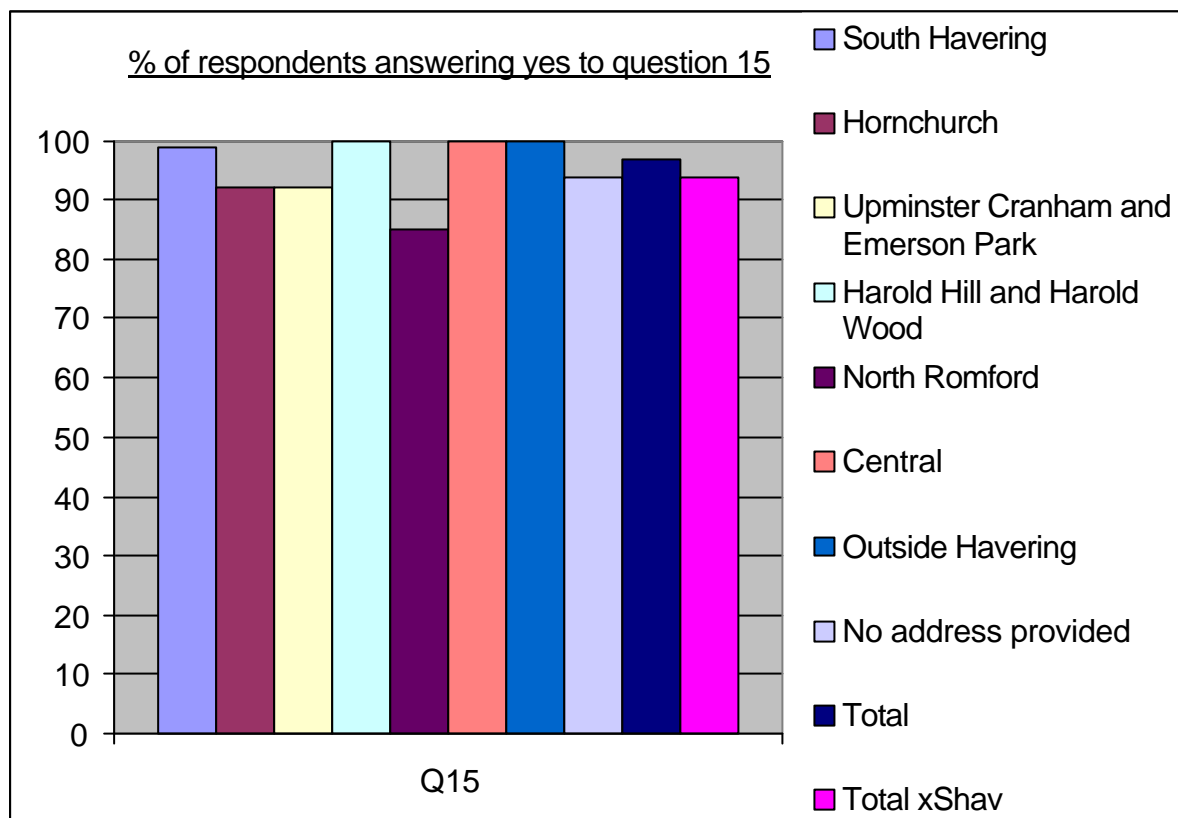
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### **Question 15**

Our preferred option is to seek where appropriate contributions towards the provision of essential new community facilities in major new residential developments. Do you agree YES/NO?

**Table and Chart 20 – % of respondents answering yes to question 15 by area**

South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total xShav
99	92	92	100	85	100	100	94	97	94



### **Additional comments on question 15**

#### Hornchurch

- A GP should be provided for every certain number of homes. Should get developers to build one in new developments.

#### Harold Hill and Harold Wood

- Asking developers to contribute will push up the cost of new development.
- S106 which mean otherwise unacceptable planning applications are approved should be resisted. The Council will inevitably become reliant on these financial contributions to supplement budgetary shortfalls and therefore decisions could be unduly influenced.

#### North Romford

- The promotion of Community Development trusts and not-for-profit Social Enterprises should be a policy.

#### No address

- Concerns that the local authority might become reliant on these contributions to counterbalance budgetary shortfalls. Local Councillors and Area forums should be used as a platform for agreeing where the contributions should be allocated.

### **The Submission approach**

There was strong support for this preferred option across the Borough, however some respondents were concerned that this may cause otherwise unacceptable

schemes to be approved. This preferred option has been taken forward as Development Control Policy DC30 'Provision of Community Facilities' which were appropriate in major new development, the Council will seek contributions towards the provision of essential new community facilities, for example GP premises, childcare facilities and so on. Without the provision of such facilities development may be unacceptable as it may place an unacceptable burden on existing facilities, so in this sense the provision of these facilities may be necessary to make the development acceptable in planning terms. However the provision of community facilities would not enable deficiencies in other aspects of the development which were contrary to Core Strategy policies to be overlooked.

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## **Leisure and recreation**

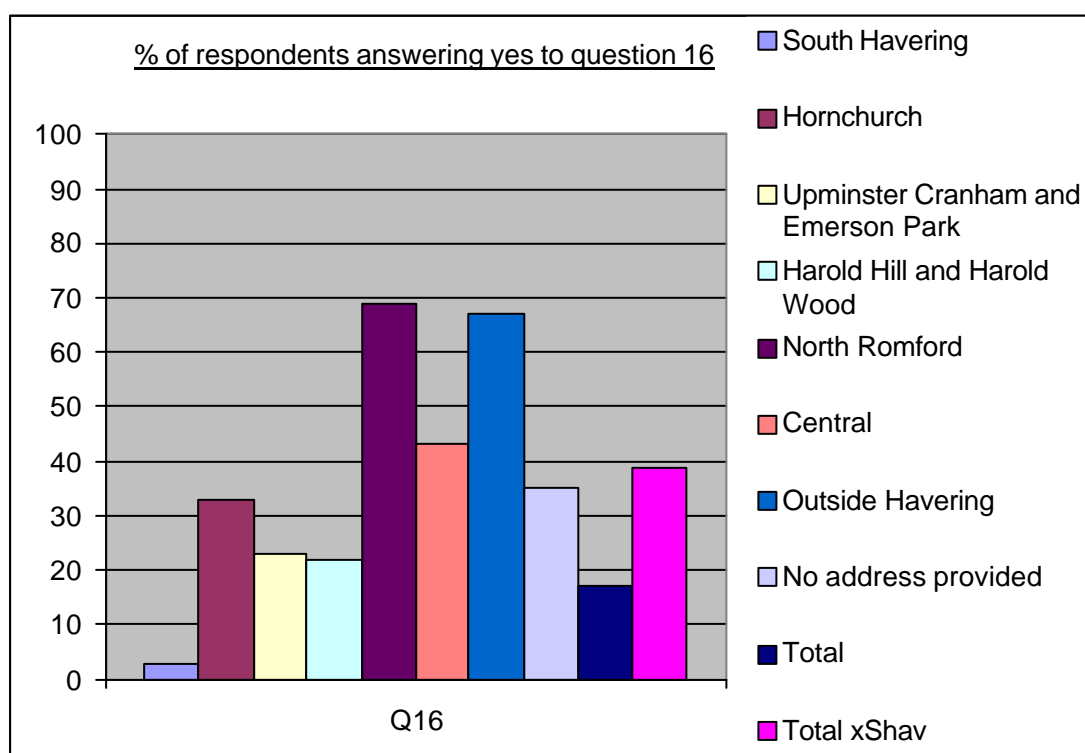
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### **Question 16**

Our preferred option is to allow the release of limited areas of poor quality or underused areas of open space to help fund the provision of high quality parks, playing fields and open spaces across the borough. Do you agree YES/NO?

Table and Chart 21 – % of respondents answering yes to question 16 by area

South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total xShav
3	33	23	22	69	43	67	35	17	39



**Additional comments on question 16**

South Havering

- Concerned that certain areas have been neglected on purpose.
- It is clear that some parks have been neglected, is this to make this option more attractive?
- Public participation is essential. This could be an important factor in helping with funding.
- All open spaces should be retained and made usable for a variety of purposes and should be close by for people to use and should be used to their maximum capacity.
- If an area is underused currently, it does not mean that it will be underused in the future. There could be a change in lifestyle where outdoor experiences are again fashionable.

Hornchurch

- Havering's open spaces and libraries are a major asset to the borough and should be well maintained. Need to encourage activities for teenagers to avoid them taking over childrens play equipment.
- Leave all open spaces alone.
- Rather than lose open space that is underused you should develop its potential, once it is gone it is gone forever.

Upminster and Cranham

- Protect fields and green areas.

Harold Hill and Harold Wood

- Don't agree that any of the parks or green spaces should be released. There has been a dramatic increase in building on in-fill sites over the last several years without the loss of more open ground.
- Who will determine what is underused or poor quality land and by what criteria. These areas often serve a multitude of unseen functions, and form part of a much wider interdependent green chain of eco-systems. Developing one may adversely impact many others. This option should only proceed with caution and following expert environmental guidance and extensive consultation with the surrounding community. Council should also propose an alternative source for funding its parks and open spaces one that is not reliant on releasing open spaces.
- Havering parks are overmanaged. Policy of allowing wilder less managed parks would be ecologically beneficial and less expensive to maintain, this providing funds for lower quality spaces. The sale of Council owned parks and open spaces in order to fund the maintenance of the remainder should be resisted. It is of little interest or use to a locality if it loses its only accessible open space, in order to fund another in a different area.
- A policy of developing facilities and amenities in areas well served by public transport would mitigate against areas in need of amenities but not having access to adequate public transport/infrastructure (e.g. Harold Park an area with a history of minimal Council expenditure).

North Romford

## **Cabinet 9 October 2006**

- Empowerment of the local community is the best way to encourage care of the public realm. There is local evidence of interest in 'Friends of' local parks groups. Upkeep of the public realm is a major issue in the borough, however, nothing lasting can be achieved without a strong engagement policy.
- Compulsory purchase of vulnerable sites should be a policy option.
- "Surplus open space" does not exist in the open context. Public open space is what defines the 'livability' of towns and should be identified as a minimum requirement in the LDF.
- The release and relocation of open space should not be included in the LDF. Proper consultation always identifies strong local communal interest in protecting and improving these spaces.
- Allotment land must be protected. LDF should support community initiatives such as Town Greens where appropriate. LDF policies should be strong in promoting and protecting open spaces.

### **Central**

- Public consultation needs to be considered in assessing "areas of poor quality". Improving other areas must be transparent for the public benefit.
- No open spaces should be sold, irrespective of the quality of the open space.
- Clarification should be given to the definition of "open space". This should not be an opportunity to sell off Council land to developers i.e Haynes Park. These spaces are our 'green lungs' and should be protected.
- Public consultation needs to be considered in assessing "poor" open space.

### **No address**

- Disagree, who will decide what is underused and in poor quality? This option could also be negative on existing biodiversity within these sites. Expert environmental and community consultation should be considered as part of this preferred option. An alternative source of funding for parks and open spaces should be considered by the local authority i.e. local business sponsorship?
- Disagree, there is a continual loss of parks and playing fields (e.g. Frances Bardsley school and Dury Falls school) without any improvements or replacements.
- Poor quality open spaces should not be disposed off but should be brought up to standard.
- Agree, the Spring Farm Park car park is never used, this could be reverted back to park land.

### **The Submission approach**

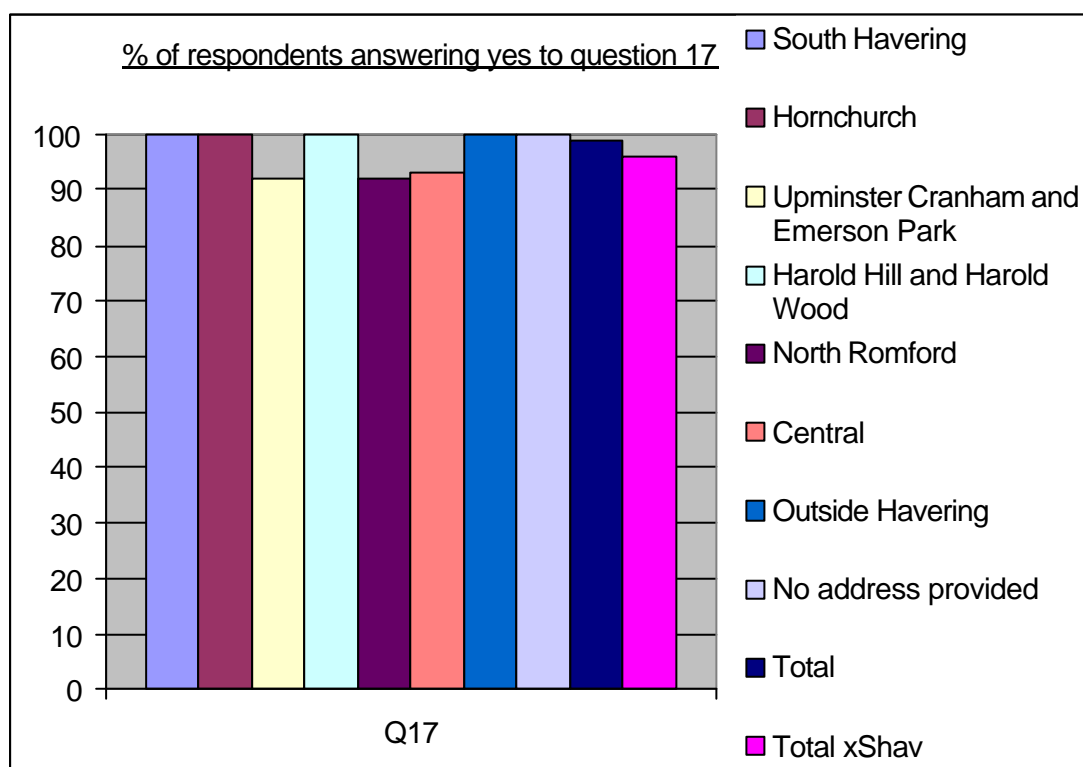
Apart from in North Romford there was opposition to this preferred option across the Borough and the additional comments reflect this. The Council is committed to ensuring there is an adequate provision of a varied range of accessible leisure and recreation facilities throughout the borough and Development Control policy DC20 'Access to recreation and leisure' sets out the open space standards that will be applied. As part of this strategy the Council recognises that there may be instances where public open space is surplus to requirements because it is of low quality and value. In these cases Development Control Policy DC18 looks to use funds from the redevelopment of such sites to help improve the quality of open space in the vicinity or to remedying qualitative and quantitative deficiencies elsewhere in the borough.

**Question 17**

Our preferred option is to ensure a greater amount of open space in major residential developments in areas where existing levels of open space are poor. Do you agree YES/NO?

**Table and Chart 22 – % of respondents answering yes to question 17 by area**

South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total xShav
100	100	92	100	92	93	100	100	99	96



**Additional comments on question 17**

**South Havering**

- There should be no interference with agriculture as a result of this.

**The Submission approach**

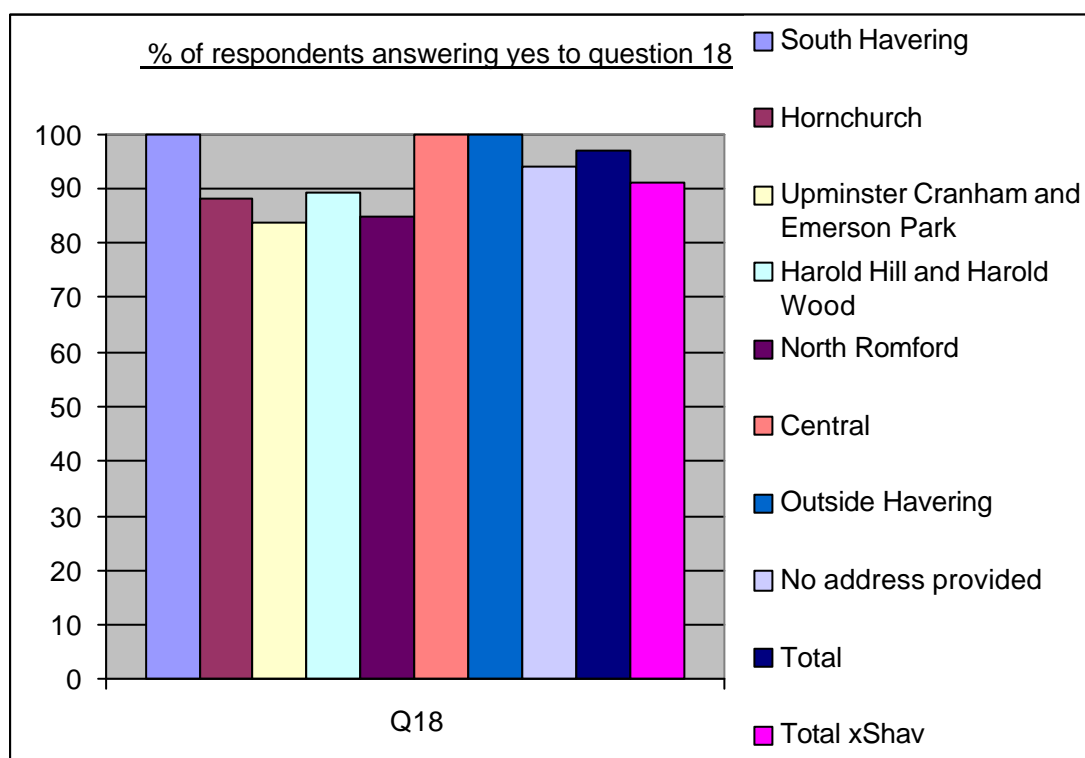
There was strong support for this preferred option across the Borough. This preferred option has been taken forward as Development Control Policy 21 'Major Developments and Open Space, Recreation and Leisure Facilities'.

**Question 18**

Our preferred option is to ensure that as many people as possible can access leisure and recreation facilities by locating them in those parts of Havering which are accessible not only by car but also by public transport, and in particular for them to be located so that they serve the existing and new communities in London Riverside. Do you agree YES/NO?

**Table and Chart 23 – % of respondents answering yes to question 18 by area**

South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total xShav
100	88	84	89	85	100	100	94	97	91



**Additional comments on question 18**

South Havering

- These facilities need to be borough wide to reduce travel for residents.

Harold Hill and Harold Wood

- Romford Football Stadium moving to Lower Bedford Road is not desirable as it will bring traffic chaos.

North Romford

## **Cabinet 9 October 2006**

- The aspiration is supported, however, in conformity with LTGDC and LREA policies the Rainham riverside areas should be identified as a preferred future leisure and entertainment location.
- Reference to green corridors, long distance footpaths and cycle-ways with particular regard to linkage between town and countryside needs to be strengthened.
- Concerned about the lack of reference to the north of the borough.

### **No address**

- Agree with the principle, however, this has the potential to adversely impact on leisure and recreation in out of town locations. Measures should be put in place to protect these spaces for those unable to take advantage of centralisation.

### **The Submission approach**

There was strong support for this preferred option across the Borough, however some respondents were concerned that residents in all parts of the borough need to have access to these facilities. This preferred option has been taken forward as Development Control Policy DC19 'Locating Cultural Facilities' which directs intensive leisure, sport and recreation uses to Romford and the District Centres where this is not possible the focus is on ensuring that the site is accessible in terms of public transport, cyclist and pedestrian access. For London Riverside the policy introduces a degree of flexibility to enable the aspirations for visitor and tourism attractions to be realised.

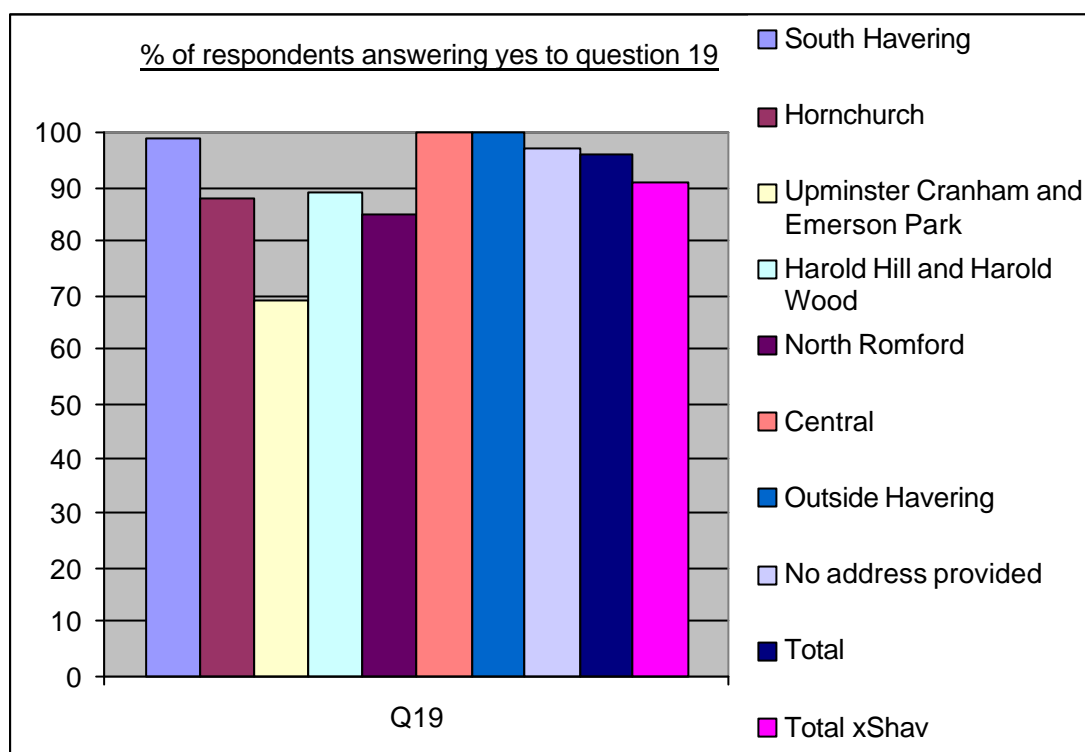
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### **Question 19**

Our preferred option is to promote better access to the countryside and, where appropriate, seek developer contributions to this. Do you agree YES/NO?

**Table and Chart 24 – % of respondents answering yes to question 19 by area**

South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total xShav
99	88	69	89	85	100	100	97	96	91



### **Additional comments on question 19**

#### North Romford

- Policies should include opportunities to enhance wildlife and green corridors through joint action with neighbouring authorities and NGOs.
- Current funding arrangements restrict opportunities to maximise countryside benefits. The LDF should confirm commitment to the creation of a regional consortium to release the strategic potential of all green access initiatives.
- The arbitrary administrative Thames Chase boundary at the A127 should be extended northward to LB Redbridge to protect future options for this important wildlife and amenity corridor.

#### No address

- Concerns that the local authority might become reliant on these contributions to counterbalance budgetary shortfalls. Local Councillors and Area forums should be used as a platform for agreeing where the contributions should be allocated.

### **The Submission approach**

There was strong support for this preferred option across the Borough. This preferred option has been taken forward as Development Control Policy DC22 'Countryside Recreation' which sets out a range of measures to increase opportunities for informal recreation in the countryside including where appropriate seeking developer contributions towards the implementation of the Green Chain Network, London Outer Orbital Loop, the Green Arc, the Thames Chase Forest and the Green Grid.

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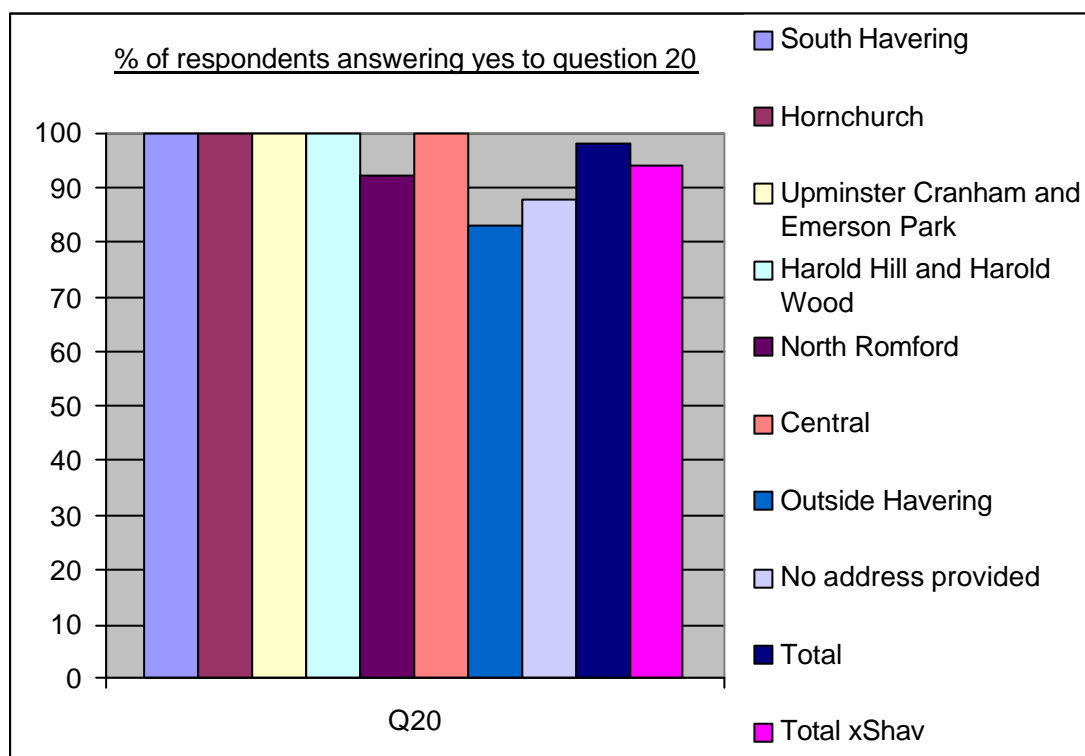
### **Question 20**

## **Cabinet 9 October 2006**

Our preferred option is to encourage the dual use of education and sports and recreation facilities so that best use is made of school buildings to the benefit of the local community. Do you agree YES/NO?

**Table and Chart 25 – % of respondents answering yes to question 20 by area**

South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total xShav
100	100	100	100	92	100	83	88	98	94



### **Additional comments on question 20**

#### **North Romford**

- The financial constraints on small non-profit groups that are a key community resource are not yet adequately addressed in policies. Joint use is too important to simply encourage. It should be a required management responsibility.

#### **Central**

- Dual use of a building could lead to less surveillance and greater vandalism. Those who offend should be severely punished.

#### **No address**

- Chafford pool is only open after school hours, for a daytime swim one has to go to Barking, more use of facilities would be positive.

Outside borough

- Consider including “where appropriate”.
- It is important to make school buildings more accessible to the wider public.

**The Submission approach**

There was strong support for this preferred option across the Borough. This preferred option has been taken forward as Development Control Policy DC29 ‘Dual Use of School Facilities’ this states the opportunities to open up existing schools and their facilities (including playing fields) to wider community uses will be encouraged where such use results in no unacceptable amenity, environmental, safety or traffic problems.

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**Arts, Culture and Recreation**

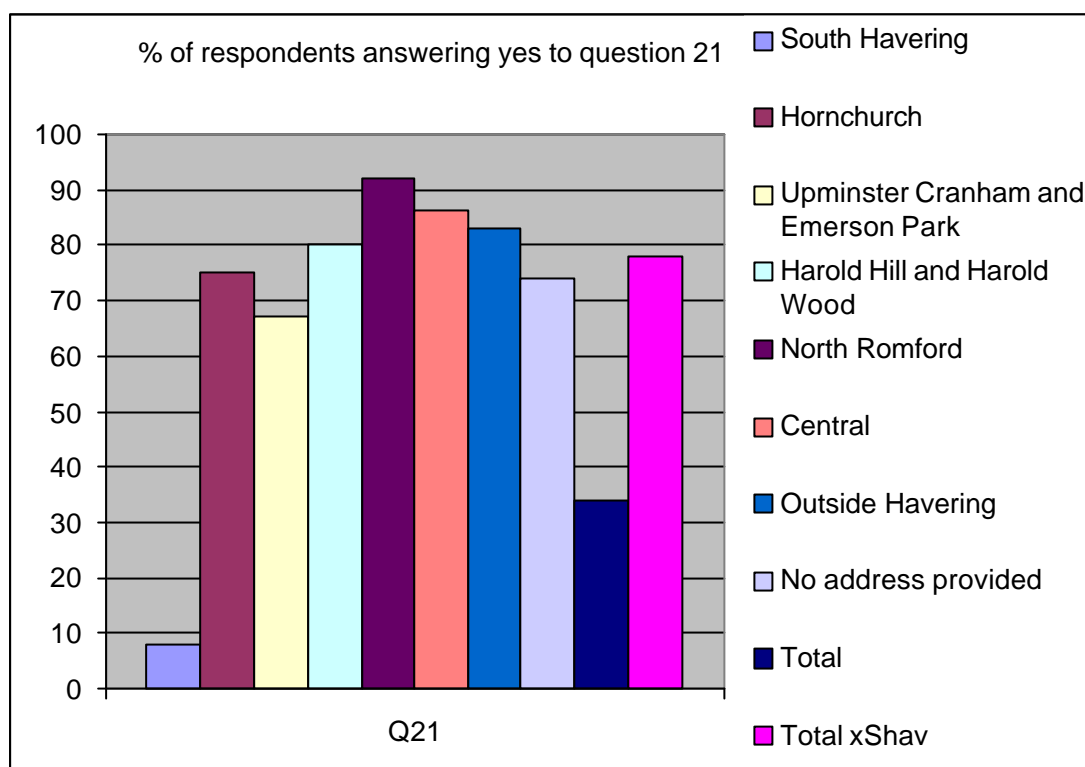
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**Question 21**

Our preferred option is to promote Hornchurch as a cultural centre and seek to diversify the night time economy of Romford through encouraging arts and cultural uses. Also, to generally diversify evening and night time entertainment throughout the borough so that the borough’s town centres cater for all groups and ages in the community. Do you agree YES/NO?

Table and Chart 26 – % of respondents answering yes to question 21 by area

South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total xShav
8	75	67	80	92	86	83	74	34	78



### **Additional comments on question 21**

#### South Havering

- Remove the night clubs from Romford town centre and replace with low cost homes. Nightclubs and casinos should be away from town centres, these at present deter the public from these areas.
- Diversification of nightlife to other areas would also diversify the problems.

#### Hornchurch

- Is Hornchurch cultural? Isn't it just restaurants and bars?

#### Upminster and Cranham

- This diversification of evening entertainment away from Romford is unlikely to lead to public disorder in other areas.

#### Harold Hill and Harold Wood

- Diversifying evening and night time economy throughout the borough could create more social disorder in more places.
- Only arts provision is at Fairkytes which is very inadequate, and the Queens Theatre only provides for a small % of amateur work. There is no proper encouragement for arts in Havering.
- Council should review its policy of allowing overdevelopment of entertainment facilities in central Romford in the light of the need to provide a decent and safe environment particularly at night.

#### North Romford

- The basic aspiration is supported but the policy needs strengthening with regard to maintaining public safety through policing and other security measures.

## **Cabinet 9 October 2006**

- Existing entertainment facilities have made Romford town centre a very unpleasant place for people to visit at night. Diversifying the area is admirable, however, this needs to be preceded by attempts to make the area feel safer and people friendly. This deserves a plan in its own right.

### **Central**

- Disagree, Hornchurch will be more like Romford where night clubs and binge drinking dominates which demeans residents.

### **No address**

- Disagree, we do not want other centres to become 'war zones' like Romford at night.
- Disagree, it is considered that this will bring about more clubs in the area. No further clubs should be allowed, particularly in Hornchurch. Pubs and clubs should be closed down where trouble occurs.
- Disagree, it is not clear why Hornchurch has been identified as a cultural centre.

### **Outside borough**

- Action needs to be taken in the LDF to address the terrible night time reputation (bars/clubs) of Romford Town Centre.

## **The Submission approach**

There was strong support for this preferred option across the Borough apart from in South Havering where there was strong opposition. Some respondents were concerned that diversification could spread the problems of the night time economy which Romford suffers. However the aim of diversification is the opposite, the aim is for the borough's centres to offer more than the pub/club culture and to try and secure a wider range of night time activities for all sections of the community. Others question whether Hornchurch is in fact a cultural centre. The Council maintains it is as it is home to the Queens Theatre and Fairkyte Arts Centre and has exciting potential to develop further in this direction. Consequently Core Policy CP5 'Culture' seeks to ensure that cultural uses help make the borough's town centres diverse and attractive places to visit by seeking to diversity evening and night time entertainment uses in town centres, carefully controlling the impact of food, drink and night time economy uses and promoting Hornchurch as a key centre for arts that serve Havering and the wider area.

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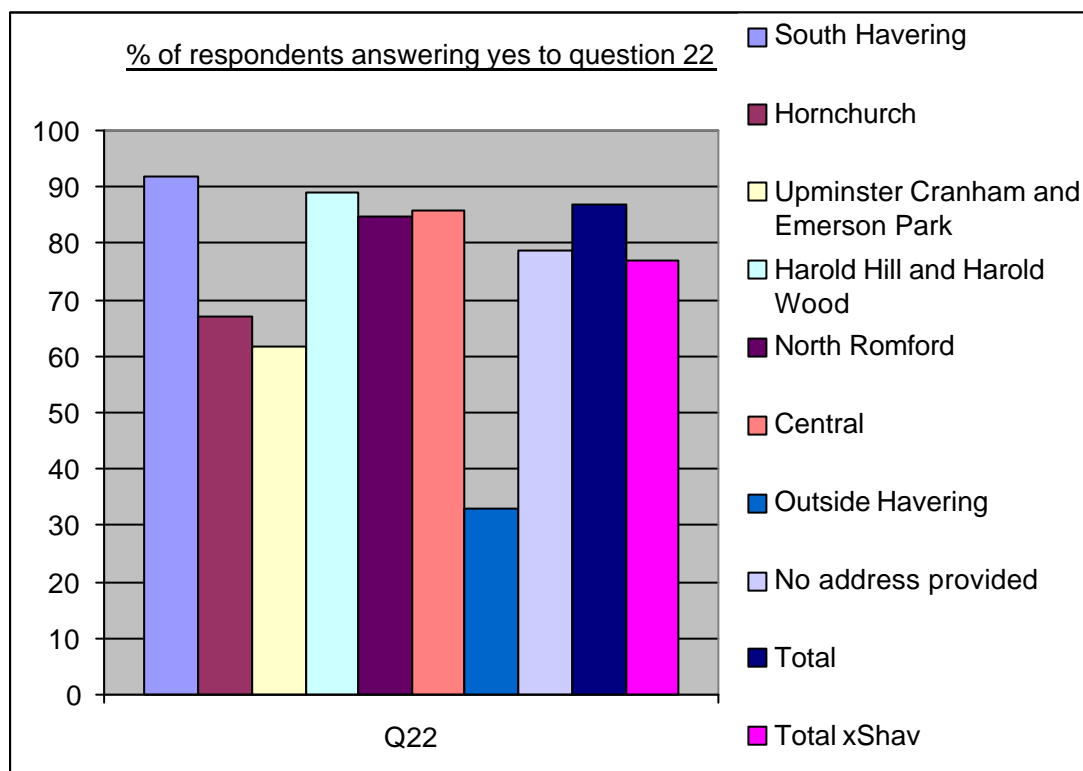
## **Question 22**

Our preferred option is to encourage, where appropriate, developers to provide public art within all new major developments. Do you agree YES/NO?

Table and Chart 27 – % of respondents answering yes to question 22 by area

## **Cabinet 9 October 2006**

South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total xShav
92	67	62	89	85	86	33	79	87	77



### **Additional comments on question 22**

#### **Hornchurch**

- New art will only get vandalised.
- Public art is a nice concept but is likely to be vandalised.

#### **North Romford**

- Money is often wasted on public art as the local community may not appreciate and look after it. Art should be commissioned through community engagement and should celebrate the local perceptions of history/heritage, without engagement the money would be better spent on public art.

#### **Central**

- Public art in modern Britain is generally of a poor quality. The Council should consider taking a levy from the developer which could go towards childrens art and play theatres.

#### **No address**

- Disagree, facilities are more useful to the public.

### **The Submission approach**

Apart from outside the borough there was widespread support for this preferred option. This is taken forward in Development Control Policy DC25 'Public Art' which seeks where appropriate the use of public art in all major and mixed use development schemes.

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## **Shops and Services**

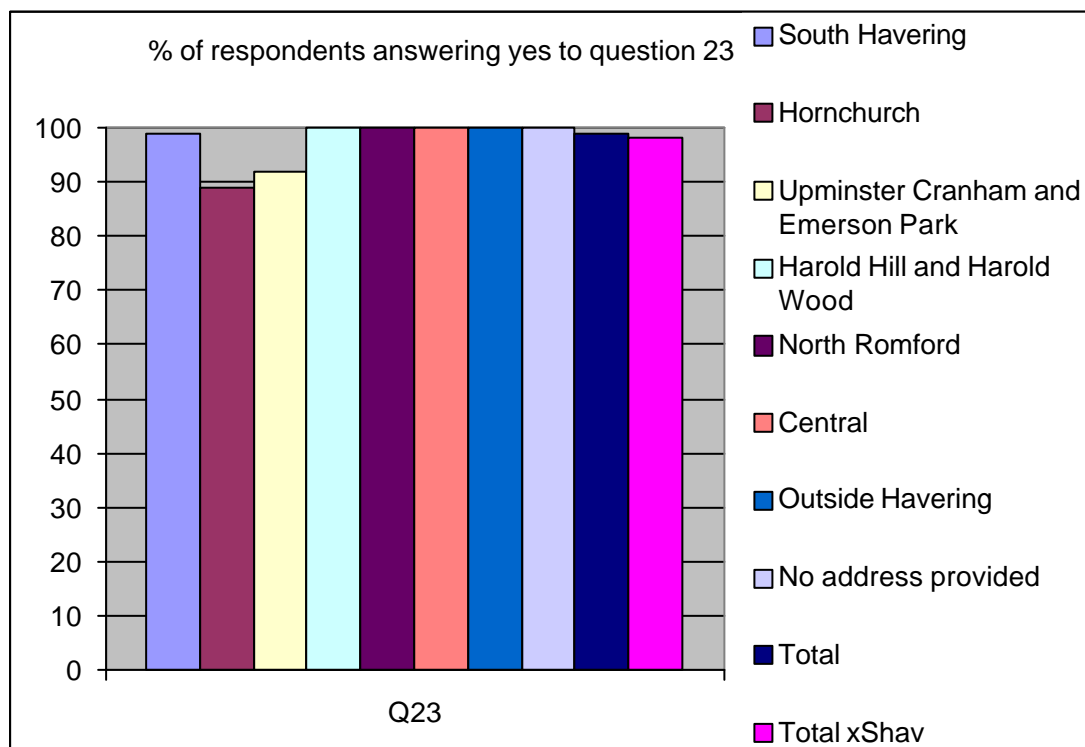
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### **Question 23**

Our preferred options is to encourage retail and service developments to locate in town, district and neighbourhood centres and include specific measures to ensure they continue to meet the needs of the communities they serve. Do you agree YES/NO?

**Table and Chart 28 – % of respondents answering yes to question 23 by area**

South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total xShav
99	89	92	100	100	100	100	100	99	98



### **Additional comments on question 23**

#### **Upminster and Cranham**

## **Cabinet 9 October 2006**

- Discourage more betting shops and café/restaurants

### **Harold Hill and Harold Wood**

- Collier Row and Harold Hill Shopping Centres need urgent regeneration.
- Over reliance on well served centres leads to a shortage of useful and relevant shops in other areas (such as Harold Park). This leads to the need to boost transport to the well served areas-another viscous circle. A balance is required throughout the borough. Small, well balanced, shopping facilities throughout the Borough would have a dramatic effect on the need to travel and would cut down on pollution congestion as well as being of real benefit to older and disabled people. Parade in Harold Park once provided a good service to local people but now contains hardly any facility of relevance to residents daily needs, recent loss of post office has aggravated this issue.

### **North Romford**

- Restrictions of take-aways, cafes and restaurants allowed in any one shopping precinct.

### **The Submission approach**

There was widespread support for this preferred option across the borough. This is taken forward in Core Policy CP4 'Town Centres' which seeks to promote and enhance the borough's network of town centres by directing retail and service development to them and setting out a strategy for each of the town centres focused on ensuring they continue to meet the needs of the people they serve. The strategy for Romford will be set out in the Romford Area Action Plan.

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## **Environmental Protection**

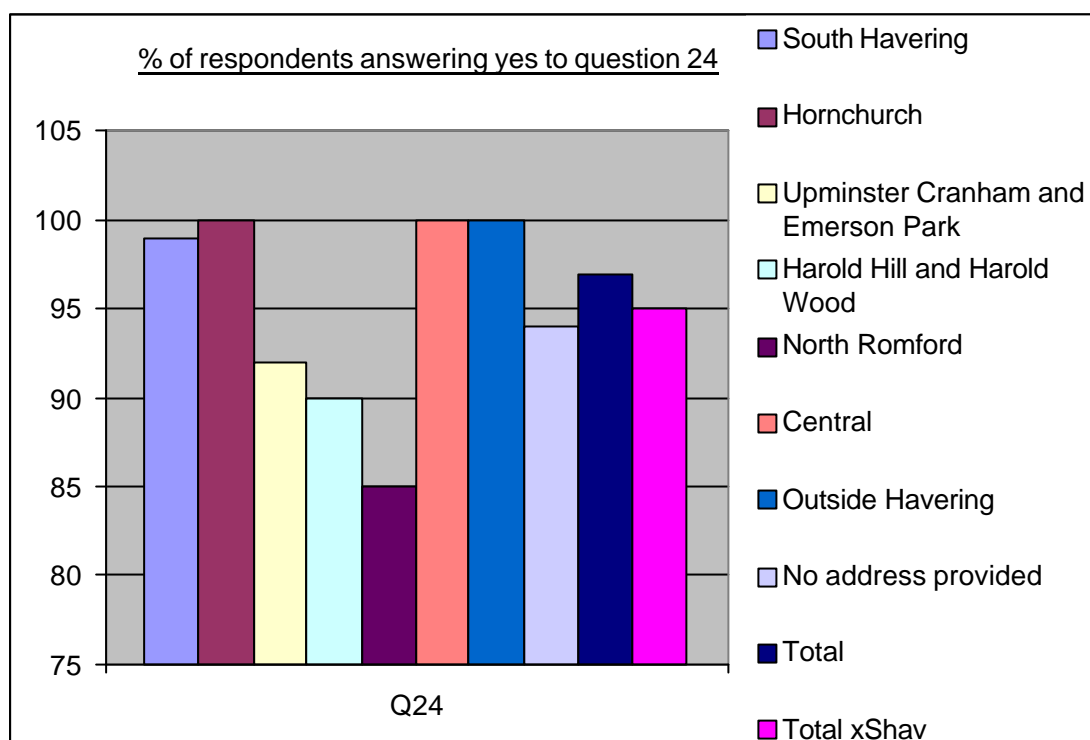
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### **Question 24**

Our preferred option is to encourage high standards of Sustainable Construction and renewable energy. Do you agree YES/NO?

**Table and Chart 29 – % of respondents answering yes to question 24 by area**

South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total xShav
99	100	92	90	85	100	100	94	97	95



### **Additional comments on question 24**

#### South Havering

- Only green forms of sustainable energy will be acceptable.
- The LDF should be insisting on Sustainable Construction and not simply encouraging. Development should not be permitted on marshes as this is in the flood plain.
- It would be positive to see evidence of this.

#### Hornchurch

- No longer have the luxury of merely 'encouraging' sustainable development. As recent stories in the newspapers show, most societies and environmental groups believe we are nearing or have already crossed the point of no return and unless we radically change our ways, we are in trouble. Sustainable development should be a requirement.

#### Upminster and Cranham

- Should insist on high standards of sustainable construction

#### Harold Hill and Harold Wood

- Won't this push up the price of new housing?

#### North Romford

- The LTGDC strategy offers zero carbon development standard. LDF policies, SPD/IPG should provide total support and create international recognition for the borough.
- The draft SPD/IPG on Sustainable Construction is inadequate. Only development standards with the highest level of sustainable construction are acceptable. All

buildings should be designed and constructed to CABE/BREEAM 'excellent' standards.

- Proactive measures including active and passive solar micro power generation and heating, permeable paving, water efficient fittings, grey water re-use and CHP at household, estate and district level should be a requirement in the Sustainable Design and Construction SPD/IPG.
- The Council resolved to become a non-GMO borough in 2004 and this needs to be included in the preferred options and policies that relate to land in which the Council has an interest.
- Deletion of the sustainable communities option is not acceptable.

#### **Central**

- Genuine high standards should be applied. It is important that there is someone is qualified to determine if the development is to a high quality and that this high quality is maintained.
- Houses should be built to reduce the effects on the environment e.g. renewable resources used in construction and energy water saving technology used.
- The LDF needs to commit and insist on high standards not just encourage. This will ensure that new developments meet national environmental targets.

#### **No address**

- Developers should not be encouraged to meet these standards, these standards should be insisted upon.
- "Encourage" is too weak and will be ignored. This should be a requirement as it is important for future generations.
- All new estates should have solar panels.

#### **Outside borough**

- The National Trust support sustainable construction and recommend replacing 'encourage' with 'insist' or 'make a pre-requisite' to reinforce the need for climate change mitigation/adaption via the planning system.
- Policies should insist that all new builds comply with the 'Eco-Homes' excellence standard.

#### **The Submission approach**

There was widespread support for this preferred option across the borough, however many respondents felt that high standards of sustainable construction and renewable energy should be insisted upon rather than encouraged. Core Policy CP15 'Environmental Management' states that major new development will be required to adopt high standards of construction and design and to incorporate on-site renewable energy equipment to reduce predicted CO<sup>2</sup> emissions by at least 10%.

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#### **Waste and Minerals**

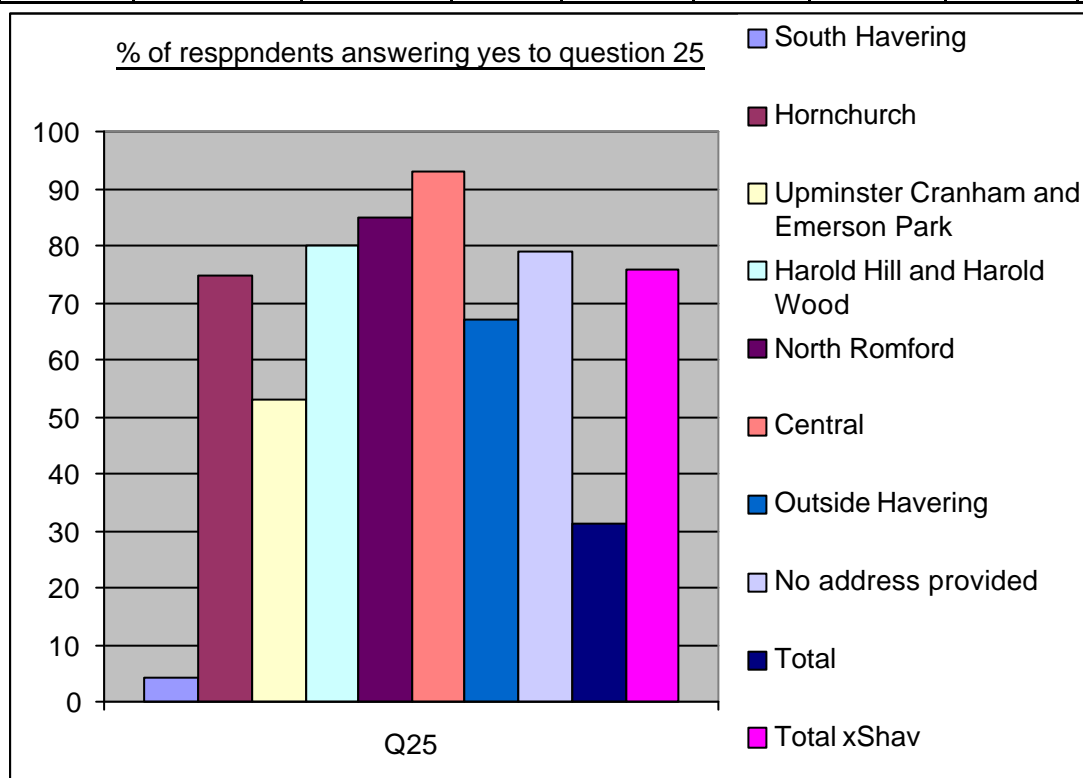
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#### **Question 25**

Our preferred option is to insist that only waste generated within East London and a fair share of waste from Central London is managed within Havering. Do you agree YES/NO?

**Table and Chart 30 – % of respondents answering yes to question 25 by area**

South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total xShav
4	75	53	80	85	93	67	79	31	76



### **Additional comments on question 25**

#### **South Havering**

- We have sufficient waste in Havering, it is not considered necessary that we should have to manage other peoples waste.
- We would not like any waste from elsewhere, enough is enough!
- Have had enough of Rainham being the dumping ground for London. This is not what I want for my children and future generations.
- No more tips or chimneys in Rainham. Rainham has provided enough of this over the years. New plants emerge with lower emissions, what about the emissions of a large number of processing plants?
- No more chimneys to spread dirt and dust onto Rainham. Rainham has done enough, why must it always be Rainham.
- Only waste from Havering should be managed in Havering.
- We have had enough of Rainham being the dumping ground for rubbish and its associated smells. The pollution as a result also causes asthma and other related chest diseases. The Council does not take Havering into consideration.

## Cabinet 9 October 2006

- How many more years are the local population going to have to put up with gravel extraction followed by waste disposal?
- No more tips, dumps or waste in Rainham.
- No to rubbish in Rainham.
- No more waste in Rainham.
- No more dumping of waste materials in Havering, this is supposed to be a Conservation Area.
- Havering particularly Rainham are already doing their fair share. Cleanaway should be moved away from their riverside location which could then be developed to the advantage of Havering.
- Havering should only manage their own waste, let other boroughs tackle their own waste it will make them more environmentally conscious.
- Why should residents of Havering, particularly Rainham have to handle waste from east and central London? These areas can provide their own waste facilities.
- Why is waste continually being directed to the Rainham area?
- More housing, tips or landfills are not considered appropriate in Havering.

### Hornchurch

- Happy to accept more waste from elsewhere subject to getting high disposal fees in compensation.
- Rubbish dumping or infilling in Havering is not good for the health of residents. Odours, fires etc also cause associated problems.

### Upminster and Cranham

- Extract the maximum minerals to gain two fold advantage, generate revenue and gain landfill sites.

### Harold Hill and Harold Wood

- Should be third option which is to not accept waste from any area outside Havering. Central London will never seek innovative and effective technologies to deal with their waste problems while they have the easy options of shipping waste to Havering, which contributes to road congestion, pollution and carbon emissions. To take a narrower view, why should Havering residents have to pay to use, for example, Brentwood's recycling centre while, at the same time they have to provide waste management facilities for other Boroughs.
- Long term solution is that inner city boroughs commit themselves to providing the space and technology to deal with inner city waste. However, it is most effective to provide large scale plants and these must necessarily be placed in outer London this should be reflected in the allocation of the annual government grant.

### North Romford

- Havering needs to advocate best practice that promotes more equal sharing of responsibilities and operations between all boroughs, including those that abdicated their recycling role and assume that outer boroughs like Havering will sacrifice increasing amounts of their residents environment. LDF appraisal is the opportunity to resolve this absolutely crucial Greater London issue.
- While waste disposal is generally unpleasant, it is an increasingly important business. Haverings facilities could help lead the way in future waste management schemes, and thus be important to the economy.

## **Cabinet 9 October 2006**

- Disagree with dealing with waste from outside of Havering. Also recycling should be done more speedily.
- Consideration of options by the Council for when the Rainham landfill is full.

### **Central**

- Every effort must be made to ensure that Havering i.e. Rainham will not be a dumping ground for radioactive waste. The Government should consider suitable alternative sites. More business and employment uses are needed more in the area than waste, Havering have had their fair share of waste.
- Havering should receive benefits for taking other borough waste.
- The Council needs to consider the effects of biodiversity as a result of the increased amount of waste.

### **No address**

- Only waste generated in the borough should be managed in the borough. If other borough waste is managed in Havering, then a trade off should be made i.e. reducing the yearly quota of housing for the borough.
- No more waste, tips, incinerators or dumping in Rainham.
- There are already enough waste facilities in Havering, we should only deal with Havering waste, in Havering.

### **The Submission approach**

There was strong opposition to this preferred option in South Havering but support elsewhere in the borough. Respondents, particularly those from South Havering commented that Havering should only be dealing with its own waste and that they had had enough of Rainham being a dumping ground. Core Policy CP11 'Sustainable Waste Management' states that new waste management facilities are only likely to be acceptable in Havering where they represent the nearest sustainable location for the management of the waste, ensure that the community or business which generated the waste is taking responsibility for its management, help the waste planning authority or London Waste Authority where the waste arose to achieve the maximum degree of self sufficiency in managing their waste, and help deliver national targets for recycling and composting of waste. It goes on to state that only waste management facilities that manage a proportionate amount of commercial and domestic waste arising in the East London Waste Authority area and would not result in Havering managing no more of central London's waste than any other non-central London Borough will be allowed in Havering. The Council considers that this is a balanced approach, with regard to emerging new London Plan policy on waste management and local concerns. The Council in partnership with the London Borough's of Newham, Redbridge and Barking and Dagenham is preparing a Joint Waste Plan which will go into more detail on how the borough will manage future waste arisings.

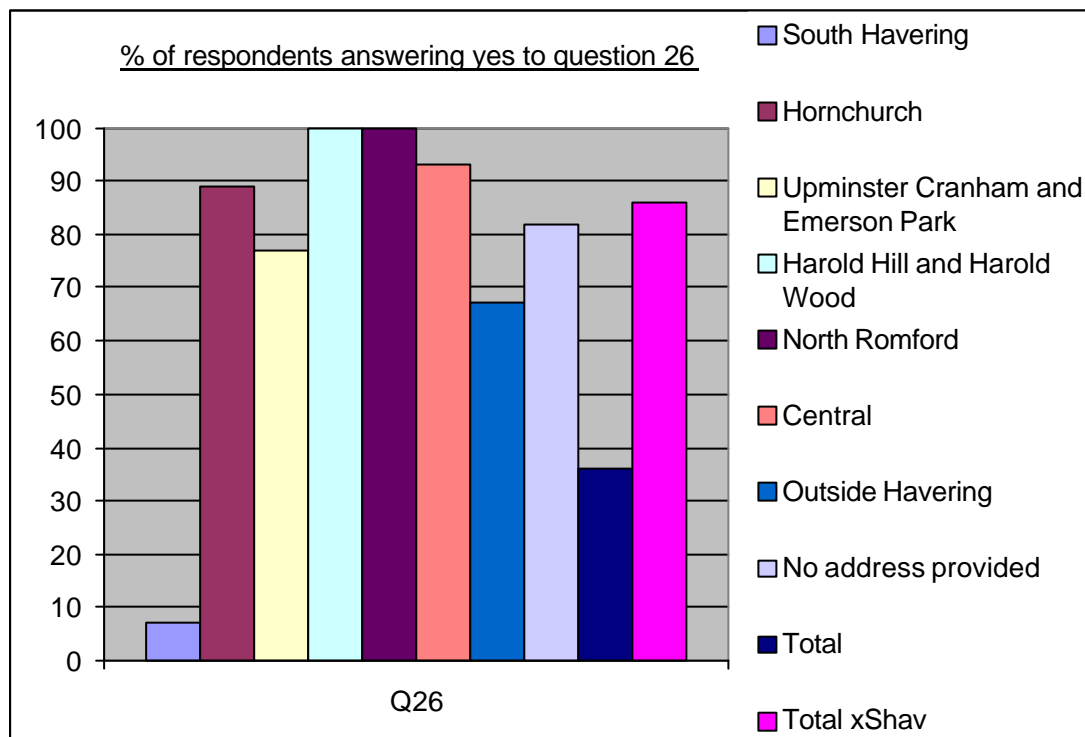
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### **Question 26**

Our preferred option is to only incinerate or landfill that waste that cannot be composted or recycled. Do you agree YES/NO?

### **Table and Chart 31 – % of respondents answering yes to question 26 by area**

South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total xShav
7	89	77	100	100	93	67	82	36	86



### **Additional comments on question 26**

#### South Havering

- Disagree, the health of children will be compromised and existing illnesses will be exacerbated, including both my children who have asthma.
- Disagree, the health of children will be compromised and existing illnesses will be exacerbated, including both my grandchildren who have asthma.
- Opposed to an incinerator in Havering.

#### Hornchurch

- Need to encourage recycling in the area, Havering makes it easy, so there is no excuse for not doing so.

#### Upminster and Cranham

#### North Romford

- A radical best sustainable management option is required to deliver full compliance with the waste hierarchy.
- The LDF must take account of the DEFRA climate change warnings and the Mayor of London's stated presumption against Energy From Waste (EFW) must

be taken into account. EFW is also unsustainable. It is a bad option for disposal of genuinely non-recoverable residual waste because the process creates toxic gases, liquids and residues. Landfilling is the safest way to dispose of inert residuals.

- The current performance of East London Waste Authority (ELWA) and LB Havering waste services is very poor, recycling figures/results are indefensible.
- EFW obscures the difference between recyclables and residuals impede action to minimise residuals using more sustainable existing technology and inhibits further advances. EFW is an unstable process and can be liable to fires and hazardous emissions which Havering should be aware of, particularly as part of the preparation of the Air Quality Management Area.
- The zero waste charter is an emerging trend towards the long term goal of total recovery. LB Havering should adopt this methodology. DEFRA subsidised EFW is no longer a sensible option.
- DEFRA should be asked to transfer the subsidy to best practice separated collection as it has done for Oxford.

**No address**

- No, there should be tighter regulations. Policy should include a commitment to 9/2002 PFI Rules which state "...approval of incineration must demonstrate that all options for recycling have been considered". This corresponds with similar government commitments.

**The Submission approach**

There was strong opposition to this preferred option in South Havering but support elsewhere in the borough. CP11 'Sustainable Waste Management' is committed to delivering national targets for recycling and composting of waste. More detail will be provided in the preparation of the Joint Waste Plan which in line with the London Plan will be first and foremost focused on waste minimisation and then on maximising recycling and composting.

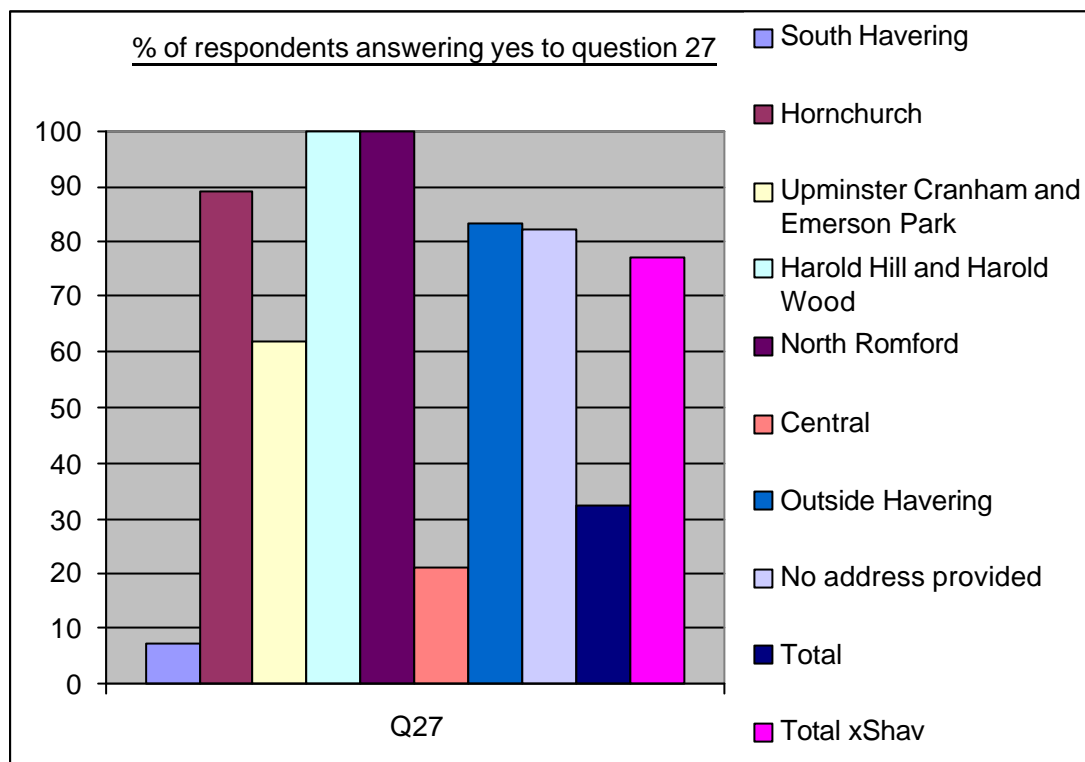
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**Question 27**

Our preferred option is to wait until the Council has responded to the Mayor of London's new minerals extraction target until showing where mineral reserves may exist and in the meantime to assess the suitability of proposals through the planning applications process. Do you agree YES/NO?

**Table and Chart 32 – % of respondents answering yes to question 27 by area**

South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total xShav
7	89	62	100	100	21	83	82	32	77



### **Additional comments on question 27**

#### South Havering

- No more landfills or gravel extraction and dust.
- No more gravel pits in Havering.
- No more mineral extraction in Rainham.

#### North Romford

- The LSP and the Community Plan requires commitment to much more through community engagement and empowerment on all aspects of extraction and restoration than is specified in the preferred options. A policy should be in the LDF to detail the commitment to continue and expand public engagement.

#### Central

- The Council should receive benefits if minerals proposals are targeted in Havering.
- The Council should consider the effects on biodiversity, mineral extraction could destroy the wildlife infrastructure forever.

### **The Submission approach**

There was support for this preferred option except in South Havering and Central Havering where respondents were opposed to further minerals extraction. Core Policy 13 'Minerals Extraction' seeks to make an appropriate contribution to the need to make provision across London for an output of 1 million tonnes per year but only where this does not have an unacceptable impact on human health or the environment. It therefore requires the operator to demonstrate that the site is the most sustainable option in particular with regard to the need and intended use of the extracted aggregates and current and forecast annual output in Havering and other

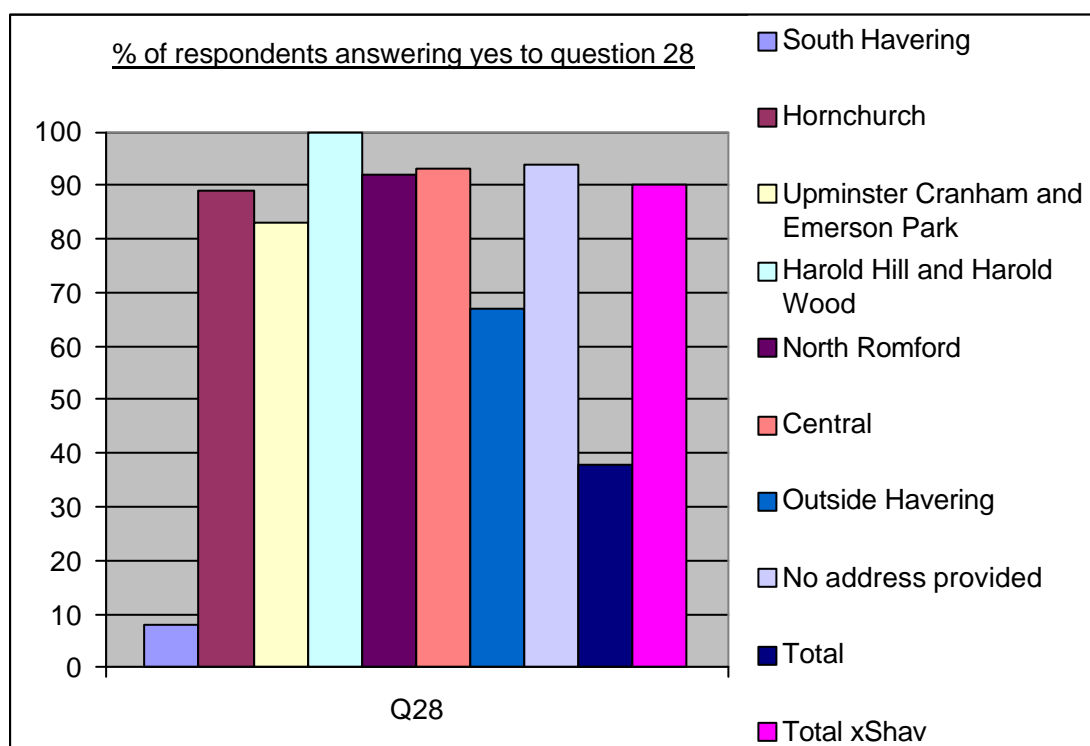
London Boroughs with regard to the East London and London landbanks. In line with the preferred option the Council intends to produce a separate document to identify any preferred areas for minerals extraction sites once London Plan policy on the issue has been finalised. All the Core Strategy does is show where minerals reserve currently exist, Minerals operators would need to satisfy a number of stringent criteria contained within the Core Strategy to gain permission for any future sites.

### **Question 28**

Our preferred option is to require higher environmental standards during mineral extraction and for the restoration of minerals sites. Do you agree YES/NO?

**Table and Chart 33 – % of respondents answering yes to question 28 by area**

South Havering	Hornchurch	Upminster Cranham and Emerson Park	Harold Hill and Harold Wood	North Romford	Central	Outside Havering	No address provided	Total	Total xShav
8	89	83	100	92	93	67	94	38	90



### **Additional comments on question 28**

#### **South Havering**

- No more tips in Havering.
- No more gravel pits in Havering.

- If the Mayors of London's mineral extraction target requires Havering to extract more aggregates, then higher environmental standards during extraction would be required.

### **The Submission approach**

Apart from in South Havering there was support for this preferred option across the borough. Core Policy CP13 'Minerals Extraction' requires that mineral workings are restored to the highest standards using progressive restoration techniques, and contribute to enhancing recreation opportunities in the Green Belt and where relevant the implementation of the Thames Chase Plan.

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### **General comments**

A number of additional comments were received. These are provided below.

- To encourage greater confidence and participation in the consultation process, the Council should not proceed with any preferred options where public feedback has demonstrated an overwhelming view against the options (say over 60%) without opening up further consultation.
- The justifications for not developing other specific sites are supported.
- Other riverscape opportunities have been missed in recent town centre development but some remain and should be captured via IPG/SPD and Design Statements e.g. North Street roundabout car-park site, Davidson Way. The enhancement achievable with a small watercourse is clearly demonstrated at Chelmsford.
- A borough review of languages used for Council literature. Particularly regarding the lack of EU languages used by the borough.
- The word "encourage" which has been used throughout the preferred options is very weak in planning terms, this should be changed to "expect" or "require" as these are firmer in planning terms. The word encourage does not comply with the London Plan. Otherwise the Havering will not be able to require these standards.
- To encourage greater confidence and participation in the consultation process, the Council should not proceed with a preferred option where the public response was 60% opposed to the option.
- Community lead initiatives should be supported by the Council i.e. "Maylands Fields: Community Vision", there is little support of this document by the local authority. How can Havering Council expect to contribute to the consultation process, when forward thinking initiatives such as this have been ignored?
- All of these preferred options will be irrelevant with the proposed Thames Gateway development of 10,000 new homes and with the overdevelopment of Romford. As a result of the environmental effects of the proposals in the area, Havering will become a ghetto in many areas and pollution and waste will rise exorbitantly.
- The word "encourage" should be replaced by "require".
- Concerned that the comments received from the public will be ignored.
- Concerned that the Preferred Options do not consider Crossrail.
- All new development should include facilities for shopping, leisure and community facilities.
- What ever happened to the "Museum of Havering" project?

- It is considered a problem that all options are arrived at by our “elected servants” without consultation with those servants (employers) sanction. However, decisions should be made by a majority of people (democracy). More events in larger groups would help to gain consensus.
- No emphasis is made on street cleaning – this is nearly non-existent in Hornchurch.
- The use of “encourage” will not result in developers taking these issues seriously. “Expect” or “require” should be the term used.
- It is a bad idea to build on the Thames floodplain.
- The landscape has changed dramatically over the last 100 years, with buildings covering fields. In the next 100 years, will buildings extend outwards all the way to Southend? Would the Council allow this to happen?
- Did not consider that the “preferred options” were genuine options and was not convinced that it provided concrete and definitive actions.
- Concerns over bus services and routes from Harold Hill to Romford. The buses are run inefficiently.
- Street cleaning in Harold Hill needs to be improved dramatically.
- Concerned about the Coach House development and those who have brought the project forward. What is the new use and will planning gain benefit the local environment?
- Romford station should be refurbished. It cannot cope with the amount of traffic and people.
- The Preferred Options questions are open to different interpretations. The Council could, as a result, use the answers to their own advantage.
- More access should be provided to the river Thames via piers and jetties.
- A minimum of 80% refuse/recycling should be transported by river.
- Central London should be identified as a more appropriate site for waste.
- No to moto cross.
- I do not feel that Havering Councils Planning Committee is committed to acting in the best interests of the electorate of the south of the borough. Particularly Rainham and Wennington and just seems to bow to pressure to build for large industries.
- No to moto cross.
- No more rubbish dumping or erection of Novara Energy Construction.
- Havering Council needs to uphold its promise to improve Rainham and the south of the borough not just build poor quality housing and increase waste facilities.
- Rainham oppose the moto cross parks.
- Why wasn't this booklet posted to every resident in Havering?
- Havering needs a marina, more police and more GP's.
- Concerned that the responses to the consultation will not be taken seriously.
- There is a free public toilets in the borough. More of these are needed.
- Elm Park station hill needs fencing replaced on Southend road.
- Rubbish is piling up at the Elm Park Bridge again.
- The Preferred Options booklet was misleading.
- The Council planning committees should be more responsible in allowing consent to plans that do not respond to residents objections.
- The 9pm route change at Romford station away from the town centre is intimidating from jobs. If you are infirm it is an extra distance to walk, please try and get the original route back.

## **Cabinet 9 October 2006**

- Why not make the ring road with the lanes all going the same way? It would aid free flowing cars and buses.
  - Why do police and community officers all travel in pairs, they all have radios should they need help. If they separated twice the area would be covered.
  - Street cleaning has improved in Romford, well done. However, pigeon droppings are still a problem outside the central library.
  - Buses do not seem to be washed, is this a save water policy.
  - Keep improving the libraries they are much improved.
-

# **Developing Havering's Future**

## **Preferred Options Heritage Focus Group**

**Monday 13 February 2006, 10.00 hrs, 8 Floor, Mercury House, Romford**

### **Present:**

Dave Vicary – London Borough of Havering  
Rebecca Davey - London Borough of Havering  
Tracey Coles - London Borough of Havering  
Sue Smith - London Borough of Havering  
Nigel Oxley - London Borough of Havering  
Cliff Jeffery – Adamsgate Action Group  
Coral Jeffery – Rainham Preservation Society  
Jan Floyd – Havering Heritage  
Laurie Ford – Havering Heritage  
Joyce Leicester – Gidea Park and District Civic Society  
Colin Clark - Gidea Park and District Civic Society  
Sylvia Bates – H A B and DSC  
Brian Evans – History and Heritage Initiative, Romford Historical Society,  
Rotary Club of Romford  
Keith Langridge – Historian, History and Heritage Initiative

### **Introduction**

Dave Vicary opened the meeting by welcoming everyone who was in attendance. Each person in turn introduced themselves to the group.

The following issues and/or concerns were raised and discussed by various people at this point in the meeting:

- Councillors not listening to the recommendations and advice of council officers;
- Council officers not always taking forward what the community wanted; and
- General concern was raised over the level of councillor support for heritage.

### **Progress of Havering's Local Development Framework (LDF)**

Dave outlined progress on Havering's LLDF in terms of where the process is at and where to from here with the development of the Core Strategy and the Development Control Policies.

## **Cabinet 9 October 2006**

The following issues and/or concerns were raised and discussed by various people at this point in the meeting:

### **Housing**

- Redevelopment of existing healthcare sites particularly Harold Wood Hospital for new housing developments were seen as a negative because it could result in the loss of local healthcare services.

### **Transport**

- It was thought that there is a lack of a suitable bus depot for Romford and a suitable depot needs to be addressed; and
- The perceived lack of public access (transport) for the proposed Rainham development to accommodate 12,000 people was raised as a concern.

### **Industry**

- The continual location of industry in the borough was thought as being a negative.

### **Housing**

- Displacement of people because of the Olympics which in turn, has created an additional demand on housing in the borough. It was suggested that this was affecting the local housing market and causing additional development;
- The location of 12,000 additional people in Rainham was seen as a concern because of the area currently being run-down.

### **Hospital/Healthcare Services**

- The inadequate supply of services/downgrade of local services in close proximity to communities in need of these services was raised; and
- The re-use of current health sites (primarily hospitals) for activities such as housing was not supported.

### **Waste**

- It was thought that the use of the borough to take central London's waste was a negative and this was not supported.

### **Politician**

- Further concerns were raised over the adequacy of the current system for politicians to take notice of what the public is saying.

## **The vision and objectives for the future planning of the borough**

Dave commenced the discussion on the vision and objectives for heritage in the preferred options document. The following discussion ensued:

Suburban Character

- Retain green spaces in our town centres;
- Retain the low density levels in all parts of the borough;
- 'Green up' the town centres, Romford in particular; and
- Maintain the green space we have in our urban areas.

Romford as East London's Town Centre

- The majority did not want Romford as a main centre for East London;
- Want the benefits of growth and development but not the issues that are associated with development;
- Romford should not rival Lakeside and not be a threat to that area;
- Want to be part of Essex and the London Fringe, not part of East London; and
- Dave outlined the role of the Romford Town Centre Area Action Plan in planning for the town centre. He suggested that it would be better to make comments about detailed issues in the Romford Town Centre in the Area Action Plan.

Officers Recommendations

- Concerns were raised that the recommendations of the heritage officer were not taken as being the primary consideration by elected members when considering planning applications.

The preferred options for heritage policies

Buildings of heritage interest/value

- There was consensus that locally listed important buildings required formal protection in addition to the listed buildings;
- Dave commented that paragraph 1.3 of the preferred options document may require amendment to make it consistent with the policies in the document;
- There were various places and buildings mentioned that people were concerned about – for example, Rainham House (removal of a fence).
- Sue suggested there is a need for/updated required on a Museum Strategy for the borough to cover the retention of artefacts, buildings etc.
- It was thought that policies are required to ensure retention of public access (albeit limited in some arrangements) for public buildings of merit that revert to private ownership;
- Conservation areas and the protection of curtilage were supported. It was felt that the current policies in the UDP do not go far enough for curtilage protection. Dave suggested SPDs for heritage guidance in conservation plans, in addition to the Core Strategy policies;

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- Cross-boundary issues were raised;
- It was suggested that an educational workshop with the councillors might go some way in educating about heritage, along with those interested in heritage having more involvement with the champion for heritage;
- Promotion, tourism and education are seen to be valuable ways of encouraging change of attitudes in a non-regulatory manner.

The group wanted to meet with the heritage champion councillor so that they can express their views direct to him. Dave said he would contact the Councillor Curtin to see if this could be arranged.

# Developing Havering's Future

## Preferred Options Age Concern Group

**Monday 13 February 2006, 10.30am, HOPWA House, Hornchurch**

This group was organised by Dora Hill and Sue Dixon (Centre Manager) of Age Concern who invited service users to attend. Four people attended, together with Dora and Sue.

### Shops and Services

- Romford is a good shopping centre, particularly the all weather shopping. But the Brewery feels isolated from the rest of the town centre [see also Design].
- Parking is an important issue in Romford. Lakeside and Bluewater both offer free parking. Coaches from Kent bring people into Romford for shopping and the market but there is nowhere for them to park. The Ice Rink sometimes allows coaches to park there but coaches have gone to Lakeside to park before returning to collect passengers.
- Opening hours should be extended in Romford. Need more cafes and less nightclubs. They felt that longer opening hours would make Romford feel safer at night.
- Hornchurch has got too many charity shops and eateries. It's important to retain a good mix of shops in Hornchurch. Litter is also a problem in the town centre. Streetcare don't empty waste bins.
- Shops in Elm Park are closing and the centre is looking tatty. This used to be a very good centre. Need to maintain and strengthen Elm Park as a shopping centre. Elderly people in particular use these local shopping facilities and it covers a large residential area.

### Community facilities

- Need to retain local libraries, as they provide a focal point for other services. Want a new library at Elm Park.
- Need youth clubs for youngsters. Extended school hours and clubs in school premises could help address this. [Dual use of school facilities]. This would allow increased use of existing buildings and schools are often located within walking distance for many people. However, staffing and security issues could be a problem.

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- Local facilities required rather than large developments. HOPWA House is a good facility but there are space (and cash) constraints on further development.
- Need to have community facilities as well as housing in any new residential development. Community organisations need to be on board as well so that developers (and council) are aware of what is needed.

### **Housing**

- Prefer houses to flats. Shortage of two bedroom accommodation.
- Concern from one person about the number of flats being built in Romford town centre. Will they become the slums of tomorrow? However, another person disagreed and thought that this development is beneficial as it brings people into the borough. Residential development is better than more nightclubs and may open up the town centre to a wider evening economy. Increasing numbers of people living in the town centre may create a safer environment.
- Don't build on the Green Belt.
- Council needs to ensure that its letting policy for housing is working. Concern over empty property and people sub-letting.
- Maintenance issues with flats. Doorman or concierge needed to maintain flats (especially council property).
- 
- Older people might welcome schemes which would release equity on their property and allow them to move to a smaller property as long as they retain control.
- Homes should be wheelchair accessible.
- Shortage of care homes in Havering [BUPA buying up homes]. The Council has closed and sold off Rosebank Avenue for private flats. Care at home is fine on paper but people don't always get the care that they require. This is a potentially dangerous situation for some older people. Council needs to find more land for care homes.

### **Design**

- Buildings with steps should have lifts or ramps to access them. Toilets should be located on the ground floor.
- Amenities should be clearly signposted as well as accessible.
- Access to the Brewery site from South Street isn't designed well – you go through a 'funnel' from the Abbey National into a large open space at the Brewery

Transport

- Dial-a-Ride charge for their service and there is a limit to the number of journeys people can make.
- Bus services have improved in recent years. One person said that she prefers to travel by bus into Romford rather than take her car.
- Walking strategy would need to consider how safe it is due to poor maintenance of pavements – uneven paving slabs, tree roots pushing up etc.
- Could the Council tarmac over paving slabs?
- Cycle lanes were supported but there needs to be cycle racks.
- Roads are often being dug up. If one utility company is digging the road up couldn't other be informed so that others could undertake work at the same time?

Environment and Heritage

- Keep the Green Belt as it is. This is not only of benefit to Havering but benefits central London by giving air to the city.
- Harold Lodge Park is a good example of improvements.
- Keep allotments.
- Rivers should be maintained and kept clean.
- Promote heritage in Havering. This could help draw people into the borough.
- Promote Romford and the market. Extended opening hours.

Waste and Minerals

- Recycling has to be made easier. Wheelie bins would be better than the plastic bags. These often create more litter as they are opened by foxes and rubbish is strewn around.

Arts and Culture

- Praised the approach of Fairkytes, bringing together lots of activities. Don't get rid of Fairkytes.
- Improved facilities in libraries

# **Developing Havering's Future**

## **Preferred Options**

### **Havering Access and Advisory Group**

**Monday 13 February 2006, 14.00 hrs, Whittaker Hall, Hornchurch**

#### **Present:**

Mary Capon  
Trevor Lowe  
Diane Sowden  
Kevin Troughton (plus one)  
Peter Hall LB Havering  
Gemma Roberts LB Havering  
Gary Chick-Mackay (Access Officer, LBH)

#### **Design**

- Designing out crime should be addressed in the LDF. Many disabled people feel vulnerable. There is a fear of crime, even though the perception and reality are different.
- Clearer spaces – and more people using spaces – creates a more inclusive society.
- Maintenance of pavements is a major problem in the borough.
- Integrated transport – ensuring that people can get to and from different spaces. There have been improvements in transport and buildings but it is often the spaces in between that are inaccessible. For example, the bus may be accessible but they have to walk on uneven pavements for long distances to use it.
- Part M of Building Regulations and the DDA apply to access to buildings and access to goods and services.
- The group supported the preferred option on Access [B1 AB Access] although they hadn't seen Mayor's SPG to the London Plan, 'Accessible London'.

#### **Housing**

- There seems to be a large number of flats being built in Havering. Need to consider access into and within blocks. There were some concerns about lifts and access out of flats in the case of fire.
- Need for key worker and social housing in the borough.

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- The group supported the preferred option [Policy H1 AG Lifetime Homes and Mobility Housing] although a number of points were raised.
- The question of the additional cost of building lifetime homes was raised. It was felt that this would add some additional, but not significant, cost to new housing. However, this is countered by being cheaper in long term as it offers the ability to adapt the home at a later stage.
- Possibility of homes requiring a larger footprint. This would appear to run counter to current housing development where properties are getting smaller.
- This would need to be discussed with developers – and for them to take on board.
- Need to consider the changes in health provision, with greater care at home the size and layout of properties is more important.
- [Internal] Stairs to be wide and straight.
- Access into homes has to be addressed.
- Lifetime Homes – visitability. Need to ensure that disabled people can visit people (and vice versa).
- Car parking is an important issue for people with disabilities. People may not drive themselves but require parking for visitors, i.e. health visitors and carers.
- Any specialist housing for people with disabilities must allow for visitor parking.

### **Community facilities**

- Community facilities need to be local and a greater quantity, For example, one attendee uses a lunch club everyday, at the moment it takes 2 buses to get there. In the future he may not be able to take the bus and he will become cut off from this service.
- There is a shortage of community facilities (particularly meeting halls) in Havering.
- Provision of community facilities should be included in developers plans and this should include the long-term support needed to manage them.

### **Transport**

- The smaller local railway stations are currently not accessible.

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- Need to have fully accessible car parks. Many disabled people can't use public transport and rely on cars.
- Parking is a problem around the Hildene Avenue shops in Harold Hill. It's important to maintain and strengthen this district shopping centre but parking is a problem. Could the large grassed area be used for parking?
- Supportive of the Park & Ride scheme, it will need to meet inclusion guidelines. But we need to make the most of current public transport and the existing infrastructure rather than ignoring it to develop something completely new.

### **Shops and Services**

- There are a wide variety of services throughout the Borough. There was particular praise for the Shopmobility scheme, which has made shopping in Romford more accessible.
- As mentioned under Transport, parking is a key problem for Romford. There was also concern about safety in Romford.
- Smaller centres including Harold Hill also have parking problems. But these smaller centres are vital for local residents.

### **Waste and Minerals**

- Reclaim and clean water from the Thames?
- Combined heat and power station using wood, paper and waste situated by the river. (Others in the group less supportive – environmental issues and location concerns)

# Developing Havering's Future

## Preferred Options Environment Focus Group

**Tuesday 14 February 2006, 10.00 hrs, 8 Floor, Mercury House, Romford**

### Present:

Dave Vicary - London Borough of Havering  
Tracey Coles - London Borough of Havering  
Peter Williams - London Borough of Havering  
Margaret Stovold - Marylands Green Belt Action Group  
Jean Cobb - Marylands Green Belt Action Group  
Gary Mills - Marylands Green Belt Action Group  
Del Smith – Friends of Dagnam Park  
Steve Pullum – Havering Green Alliance  
Phil Butler – Friends of Rainham Marsh

### Introduction

- Dave Vicary opened the meeting by welcoming everyone who was in attendance. Each person in turn introduced themselves to the group.

### Progress of Havering's Local Development Framework (LDF)

- Dave outlined progress on Havering's LLDF in terms of where the process is at and where to from here with the development of the Core Strategy and the Development Control Policies.

### The vision and objectives for the future planning of the borough

- Dave commenced the discussion on the vision and objectives for the environment in the preferred options document.
- The following points are recorded as being discussed by the group at this point in the meeting:

#### London Riverside conservation park – a premier environmental attraction

- Quality development by the edge of the river is wanted, along with green space.

### Sustainable construction

- Disappointment was voiced over the Council's stance to 'encourage' rather than 'ensure' sustainable construction. There are many benefits to keeping up standards and pushing sustainable construction.

Integrated transportation system

- There is a need to integrate public transportation into new housing developments;
- It was asked what level of evidence was there to show that reducing parking spaces in residential developments lead to an increase in use of public transportation systems and a reduced reliance of public transport;
- Innovative design is required to address the issue of land being used for car parking – for example, create underground car parks to enable above ground areas to be used by other uses. Security and safety are important design considerations for underground car parks to work effectively.

Sustainable new communities at London Riverside for 12,000 people

- Having a blank canvas to do something in this area was seen as a good thing. Residential development and utilising the riverside was also viewed as a good thing;
- Must ensure that there is adequate infrastructure to support such development; and
- An integrated public transport scheme as part of the proposed development is required. Any transportation system must provide links with the rest of the Borough and to other boroughs.

The preferred options for environment policies

Dave commenced the discussion on the preferred options for the environment policies in the preferred options document.

The following points are recorded as being discussed by the group at this point in the meeting:

Protecting biodiversity and geodiversity (A2 AA)

- Concern was voiced about mitigation needing to be appropriate for the proposed effects of the development;
- The definition of 'Brownfield sites' was questioned. It was noted that previously developed sites may be important because of their biodiversity. It was suggested that brownfield sites must not be treated as being without ecological/biodiversity value.

Biodiversity in new developments (A2 AB)

- The longer-term management of land, once it is protected, is imperative. Methods such as on-site wardens and planning agreements ensuring the enhancement of sites (or nearby sites) were mentioned.

Green belt boundary (A3 AA)

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- The Whitworth Centre was thought to be of little ecological worth. However, local residents may have a problem with it being removed from the Green Belt because it was traditionally part of the Green Belt;
- Concern was voiced over a major developed site being proposed for Cardrome because of the amenity value of the site if the 'foot print' was moved away from the Rainham Road frontage;
- The issue of flexibility of the 'footprint' was raised. Some felt that the ability to move the 'footprint' within a site was an issue as it may threaten other parts of the site. Others thought that the flexibility was a good thing because it may enable parts of a site to be protected; and
- The concept of a regional park was discussed, with areas of green space linked to make corridors. It was suggested that the Council needed to express its aspirations to link up with other bodies to support creating this and looking after these areas.

### **Appropriate development in the green belt (A3 AB)**

- The gradual development of small holdings being developed was raised as being a concern, particularly with regards to houses related to the holding;
- The purpose of Green Belt to stop the coalescence of settlements is important and must be kept so; and
- There was discussion over the effect agricultural practices may have on the Green Belt and it was questioned whether the Council had the powers to stop activities that were detrimental to these sites – for example, ploughing. Dave replied that the Council was unable to regulate activities that do not require planning permission.

### **Agriculture (A3 AC)**

- No comments.

### **Crow Lane area (A2 AD)**

- No comments.

### **Flood risk (C1 AA)**

- Concern was voiced over development in the flood plain of the Thames, especially given the proposed residential development for 12,000 people.

### **Sustainable construction (C1 AB)**

- It was stressed that the Council should ensure that sustainable construction is undertaken by developers instead of encouraging that this type of design be undertaken;
- Policies in the preferred options are weak on micro-generation (solar power) and this needs to be carried into the LDF;

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- Strong policies are required for sustainable construction, particularly those related to climate change; and
- The short supply of water was mentioned.

### **Renewable energy (C1 AC)**

- See previous comments made on sustainable construction.

### **Access to recreation and leisure (D1 AA)**

- Concern was voiced over the standards proposed for the distribution of open space in the Borough. There was general concern that the standards were drawn up with inner-London boroughs in mind that have a lack of open space and the inability to provide such additional areas;
- Dave explained that at the time of drawing up the preferred options, the standards were incomplete and would be based on the Open Space Needs Assessment. These would be completed at the next stage of the Core Strategy. Concern was again voiced at this;
- The Standards should not be taken as a maximum. They are allowing parts of existing parks to be developed;
- It was thought that these standards were more likely to be applicable to assessing applications for new development rather than rationalising the Council's open space stock. The Core Strategy would need to be amended to ensure that this was explicit in policy; and
- It was questioned whether the supply of London's open space requirements can be related to Havering.

### **Development of surplus open space (D1 AB)**

- The loss of open space was opposed;
- The value in open space is not always reflected in the use of the space, but in the values placed by people on it being there and it being available to be used. Many of the local residents may not support the criteria on the distribution of open space where this is related to anything less than the provision of the current levels of open space;
- Concern was voiced about the effect on the ambience of the Borough due to developments of increased density. The current level of greenness should be retained; and
- It was thought that the wording 'used/sought' was weak and should be replaced with 'must', to ensure that developers shall be required to contribute towards open space development.

### **Major developments and developer contributions (D1 AC)**

- See discussion above on open space.

### **Location of intensive leisure and recreation facilities (D1 AD)**

- See discussion above on open space.

### **Countryside recreation (D1 AE)**

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- There is a typo in the last sentence of the final bullet-point in this section and 'Thames Forest Circle' should be amended to read 'Thames Chase Forest Circle'.

### **Trees (D1 AF)**

- No comments.

### **General**

- A question was raised regarding how the issue of a non-GM stance could be expressed through the Core Strategy. There was discussion around whether the Council had declared itself to be non-GM. Dave thought that this is not an issue to be addressed in an LDF document. Peter undertook to find out whether the Council was non-GM or not;
- It was questioned what the Council's commitment was to keeping up with the demand for infrastructure and services as a result of new development, particularly housing. Particular services mentioned were healthcare and education. Dave outlined the role of action plans in planning for more detailed development;
- Consultation and partnerships with expert bodies and local groups about the care of sites should be committed to in the Core Strategy;
- Enforcement of the policies in the Core Strategy will be core to ensure the protection of sites;
- Park and Ride in the Green Belt is of concern as the area needs to be treated sensitively to protect the various elements that make it special – for example, an important habitat for migratory birds; and
- Strong policies are requested in relation to waste. This related to all waste, especially residential waste. Because the Council receives waste from inner London, it was thought that encouraging the reduction of waste in other boroughs was of importance, too.

### **Any other business**

Dave distributed information on the closing date for comments on the Core Strategy and the Interim Planning Guidance.

Peter agreed to follow up with the legal section the Marylands Action Group's request for public access/rights of way to the Marylands site.

### **What happens next**

Dave reiterated what happens next in the process and how people can be involved in this through a more formal means (representation, hearing with an inspector etc.).

**The meeting closed at 12:40 pm.**

# Developing Havering's Future

## Preferred Options Health Focus Group

**Friday 17 February 2006, 10.00, Committee Room 3B, Town Hall,  
Romford**

### Present:

London Borough of Havering:  
Daniel Pope  
Gemma Roberts

Havering PCT:  
Elaine Rashbrook  
Barbara King  
Alison Wade  
Elaine Greenway  
Suzanne Farris  
Jay Sundersing

### Introduction

Daniel Pope (DP) opened the meeting by welcoming everyone who was in attendance. Each person in turn introduced themselves to the group.

### Progress of Havering's Local Development Framework (LDF)

DP outlined progress on Havering's LDF in terms of where the process is and the development of the Core Strategy and the Development Control Policies. The presentation also highlighted how the LDF will address health issues.

## **Discussion**

### Economy

- Preferred Option 2 raises health concerns, regarding where people build. For example the risks of contaminated land, particularly for housing.
- DP explained that LBH were currently conducting an employment land review that will consider the use of spare land and there will be some prioritisation of housing. There is already a contaminated land policy in place which should safeguard against health risks.

### Housing

## **Cabinet 9 October 2006**

- There was concern about the size of housing and the large amount of flats being built. There needs to be accessible housing for people with disabilities, families and children that need space for equipment and moving around. DP explained that some plans set out minimum size of new dwellings.
- This links into the need for the wider built environment to be accessible.
- With the increased emphasis on care in the community, rather than out patient hospitals, there needs to be more thought given to these facilities.
- There needs to be a needs assessment for health facilities alongside the building of large areas of new homes, e.g. in Rainham but also Romford.
- There is need for more accommodation for key workers in Romford as opposed to more “luxury flats”.
- There needs to be at least a percentage of homes that are built larger, also taking account of the need for back gardens.
- New schemes should include renewable energy and water to decrease costs and protect the environment.

### **Transport**

- Public transport is important for health, Community Matrons have had difficulties with people not attending appointments. This has knock-on effects for NHS, with late diagnosis.
- Latest guidance suggests clinics should be within buggy walking distance.
- Homezones were regarded as a good way to create more people friendly residential environments.

### **Community Facilities**

- There was concern about Preferred Option 17, the loss of facilities. Local amenities may not be used now but with the current focus on obesity when people are encouraged to get more active where do they go? How is the decision to remove community facilities made? There should be scope to engage people and develop new community uses if the current one is defunct. The facility should be improved or promoted.
- Young people in particular need this type of facility. Any facility for young people should be unstructured.

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- Generally the Primary Care Trust are looking to provide more accessible health centres in more convenient locations, unsure what will happen post LIFT.
- The new White Paper suggests a return to community based health care such as cottage hospitals.

### **Arts, Culture and Entertainment**

- There are problems in Romford with too many pubs and nightclubs and irresponsible use of alcohol. The town centre needs to be made safe / comfortable for all ages, not just the young. A mixed population in the town centre in the evening would cut down problems.
- The smoking ban will also need to be managed, with increased need for outdoor spaces for drinkers.
- There also seems to be people leaving bars at the same time, has this changed with the licensing laws?
- There are other departments in the council that need to be involved in creating a safer Romford.

### **Leisure & Recreation**

- Need to use the opportunity of the Olympics to promote physical activities and get investment for new facilities. For example, using the parks for cycling, walking, horse riding. Olympics should feature in the LDF plans.

### **Waste & Minerals**

- There was concern about the waste to energy plans, as it uses cutting edge technology it's not possible to identify the health impacts, in particular on air quality.

### **AOB**

- Elaine Rashbrook agreed to take the planning guidance for GP's surgeries back to the PCT for comment in case any changes were necessary which needed reflecting in the LDF.
- There was discussion about the future of the PCT in London. The government has not made a final decision but it is set to change the structure and division of roles within the NHS.

# **Developing Havering's Future**

## **Preferred Options Residents Focus Group 1**

**Tuesday 21 February 2006, 10.00 hrs, Wykeham Hall, Romford**

### **Present**

Martyn Thomas (LBH)  
Dave Vicary (LBH)  
Valerie Morris  
Alan Williams  
Pauline Hedger  
Brian Cornwell  
Olive Fletcher  
Paul Randell  
Val Eastoe  
Janet Hares  
Coral Jeffery  
Cliff Jeffery  
R. Gallagher  
Mary Gallagher

The main points which came out of the discussion were as follows:

- Why is only Beam Reach designated for high tec industry? – this should also apply to the Ferry Lane/Coldharbour Lane area.
- The ferry should be reinstated with a service provided to Central London.
- The new developments at the Murex Site and next to Rainham Station are very poorly designed and eyesores. The new health clinic in Southend Road is also very poorly designed and totally inappropriate in terms of style and materials used. The Council is clearly not implementing its design policies.
- Romford should not be the only office area – there are opportunities for office development at Rainham. Together with a marina and the casino the whole area would be uplifted.
- New housing in Rainham should be a mixture of types and should not be all flats.
- More leisure facilities should be provided in Rainham – there is support for the casino proposal

## **Cabinet 9 October 2006**

- Planners should look at Rainham from the south side of the river to fully appreciate the effect of proposals. The frontage on the south side of the river has a better environment especially when seen from the riverside footpath.
- Can a hold be put on developments until the LDF is adopted and its design policies could be applied to planning applications.
- Should prevent extensions to small houses, especially bungalows, to ensure that there are enough suitable houses in the borough for retired people.
- Flats should not be built without car parking - there should be 2 off road parking spaces for each new house with parking on the road prevented by design or parking restrictions.
- Retirement homes should have gardens.
- The Council should make areas of land available so that residents can "self build" homes.
- There should be more Council housing.
- Grants of up to £50,000 are being paid to residents in Inner London to move to Outer London – this makes it more difficult for local people to buy a house.
- Every new home should have a solar panel.
- Parts of parks should not be developed to finance improvements to other parks or provision of additional parks.
- There should be a wider range of entertainment facilities in Romford – especially for older people.
- Pressure should be applied to the owners of the cinema at the Brewery to show a wider range of films to suit more tastes.
- More local cinemas are needed
- Romford suffers from a poor environment due to lack of open space, poor street cleansing and graffiti.
- The covered Liberty shopping centre is very good.
- The integrity of existing design should be maintained. For example new shop fronts in Rainham Village are good because they do this. Similarly the heritage/style of centres such as Elm Park should be preserved.

## **Cabinet 9 October 2006**

- The Market Place frontages in Romford should be replaced with restaurants and small independent shops.
- There should be no more mineral extraction in the Borough. There is a large site in Scotland which could serve all of the country's needs. Minerals could be transported from there by sea.
- Landfill following mineral extraction is a problem.
- Facilities, especially for the elderly, should be retained at St. Georges Hospital.
- There should be a good direct rail service between Stratford and Rainham.

# **Developing Havering's Future**

## **Preferred Options Residents Focus Group 2**

**Tuesday 21 February 2006, 10.00 hrs, Wykeham Hall, Romford**

### **Present**

Daniel Pope (LBH)  
Gemma Roberts (LBH)  
Ms Ellison  
Mr Tucker  
Mrs B.A Speed  
Mrs Gill  
Mr Pearce  
Mr Dowding  
Ms Johnson  
Mr C. Godden  
Mr P Coghlan

## **Cabinet 9 October 2006**

The main points which came out of the discussion were as follows:

### **Environment & Heritage**

Greenbelt:

- Why do any sites need to be removed from the greenbelt?
- Happy with the proposals as long as the Council will protect the remaining greenbelt and it will not be “eaten away”.
- After it was explained that all the sites put forward to be removed from the Green Belt were tested against a number of criteria it was suggested that this was a subjective exercise.

### **Transport**

There was an agreement that there needs to be less reliance on car ownership but unsure how to achieve this. If the Council is to get traffic levels back to 2001 levels the implementation of projects will have to be quite aggressive. There was seen to be a conflict between this and the building of shopping centres with large car parks.

Park & Ride:

- Unsure if Park & Ride schemes worked.
- Original Romford Park & Ride scheme for Romford was popular, but poorly planned / managed and often overflowing.
- Parking is a major issue across the Borough, including the smaller district centres.

Walking:

- Developments need to design in footpath routes for residents to be able to reach local public transport. The Council needs to work harder with developers to make sure these issues are addressed

Cycling:

- Need to promote cycling and improve cycle routes.

Buses:

- There should be more bus services into the Brewery to attract customers.
- Stores could have their own buses.

Parking:

- Houses are built too close to the road without adequate parking.

### **Housing**

## **Cabinet 9 October 2006**

- Many new developments do not adequately address the needs of pedestrians. The Council needs to work harder with developers to remedy this.
- Concern about the Mayor of London's request for new powers and the impact this would have on planning in Havering
- The buildings surrounding Ludwigshafen Place show a jumble of different styles and facades, need consistently good design in Romford.
- The Romford Office Quarter should be used for housing or mixed development if the offices are not being used.

### High density housing:

- Do not want community facilities and shops in Elm park to be demolished to be replaced by flats.
- Generally flats will lead to more demand on resources and overpopulation.
- Risk that these new flats will become the slums of the future.
- New homes may be nice but families need to have gardens.
- These new developments may not preserve the character of the area.
- Affordable housing needs to be more affordable.

## **Shops & Services**

- Traffic problems at Roneo Corner due to large superstores. These superstores (e.g. Tesco) are killing smaller district centres such as Elm Park which people can walk to. The growth of Romford is also having an effect on smaller centres.
- Roneo Corner should be renamed Havering Well as it used to be called.

## **Environmental Protection**

- Need to plan properly for the impact of climate change on rivers and therefore housing.
- Council should learn from best practice in other London Boroughs, particularly in sustainable design.

## **Waste & Minerals**

- Concern about the increased use of incinerators and the waste from outside Havering being processed here, although it could be seen as a NIMBY (not in my back yard) attitude, shouldn't Havering just be responsible for managing its own waste?
- Need to use new technology to reduce emissions from incinerators.
- Need to work more on minimising waste

## **Cabinet 9 October 2006**

- Council should work with producers of waste, e.g. supermarkets, to help minimise waste particularly packaging waste.

### **Leisure & Recreation**

- What does the Local Development Framework say about the Olympics? If we don't have any events can Havering not contribute and benefit in other ways for example Hotels and warm up facilities.

### **General**

- What is the cost of the various proposals in the LDF, and who pays?

# Developing Havering's Future

## Preferred Options Residents Focus Group 3

**Tuesday 21 February 2006, 19.00 hrs, Wykeham Hall, Romford**

Present:

Daniel Pope (LBH)  
Peter Hall (LBH)  
Ken Gluntz  
Barry Howlett  
Edward McKiernan  
Gary Mills  
Martin Montgomery  
Mr E Moorey  
Jean Robb  
David Stovold  
Margaret Stovold

The main points which residents raised during the discussion are as follows:

### Transport

- Transport is the most important issue in Havering at the moment.
- Need to develop a staged transport policy for the next 50 years. The volume of people and traffic is not going to diminish.
- Not going to reduce the reliance on cars. Buses can't take you from your front door to where you want to go.

### Park & Ride

- If people can't park they won't shop in Romford.
- By the time the next plan is prepared the volume of traffic will have increased even more, particularly if Romford continues to grow as a shopping centre. Can't allow the volume of traffic to keep growing. Main Road has seen a large increase in the volume of traffic. Need to have a Park & Ride scheme from Gallows Corner into Romford.
- Park & Ride will need to get people into Romford quickly but it might have to be located beyond Gallows Corner.
- Land will have to be found for the Park & Ride but where will this be? Will it be through compulsory purchase or will green spaces be lost?

## **Cabinet 9 October 2006**

- Main Road has two lanes and its difficult to increase the lane capacity so why nor push for Park & Ride or a tram?

### **Public transport**

- Will public transport be improved or will a congestion charge be considered?
- Would be good to know where people driving into Romford are coming from. If this was known then public transport provision could be addressed in those areas.
- Most bus routes seem to come into Romford. If there were more routes across the borough that avoided Romford this would direct some traffic away from the town centre.

### **Thames Gateway Transit**

- Collier Row gets a raw deal in terms of transport. The first phase of the Thames Gateway Transit should be from Collier Row to Romford as Barking already has good transport links.
- Seems that a tram is too expensive for Romford so it gets a radio operated bus [Thames Gateway Transit] instead.
- Harold Hill is one of the largest estates in London and there are plenty of buses but no rail link. Would it be possible to consider a light rail or tram link from Harold Hill to Romford?
- [With regard to developer contributions for transport improvements, such as bus lanes] the downside to this is that the Council has to allow development in the first place. To carry on like that [allowing more development] is not sustainable.

### **Crossrail**

- Crossrail won't improve transport in Havering. Who needs to get to Heathrow on a regular basis? There's already good access to central London but what about links to East Anglia and north of the borough? Crossrail won't do anything for Havering apart from giving the area a depot.
- Crossrail cannot be stopped. It's going to happen so need to ensure we get the best deal from it that we can.

### **Car Parking**

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- Car parking is non-existent. It's inadequate. Should bury car parks underground as they do in Paris but as usual there is a lack of investment to do this.
- All the car parks in Romford are within the Ring Road. They should be outside the Ring Road. How about knocking the existing car parks down and building new ones further out. Road tunnels under Romford would allow through traffic to avoid the centre and therefore alleviate congestion.
- Developers of large schemes in Romford town centre should contribute to car parks outside the Ring Road and to the Park & Ride scheme.
- The plan could phase out car parks within the Ring Road and keep this area for core businesses?

### **Waste**

- Can the Council make a profit from disposing of other Borough's waste?
- Don't want anybody else's waste. Havering produces enough of its own and does not dispose of this properly. Why can't other borough's dispose of their own waste?
- What about the pollution from vehicles bringing the waste into Havering?
- Tower Hamlets have built too many flats so they don't have the space for an incinerator in their borough, but they should take more responsibility for managing their own waste.
- Rainham is a dumping ground and has had a raw deal with waste disposal.
- The Council has not got the power to deal with these issues and is being by-passed by the Development Corporation and National Government. Does Havering have any say at all on waste?

### **Minerals**

- Can the Council insist on money for enhancement after extraction has finished?
- Enhancement does happen but the question is how many more fields do you open up for extraction?
- 
- It would be crazy to say that Havering can supply minerals for London. Havering is not being not forced to identify sites, it is being asked to. Who is going to pay for site appraisals to be undertaken, this is a complex and potentially expensive task.

Environment

- Local parks are the lungs of Havering.
- A number of parks have their own committees [Friends of the Park] but has this happened everywhere in the borough?
- If there will be additional people living in Havering, then need to ensure that parks are retained.
- Need to retain the wild and green spaces Havering has.
- Need to preserve and improve the quality of the parks in Havering. The quality of parks is generally poor at present.
- Why can't there be more wild spaces in Havering's parks? Some of the parks are too formal, have too many concrete paths [Central Park] and no soul.
- Private gardens provide a good haven for wildlife. It's important to retain front and back gardens. However, many people concrete over front gardens for car parking. Didn't Ken Livingstone have a policy that planning permission was necessary if more than 50% of a front garden was concreted over? Is there any chance of Havering going down this road?
- Drainage is a problem. How much consideration is given to this in the Plan?
- The policies talk about protecting sites but it should be about maximising the amount of the borough's biodiversity.
- More weight should be given to [SSSI] designations.

Housing

- Inside the Romford Ring Road should be a business and commercial area. It's not suitable for housing. The Council wants to put flats with balconies inside the Ring Road but where is the amenity space for those people with children?
- Have to accept that given the cost of housing, flats are a stepping stone on the property ladder for many people. The flat culture in Romford makes sense in terms of people living here and working in the City.
- The South East is going to be concreted over. There are too many people here.
- Havering is a nice borough to live in and enjoys a lot of green space but this is under increasing pressure [from housing].

- There will be a big change in the amount of housing built in the next 10 years. London authorities will do what they want to do. The south of Havering will feel most of this development pressure. There are too many layers of government there [Thames Gateway] and the National Government will push through this new housing.
- People may move in to flats but they want homes with gardens, especially when they start a family. Flats aren't suitable for children.
- People will move out of flats when they have children. There won't be a balanced community in flat developments, only old people and young people.
- More small houses with gardens and starter homes are needed instead of flats.
- More flats and housing in Romford town centre will lead to an increase in muggings.
- People who work in the City need access to the station so town centre development suits them.
- New housing development needs a mix of people to create balanced communities.
- Can the Council have a say in the size and quality [i.e. soundproofing] of properties being built? If people have to stay living in a flat this will make it easier for them to do so.
- People are moving to Romford as it's cheaper than the rest of London. If Havering's housing was more expensive there wouldn't be as much pressure.
- Need innovative design to make housing more affordable.

# Developing Havering's Future

## Preferred Options Residents Focus Group 4

**Tuesday 21 February 2006, 19.00 hrs, Wykeham Hall, Romford**

### Present

Martyn Thomas – London Borough of Havering  
Tracey Coles - London Borough of Havering  
J L Sanders  
Michael F Cullen  
Lynda Horey  
Stephen McKie  
John Peterson  
Ron Geggus  
Samantha Crown

### **Focus Group Discussion**

#### Economy

- Are there guidelines on living accommodation associated with offices (mixed use development)?
- Office car parks should be subterranean or rooftop to avoid the use of space that could be used for alternative uses.

#### Waste

- Waste management is poor and needs to be controlled at the source – the household.
- Consult the borough on alternatives for improving its waste management.
- Use wheelie bins for collecting all waste, including recycling. It would improve the street environment.
- It was queried how the elderly would handle a large bin for recycling purposes.
- Bulky waste management needs addressing for bulk waste to be collected by appointment.
- The Borough should resist accepting waste from outside the Borough.
- The Council should not charge for waste collected at the door as it will lead to a major increase in dumping, expensive administration costs corruption and more expensive collection costs.
- Could mineral extraction sites could be used for landfills and the disposal of waste?

#### Flood Protection

- The Borough needs to be prepared for flood emergencies/mitigation.

### Shops and Services

- Reduce the number of clubs and night-time issues that are associated with these. Do not allow clubs to reopen when they close down.
- Rethink the type of use for Romford to make it an attractive place to a broad spectrum of people.
- Protect the local shops we have now.
- Improve the facades of buildings.
- Hornchurch is good as a cultural centre; however, other uses are overshadowing this – for example, night-time entertainment.
- What is planned for Upminster?
- Maintain Romford as an historical market town.
- Need to ensure that facilities are available to place rubbish in at shops (inside and outside. Could this be a requirement that the Council has of businesses that generate rubbish?

### Design

- Building facades should fit in with the surrounding area – for example, a traditional town centre.
- Use incentives to encourage shop owners to improve shop fronts.
- Like the clock design in Romford as it is seen as fitting in with the theme of the town.
- The new Asda building design doesn't fit with Romford's town centre.
- Do not like the design of the Rainham Medical Centre Building.

### Environment & Heritage

- One resident was concerned about the future of her local area (Rush Green), in particular the proposal to lose open space. She has organised a public meeting to find out what local residents want and will let the Council share this information in the form of positive feedback. She proposed that other agencies may be able to assist with funding the care of open space. She felt that Rush Green is on the boundary and partly in other areas and misses out.

### Community Facilities

- The issue of the old hospital sites was raised (redevelopment of sites for housing, loss of services etc.).
- There is a lack of public discussion over what the health sector are doing, with some sites being redeveloped for housing as part of the disposal process.
- It is a struggle to find suitable facilities for teaching/practice. School and church halls are often not always suitable for this purpose.

### Transport

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- The river is not being used as it could be for transportation. Need to utilise and improve access to the river.
- The central city link along the river has good potential.
- A monorail was mooted as being a way to address the transportation problem. Some thought the cost may be prohibitive.
- Trains to trams were raised as being a way to address the transportation problem.
- Park and Ride was also raised as an option.

### **Open Space/Parks**

- Development in parks and open space is not viewed as being good.
- People interested in the parks could be involved in a forum to share their ideas and experiences.
- Study the reasons why people are not using the parks and address these issues rather than disposing of the land. Land is not replaceable, it is a limited resource and it should not be disposed of.
- The issue of the Olympics and the effect of it on Havering was discussed.

### **Housing**

- Flats are over-populating areas and problems with transportation.
- Housing and density is seen as a borough-wide issue.
- Services (medical and education) need to be supplied along with housing.
- Development is being centred in areas that are degraded.
- Affordable housing is not affordable.

# **Developing Havering's Future**

## **Preferred Options Housing Association Focus Group**

**Wednesday 22 February 2006, 10.00 hrs, 9 Floor Mercury House,  
Romford**

Present:

Andy Clarke - London and Quadrant  
Tracey Coles - London Borough of Havering  
Caroline Compton-James - Circle Anglia  
Mark Dalby - London Borough of Havering  
John Edwards – East Thames Group  
Bola Egbetayo - Dominion Housing Group (Kelsey Housing Association)  
Graham Forster - East Thames Group  
Jonathan Hewlings – The Guinness Trust  
Graham Nixon - John Grooms Housing Association  
Daniel Pope - London Borough of Havering  
Terence Smith - Toynbee Housing Association

The main points which came out of the discussion were as follows:

### **Focus Group Discussion**

#### **Housing mix and size**

- Currently many units are simply too small. This is because the borough does not have standards in its UDP to control this. Size standards across all tenures are needed to ensure adequately sized homes are provided to meet identified need. The Housing Corporation Development Scheme Standards are what housing associations must build to where grant is involved and could be a useful basis for market home standards. Alternatively may consider using Parker Morris standards.
- Housing mix is very important. Again Havering's UDP says little on this subject. Many schemes are made up of 1 and 2 bed flats, when the need particularly for affordable housing is for larger family units. Hackney for example includes strict standards for housing mix, Havering should do the same in its Local Development Framework.
- If the LDF does have mix standards then it will enable housing associations to compete with market housebuilders, and will also make it easier to ensure the mix and size of housing they need.
- Recognised that providing family homes is more difficult in Romford Town Centre but this is where a significant proportion of Havering's new

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homes will be so some family accommodation will be necessary here, though more likely on the fringes. In addition the Council prefers to secure units on site because it is difficult to spend off site contributions because there are not the sites available.

- Invited to look at the east Thames Quality Plan for housing standards.
- Use planning briefs for Council owned sites which prescribe tenure and mix so that housing associations can compete on equal terms with developers and the Council gets the necessary units to meet housing need.

### **Section 106**

- Section 106 contributions is part of the cause of lower quality products ie. Cutting costs in the quality of the product to offset the cost of the contribution. Control of s.106 contributions will allow developers to produce better quality housing. In particular, it will allow Housing Associations to be competitive.
- Education contributions required on those units the Council does not have nomination rights for, this is a further cost to the housing association and hinders competition and can affect the quality of the product.
- Use planning agreements to ensure a certain number of family units or habitable rooms to ensure that the larger housing sizes are built.

### **Sustainable construction**

- Encouraging eco-design will not get us far in good design. Needs to be stronger than simply encourage. Homes secured through grant require very good in any event. Providing 10% renewables is difficult, though easier to achieve on major development schemes.

### **Car Parking**

- 1 for 1 car parking preferred as then there is not a problem over the allocation of parking spaces.
- 
- Need to ensure wheelchair car parking is provided whatever the overall parking standards are.
- No real case for applying a lower car parking standard to affordable units than for general market housing.

### **Key worker housing**

- Need more clarity on the definition of a key worker. Council doing research on this issue.

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- Rent levels for shared ownership too high, this in some instance reflects price paid for land.

### **Other issues**

- Using habitable rooms instead of dwellings may help secure a better mix of affordable housing even if it actually may lead to less units being secured.
- Sheltered housing schemes help release currently occupied homes for others to move into
- Would the Council consider introducing a service charge cap. There are issues here about charging different levels of service charges across the one scheme.
- The Council prefers on site provision because there is a lack of readily available land to provide units off site

# Developing Havering's Future

## Preferred Options Heritage Focus Group 2

**Monday 13 March 2006, 10.00 hrs, Committee Room 4, Town Hall, Romford**

### Present:

Councillor Andrew Curtin - London Borough of Havering  
Dave Vicary - London Borough of Havering  
Tracey Coles - London Borough of Havering  
Sue Smith - London Borough of Havering  
Nigel Oxley - London Borough of Havering  
David Lawn - London Borough of Havering  
Keith Langridge - Local historian, Romford Historical Society  
Joyce Leicester - Gidea Park and District Civic Society  
Jan Floyd - Havering Heritage  
Sylvia Bates - H A B and DSC  
Colin Cork - Gidea Park and District Civic Society  
Brian Evans – History and Heritage Initiative, Romford Historical Society, Rotary Club of Romford

The main points which came out of the discussion were as follows:

### Interpretation of heritage and consultation

- It was thought that politicians do not have enough knowledge of the history or heritage of the Borough. Also some council officers do not live in the borough and therefore have a limited knowledge of Havering's heritage. Suggestions on how to address this issue were discussed - which included:
  - Induction course for staff/councillors to improve appreciation of heritage and decision making,
  - Improving Havering website as a heritage information source,
  - Reports to Committee on planning applications should include a section on heritage implications
  - A longer notification period should be given prior to an application going to Regulatory Services Committee
  - The time allowed for speaking at Regulatory Services Committee should be longer than the current two minutes
  - Proactive responses by the public at hearings.
- The Council needs to protect a wider range of features that contribute towards the borough's heritage – it was particularly important to protect buildings on the local list.

Archaeology

- It was agreed that the current policies in the UDP afforded good protection for archaeology and that they should be carried forward into the LDF. However the main problem was the lack of base data about sites with archaeological potential so that it was difficult to know on which sites to apply the policies. Councillor Curtin thought that work had been done on this as part of the Thames Gateway proposals. However it was agreed the English Heritage should be pressed for comprehensive and up to date information at a senior level. If the information is not available in time then the LDF needs to highlight the importance of the role of English Heritage in providing the information.
- It was agreed that the Council's current system for protecting archaeology works well when planning applications are being considered. However, there is a reliance on staff to put policy into action and this can only be done effectively if there is an up to date data base as mentioned above.
- In discussing the regeneration of the Thames Gateway it was pointed out that it must not be assumed that brownfield sites have had their archaeological interest destroyed – some sites may indeed have remains that are intact.

Romford Town Centre and other Town Centres

- It was thought that there is a lack of green space in Romford Town Centre and in addition that the Coronation Gardens was not attractive and needs to be developed/landscaped. It was pointed out that the Romford Urban Strategy Interim Planning Guidance was currently out on consultation. With regard to green space the Guidance includes 'greening' of the ring road and opening up the River Rom in the Bridge Close area and in the vicinity of the former Decathlon store.
- There is public concern about the main centre turning into a 'concrete jungle'. The various issues mentioned included:
  - Increasing difficulty of movement into and within the area,
  - Little provision for parking,
  - Large retail premises and shops catering for the cut-priced and cheaper end of the market taking over the town centre – this may also have an adverse impact on the Market,
  - Increasing density, height etc.,
  - Increasing shading and wind,
  - Highway congestion,
  - Lack of landscaping associated with new developments,
  - Shopping outside Romford is perceived as being 'more pleasant'.

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- Local residents suffer the adverse effects of the increased activity in Romford.
- Over protective Green Belt policy forcing development and therefore higher densities in the built up areas
- The council's policy is to encourage development that is located in town centres in line with Government Policy. Dave Lawn said that the approved schemes for Romford Town Centre are well-designed, with landscaping and quality design elements.
- Councillor Curtin said the vision should be to achieve healthy town centres, with green space, shopping and cultural elements etc to provide town centres that were designed for the community and provided a first rate "civilised" environment. Richmond was cited as an example of a town centre which was provided linked green spaces balanced with culture and shopping in a 'civilised area' It was agreed that this vision could be championed in Havering through the Community Strategy. It would then be the basis of all of the council's various strategies rather than just being in the planning strategy (i.e. the LDF)
- There is a desire for the borough to have high quality, up market town centres that have high levels of accessibility. Parts of Havering are affluent and we need to encapsulate and promote this more than we do now.

### **Employment**

- Employment opportunities are required for tomorrow's residents of Havering i.e. the youth of today. Need to introduce more high skill jobs and a quality environment and a respect for and protection of the heritage will help encourage such uses into the Borough

### **Conclusion**

Councillor Curtin concluded by stating that he will shortly be writing his Historic Environment Champion report for the Council. He will include points raised at this meeting in his report. He also commented that he will send a formal response to the LDF on heritage issues.

It was agreed that another meeting would be scheduled for mid-April.

# **Developing Havering's Future**

## **Preferred Options Heritage Focus Group 3**

**Tuesday 11 April 2006, 10.00 hrs, Committee Room 4, Town Hall,  
Romford**

### **Present:**

Councillor Andrew Curtin  
Dave Vicary – London Borough of Havering  
Jan Floyd – Havering Heritage  
Laurie Ford – Havering Heritage  
Colin Cork – Gidea Park Civic Society  
Sylvia Bates – HAB & DS  
Cliff Jeffrey – Adamsgate Action Group  
Coral Jeffrey – Rainham Preservation Society

The meeting discussed the policies set out in the Local Development Framework Preferred Options Report as follows:

### **A/AA – Buildings of Heritage Interest**

The group felt strongly that the LDF policy should also give protection to Locally Listed Buildings. Not only was this important for the local heritage but regeneration would be assisted by the existence of such an asset. There was much discussion about the relative protection that was afforded to a Listed Building as opposed to a Locally Listed Building. Dave Vicary explained that his understanding was that planning permission is not required to demolish a building unless the building was either

- Listed
- in a Conservation Area
- in residential use

and that therefore the fact that a building was locally listed would not protect it from demolition. Dave would check whether this was indeed the situation. It was suggested that the fact that a Locally Listed Building could sometimes be demolished should be pointed out to Council Members to allay their fears that protection of Locally Listed Buildings was too restrictive and would hinder regeneration. It was also pointed out that as VAT was levied on conversions and not new build and this was a disincentive to retain buildings.

### **A/AB – Conservation Areas**

Councillor Curtin queried why three possible Conservation Areas had been suggested in Hornchurch rather than one encompassing the whole of

Hornchurch as this would also protect the road pattern. Dave explained that this type of issue could be resolved through the Heritage Strategy which would be adopted as a Supplementary Planning Document when it was completed – Councillor Curtin was keen that this happened as quickly as possible.

It is important that Rainham Conservation Area is protected and that the positive contribution that its heritage can make to the regeneration of London Riverside should be recognised in the LDF.

Concern was also explained that poor developments outside, but close to Conservation Areas, can be damaging to the character of the Conservation Area - the site at the northern end of Ferry Lane was cited as an example of this.

Colin Cork suggested that SPD should be prepared to set minimum plot sizes in Gidea Park Conservation Area. Such a policy had been successful in Emerson Park and Hall Lane and it was ironic that in the Gidea Park Conservation Area the lack of such a policy has resulted in developments, sometimes flats, on smaller plots which is altering the character of the area.

#### **A/AC – Other Areas of Special Townscape or Landscape Character**

The question of consistency between adjoining Boroughs was raised particularly in respect of the Havering Ridge Area of Special Character in Havering and Redbridge. It was agreed that this could best be pursued through ensuring that the London Plan set out those areas where consistency was required and that this type of issue could be raised when the GLA is amending the Plan. Councillor Curtin was keen to ensure that this type of issue was not forgotten and Dave Vicary said that staff could set up a folder to note any issues that could then be raised at the appropriate time.

#### **A/AD – Archaeology and Ancient Monuments**

Coral Jeffrey raised the issue of the concrete barges on the river frontage and queried whether they should be preserved.

Dave Vicary explained that after the last meeting, he had made enquiries about the existence of a map showing archaeological sites in the Thames Gateway but to no avail. Councillor Curtin would also pursue this. It was agreed that English Heritage should be asked to supply information on archaeological "hotspots" and that if this information was not available to include in the Submission Document it should be made clear that the information will be concluded at a later date in SPD.

#### **A/AE – Other Historic Landscapes**

The protection of historic parks and gardens was welcomed, but it was also important to protect views from afar.

**A/AF – Trees**

The protection and additional planting of trees was welcomed and Councillor Curtin suggested that future planting should be integrated into new development in a "21<sup>st</sup> Century" way.

Laurie Ford raised the issue of plaques on buildings but it was agreed that this was something too detailed for the LDF but perhaps would be included in Heritage Strategy.

The possibility of giving some extra protection to parts of Harold Hill – Dave said this could be addressed through the Heritage Strategy.

Councillor Curtin would write to Roger McFarland setting out the various comments the group has made on the Preferred Options report. Individuals would also send in comments if they so wished. As the official deadline had already passed it was agreed that any comments should be received before Friday 21 April.

**Appendix 1c (Appendix 20 of Statement of Compliance)**

**Core Strategy and Site Specific Allocations Preferred Options  
Representations**

**Contents-Representations on Core Strategy Preferred Options**

<b>Core Strategy Preferred Options Report Contents</b>			<b>Representation Reference</b>
<b>Section</b>		<b>Page</b>	
	General comments	5	CS1-CS16
1	Summary	No representations received	
2	Have your say	No representations received	
3	What is planning?	No representations received	
4	Structure of the Preferred Options Report and where it fits into Havering's Local Development Framework	No representations received	
5	Main issues in Havering from 2005-2020	12	CS17-CS28
6	Summary of Sustainability Appraisal of options	No representations received	
7	Vision and objectives for the future planning of the borough up to 2020	17	CS29-CS48
8	Details of broad locations for required allocations	27	CS49-CS1095
9	Introduction to policies	No representations received	
9A1-3	Heritage, biodiversity and Green Belt	33	CS1096-CS2239
9B1	Urban design, crime and accessibility	99	CS2240-CS2260
9C1	Climate change	109	CS2261-CS2298
9D1	Recreation and leisure	126	CS2299-CS2333
9E1-2	Minerals and waste	142	CS2334-CS2359
9F1	Community facilities	155	CS2360-CS2377
9G1-2	Transport	163	CS2378-CS2434
9H1-3	Housing	189	CS2435-CS2492
9I1-2	Arts, culture and entertainment	217	CS2494-CS2501
9J1-2	Retail and services	220	CS2502-CS2519
9K1-2	Employment	229	CS2520-CS2542

**Contents-Representations on Site Specific Allocations Preferred Options**

<b>Site Specific Allocations Preferred Options Report Contents</b>			<b>Representation Reference</b>
<b>Section</b>		<b>Page</b>	
1	Summary	No representations received	
2	Have your say	No representations received	
3	What is planning	No representations received	
4	Structure of the Preferred Options Report and where it fits into Havering's Local Development Framework	No representations received	
5	Introduction	239	SSA2543
6	Vision and objectives for the future planning of the borough up to 2020	No representations received	
7	Range of sites that need to be covered	241	SSA2544-SSA3112
8	The sites included in this document	No representations received	
9	Site specific allocations schedule		
	Romford Ice Rink	245	SSA3113-SSA3115
	St George's Hospital	246	SSA3116-SSA3803
	Oldchurch Hospital	250	SSA3804-SSA3805
	Elm Park Town Centre	251	SSA3806-SSA3991
	Harold Wood Hospital	252	SSA3992-SSA4082
	Aherns Crow Lane	254	SSA4083
	Roneo Corner	254	SSA4084-SSA4086
	Broxhill Centre	255	SSA4087-SSA4088
	London Riverside Conservation Park	256	SSA4089-SSA4095
	Rainham Historic Core	259	SSA4096
	Rainham Station Transport Interchange and Civic Square	260	SSA4098-SSA4101
	Beam Park	262	SSA4102-SSA4106
	Rainham West	264	SSA4107-SSA4482
	Ingrebourne Creek	267	SSA4483-SSA4484
	Land between railway and Broadway	268	SSA4485-SSA4486
	Rainham Regional Casino and Entertainment Complex	269	SSA4487-SSA4492
	Rainham Central	272	SSA4493-SSA4495
	Rainham Traffic Management System	274	SSA4496-SSA4497
	Beam Park Station	275	SSA4498-SSA4500
	Arnolds Field Community Woodland	276	SSA4501-SSA4502
	Rainham Quarry Community Woodland	277	SSA4503
	Warwick Lane Landfill Site Community Woodland	277	SSA4504-SSA4505
	Upminster Cemetery	278	SSA4506
	South Essex Crematorium	279	SSA4507
	North Street Bus Garage	279	SSA4508
	Channel Tunnel Rail Link	279	SSA4509
	Crossrail	280	SSA4510-SSA4511
	General comments	281	SSA4513-SSA4523

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	Omitted sites		
	Maylands Field	287	SSA4524
	Mardyke Farm	289	SSA4525
	Land at Station Road, Land at Ardleigh Close and Land at South Side of Arterial Road	289	SSA4526
	Land north of A12	290	SSA4527
	South Hall Farm	290	SSA4528
	Land adjacent to Lodge Residential Care Home	291	SSA4529
	Ingrebourne Creek Crossing	292	SSA4530

### **Respondents to Core Strategy Preferred Options**

Name	ID
2095 representations from members of the public	Various
Applied Environmental Research Centre	578
Andrew Martin Associates	605
Bellways	586
Brown Mineral Partnership	909
CEMEX	571
CGMS representing Higgins Homes	608
CGMS representing the Metropolitan Police Association	612
CGMS representing Royal Mail Property Holdings	995
Cleanaway	1370
Cluttons representing the Crown Estate	860
Councillor Curtin	
Countryside Agency	66
Cushman and Wakefield representing Tesco Stores	597
David L Walker	1224
Denis Tyson Associates	898
Environment Agency	846
Environomics representing Brett Aggregates	614
Essex Wildlife Trust	857
Friends of Dagnam Park	1027
Gidea Park and District Civic Society	728
Government Office for London	680
Greater London Authority	622
GVA Grimley representing Havering College	1372
GVA representing Sun International	655
Havering Heritage	812
Havering NHS Primary Care Trust	890
Havering Policy Crime Prevention Design Advisor	491
Hepher Dixon representing Barratt Homes	1002
Highways Agency	563
Iceni Projects	1369
Inland Waterways Association	815
John Newton Associates	839

## **Cabinet 9 October 2006**

Keith Langridge	
London City Airport	923
London Thames Gateway Development Corporation	1066
Mrs S.C.Bates	1377
Port of London Authority	859
Quarry Products Association	565
Rapleys representing Morrisons	891
Rapleys representing Trinity Hall	1371
Roger Tym and Partners representing Somerfields	1373
Romford and District Allotment and Gardens Association	727
Royal Society for the Protection of Birds	566
RPS representing Fairview New Homes	1226
Rush Green Regeneration Group	
Savvas Chrisdodoulou	1245
Stephen Hayhurst	1016
Thames Water	617
Transport for London	538
Turley Associates representing Cardrome	902
Turley Associates representing Hammersons	1167
Woolf Bond Planning representing George Wimpey Homes	1226

### **Respondents to Site Specific Allocations Preferred Options**

Name	ID
1897 representations from members of the public	Various
Atis Real representing the Barking, Havering and Redbridge NHS Trust	987
CEMEX	571
CGMS representing Royal Mail Property Holdings	995
Cluttons representing the Crown Estate	860
CPRE North East London	691
Cushman and Wakefield representing Tesco Stores	597
Environment Agency	846
Forge Developments	1246
Hepher Dixon representing Barratt Homes	1002
Highways Agency	563
Greater London Authority	622
Government Office for London	680
GVA representing Sun International	655
London Thames Gateway Development Corporation	1066
Maylands Action Group	1277
Network Rail	293
Roger Tym and Partners representing Somerfields	1373
Royal Society for the Protection of Birds	566
Thames Water	617
Transport for London	538

## Core Strategy Preferred Options representations

The ID is the unique reference number of each respondent as contained in Havering's Local Development Framework database. Due to changes to the format and structure of the Submission Core Strategy and Site Allocations Documents, under the title 'Section/Policy' the new location is given in a box for ease of reference.

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## General representations

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### **ID**

680

### **Consultee**

Government Office of London

### **Representation CS1**

Commend Council on layout of reports. Overall they are informative in terms of providing background data across the range of policy areas, setting the policy framework including useful cross referencing, explaining what the CS and other DPDs must include and summarising the SA of the main objectives.

The strategic policies are linked to the vision and objectives only by the referencing system but they are included only in the section in each topic area next to the DC polices to which they relate. Whilst this is fine it would be helpful if the strategy was also shown as a separate entity. With the vision objectives and policies all together,

### **Council's recommended response** **CHANGE**

Core Strategy Strategic Policies now presented as a separate entity.

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### **ID**

680

### **Consultee**

Government Office of London

### **Representation CS2**

It is not clear how responses to the options have led to the choice of preferred options. It would have been helpful if the preferred options themselves had briefly summarised the consultation responses against each policy and

indicate in what way they had influenced the Council in deciding on its chosen approach.

**Council's recommended response CHANGE**

The Council does agree in hindsight that ordering consultation responses by policy would have been clearer and therefore this is the approach taken with the preferred options responses. However the documents titled 'Organisations Responses to the Core Strategy and Site Specific Allocations Options Consultation' clearly shows how responses were addressed in developing the preferred options.

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**ID**

680

**Consultee**

Government Office of London

**Representation CS3**

Proposals map needs to be at least available at preferred options stage if including site allocations or other boundary designations. Presumably this will appear at submissions stage although it really should have been available now so consultees could understand the allocations.

**Council's recommended response NO CHANGE**

PPS12 para 2.26 states that at the participation on preferred options stage in accordance with Regulation 26 LPAs should prepare a map or maps to accompany the pre-submission proposals document. This may for example identify various sites and alternatives which are being considered for development and or areas of land to which policies would relate. In contrast para 2.27 states that LPAs when submitting their DPDs in accordance with regulation 28 must include a submission proposals map to identify how the adopted proposals map will be amended or added to. Therefore the Council interpreted that the lack of reference to a proposals map in para 2.26 highlighted that one did not need to be produced and that it was acceptable to show allocations/designations via separate plans. This was the approach taken where every site allocation and green belt site was shown on a separate plan. The only other change to existing policy designations on the UDP proposals map was the change in boundary of the Rainham Employment Area which was shown on a separate plan too. Therefore the Council considers that the approach it took was consistent with PPS12.

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**ID**

680

**Consultee**

Government Office of London

**Representation CS4**

The LDF documents appear to have been prepared in accordance with the LDS

**Council's recommended response**

Noted

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**ID**

680

**Consultee**

Government Office of London

**Representation CS5**

In so far as it is possible to judge the documents appear to have been prepared in line with the adopted SCI

**Council's recommended response NO CHANGE**

Noted

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**ID**

680

**Consultee**

Government Office of London

**Representation CS6**

The SA has been submitted with the two Preferred Options Reports. It has been prepared in line with the guidance set out in the ODPMs document Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks providing baseline data and fully assessing the impact of various policy options. No comments on this document.

**Council's recommended response NO CHANGE**

Noted

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**ID**

680

**Consultee**

Government Office of London

**Representation CS7**

In so far as it is possible to judge given the early stages of most boroughs LDFs the various documents are consistent with those being prepared by neighbouring boroughs and non-London authorities. However this will need to be made clear to ensure soundness.

**Council's recommended response NO CHANGE**

Noted

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**ID**

680

**Consultee**

Government Office of London

**Representation CS8**

Each document provides a clear mechanism for implementing and monitoring

**Council's recommended response NO CHANGE**

Noted

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**ID**

680

**Consultee**

Government Office of London

**Representation CS9**

With the exception of a few policies the documents seem relatively flexible and able to deal with changing circumstances.

**Council's recommended response NO CHANGE**

Noted

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**ID**

815

**Consultee**

Inland Waterways Association

**Representation CS10**

Provides a checklist identifying those areas relating to the inland waterways on which the Associations representative wish to be consulted.

**Council's recommended response NO CHANGE**

Noted

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**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS11**

It is clear from the Core Strategy Preferred Options that the Council are yet to prepare their evidence base to justify their preferred policy positions. For example the Employment Land Review, Retail and Leisure Needs Assessment and Local Housing Needs Assessments have not yet been published. This is contrary to para 4.11 of PPS12 and section 5.2 of its companion guide. Object to the Council proposing preferred policy options that are not justified by an evidence base. It is also not clear whether the Council has involved the community in the preparation of the evidence base and in our view this renders the preferred policy approaches as unsound and jeopardises the soundness of the development as a whole.

**Council's recommended response NO CHANGE**

The Council has rigorously followed government guidance in PPS12 and its companion guide in preparing its Core Strategy. It published a comprehensive options report. This set out for each topic area the evidence base on which the options presented were founded. With regard to the highlighted studies it is true that these were not available at the issues and options or preferred options stages. Therefore the Council's options for these areas relied on regional level data, for example the Mayor of London's Report on Industrial/Warehousing Floorspace 2004 and draft SPG on Industrial Capacity. This highlighted that in Havering a policy of managed transfer should be followed as floorspace and land vacancy rates are particularly high. A similar approach was taken for retailing where regional studies such as the Mayor of London's Comparison and Convenience Reports were used, as well as Havering's own retail survey and ODPM data. The Council's subsequent Employment Land, and Retail and Leisure Studies have corroborated the regional level data and enabled the submission policies to consolidate the preferred options put forward.

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**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS12**

PPS12 states that the evidence base will be relied upon by the Council in testing the soundness of the development plan document at independent examination. Failure to publish the evidence base as part of the Preferred Options has denied the community the opportunity to scrutinise and comment on the soundness of the policy.

**Council's recommended response NO CHANGE**

In both cases the implications of this data were clearly set out and links to the options presented identified. Moreover this was summarised in a concise and

user friendly questionnaire to enable the community and other stakeholders to have their say.

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**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS13**

Work on the Core Strategy should be halted until the evidence base is in place and has been informed by targeted community involvement. In addition to this targeted early involvement, it is only appropriate and correct that the community as a whole is given the opportunity to review the evidence base and comment on its robustness and soundness as the basis for the DPD. The evidence base and policy should therefore be published with the wider community given a further opportunity to comment prior to the submission of the DPD to the Secretary of State.

**Council's recommended response NO CHANGE**

It is still not clear what precise form housing needs assessments should take, as PPS3 has yet to be published in its final form. In the meantime the Council is updating its local housing needs assessment as an interim measure and will also have recourse to the GLA's Housing Requirements Study. The Employment Land Review and Retail and Leisure Needs Surveys have now been published. These studies corroborate regional level data.

The Council therefore feels it is appropriate to progress with its Core Strategy as there are no significant changes to the Council's preferred approach to the future planning of the borough in either of these two reports. The retail study does identify significant issues for Romford Town Centre but these can be properly taken forward through the Romford Area Action Plan Preferred Options.

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**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS14**

In our view consultation on the Core Strategy Preferred Options would have benefited from the opportunity to review and comment on precise draft wording of policies. Disappointed that the drafted Preferred Options have not sufficiently advanced from the Issues and Options Paper to enable such a detailed review.

**Council's recommended response NO CHANGE**

The content of Havering's Core Strategy Preferred Options followed the advise in checklist 8b of the Companion Guide to PPS12, 'Creating Local Development Framework'.

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**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS15**

In terms of the format of the document the reader has to move between Section 6-Main Issues in Havering-2005-2020-in order to review the background to the policy options in Section 9. It would be useful to have these main issues moved to Section 9 and sorted based on Topic areas.

**Council's recommended response** **CHANGE**

The format of the submission document has rectified this by placing the policies and the justifying text together.

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**ID**

1066

**Consultee**

London Thames Gateway Development Corporation

**Representation CS16**

Should be reference to the LTGDC within the introductory chapters of the LDF documents which explain its role within the area both in terms of its role as planning authority and regeneration agency and its boundary should be shown on the proposals map. Reference to London Riverside being a priority area for funding and implementation for the LTGDC to take account of the LTGDC programme and priorities for funding identified through the LTGDC regeneration framework.

**Council's recommended response** **CHANGE**

Reference to LTGDC now provided in Implementation and Monitoring section and to it being a priority area for funding and implementation. Boundary shown on separate plan within the Core Strategy.

## **S5 Main Issues**

In response to representations from Government Office of London and Barton Willmore (representing Crest Nicolson) the main issues section has been amalgamated with the Core Policies to create a freestanding Core Policies section, as much of the material in the main issues sections is in effect the reasoned justification of the Core Policies. A shortened Key Issues section (S6) is now included.

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### **Section/Policy**

5.2 **6.1**

### **ID**

NA

### **Consultee**

Cllr Curtin

### **Representation CS17**

Would be good to see the policies proposed in the document linked to the Community priorities

### **Council's recommended response **CHANGE****

Section 6 of the Core Strategy now clearly shows how the Core Strategy Vision and Objectives flow from the Community Strategy,

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### **Section/Policy**

5.25 and 7.2 bullet 9 **CP7 and 6.3 bullet 17**

### **ID**

1370

### **Consultee**

Cleanaway

### **Representation CS18**

Support concept of Conservation Park and steps towards its realisation

### **Council's recommended response **NO CHANGE****

Support welcomed

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### **Section/Policy**

5.39 **CP17**

### **ID**

612

**Consultee**

CGMS representing Metropolitan Police Authority

**Representation CS19**

Welcomes inclusion of policy extracts from PPS1 recognising that a key planning objective should be the creation of safe and accessible environments where crime and fear of crime does not undermine the quality of life or community cohesion.

**Council's recommended response** **CHANGE**

This is now covered in CP17 Design.

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**Section/Policy**

5.44 **DC49**

**ID**

846

**Consultee**

Environment Agency

**Representation CS20**

Recommend that new development be kept outside of flood zone 3 and that the sequential test in PPG25 is used to ensure that all new development is located outside of high risk areas.

**Council's recommended response** **CHANGE**

In line with PPG25 policy DC49 requires a flood risk assessment to be submitted with planning applications for proposals in flood risk zones 2 and 3.

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**Section/Policy**

5.45 **CP15**

**ID**

846

**Consultee**

Environment Agency

**Representation CS21**

Support Strategic Flood Risk Assessments being undertaken and should be undertaken by the LPA as soon as possible in the planning process.

**Council's recommended response** **NO CHANGE**

The SFRA is now complete

**Section/Policy**

5.45 **DC49**

**ID**

846

**Consultee**

Environment Agency

**Representation CS22**

Need to make reference to the need to reduce surface water flood risk and to adopt Sustainable Urban Drainage Systems.

**Council's recommended response **CHANGE****

Policy C1AA (now DC49) has been refined so that it now states that new development or redevelopment will be permitted where it can be demonstrated (amongst other things) that, surface water is controlled as near to its source as possible and does not add to flood risk elsewhere, and the use of SUDs has been considered. Where SUDs have not been used the applicant should justify these reasons.

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**Section/Policy**

5.45 **DC49**

**ID**

846

**Consultee CS23**

Environment Agency

**Representation**

Note that EA would require a SFRA at the planning application stage, criteria is that surface water discharge from the developed site should mimic that of an undeveloped green field site up to and including a 1 in 100 year critical duration storm event. Techniques for controlling surface water run off include conventional attenuation storage permeable pavements grassed swales infiltration trenches and ponds, use of water conservation techniques such as greywater reuse/rainwater harvesting should be promoted as should the development of greenroofs.

**Council's recommended response **CHANGE****

Reference to green field site has now been made in policy DC49 (formerly C1AA), the more detailed points will be addressed in Sustainable Construction and Design SPD.

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**Section/Policy**

5.45 **CP15 and DC49**

**ID**

622

**Consultee**

GLA

**Representation CS24**

Within the main issues for Havering section of the Core Strategy, the reference to Thames Barrier protecting Havering is not accurate (paragraph 5.45). It is the tidal walls, embankments and gates within and close to the borough that do this. This paragraph should recognise the emerging PPS25 currently out for consultation.

**Council's recommended response **CHANGE****

Main issues section no longer exists. Text of policy DC49 (formerly C1AA), and CP15 (formerly C1A) has been changed accordingly.

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**Section/Policy**

5.47-5.50 **CP15 and DC52**

**ID**

846

**Consultee**

Environment Agency

**Representation CS25**

Contents of this section (water and drainage) supported, and support that the Blue Ribbon has been included.

**Council's recommended response **CHANGE****

Main issues section no longer exists. Text of CP15 and DC52 take this forward.

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**Section/Policy**

5.86 **DC63**

**ID**

612

**Consultee CS26**

CGMS representing Metropolitan Policy Authority

**Representation**

In line with this it is important to recognise that the provision of appropriate police facilities form a key element of reducing social inequalities, accordingly the need to secure appropriate police provision should be recognised by the Council's Core Strategy policies.

**Council's recommended response** **CHANGE**

Noted. This is covered in DC63 (formerly B1AC)

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**Section/Policy**

5.202 **CP3**

**ID**

1370

**Consultee**

Cleanaway

**Representation CS27**

Justification for de-allocation of Coldharbour Lane is not transparent and reason for this change not clear. Strategic waste management facility should be safeguarded from incompatible uses. Removing the site as a potential employment area could result in incompatible development being allowed in close proximity to the existing waste management facility and as a result its future operation could be compromised. London Plan alterations require that waste management facilities be preserved. Therefore object to this de-allocation until further evidence is presented.

**Council's recommended response** **CHANGE**

Coldharbour Lane Commercial Area has been de-designated and included within the London Riverside Conservation Park. The Council consider this use to be incompatible with the neighbouring conservation park. This facility is a temporary use tied to the life of the landfill site, and in line with the Government and Regional Policy replacement facilities have been provided on Frog Island to divert waste from landfill further up the waste hierarchy. Therefore the Council does not consider it appropriate to maintain this waste management facility beyond its temporary permission when alternative arrangements have been put in place. See paragraph 1.10 CP3.

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**Section/Policy**

5.126 **DC39**

**ID**

622

**Consultee CS28**

Greater London Authority

**Representation**

Paragraph 5.126 would be clearer and simpler if it stated that Havering has two safeguarded wharves, Frog Island and Tilda Rice, and another operational river terminal at Cleanaway. Safeguarded Wharves being shown on the Proposals Map is supported as this helps to clarify the location and extent of the safeguarded sites.

**Council's recommended response **CHANGE****

This has been clarified in DC39 in line with the GLA comments. Safeguarded wharves shown on proposals map.

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## **S7 Vision and objectives**

This section has now been split into Section 6-Vision and Section 7-Objectives. The vision has been reordered and the following amendments have been made to its wording.

	<b>REVISED WORDING</b>	<b>REASONING</b>
<b>CORE STRATEGY VISION AND OBJECTIVES</b>		
Vision (3)	'Havering will have a dynamic, prosperous economy founded on a strong skills base, a quality environment and a hierarchy of strategic and local employment sites. In particular London Riverside will be a centre for advanced manufacturing and <b>a wide range of modern</b> industries clustered around the Centre for Engineering and Manufacturing Excellence <b>and a tourism and leisure destination centred on the London Riverside Conservation Park and Thames Gateway Regional Casino and Entertainment Centre. Environmental and green industries will provide further new opportunities for economic growth and jobs.</b> There will be a range of e-enabled knowledge-based industries within new mixed used developments in and around the borough's town centres. <b>Havering residents will be equipped to get good quality, well-paid, jobs locally and in the Thames Gateway.'</b>	The new wording in second sentence introduces greater flexibility to the range of uses which can be secured on Beam Reach, replacing 'high-tech' which is too specific. Recognition of the importance of the growth of environmental and green industries (forecast to double by 2010) is highlighted. Additional sentence at the end better reflects Havering's Community Strategy.
Vision (4)	'Romford Town Centre, with the help of the Romford Town Centre Partnership, will	Change to last sentence better reflects Romford Urban Strategy which

	continue to be East London's Premier Town Centre thriving on the competition offered by Stratford to the west and Lakeside and Bluewater to the east. It will have <b>built upon its traditional character</b> , and have a safe, diverse, culturally rich and well managed <b>evening</b> economy offering a range of activities for people of all ages.'	emphasises Romford's traditional qualities which can give it a competitive advantage compared with out of town shopping complexes. The previous reference to the night time economy is replaced by a reference to the evening economy.
Vision (7)	<b>'In recognition of its importance to its residents and visitors' quality of life, Havering will have a strong and well-developed cultural provision, including opportunities for sport and leisure activities, indoor and outdoor, convenient access to a network of open space, arts and creative activities and industries, and libraries, heritage centres or museums. Voluntary and community groups, including faith groups, will be able to find suitable premises and will be encouraged and supported.'</b>	Largely new statement better reflects the central role of culture in creating good communities by offering enjoyable and accessible opportunities for shared community activity and the sense of local identity. Based on the Department of Culture Media and Sport's definition of culture.
Vision (9)	'Spatial inequalities in Havering's health system will be reduced through the provision of additional, accessible facilities. <b>Havering's cultural and leisure provision will enable people to pursue a healthier lifestyle through personal well-being and fitness from activities such as walking and cycling. Older people will be supported to live healthily and safely at home whenever possible.</b> The new Oldchurch Hospital will be up and running in conjunction with a network of Primary Care Trust Centres. Improved availability of services and facilities in Havering's health care system will be achieved through the provision of additional accessible facilities.'	Additional second sentence better reflect the Community Strategy in recognising the important role of widening cultural and leisure opportunities in encouraging healthier lifestyles and personal fitness and well being, and Havering's Supporting People Strategy in providing home-based care solutions for older people.
Vision (10)	<b>'Havering schools and colleges will maintain and build upon their reputation for excellence. More Havering residents will participate in further and higher education (including at universities, colleges and CEME), and lifelong learning, so that Havering residents improve their skills and qualifications, as well as extending their personal development at all stages of life.'</b>	A more complete vision statement now incorporating not just schools, but universities, colleges and CEME, further and higher education and lifelong learning, linked to skills and development of the individual.
Vision (12)	'Havering's transport system will consist of a comprehensive clean fuel bus network, rail links across London that provide convenient access to the Stratford EuroStar station, the Crossrail service through Romford, a new station on the Fenchurch Street line serving the new residents and employees of London Riverside, and East London Transit which will run from Barking to Rainham, then onto Elm Park, Romford, Harold Hill and Collier Row. <b>Provision will continue to be made for cars in recognition that many people will</b>	Previously the second sentence read: 'Provision will continue to be made for those for whom a car is the preferred mode of transport but overall traffic growth will be falling and many more people will choose to walk and cycle.' The slight change of emphasis in this sentence brings the wording in line with the London Plan paragraph 3.205, overcoming a GLA objection to the detailed wording.

	<b>continue to use them for travel, particularly in the suburbs but overall traffic growth will be</b> falling and many more people will choose to walk and cycle. The borough will continue to have excellent road links due to the A12, A13, A127 and M25.'	
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## **Section/Policy**

7.1 **6.1**

## **ID**

860

## **Consultee CS29**

Cluttons representing the Crown Estate

## **Representation**

Green Belt sites should be considered in conjunction with non GB sites if Havering is to take a longer term view of development in the borough. All GB should be reviewed within and close to its boundaries to assess whether there are small scale opportunities on land which is well related to Romford Town Centre where sustainable development may be appropriate. Para 68 of PPG3 highlights that where GB boundaries have been drawn too tightly there may be a case for reviewing them where this would be most sustainable option. Para 2.8 of PPG2 states that GB boundaries should be carefully considered so as not to include land that it is unnecessary to keep permanently open otherwise it may not be able to maintain the degree of permanence GB should have. This would devalue the purpose of its designation. Para 2.10 of PPG2 says that LPAs should take account of sustainable patterns of development which may involve the loss of some GB. Previously developed land sites can have many constraints and therefore should not rely on small number of such sites to meet housing supply. Also may result in geographic imbalance in supply of housing limiting housing choice in some areas. Sequential approach should be realistic about Brownfield supply, as highlighted by para 34 of PPG3 and 2.15 of PPS12. Therefore following SSA should be included: East side of Crown Farm, south of A12, Triangular area north of A12 and south of Marlborough Road, Gobions Farm south of Collier Row Road and east of White Hart Lane, Triangular area north of Collier Row Road and south of Hog Hill Road.

## **Council's recommended response NO CHANGE**

Havering's housing target included in the London Plan Draft Alterations of 535 homes per year is based on a robust housing capacity study which excluded supply from Green Belt and Green Field sites, consequently the target is deliverable without recourse to such sites and therefore on this basis there is no reasons to make incursions into the GB except where exceptional circumstances exist. The Council does not consider that exceptional circumstances exist in this case.

**Section /Policy**

7.1 **6.1**

**ID**

846

**Consultee**

Environment Agency

**Representation CS30**

Wording of Havering Strategic Partnership's vision should include 'greener'.

**Council's recommended response NO CHANGE**

Comments have been forward to Community Strategy team. This text simply repeats the HSPs existing vision.

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**Section/Policy**

7.1 **6.1**

**ID**

680

**Consultee**

GOL

**Representation CS31**

There's only limited reference to the Communty Strategy and it is not clear how the link is made between the high level objectives of that document and the CS vision set out in para 7.2. Help if Community Strategy objectives were included more fully rather than simply summarised and it was shown which of its objectives related to the various Core Strategy aspirations and objectives.

**Council's recommended response CHANGE**

Section 6 of the Core Strategy now shows clearly the link between the high level objectives of the Community Strategy and the Core Strategy vision.

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**Section/Policy**

7.2 **6.4**

**ID**

**Consultee**

Keith Langridge

**Representation CS32**

Rainham is so important for the new Thames Gateway initiative, and this is a good reason why it does not need any more rubbish dumping over there or other noxious plant operations. Need to develop framework of the River Thames with footpaths and especially consideration of a new boating marina and riverside facilities; something that will provide work and pleasure and further use of the Thames itself. There is always room for ferries of some sort now that the rail and road systems are getting crowded and going into London is costly and an arduous journey. See no reason to not build suitable housing that could have the river as a way of going to London or other areas down stream, even for pleasure purposes. This seems to be mainly operating from the London area.

**Council's recommended response NO CHANGE**

Noted

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**Section/Policy**

7.2 6.4 bullet 7 and 8

**ID**

622

**Consultee**

Greater London Authority

**Representation CS33**

The Core Vision (S7) should not only state the protection of the Green Belt but also the important open space network within the built area. The vision should seek to protect, create and enhance the open space network in the borough and achieve a multi-functional green infrastructure, implementing the principles of the Green Grid.

**Council's recommended response CHANGE**

This is covered in parts 7 and 8 of the Core Strategy Vision.

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**Section/Policy**

7.2 6.4

**ID**

**Consultee**

Greater London Authority

**Representation CS44**

The London Plan calls for boroughs to prepare open space strategies. These should audit existing provision and assess demands for all open space in the borough, both public and private. It should also incorporate objectives, an action plan of implementation, monitoring and regular updating. The Mayor has produced the Guide to Preparing Open Space Strategies, as best practice

guidance to the London Plan, which sets out a methodology and consistent approach for London boroughs. The Core Strategy should state that an Open Space Strategy will be prepared and maintained. The vision should refer to preparing and updating a robust Open Space Strategy as set out in the London Plan and the Mayor's Best practice Guidance on Preparing Open Space Strategies which is available on the following link:

[http://www.london.gov.uk/mayor/strategies/sds/open\\_space.jsp](http://www.london.gov.uk/mayor/strategies/sds/open_space.jsp)

**Council's recommended response NO CHANGE**

An open space strategy is currently being prepared by the Council. This is referred to in CP7 and DC20. The Council does not consider it necessary to refer to it in the vision.

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**Section/Policy**

7.2 bullet 8 6.4 bullet 17

**ID**

846

**Consultee CS35**

Environment Agency

**Representation**

Change to 'will flourish **in all habitats**, particularly...'

**Council's recommended response CHANGE**

This change has been made to part 17 of the vision

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**Section/Policy**

7.2 bullet 9 6.4 bullet 16

**ID**

846

**Consultee CS36**

Environment Agency

**Representation**

Add that 'This will include the reduction in fluvial, tidal and surface water flood risk'.

**Council's recommended response NO CHANGE**

The Council considers that this level of detail is not necessary in the vision

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**Section/Policy**

7.2 bullet 9 6.4 bullet 16

**ID**

846

**Consultee CS37**

Environment Agency

**Representation**

Support these key objectives

**Council's recommended response NO CHANGE**

Support welcomed

**Section/Policy**

7.2 bullet 11 6.3 bullet 11

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**ID**

563

**Consultee CS38**

Highways Agency

**Representation**

The HA supports the Council's Vision to provide good access to an integrated transport system, providing increased transport choice to residents and workers and also reducing the need to travel within the Borough. Furthermore the HA supports the encouragement of mixed use developments: which promote linked trips and helps to sustain the local economy.

**Council's recommended response NO CHANGE**

Supported noted

---

**Section/Policy**

7.2 bullet 15 6.4 bullet 13

**ID**

1370

**Consultee CS39**

Cleanaway

**Representation**

This states that the borough's landfill sites will no longer be used by 2020, this assumes that residuals will be exported to landfill outside the borough contrary to the proximity principle stated in Objective E1 and in S5.76. This objective is misleading and should be reworded to acknowledge the important role which landfill will continue to play in sustainable waste management in the area.

**Council's recommended response NO CHANGE**

Whilst residuals may need to be landfilled the Council does not consider that landfilling in the current site is a sustainable solution as continued use of this site beyond its current permission would conflict with the neighbouring conservation park.

---

**Section/Policy**

7.3-7.22 **S7**

**ID**

612

**Consultee CS40**

CGMS representing the Metropolitan police Authority

**Representation**

Support these key objectives in particular F1. Welcome the expansion of this objective to identify police facilities as forming a vital part of the borough's essential social infrastructure.

**Council's recommended response NO CHANGE**

Not necessary to define in the objective what the essential social infrastructure is as where relevant this is expanded in policy.

---

**Section/Policy**

7.5 **7 EN(B)**

**ID**

857

**Consultee CS41**

Essex Wildlife Trust

**Representation**

Should include reference to GLA and UK Biodiversity Action Plans as well as Havering's BAP. There include reference to these.

**Council's recommended response CHANGE**

Objective now refers to London and UK Biodiversity Action Plans

---

**Section/Policy**

7.9 **7 WM(A)**

**ID**

1370

**Consultee CS42**

Cleanaway

**Representation**

Support the overall objective of waste minimisation.

**Council's recommended response NO CHANGE**

Support noted

---

**Section/Policy**

7.12 7 TR(A)

**ID**

563

**Consultee CS43**

Highways Agency

**Representation**

The HA suggests that the potential traffic and transport effects of all proposed development locations should be considered as a proactive input to the sustainable planning process. In particular, it is critical that local level land-use development strategies take full consideration of opportunities to reduce the need to travel and reliance on the private car, reduce the distance travelled and encourage travel by sustainable modes. This could be achieved by balancing the supply of housing and employment to address current concerns as well as avoid the creation of additional demand for travel between home, work and other facilities.

**Council's recommended response NO CHANGE**

Noted

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**Section/Policy**

7.12 7 TR(A)

**ID**

66

**Consultee CS44**

Countryside Agency

**Representation**

Supported

**Council's recommended response NO CHANGE**

Support welcomed

---

**Section/Policy**

7.12

**ID**

622

**Consultee CS45**

Greater London Authority

**Representation**

Support approach to concentrate major trip generating development in main centres, but propose deleting the words “whilst recognising that residents favoured mode of transport will continue to be the car”, because this is not an aspirational starting point for an objective that is about promoting improved sustainable transport in London. Department for Transport figures show a reduction in traffic flows in the borough since 2002

**Council’s recommended response **CHANGE****

This objective has now been changed so that it is consistent with the London Plan paragraph 3.205 so it now states; ‘whilst recognising that many people will continue to use their cars for travel, particularly in the suburbs’.

---

**Section/Policy**

7.13 **7 TR(B)**

**ID**

563

**Consultee CS46**

Highways Agency

**Representation**

The HA supports initiatives to improve public transport provision in the District and therefore create a potential to reduce development impacts on the trunk network.

**Council’s recommended response **NO CHANGE****

Support welcomed

---

**Section/Policy**

7.12 and 7.13 **7 TR(A) and TR(B)**

**ID**

563

**Consultee CS47**

Highways Agency

**Representation**

The HA supports this objective as it seeks to reduce the need to travel. The HA supports the location of development within the main centres of the Borough where there is good public transport access as this will encourage the use of alternatives to the car. The HA is slightly concerned about continuing references to residents continuing to have the car as a favoured mode of transport and consider that a more proactive approach could be taken towards the use of sustainable modes.

**Council's recommended response** **CHANGE**

This objective has now been changed so that it is consistent with the London Plan paragraph 3.205 so it now states; 'whilst recognising that many people will continue to use their cars for travel, particularly in the suburbs'.

---

**Section/Policy**

Key Diagram 1

**ID**

622

**Consultee CS48**

Greater London Authority

**Representation**

The identification of the Green Arc on the map (pages 81-82) is welcomed. However, it should encompass the Green Belt from the Thames to the northwest corner of the borough. There should also be a reference to the Green Arc within the relevant Green Belt policy.

**Council's recommended response** **CHANGE**

Diagram has been changed accordingly. Reference now made within CP7 (formerly D1A) to the Green Arc.

---

## **S8 Broad Locations**

Following advice from the Government Office for London that Core Strategies should not allocate sites but only indicate major growth areas such as locations for which AAPs will be prepared, this section has been deleted and reflected where appropriate within the relevant Core Policies.

---

**Section/Policy**

8.4 (and H1AA) **CP1**

**ID**

680

**Consultee CS49**

Government Office of London

**Representation**

As the London Plan alteration is only draft the housing requirement set for period should be 350 as set out in the London Plan, although the wording could state that the Council will seek to exceed this figure and has identified the capacity to achieve the higher figure of 535. Also reference should be provided to draft PPS3.

**Council's recommended response** **CHANGE**

CP1 (formerly H1-H3A) refers to the London Plan early alterations housing target of 535 new homes per year as this is the target that will apply when the Core Strategy is scheduled to be adopted. Reference is also provided to Draft PPS3.

---

**Section/Policy**

8.5 5.8 and CP1

**ID**

680

**Consultee CS50**

Government Office of London

**Representation**

Needs to make clear that the Core Strategy should not allocate sites but only indicate major growth areas such as locations for which AAPs will be prepared.

**Council's recommended response** **CHANGE**

The Broad Locations section has now been deleted.

---

**Section/Policy**

8.5 CP1 and CP14

**ID**

NA

**Consultee**

526 members of the public

**Representation CS51-CS576**

Objection to 8000 Homes proposed for Havering.

I totally object to the intention to build at least 8000 homes in Havering, as indicated in your Local Development Framework.

I also object to the loss/re-designation of green belt, which contravenes the following policies of Havering's Unitary Development Plan.

STR1:

- (2) To give a high priority to protecting and improving the environment
- (4) To prevent inappropriate development in the Green belt

ENV1

Maintain Havering's existing open and spacious residential character. Page 28 (67) states that the "The plan aims to ensure that Havering's character and environment are maintained and enhanced". Your plan to allow so many properties, many of them flats, will impact negatively on the quality of life of the Borough's residents.

**Council's recommended response CHANGE**

The Housing Supply policy (CP1) takes forward the forthcoming London Plan housing targets, which are 535 new homes per year from 2007/08-2016/17. This adds up to at least 5350 new homes. Plus a further three years new housing which adds a further 1605 new homes. The reference to the individual sites in paragraph 8.5 has not been carried forward into CP1 on the advice of GOL. CP1 therefore refers to broad locations of new housing development and other sources of supply without mentioning specific sites. The Council considers that these new homes can be provided without detriment to Havering's existing open and spacious residential character, or the quality of life of the Borough's residents. Core Strategy policy requires that developers adopt a design led approach with regard first to providing the right housing mix and then appropriate densities with regard to public transport levels and the setting of the development.

Meeting these targets does not require recourse to Green Belt land, the Green Belt has only been altered where the Council considers there are exceptional circumstances for doing so in line with PPG2.

---

**Section/Policy**

8.5 CP1 and CP14

**ID**

NA

**Consultee**

514 members of the public

**Representation CS577-CS1091**

Objection to 5000 homes proposed for London Riverside Development Area including Rainham

Totally object to the intention to build 5000 homes in the London Riverside Area, as indicated in your Local Development Framework, as a vast amount of these homes will be in a narrow area of the Rainham/Wennington and South Hornchurch Wards. This is far too high a density and is indicative of mainly flats/apartment blocks.

Also object to the loss/re-designation of green belt, which contravenes the following policies of Havering's Unitary Development Plan:

STR1:

- (2) To give a high priority to protecting and improving the environment
- (4) To prevent inappropriate development in the Green belt

ENV1

Maintain Havering's existing open and spacious residential character. Page 28 (67) states that the "The plan aims to ensure that Havering's character and environment are maintained and enhanced". The concreting over of Rainham cannot achieve this.

The Council should adhere to the responses to their expensive consultation exercise, the London Riverside Development Options, where the residents made it perfectly clear that they don't want over development, mass housing or tower blocks.

**Council's recommended response **CHANGE****

Please see previous response. Whilst the Council is still committed to building sustainable new communities in London Riverside reference to 5000 new homes in London Riverside has now been deleted from the Core Strategy as the Council considers that the development of this area should not be driven by a predetermined capacity. In line with the approach of the Core and DC policies development should be design led. It is important to emphasise that the new homes planned for Rainham are on sites previously designated as Employment Sites, or on brownfield sites within Rainham Village. One of the functions of the green belt is to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

---

**Section/Policy**

8.14 **CP3**

**ID**

680

**Consultee CS1092**

Government Office of London

**Representation**

Employment Land Review should have been taken at an earlier stage as it is part of the evidence base upon which the policy options should have been based.

**Council's recommended response **NO CHANGE****

The Employment Land Review with regard to the principle of managed transfer established in the GLA SPG on Industrial Capacity aims to identify surplus employment land for transfer to other uses. The study has confirmed the strategy set out in the preferred options to redefine the boundary of the

Rainham Employment Area as also set out in the IPG on London Riverside and intimated in the London Plan. The only other changes it suggests are to de-designate the New Road Employment Area, re-define the Coldharbour Lane Commercial Area, de-designate the Victoria Road Commercial Area, Bridge Close, Spring Gardens, Lambs Lane and Chesham Close. UDP policy since 1993 has allowed residential development within the New Road Employment Area so its de-designation is not a significant change in this respect. The Victoria Road Commercial Area has been substantially weakened by a number of shops and services and is not fulfilling the function it was allocated for. Bridge Close will be dealt with within the Romford Area Action Plan. A significant part of Chesham Close has already been lost to residential development, so its de-designation was inevitable. Spring Gardens and Lambs Lane are small secondary employment areas, constrained by their size, close proximity to residential and poor access. The Council does not consider that the results of the study fundamentally challenge the strategy and policies of the Core Strategy as consulted on at the issues, options and preferred options stages, indeed it corroborates them. It is also validated by the East London Industrial Land Survey.

---

**Section/Policy**

8.18 **CP13 and DC42**

**ID**

680

**Consultee**

Government Office of London

**Representation CS1093**

Should include the adopted London Plan figures as a base, and then mention the alterations. The comments about areas of search is confusing as these are not listed, the same applies to the preferred policy approach in Policy E2BA which mentions the proposals map but does not include it so that consultees can respond.

**Council's recommended response NO CHANGE**

Policy E2BA (now DC42) referred to the intention to show areas of search on the proposals map at the submission stage. The purpose of the preferred options was to establish the principle of identifying the areas of search rather than their extent. The Council intends to prepare a separate Minerals DPD so that preferred areas can be identified in line with MPS1. London Plan policy does not include a minerals allocation for London. The Areas of Search cover the known extent of minerals reserves which have not been exhausted and do not confer any special status on them, rather any applications within the areas of search will need to satisfy CP13 and DC42. This way until the London Plan alterations have been adopted and the preferred areas identified through a separate DPD planning applications for minerals extraction will be assessed against the criteria in these policies.

**Section/Policy**

8.20 CP11

**ID**

1370

**Consultee**

Cleanaway

**Representation CS1094**

Support process of Joint Waste Plan

**Council's recommended response NO CHANGE**

Support welcomed

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**Section/Policy**

8.20 5.44 and CP11

**ID**

1370

**Consultee**

Cleanaway

**Representation CS1095**

Here it suggests that the proximity principle applies to the ELWA region when in fact it applies to the wider sub-region.

**Council's recommended response NO CHANGE**

The Council considers that waste should be disposed of in one of the nearest appropriate locations, and for this reason the ELWA region rather than the GLA sub-region is the more appropriate scale. Moreover the ELWA is an existing waste management area, whereas the East London sub-region is a more general area not specifically designated for waste management purposes, including as it does for example the City of London which has little in common with LB Havering.

## **Heritage, Biodiversity and Green Belt**

The policies in this chapter have now been re-categorised under new chapters. There is now a dedicated Heritage chapter, Biodiversity forms parts of the Environmental Management chapter and Green Belt also now has a dedicated chapter. Consequently the policy references have changed and the new references are provided for ease of reference.

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### **Section/Policy**

General

### **ID**

680

### **Consultee**

Government Office of London

### **Representation CS1096**

Preserve and enhance needs to be changed to preserve or enhance throughout this section.

### **Council's recommended response-CHANGE**

"and" changed to "or" where appropriate

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### **Section/Policy**

A1A Heritage CP18 and DC67

### **ID**

812

### **Consultee**

Havering Heritage

### **Representation CD1097**

With regard to way heritage issues were treated on Oldchurch Hospital application questions point of heritage focus group.

### **Council's recommended response-NO CHANGE**

Statement of compliance includes focus group minutes and in response to feedback policy DC67 now states that 'the Council will also take into account the contribution that other buildings of historical and/or architectural interest make to heritage'.

---

### **Section/Policy**

A1A Heritage CP18

**ID**

NA

**Consultee**

Keith Langridge

**Representation CS1098**

LDF requires to have built in again proper protection for Havering's locally interesting buildings and spaces, it is very important to retain local history. The buildings are a reminder of the past and the growth of the area overall several centuries. It has been neglected in the past and that has lost some very nice properties that has constituted the areas growth and prosperity. This is why it is so important to have full and proper protection on all Havering's old properties. Need to establish a list of locally important properties within Havering, including all areas, including Rainham which is currently being neglected. Need a concerted effort otherwise more old buildings will be lost. The Old Woolpack pub is just standing there, it will probably just rot and then its terrible state will be used to justify its demolition. It is shameful and unnecessary so please ensure there is proper protection built in for Havering's buildings and spaces of value.

**Council's recommended response-NO CHANGE**

Policy DC67 (formerly A1AA) now refers to need to take into account other buildings or historical and/or architectural interest.

---

**Section/Policy**

A1A Heritage **CP18**

**ID**

NA

**Consultee**

Cllr Curtin

**Representation CS1099**

Need to present well-established arguments about how the historic environment fosters rather than is an obstacle to key social objectives, most particularly economic development, but also public health, community safety, better educational attainment, and community cohesion.

**Council's recommended response-CHANGE**

Reasoned justification to CP18 (formerly A1A Heritage) now includes these positive roles of the historic environment.

---

**Section/Policy**

A1A Heritage **CP18**

**ID**

NA

**Consultee**

Cllr Curtin

**Representation CS1100**

Concerned at the way in which conservation policy in Hornchurch was split into 3 separate areas and that this may lead to a dilution of benefit of the historic environment in Hornchurch village.

**Council's recommended response-NO CHANGE**

This will be addressed in the Heritage Strategy SPD

---

**Section/Policy**

A1A Heritage CP18

**ID**

NA

**Consultee**

Cllr Curtin

**Representation CS1101**

Heritage Strategy should be adopted.

**Council's recommended response-NO CHANGE**

Local Development Scheme programmes the Heritage Strategy SPD to be adopted in December 2007

---

**Section/Policy**

A1A Heritage CP18

**ID**

NA

**Consultee**

Cllr Curtin

**Representation CS1102**

Concerned to see the historic environment of Rainham Village identified as a key asset for the borough in relation to the Thames Gateway and wished to know more about how the LDF envisaged conservation in Rainham relating to the UDC.

**Council's recommended response-NO CHANGE**

This point is covered in the Site Specific Allocations Document . Separate allocations aim to recreate the historic quay on the River Ingrebourne, ensure new development within the village enhances nearby heritage assets and

requires the submission of a heritage statement with proposals for new development. In addition a specific allocation is made covering the land to the north of the Broadway and south of Upminster Road South including Rainham Hall and grounds, which seeks to preserve and enhance these heritage assets.

---

**Section/Policy**

A1A Heritage CP18

**ID**

NA

**Consultee**

Cllr Curtin

**Representation CS1103**

Keen to see greater protection afforded to the Harold Hill Estate.

**Council's recommended response-NO CHANGE**

This will be addressed in the Heritage Strategy SPD

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**Section/Policy**

A1AA Buildings of historic interest DC67

**ID**

1377

**Consultee**

S.C.Bates (Mrs)

**Representation CS1104**

Very concerned about the future of Havering and how in the last 100 years it has lost nearly all of its character. A sense of pride has to be cultivated or Havering will lose its identity and become another over population part of the Eastend of London, a satellite of Stratford. Hope the following features will be preserved as they are not included in the report.

**Council's recommended response-NO CHANGE**

These are detailed points which will be addressed in preparing the Heritage Strategy SPD

---

**Section/Policy**

A1AA Buildings of historic interest DC67

**ID**

1377

**Consultee**

S.C.Bates (Mrs)

**Representation CS1105**

Very concerned about the future of Havering and how in the last 100 years has lost nearly all of its character. A sense of pride has to be cultivated or Havering will lose its identity and become another over population part of the Eastend of London, a satellite of Stratford. Hope the following features will be preserved as they are not included in the report.

Very concerned about the future of Havering and how in the last 100 years it has lost nearly all of its character. A sense of pride has to be cultivated or Havering will lose its identity and become another over population part of the Eastend of London, a satellite of Stratford. Hope the following features will be preserved as they are not included in the report.

'Willoby's Hill' (end of Lodge Lane, Collier Row). Privately owned field with an outcrop of boulders left over from the ice age.

The man-made lake and ice-house in Heap's Wood (also a heronry), at the side of Bedford's Park and to the south-east of Bower House.

At the bottom of Havering Country Park, just off Mud Hill and a few yards from where a cache of Roman artefacts was found, is a bomb crater, which was one of the first bombs to drop in this area in WW2. This also had the interest of local jobs-its needs to be retained and maintained.

The Reading Room in Collier Row Road which apparently was donated for the villagers use long before the advent of public libraries.

**Council's recommended response-NO CHANGE**

These are detailed points which will be addressed in preparing the Heritage Strategy SPD

---

**Section/Policy**

A1AA Buildings of historic interest DC67

**ID**

NA

**Consultee**

Cllr Curtin

**Representation CS1106**

Locally listed buildings and sites play a key role in Havering's sense of identity. Need to ensure that the maximum benefit is gained from that through the LDF and proper protection of local heritage. Keen to know how the Council can join the lobby of those seeking to have the distinction between the VAT levied by the Government on conversions and the zero VAT rating on

new build evened out to remove any prejudice against restoration and conversion.

**Council's recommended response- CHANGE**

Policy DC67 (formerly A1AA) now refers to need to take into account other buildings or historical and/or architectural interest.

VAT is not a matter for the LDF

---

**Section/Policy**

A1AB Conservation areas DC68

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS1107**

Fails to comply with PPG15. Para 4.20 states that new development should either preserve or enhance the character of the area not both as stated in the Council's preferred approach. This comment applies to the other relevant A1 policies which refer to a desire to preserve and enhance.

**Council's recommended response- CHANGE**

and" changed to "or" where appropriate

---

**Section/Policy**

A1AB Conservation areas DC68

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS1108**

No monitoring mechanism

**Council's recommended response- NO CHANGE**

Monitored at Core Strategy level through heritage indicators<sup>1</sup>

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**Section/Policy**

A1AB Conservation areas DC68

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<sup>1</sup> It is inappropriate to have an indicator and target for every GSDP policy in line with Government guidance monitoring has been moved up to the Core Strategy level, with the aim of maintaining a set of around 50 indicators.

**ID**

612

**Consultee**

CGMS representing Metropolitan Police Authority

**Representation CS1109**

Preserving or (not and) enhancing

**Council's recommended response** **CHANGE**

and" changed to "or" where appropriate

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**Section/Policy**

A1AD Archaeology and monuments **DC70**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS1111**

Not compliant with paras 13 and 8 of PPG16. Policy states that development may be refused on sites that have an outstanding archaeological significance. PPG16 states at para 28 that refusal of planning permission should be very much a last resort. Rather the PPG advocates positive planning and management to bring about sensible solutions to the treatment of sites with archaeological remains and reduce the areas of potential difference. It also highlights at para 13 that if physical preservation in situ is not feasible an archaeological excavation for the purposes of preservation by record may be an acceptable alternative. The policy as draft is in consistent with this approach.

**Council's recommended response- NO CHANGE**

The policy does not conflict with PPG16. Para 13 says that "The preservation *in situ* of important archaeological remains is therefore nearly always to be preferred". Para 8 makes it clear that when nationally important archaeological remains are affected by proposed development there should be a presumption in favour of their physical preservation. It is perfectly feasible that such, yet as undiscovered, remains exist in Havering

---

**Section/Policy**

A1AD Archaeology and monuments **DC70**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS1112**

Put hotspots on proposals map

**Council's recommended response- **CHANGE****

Hotspots will be shown in Heritage Strategy SPD.

---

**Section/Policy**

A1AD Archaeology and monuments **DC70**

**ID**

614

**Consultee**

Environomics representing Brett Aggregates

**Representation CS1113**

Sites and buildings of 'special historical or archaeological importance' do not always justify conservation in situ. Depending on the level of importance attached to archaeological or historical potential, it is often possible to agree a pragmatic approach to carry out a scheme of archaeological evaluation and/or excavation with the relevant historical/archaeological organisation for mineral extraction.

**Council's recommended response- NO CHANGE**

Policy does not attempt to preserve all remains in situ. See also comments above in response to Crest Nicholson

---

**Section/Policy**

A1AD Archaeology and monuments **DC70**

**ID**

NA

**Consultee**

Cllr Curtin

**Representation CS1114**

Keen to see a more forthright recognition of the central role of archaeology and ancient monuments to the historic environment and would urge a SPD on the matter for Havering.

**Council's recommended response- NO CHANGE**

Archaeology and its importance will be covered in the Heritage Strategy

---

**Section/Policy**

A1AE Other historic landscapes DC71

**ID**

728

**Consultee**

Gidea Park and District Civic Society

**Representation CS1115**

The Reed Pond Walk which is a registered Town Green under the Commons Registration Act 1965, and in 1912 covenanted as open space in perpetuity should be included as an 'Other Historic Landscape' in para 1.4.

**Council's recommended response- NO CHANGE**

This will be addressed in Heritage Strategy SPD

---

**Section/Policy**

A1AE Other historic landscapes DC71

**ID**

NA

**Consultee**

Cllr Curtin

**Representation CS1116**

Welcome policy on historic landscapes including parks.

**Council's recommended response- NO CHANGE**

Support welcomed

---

**Section/Policy**

A1AF Trees DC60

This policy has been moved to the Environmental Management chapter

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS1117**

Not all existing trees should be protected. The determination as to whether it is desirable to retain a tree should be the quality of the specimen, the amenity value of the tree and other scheme requirements.

**Council's recommended response- NO CHANGE**

## **Cabinet 9 October 2006**

The policy says that TPOs will be used as appropriate to protect trees. Such trees would have to be of public amenity value and therefore by definition this does not apply to all trees in the borough

---

### **Section/Policy**

A1AF Trees DC60

### **ID**

1040

### **Consultee**

Barton Willmore representing Crest Nicholson

### **Representation CS1118**

No monitoring mechanism

### **Council's recommended response- NO CHANGE**

Monitored at Core Strategy level through biodiversity indicators<sup>2</sup>

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### **Section/Policy**

A1AF Trees DC60

### **ID**

586

### **Consultee**

Bellways

### **Representation CS1119**

Does not allow for circumstances where the loss of a tree or trees is appropriate for certain developments to take place

### **Council's recommended response- NO CHANGE**

See comments above under Crest Nicholson. Also the existence of a TPO does not necessarily prevent planning permission being granted for development that involves the loss of a preserved tree/s.

---

### **Section/Policy**

A1AF Trees DC60

### **ID**

NA

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<sup>2</sup> It is inappropriate to have an indicator and target for every GSDP policy in line with Government guidance monitoring has been moved up to the Core Strategy level, with the aim of maintaining a set of around 50 indicators.

**Consultee**

Cllr Curtin

**Representation CS1120**

Keen to see the document encourage early 21 century approaches to promoting tree planting and green space in the urban environment-drawing on the fine tradition of contemporary solutions in this area, which was established by the Gidea Park Garden Suburb and Harold Hill Estate among others when they were first built.

**Council's recommended response- NO CHANGE**

Noted

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**Section/Policy**

A2A Biodiversity and geodiversity CP16

**ID**

586

**Consultee**

Bellways

**Representation CS1121**

Policy restricted by its focus on development and is undermined by not relating to wider policy across the Borough. Development alone will not provide and/or protect new or improved areas or biodiversity. Policy should relate/refer to a wider policy whereby it is clear what the role of development control policy in the context of wider policy is. Furthermore policy should also deal with and cover opportunities where there is small amount of loss where more and wider provision is ultimately made.

**Council's recommended response- CHANGE**

Scope of policy has been widened so that it now refers to maintaining and enhancing biodiversity throughout the borough. Policy and reasoned justification now includes reference to Thames Chase Action Plan, Havering Biodiversity Action Plan and London Riverside Conservation Park.

---

**Section/Policy**

A2A Biodiversity and geodiversity CP16

**ID**

857

**Consultee**

Essex Wildlife Trust

**Representation CS1122**

Fully endorses this policy

**Council's recommended response- NO CHANGE**

Support welcomed

---

**Section/Policy**

A2A Biodiversity and geodiversity **CP16**

**ID**

566

**Consultee**

Royal Society for the Protection of Birds

**Representation CS1123**

The RSPB supports the strategic policy A2A on Biodiversity and Geodiversity. This policy is important to protect and enhance the Borough's wildlife and natural heritage.

**Council's recommended response- NO CHANGE**

Support welcomed

---

**Section/Policy**

A2AA Protecting biodiversity and geodiversity **DC58**

**ID**

846

**Consultee**

Environment Agency

**Representation CS1125**

(Section 1.3) Add to first bullet point after proposals map 'or the blue ribbon network'.

**Council's recommended response- **CHANGE****

Reference to the blue Ribbon Network has been made to the policy and justification

---

**Section/Policy**

A2AA Protecting biodiversity and geodiversity **DC58**

**ID**

846

**Consultee**

## **Cabinet 9 October 2006**

Environment Agency

### **Representation CS1126**

Add Blue Ribbon to the proposals map

#### **Council's recommended response- CHANGE**

Blue Ribbon network is covered by Sites of Nature Conservation Importance and therefore Council it necessary to duplicate this designation.

---

#### **Section/Policy**

A2AA Protecting biodiversity and geodiversity DC58

#### **ID**

846

#### **Consultee**

Environment Agency

### **Representation CS1127**

Needs an additional bullet point to 'aim to protect rivers and their associated corridors'.

#### **Council's recommended response- CHANGE**

This additional bullet point has been added.

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#### **Section/Policy**

A2AA Protecting biodiversity and geodiversity DC58

#### **ID**

857

#### **Consultee**

Essex Wildlife Trust

### **Representation CS1128**

Fully endorses this policy, and pleased to see more detailed provided in SPD

#### **Council's recommended response- NO CHANGE**

Support welcomed

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#### **Section/Policy**

A2AA Protecting biodiversity and geodiversity DC58

#### **ID**

622

#### **Consultee**

Greater London Authority

**Representation CS1129**

The policy approach is generally supported. However, to be fully consistent with Policy 3D.12 of the London Plan, the first and fourth bullet points of Preferred Policy A2 AA should make it clear that planning permission for proposals which adversely affect important sites or species will only be granted if economic or social benefits of the proposals clearly outweigh the nature conservation importance of the site or species. Wording to this effect should be added before the reference to mitigation. Also, in the fourth bullet point, clarification is required that “the Biodiversity Action Plan” refers to both London and Havering BAPs.

**Council’s recommended response- CHANGE**

Policy wording has been altered accordingly and justification makes it clear that the London Biodiversity action Plan will also be referred to when implementing the policy

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**Section/Policy**

A2AA Protecting biodiversity and geodiversity DC58

**ID**

566

**Consultee**

Royal Society for the Protection of Birds

**Representation CS1130**

The RSPB would like to see the designations for proposals map relating to policy A2AA (referred to in paragraph 1.10) include separate national (Sites of Special Scientific Interest, SSSIs), and borough (Local Nature Reserves, local wildlife sites). This will make it clear to developers the different levels of protection afforded to the different classes of site.

**Council’s recommended response- CHANGE**

The proposals map will show the different designations relating to sites of nature conservation interest.

---

**Section/Policy**

A2AB Biodiversity in new developments DC59

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS1131**

## **Cabinet 9 October 2006**

BAP should be subject to EIP

### **Council's recommended response- NO CHANGE**

The Havering BAP has already been approved.

---

#### **Section/Policy**

A2AB Biodiversity in new developments DC59

#### **ID**

1040

#### **Consultee CS1132**

Barton Willmore representing Crest Nicholson

#### **Representation**

Planning obligations/contributions need to satisfy Circular 05/05

### **Council's recommended response- CHANGE**

Policy PO1 now makes it clear that any planning obligations/contributions will need to satisfy Circular 05/05

---

#### **Section/Policy**

A2AB Biodiversity in new developments DC59

#### **ID**

586

#### **Consultee**

Bellways

#### **Representation CS1133**

Needs to clarify that any improvements should relate to the site and be viable in terms of the overall scheme

### **Council's recommended response- CHANGE**

Policy PO1 now makes it clear that any planning obligations/contributions will need to satisfy Circular 05/05

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#### **Section/Policy**

A2AB Biodiversity in new developments DC59

#### **ID**

846

#### **Consultee**

Environment Agency

**Representation CS1134**

Largely support this policy, however biodiversity features that could be added to developments should be specified these should include, buffer zones to watercourses, native planning, swift nesting boxes, bird/bat boxes in SUDs, restoring natural river banks, deculverting rivers, green and brown roofs.

**Council's recommended response- CHANGE**

Policy reasoned justification now refers to these as examples of ways that developments can enhance their biodiversity.

---

**Section/Policy**

A2AB Biodiversity in new developments DC59

**ID**

857

**Consultee**

Essex Wildlife Trust

**Representation CS1135**

Fully endorses this policy, and appreciate reference to Havering's BAP when determining priorities for creating habitats in new developments.

**Council's recommended response- NO CHANGE**

Support welcomed

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**Section/Policy**

A2AB Biodiversity in new developments DC59

**ID**

622

**Consultee**

Greater London Authority

**Representation CS1136**

Preferred Policy A2 AB is broadly consistent with the London Plan, but it should also refer to protecting existing features of biodiversity interest, as such features may be found outside designated sites and species covered by Policy A2 AA.

**Council's recommended response- NO CHANGE**

Policy seeks to protect all priority species and habitats as identified in London and Havering Biodiversity Action Plans.

The Council does not consider it feasible to protect all existing features of biodiversity interest as this would place too high a burden on developers.

---

**Section/Policy**

A2AB Biodiversity in new developments **DC59**

**ID**

1226

**Consultee**

RPS representing Fairview New Homes

**Representation CS1137**

Should make clear that developer contributions towards biodiversity enhancements will be based on the need for such provision and should be applied on site by site basis. Contributions should only be sought where development creates a specific need for such enhancements e.g. the development involving a loss of biodiversity. Planning obligations relating to such types of provision should conform to the tests in Circular 05/05.

**Council's recommended response- **CHANGE****

It is not accepted that contributions towards biodiversity enhancements should only be made to compensate for a loss of biodiversity. Such contributions may be required to ensure that biodiversity forms an integral part of new developments. Policy PO1 now makes it clear that any planning obligations/contributions will need to satisfy Circular 05/05

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**Green Belt**

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**Section/Policy**

Omission

**ID**

622

**Consultee**

Greater London Authority

**Representation CS1138**

Metropolitan Open Land omission – The Council should consider, as part of the LDF process, whether there is any open land that meets the criteria for designation as MOL as set out in policy 3D.9 of the London Plan

**Council's recommended response **NO CHANGE****

It is not considered necessary to designate any land as Metropolitan Open Lane because of the extensive protection afforded by the Green Belt.

---

**Section/Policy**

A3AA Green Belt Boundary **CP14**

**ID**

NA

**Consultee**

1040 Members of the public.

**Representation CS1139-2178**

Object to the loss/re-designation of green belt, which contravenes the following policies of Havering's Unitary Development Plan:

STR1:

(2) To give a high priority to protecting and improving the environment

(4) To prevent inappropriate development in the Green belt

ENV1

Maintain Havering's existing open and spacious residential character.

Page 28 (67) states that the "The plan aims to ensure that Havering's character and environment are maintained and enhanced". Your plan to allow so many properties, many of them flats, will impact negatively on the quality of life of the Borough's residents.

**Council's recommended response NO CHANGE**

The Council has only proposed to alter the Green Belt boundary where it considers there are exceptional circumstances which justify this in line with PPG2.

---

**Section/Policy**

A3AA Green Belt Boundary-Rush Green Open Space **CP14**

**ID**

NA

**Consultee**

Rush Green Regeneration Group

**Representation CS2179**

At a packed public meeting (19/03/06) the residents of Rush Green voted 100% in opposition to the proposed removal of the Rush Green Open Space and allotments. Land at the moment is underused, but group will put forward proposals to the Council with the necessary documentation to keep the area within the Green Belt.

**Council's recommended response **CHANGE****

The Council proposes to keep this site within the Green Belt

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**Section/Policy**

A3AA Green Belt Boundary **CP14**

**ID**

66

**Consultee**

Countryside Agency

**Representation CS2180**

Support policy to define the Green Belt boundary so that it remains defensible and therefore helps to keep the land included open permanently, but this is contradicted by the removal of the five sites.

**Council's recommended response **CHANGE****

The Council is now proposing to remove five sites where the Council considers there are exceptional circumstances justifying their removal from the Green Belt, part of Mardyke Farm, Whitworth Centre, Tay Way and Part of Lot 7 Hornchurch Airfield.

---

**Section/Policy**

A3AA Green Belt Boundary **CP14**

**ID**

66

**Consultee**

Countryside Agency

**Representation CS2181**

With regard to Major Developed Sites referring to PPG2 Annex C given modern building techniques all efforts would be made to secure lower heights and smaller areas for these development lessening the impact and footprint of these developments. This is necessary to be consistent with Objective A2.

**Council's recommended response **NO CHANGE****

Policy makes it clear that the criteria set out in Annex C of PPG2 will apply. It would be unreasonable to impose stronger criteria than those set out in national policy.

---

**Section/Policy**

A3AA Green Belt Boundary **CP14**

Site to the east of Meadows Road

**ID**

608

**Consultee**

CGMS representing Higgins Homes

**Representation CS2182**

(Para 1.6) The site to the East of Meadowside Road does not fulfil the five purposes and therefore should be included in the sites to be removed from the Green Belt.

Site is on edge of existing settlement and surrounded to the south and east by a large swathe of green belt. Its removal will not have an adverse impact on the sprawl of the urban area, nor does the inclusion of the site play a significant part in preventing towns merging. Neither does purpose 3 apply as the site is of a poor quality. Furthermore the surrounding area is not a historic town. It is a sustainable location for development and development for housing would satisfy purpose 5.

(para 1.6) The land East of Meadowside Road should be removed from the GB for the purpose of providing residential accommodation with the option of retaining some land for a community forest. Its less prominent than other locations under consideration by the Council for removal.

**Council's recommended response NO CHANGE**

There is an existing well defined boundary between this site and the existing residential area to the west. The site performs a function in terms of 4 of the 5 purposes for including land in the Green belt as set out in PPG2. The only purpose not met is that relating to the preservation of the setting of an historic town – that is not surprising as the site is not located close to an historic town. The site should therefore be retained in the Green Belt.

---

**Section/Policy**

A3AA Green Belt Boundary **CP14**

Land to the rear of Pretoria Road and land to East side of Crown Farm

**ID**

860

**Consultee**

Cluttons representing the Crown Estate

**Representation CS2183**

It is considered that the GB role within the Dagenham Corridor is to check unrestricted sprawl, prevent neighbouring towns merging and to assist in safeguarding the countryside. However the GB has not been reviewed since its designation. Although there is a presumption for development on brownfield land there is a finite supply of such land and it may not be in the most sustainable location for residential development or deliverable. As it is a finite resource Greenfield land may need to be considered in the future. The release of the following sites will enable the Council to meet its targets and enable a number of benefits through S106 agreements. Following sites should be released from the GB or at least safeguarded for housing in the future particularly if a park and ride facility is provided in the locality.

Land to the rear of Pretoria Road

If mineral excavations commenced east of Crown Farm it is unlikely that this land will be economical to either extract from or remain in agricultural use. As there is adequate access to this area from Pretoria Road this site could provide for a natural extension to the existing urban area and provide much needed family accommodation.

**Council's recommended response NO CHANGE**

The Council considers that this site satisfies the purposes of including land in the GB and therefore should remain within it and that there are no exceptional circumstances justifying its removal. The Council is preparing a separate DPD to identify preferred areas of search for minerals in the interim the Core Strategy identifies areas of search for minerals extraction.

---

**Section/Policy**

A3AA Green Belt Boundary CP14  
West side of Crown Farm

**ID**

860

**Consultee**

Cluttons representing the Crown Estate

**Representation CS2184**

It is considered that this area could accommodate an expansion of the existing golf range to provide better facilities. This would result in a loss of underused and overgrown allotment land and land which is currently used for equestrian purposes. In conjunction with the proposed use the farm buildings should be considered as appropriate for ancillary uses.

**Council's recommended response NO CHANGE**

The Core Strategy and DC policies are sufficient to enable full consideration of such a proposal if a planning application was submitted.

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**Section/Policy**

A3AA Green Belt Boundary CP14  
Triangular area north of A12 and south of Marlborough Road

**ID**

860

**Consultee**

Cluttons representing the Crown Estate

**Representation CS2185**

Triangular area north of A12 and south of Marlborough Road-Remove from GB or safeguard for development further to the provision of a park and ride facility. Site is well located to existing community infrastructure and could take

advantage of park and ride if it was provided. Would be sustainable as it would not result in excess increase in car use.

**Council's recommended response NO CHANGE**

There is a very well defined boundary between this site and the residential area to the east. The Council considers that this site satisfies the purposes of including land in the GB and therefore should remain within it and that there are no exceptional circumstances justifying its removal. Re park and ride feasibility studies have not been completed and it would therefore be premature to allocate specific sites.

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**Section/Policy**

A3AA Green Belt Boundary **CP14**

Gobions Farm-south of Colliers Row Road and east of White Hart Lane

**ID**

860

**Consultee**

Cluttons representing the Crown Estate

**Representation CS2186**

Gobions Farm-south of Colliers Row Road and east of White Hart Lane. Could accommodate development without significant impact to boroughs open and green character as it is effectively brownfield land, located within walking distance of Collier Row centre and therefore a sustainable location for future residential development.

**Council's recommended response NO CHANGE**

The Council considers that this site satisfies the purposes of including land in the GB and therefore should remain within it and that there are no exceptional circumstances justifying its removal.

---

**Section/Policy**

A3AA Green Belt Boundary **CP14**

Triangular area north of Colliers Row Road and south of Hog Hill Road

**ID**

860

**Consultee**

Cluttons representing the Crown Estate

**Representation CS2187**

Triangular area north of Colliers Row Road and south of Hog Hill Road. Sustainable location for residential development, within walking distance to Collier Row centre. Could accommodate development without significant impact to the Borough's green and open character and it would ensure that

there is no additional development pressure on the surrounding countryside and green belt.

**Council's recommended response NO CHANGE**

The Council considers that this site satisfies the purposes of including land in the GB and therefore should remain within it and that there are no exceptional circumstances justifying its removal.

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**Section/Policy**

A3AA Green Belt Boundary **CP14**

Triangular area north of Colliers Row Road and south of Hog Hill Road

**ID**

860

**Consultee CS2188**

Cluttons representing the Crown Estate

**Representation**

Remaining GB land will check unrestricted sprawl and prevent neighbouring towns from merging hence the release of the above mentioned sites would not compromise these fundamental green belt roles. Development of these sites will allow for the opportunity to improve access to the countryside whilst ensuring the countryside future is protected. This is likely to be achievable as this part of the corridor is under one ownership. Would allow for the improvement of remaining GB in terms of its quality, environment accessibility and defensibility and assist in urban regeneration in the locality. Would also help improve recreational facilities. Developments could help provide funding for better access to open space and an improved and safer environment.

**Council's recommended response NO CHANGE**

Please see response to Green Belt sites put forward by Cluttons representing the Crown Estate

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**Section/Policy**

A3AA Green Belt Boundary **CP14**

Site at South End Road Rainham known as South Hall Farm

**ID**

571

**Consultee**

CEMEX UK

**Representation CS2189**

Site at South End Road Rainham known as South Hall Farm has potential to meet Borough's housing requirement within the plan period or beyond. In this location designation as Thames Chase Community Forest does not make a

significant contribution to the forest as a whole. Site is convenient for primary and secondary schools, employment areas and is in good proximity to public transport including Rainham Station. This makes it advantageous in helping to sequentially meet long term housing need. This would meet two of the Governments objectives in PPG3 concerning sustainability and car dependence set out in paragraph 2 of PPG3. Therefore substantial portion of the northern end of the site can help meet the borough's housing need.

Site at South Hall Farm can help meet housing targets and therefore should be removed from the GB, therefore A3AA should identify a range of sites in a variety of location suitable for a mix of housing types to reflect the tests of soundness in PPS12. This site would meet the aims of Strategic Policy H1-H3A. Moreover the inclusion of this site in the GB is not justified with regard to the GB purposes. There are existing restrictions around the site which would present unrestricted sprawl including major roads forest marshland and the river. To the east of Rainham the nearest settlements are Wennington and Aveley a significant distance away development of this site would not cause settlements to merge. The existing restrictions around the site would safeguard the countryside from further encroachment. Development on the edge of Rainham will not affect the setting or special character of the town. Government recognises that not all future housing demand can be met on brownfield sites, and this will help accommodate the significant increase in housing demand in the Thames Gateway area, complimenting existing brownfield allocations and ensure that a variety of site for a variety of types and sizes of housing would be possible in highly sustainable locations.

**Council's recommended response NO CHANGE**

The Council considers that this site satisfies the purposes of including land in the GB and therefore should remain within it and that there are no exceptional circumstances justifying its removal. The GLA Housing Capacity Study and London Plan has set housing targets on the basis that Green Belt remains protected. There is therefore no need to release Green Belt sites to meet the targets set out in the London Plan.

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**Section/Policy**

A3AA Green Belt Boundary CP14

**ID**

680

**Consultee**

Government Office for London

**Representation CS2190**

(para 1.7) Should say defined not allocated as CS cannot allocate sites and wording should comply with Annex C of PPG2 where it is made clear that the sites remain in the GB and the definition of their boundaries simply show the land to which the provisions of Annex C applies. Also there is no explanation

of how each site complies with the criteria for definition as MDSs. Maps are provided but there is no indication of other uses.

**Council's recommended response** **CHANGE**

Allocated has been changed to identified.

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**Section/Policy**

A3AA Green Belt Boundary **CP14**

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2191**

There should be a reference to the Green Arc within the relevant Green Belt policy.

**Council's recommended response** **CHANGE**

Reference made to Green Arc within CP7 Recreation and Leisure

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**Section/Policy**

A3AA Green Belt Boundary **CP14**

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2192**

The Preferred Policy should promote the positive roles of the land in fulfilling the objectives stated in paragraph 1.6 of PPG2. The aim of improving the quality of the landscape and accessibility to the countryside around London should be added. The Green Arc partnership is actively seeking to achieve these aims in this quadrant of London and Essex and the policy should support the aims and vision of the partnership. The active participation of the borough in the Green Arc partnership would be welcomed.

**Council's recommended response** **CHANGE**

Policy now promotes the positive roles of the land in fulfilling the objectives stated in para 1.6 of PPG2. The Green Arc is dealt with in the policies on recreation

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**Section/Policy**

A3AA Green Belt Boundary **CP14**

**ID**

622

**Consultee**

Greater London Authority-Whitworth Centre

**Representation CS2193**

Any proposal to remove land from the Green Belt needs to demonstrate the exceptional circumstances as set out in paragraph 2.6 of PPG2. The justification for the deletion of the Green Belt from the following sites needs to be demonstrated.

Whitworth Centre - the large playing field appears to be important. The site does not appear to be substantially different to the many other education sites in the Green Belt.

**Council's recommended response NO CHANGE**

The Council is now proposing to remove four sites from the Green Belt, Tay Way and Part of Lot 7 Hornchurch Airfield, Whitworth Centre and part of Mardyke Farm where the Council considers there are exceptional circumstances justifying their removal.

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**Section/Policy**

A3AA Green Belt Boundary CP14

Lot 7

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2194**

Lot 7 - appears partly developed, but judging by OS base, the proposed boundary appears to be drawn very generously around the site. Rather than removing from the Green Belt, the boundary should be drawn more tightly, unless there is an extant permission for further development.

**Council's recommended response NO CHANGE**

The boundary has been drawn around the developed area

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**Section/Policy**

A3AA Green Belt Boundary CP14

Spring Farm Car Park

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2195**

Spring Farm Car Park – if this is a car park for the open space users it should not be removed as it is ancillary to the open space land use.

**Council's recommended response **CHANGE****

The Council proposes to now keep this land within the Green Belt

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**Section/Policy**

A3AA Green Belt Boundary **CP14**

Rush Green Open Space and Allotments

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2196**

Rush Green Open Space and Allotments – the site scores well in the assessment and should not be deleted.

**Council's recommended response **CHANGE****

The Council proposes to now keep this land within the Green Belt

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**Section/Policy**

A3AA Green Belt Boundary **CP14**

Mardyke Farm

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2197**

It is understood, although not specified in the Preferred Options at this stage, that the Council may be considering development proposals on the Mardyke waste site, which would involve the loss of Green Belt land. The Mayor considered a separate report on this matter in November 2005 (ref:PDU/1297/01). The Council will need to take into account the Mayor's views on this matter, as set out in the November report, should it take forward any proposals for this site at the Submissions Stage.

**Council's recommended response **NO CHANGE****

Noted

**Section/Policy**

A3AA Green Belt Boundary CP14

**ID**

563

**Consultee**

Highways Agency

**Representation CS2198**

The preferred option is to allocate the Broxhill Centre and the cardrome as Major developed sites within the green belt. The St Georges Hospital site has been previously allocated as a development location within the UDP. The HA expects local planning authorities to assess the impact on the trunk network of greenbelt growth options. The agency would expect to see transport assessments to confirm the deliverability of these sites within the LDF process. Depending upon the severity of the issues identified transport modelling may be useful, or indeed necessary, within the LDF process. We would expect to see emerging policies to minimise demand at source and require the mitigation of trunks road impacts throughout all stages of development planning, implementation and operation.

This is a particularly relevant to green belt areas, as an alternative transport choices tend to be limited, meaning that levels of reliance on the private car can be much higher than in urban centres. Although the HA recognises that new transport hubs could be developed over time would facilitate the use of non-car modes and provide opportunities to reduce the need to travel as well as the length of journeys, this process is likely to require very substantial investment.

**Council's recommended response**

Policy DC33 requires for development with significant transport implications the submission of a Transport Assessment in line with the guidance in PPG13

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**Section/Policy**

A3AA Green Belt Boundary CP14

Land adjacent to Lodge Care Home

**ID**

1369

**Consultee**

Iceni projects

**Representation CS2199**

(Para 1.6) Supports sustainable communities approach set out in section 5 para 5.5 but objects to its application. Present approach would lead to

unsustainable patterns of development that fail to provide the quality of housing and facilities required for the increased elderly population (over 85s) in the borough. Despite recognising all the issues involved and the critical need to plan for an aging population the CS then fails to make the required and appropriate spatial planning provision to improve and expand the specialist facilities in the borough. Paras 5.12, 5.37, 5.38, 5.89, 5.99 and 5.100 are all significant in this regard. Land at Fritton Road should be removed from the GB to provide a Sustainable Retirement Complex. It is recognised in Para 5.100 of the Core Strategy that care facilities find it difficult to compete with general housing in finding sites for their schemes. NPL have a site that they are committed to developing solely for interconnected housing and community facilities for the elderly and infirm but prevented by the current approach in the CS. Identification of the subject land in the CS would be consistent with the adopted Sustainable Communities approach set out in para 5.68 for the following reasons.

It would make a positive contribution to promoting sustainable and inclusive patterns of development. Existing Lodge Care Home is severed from shops and services and is poorly located in terms of proximity to existing centres as such the residents do not have the quality of life and accessibility that the sustainable communities approach demands and are geographically disadvantaged. Existing care homes does not have on site community provision that would be provided as part of an extended facility to the elderly and infirm. Accordingly strategy of reducing need to travel will be supported by this approach. This facility would address identified borough issues such as the provision of specialist housing for an aging population and improving accessibility to services for the elderly. This will be achieved in a more sustainable way than the existing approach which would result in elderly and infirm residents being forced to live in more general residential accommodation. The development will enable existing residential accommodation in the borough presently occupied by elderly and infirm residents to be released and reused.

There are other community facilities in the GB already in this location this proposal would not compromise the GB objectives in this location and would enable the existing facility in the GB to function more sustainably.

**Council's recommended response NO CHANGE**

See site response to Site Specific Allocation put forward by Forge Developments

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**Section/Policy**

A3AA Green Belt Boundary CP14  
178,188,188a Crow Lane

**ID**

839

**Consultee**

## **Cabinet 9 October 2006**

John Newton Associates

### **Representation CS2200**

Wishes 178,188,188a Crow Lane Romford to be taken out of the Green Belt.

### **Council's recommended response NO CHANGE**

Site not included for release from Green Belt because it meets the purposes of including land in the Green Belt.

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### **Section/Policy**

A3AA Green Belt Boundary **CP14**

Havering College, Quarles Campus, Tring Gardens

### **ID**

839

### **Consultee**

John Newton Associates

### **Representation**

Wishes Havering College, Quarles Campus, Tring Gardens, Harold Hill to be taken out of the Green Belt

### **Council's recommended response NO CHANGE**

The Council considers that this site satisfies the purposes of including land in the GB and therefore should remain within it and that there are no exceptional circumstances justifying its removal. Please note a separate representation has been received from Havering College represented by GVA Grimley for the site to be allocated as a Major Developed Site in the Green Belt.

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### **Section/Policy**

A3AA Green Belt Boundary **CP14**

Havering College, Quarles Campus, Tring Gardens

### **ID**

1371

### **Consultee**

Rapleys representing Trinity Hall

### **Representation CS2201**

In accordance with the purpose of defining the GB boundary as set out in paragraph 1.1 of Objective 3 believe that Chapman Farm site must form part of that due consideration. Request the evaluation of suitable land uses for this site in accordance with the principles of PPG2 as part of this process.

### **Council's recommended response NO CHANGE**

The Council considers that this site satisfies the purposes of including land in the GB and therefore should remain within it and that there are no exceptional circumstances justifying its removal.

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**Section/Policy**

A3AA Green Belt Boundary CP14

Cardrome

**ID**

902

**Consultee**

Turley Associates representing the Cardrome

**Representation CS2202**

(Para 1.7 and 1.13) Support proposed designation as a Major Developed Site believe the site's characteristics merit further consideration for release. The site does not meet all of the purpose of the GB identified in para 1,5 of PPG2.

1. The boundary of Greater London beyond Upminster is approximately 5 km to the east of this narrow north-south strip of GB which is enclosed by urban development. The key role of preventing London from sprawling further into Essex is unlikely to be affected by the release of this site.
2. Whilst this wider section of the GB has a role to play in preventing coalescence of Dagenham and Hornchurch there is sufficient width of GB beyond the site (towards Dagenham to the east) to prevent merging of these areas in the event the Cardrome is removed from the GB. The remaining GB would maintain a significant and appropriate openness in the area.
3. This site constitutes an operational use with tarmac roads set out across its entirety and significant development to its eastern boundary. Coupled with major development (residential) to the immediate north of the site, and question whether release of the site would actually lead to encroachment into the countryside.
4. The site in no way preserves the setting and special character of any historic town and this should not be considered a reason for sustaining the designation.
5. Role the Cardrome site can play in assisting regeneration is questionable.

Boundary of this section of GB is considered irregular. Significant residential development to the north renders the western boundary irregular in the context of urban development in the immediate area. Release of the site would facilitate a more logical GB boundary reflective of the key features of the surroundings namely the Beam River, Upper Rainham Road and Turner

Road residential development. Boundary change would in no way result in the merging of Hornchurch and Dagenham.

Existing lawful use on the site may be considered non-conforming with GB designation, collectively or individually. Release of the site could either effectively relocate these use out of the GB or allow for redevelopment more suited to a site adjacent to the GB. Site should be considered for full release and inclusion within the built-up boundary.

**Council's recommended response NO CHANGE**

As a large part of the site is in an open use with no buildings it currently meets the purposes of including land in the Green Belt. The sites designation as a Major Developed Site will ensure that large parts of the site remain open and the continuation of the Green Belt function.

1. The site helps prevent Hornchurch sprawling into Dagenham.
2. Very few sites can be said individually to prevent coalescence. However this site represents a significant piece of Green Belt in an area where the width of the Green Belt is particularly narrow. PPG2 para 2.9 states that, 'wherever practicable a Green Belt should be several miles wide, so as to ensure an appreciable open zone all round the built-up area concerned.' Its loss therefore would have a significant impact on this function particularly with regard to its visual impact on the Eastbrook End Country Park.
3. PPG2 is clear at paragraph 1.7 that the quality of the landscape is not relevant to the inclusion of land within a Green Belt or to its continued protection.
4. Agreed
5. GLA's Housing Capacity Study excluded supply from GB sites and therefore releasing this site for housing would not encourage the development of the major brownfield sites on which Havering's future housing provision target is based.

Rainham Road from the Cardrome to just past Ford Lane forms the eastern boundary of the GB. For no significant length does the River Beam form the boundary to the GB.

PPG2 is clear at paragraph 1.7 that the quality of the landscape is not relevant to the inclusion of land within a Green Belt or to its continued protection.

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**Section/Policy**

A3AA Green Belt Boundary **CP14**

Cardrome

**ID**

NA

**Consultee**

15 members of the public

**Representation CS2203-CS2217**

I refer to your consultation regarding the above and fully support the proposal put forward by the owners of the Cardrome to redevelop the site. I strongly agree that the site should be removed from the greenbelt. I understand that as part of the second stage of consultation that the Council has designated some sites including this one as 'major developed site in the green belt' but this is not enough to secure the essential redevelopment of this site.

The Council officers and elected members must support the owners and work with them to make sure that the businesses and employers are able to move to new appropriate premises elsewhere and the existing site redeveloped.

The existing Cardrome is bounded on two sites by private housing and is separated from the Chase by the river and a skate park. We have ample good quality parkland and access to The Chase and greenbelt in this area. What the area needs is more housing on sites such as the Cardrome which is already developed but for inappropriate uses in a residential area. The Cardrome site should be designated as a brownfield site if this supports its redevelopment.

I do not agree with the Council that the Cardrome meets the criteria for inclusion in the green belt, as it does not have any open space, environmental or heritage value, or any biodiversity/sustainability benefits. It is a bad neighbour use and contributes negatively in terms of noise, light pollution, carbon monoxide levels and general air pollution due to the types of businesses and numbers of car concentrated in the one area.

I agree that the Cardrome would be better zoned for new housing that would be available for thousands of people wishing to live in this area and recommend that the Council formally designate the site as brownfield suitable for redevelopment or for housing.

**Council's recommended response NO CHANGE**

See response to Turley Associates representing the Cardrome

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**Section/Policy**

A3AA Green Belt Boundary CP14

Part of Mardyke Farm

**ID**

1002

**Consultee**

Hepher Dixon representing Barratts Homes

**Representation CS2218**

The Mardyke development requires some land to be released from the GB. PPG2 indicates that GB boundaries should be reviewed only exceptionally, in effect where the same very special circumstances apply that would otherwise be needed to justify inappropriate development within the GB. In this case the need to remove land from the GB arises for a series of locationally specific reasons (to enable the Mardyke Estate to be regenerated as part of a sustainable new mixed community; to enable the remediation of the Mardyke Farm Waste site; to enable a new park to be created and maintained in perpetuity; and to enable the Dagenham Corridor to be reconnected).

All of the benefits secured by removing land from the GB are desirable in the public interest. They are all consistent with relevant Government and Planning Policy. Most of the development, in terms of and take is appropriate development for the purposes of GB policy; and is development that would directly contribute to the Government's objectives for the use of land within the GB.

None of the benefits secured by the development could be secured otherwise. Whilst a more limited estate renewal scheme could be undertaken with the benefit of £15-18 m of ODPM 'gap funding', a scheme of the scale and character envisaged by the master plan is only possible if the masterplan proposals proceed. There is no prospect of public funding for the development of a new park of the scale and character proposed in the master plan.

The masterplan is conceived on the basis that the amount of land to be taken out of the GB for development is the minimum needed to secure the benefits in a coherent, well-planned fashion.

The GB retained as part of the masterplan will be functionally more effective and more valuable in amenity terms. It will be safeguarded against development in the long term because of its status as a public park with its own management and maintenance endowment.

These are exceptional circumstances. They are very special circumstances that are sufficient to justify a decision by London Borough of Havering to modify the GB boundary and make a site specific allocations to enable the master plan proposals to proceed.

Individually the very special circumstances identified above would not be sufficient to outweigh the harm caused to the GB. However when these circumstances are considered together the benefits derived clearly outweigh any harm caused. The circumstances surrounding the masterplan scheme are therefore 'very special' and 'exceptional' within the meaning of those terms by PPG2.

**Council's recommended response** **CHANGE**

The Council considers that there are exceptional circumstances justifying the removal of part of the Mardyke Farm site from the Green Belt more detail is provided in CP14.

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**Section/Policy**

A3AA Green Belt Boundary **CP14**

Gallows Corner Car Wash Site

**ID**

605

**Consultee**

Andrew Martin Associates (response carried forward from issues stage)

**Representation CS2219**

Existing car wash site Gallows Corner. This minor amendment will facilitate development of this gateway site and will enable a new and safe access to be provided.

**Council's recommended response NO CHANGE**

Whilst the site is currently used for a car wash it does together with the adjoining land mark the boundary of the Green belt to the west of Gallows Corner

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**Section/Policy**

A3AA Green Belt Boundary **CP14**

Land north of Cranham occupied by Cranham Caravans

**ID**

605

**Consultee**

Andrew Martin Associates (response carried forward from issues stage)

**Representation CS2220**

Land north of Cranham occupied by Cranham Caravans should be removed from Greenbelt. A large proportion of the site is hardstanding in addition there a number of buildings on site including sales office, service bays and a leisure shop. The site does not fulfil any Green Belt function. The site does not constitute open land in view of the fact that it has extensive areas of hardstanding upon which caravans are sited together with a number of other buildings. Its continued inclusion within the Green Belt is not therefore urban sprawl since there has already been significant built development on the site which has indeed been present for a number of years. Therefore the site pays no contribution to the function of the Green Belt and the boundary should be amended accordingly.

**Council's recommended response NO CHANGE**

The Council considers that this site satisfies the purposes of including land in the GB and therefore should remain within it and that there are no exceptional circumstances justifying its removal.

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**Section/Policy**

A3AA Green Belt Boundary CP14  
Land South of St Mary's Lane

**ID**

898

**Consultee**

Denis Tyson Associates

**Representation CS2221**

Planning approval was granted on the site for the use of a substantial metal framed building to be used for storage distribution purposes. Use class B8.

This use of the site fits unhappily into the location. Active full use of the building would create a major degeneration of the environment and amenity.

The site is within a conservation area the re introduction of storage and distribution use would indeed harm the character of the conservation area

A residential village development on the site would provide an attractive environmental development removing the harm that will obviously arise from full use of the site for storage and distribution.

The suggest land should be so developed and released from the green belt, one of the building was recently damaged by fire. Planning approval has been granted to relocate that building within the site.

The owner of the site has been aware of the representations being made and the Council's review of the UDP. Their belief is that good planning for the area would involve releasing the land from the green belt and therefore the fire damaged building has not been repaired or replaced.

It is a statement of fact that the owners of the site will seek to maximise their return from the site and if not released for residential development in line with these representation then naturally the site will be developed with the planning approval granted in this case on active storage and distribution centre. Use class B8.

There is further gain to be made by the release of the land by relocating the Chase around the site or through a development of the site to remove the dangerous accident junction of The Chase with St Mary's Lane close to the railway bridge.

The advantages in summary are as follows

1. The site has no beneficial use at present other than for storage and distribution
2. Active use of the site for storage and distribution will detrimentally effect the amenities of residents nearby and harm the character of the conservation area
3. Redevelopment of the site can solve the access problem of The Chase with St Mary's Lane bringing a much safer junction for use and access to the Chase and in particular the church and dwellings that front the Chase
4. The site would provide substantial housing gain to meet housing targets. The development will also provide a high proportion of affordable homes.

**Council's recommended response NO CHANGE**

The Council considers that this site satisfies the purposes of including land in the GB and therefore should remain within it and that there are no exceptional circumstances justifying its removal.

Whilst there is one building on the site the majority of the site remains open and contributes to the open nature of the Green Belt. The GLA Housing Capacity Study and London Plan has set housing targets on the basis that Green Belt remains protected. There is therefore no need to release Green Belt sites to meet the targets set out in the London Plan.

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**Section/Policy**

A3AA Green Belt Boundary **CP14**

Land to South of Little Gaynes Lane

**ID**

898

**Consultee CS2222**

Denis Tyson Associates(response carried forward from issues stage)

**Representation**

Urban fringe areas within the GB could be developed for residential purposes causing no harm to GB character and openness. In line with this suggest specifically the area south of Little Gaynes Lane at the junction with Hacton Lane, for exclusion from the GB. It would provide much needed housing without affecting the green and open character of GB or cause loss of agricultural land nor reduce leisure opportunities for the residents of the borough.

**Council's recommended response NO CHANGE**

The Council considers that this site satisfies the purposes of including land in the GB and therefore should remain within it and that there are no exceptional circumstances justifying its removal.

It is not unusual for existing residential properties especially when they are low density to remain in the Green Belt. The site has many trees which lessens considerably the visual impact of the dwellings on the Green Belt. The GLA Housing Capacity Study and London Plan has set housing targets on the

basis that Green Belt remains protected There is therefore no need to release Green Belt sites to meet the targets set out in the London Plan.

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**Section/Policy**

A3AA Green Belt Boundary **CP14**

Land north side of Crow Lane to the east of Ahern site 208 and 198

**ID**

898

**Consultee**

Denis Tyson Associates (response carried forward from issues stage)

**Representation CS2223**

Land north side of Crow Lane to the east of Ahern site 208 and 198. In the late 1970's the GB boundary was reviewed and the Ahern site and other commercial sites to the west were allocated for residential development. Fairview development has been built since and understand that Aherns are pursuing a residential development of their site at this time. The area would be better served by a development of the site for residential purposes provided much needed housing as recommended in PPG3 and enhancing the environment.

**Council's recommended response NO CHANGE**

The Council considers that this site satisfies the purposes of including land in the GB and therefore should remain within it and that there are no exceptional circumstances justifying its removal.

The GLA Housing Capacity Study and London Plan has set housing targets on the basis that Green Belt remains protected There is therefore no need to release Green Belt sites to meet the targets set out in the London Plan.

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**Section/Policy**

A3AA Green Belt Boundary **CP14**

Land at Park Farm and Meadow Farm north of the A12

**ID**

1245

**Consultee**

Savvas Christodoulou

**Representation CS2224**

Developing Havering's Future' seeks comments and suggestions on a variety of issues to help establish Havering's future Development Framework.

Include, amongst other matters is the criteria, 'Maintaining and Enhancing Havering's Environment', which concerns the future protection, improvement and quality of the Borough's open spaces.

A separate consultation document of Havering's Walking Strategy is promoted on a set of objectives, namely:

1. To maintain a high quality walking environment.
2. To improve the pedestrian environment
3. To promote safety, security and interaction
4. To promote walking and walking for leisure

A series of targets are proposed to support these objectives in particular:

Target 5: Seeking to reduce physical barriers within an initial project within Harold Hill (para 3.2)

Target 7: Seeking to ensure pedestrian needs are taken into account up to 2010 within the LDF planning policy document.

Target 8: Seeking to deliver highway improvement schemes beneficial to walking, each year up to 2010.

The following proposal seeks to help in addressing these complementary aims in a cost effective manner through the provision of a linear park along the northern boundary of the A12, shortly west of Gallows Corner, funded through a modest expansion of the Harold Hill residential development.

Gallows Corner is a major focal point for traffic within the Borough. The A12 effectively separates the Harold Hill estate from the remainder of the Borough, along with its shopping and leisure facilities. Pedestrian links and generally unattractive and inconvenient.

Such movement would be materially enhanced along with the environment, if the barriers to pedestrian movement across the open spaces along the northern flank of the A127 could be removed and a linear park created

The Council owns the public golf course. It has the opportunity to form a modest green corridor there, accessible to the public through the Council owned former play area site to the East, which suffered excessive vandalism in the past. Further east, the Old Libertians playing field is separated from the play area by the remaining plots of two former farms (Park Farm and Meadow Farm).

A car park is currently under construction by the playing fields and a right of way along the perimeter of that site could link to pedestrian routes further to the west, if part of the two former farm plots could be set out as an integral element of a proposed linear park. This would remove all pedestrian barriers for approximately 1 mile west of Gallows Corner.

To encourage the owners of Park Farm and Meadow Farm to release the necessary land, it is proposed to re-designate the remainder of those two sites for residential development. Planning permission for subsequent development could require a suitable planning obligation to help fund the setting out of the linear park.

Although this would involve modest change to the green belt boundary, it would support each of the objectives in Havering's Draft Walking Strategy and go some way to meeting targets 5,7 and 8. It would improve the open environment and make it more accessible, helping to maintain and improve the quality of Havering's green belt at a prominent location.

**Council's recommended response NO CHANGE**

The Council considers that this site satisfies the purposes of including land in the GB and therefore should remain within it and that there are no exceptional circumstances justifying its removal.

The GLA Housing Capacity Study and London Plan has set housing targets on the basis that Green Belt remains protected There is therefore no need to release Green Belt sites to meet the targets set out in the London Plan

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**Section/Policy**

A3AA Green Belt Boundary **CP14**  
Shepherds Hill

**ID**

1016

**Consultee**

Stephen Hayhurst (carried forward from issues stage)

**Representation CS2225**

Shepherds Hill. Exclusion of this site from the GB would not weaken but tighten the protection afforded to the open farmland to the north and south of the settlement. It is in a rough condition with some run down buildings on it and does not make a valuable contribution to GB objectives. Need to re-examine carefully the GB status of the Shepherds Hill area and question whether it is necessary to give the land the continued protection afforded by the GB designation or whether it would be preferable to realise the sustainable development opportunities it presents.

**Council's recommended response NO CHANGE**

The Council considers that this site satisfies the purposes of including land in the GB and therefore should remain within it and that there are no exceptional circumstances justifying its removal.

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**Section/Policy**

A3AA Green Belt Boundary **CP14**  
St George's Hospital

**ID**

890

**Consultee**

Havering NHS Primary Care Trust

**Representation CS2226**

In addition to those sites listed in Section 9 Objective 3 policy A3AA, St George's Hospital should also be removed from the GB for the reasons set out in original submission. In support of paragraph 5.135 and paragraph 8.2 the hospital site presents a significant opportunity for new housing capacity and thus should be reallocated for residential use.

**Council's recommended response NO CHANGE**

The Council considers that this site satisfies the purposes of including land in the GB and therefore should remain within it and that there are no exceptional circumstances justifying its removal.

However it has been included as a Major Developed Site.

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**Section/Policy**

A3AA Green Belt Boundary **CP14**

Quarles Campus, Tring Gardens

**ID**

1372

**Consultee**

GVA Grimley representing Havering College

**Representation CS2227**

Is one of three main campuses for Havering College. In August 2006 the College will reduce from 3 main sites to two following the closure of the Harrow Lodge site in Hornchurch and the relocation of the student population to the new Centre for the Creative Arts at the main Campus at Ardleigh Green. The use of the College Land and property assets is under constant review. It is likely that the land and property asset requirements of the college will be subject to continual change over the LDF plan period.

Changing requirements and demands will mean that the College's Estate Strategy will have to be adaptable to ensure that it can deliver its educational objectives. This is important for the future of educational provision within the borough. Quarles campus currently forms an integral part of the College's wider operational educational portfolio. As such planning policies need to provide sufficient adaptability and room for the college to operate the Campus in the future.

Existing and emerging planning policy as it stands protects and encourages education activities on the site. It remains important that the College's essential educational operative activities are protected, if and until the site becomes surplus to operational requirements. However the existing planning policy is inflexible. The Green Belt, environmental and open space designations combine to provide a policy 'landscape' that will increasingly impinge upon the College's abilities to adapt to its changing educational operational requirements.

It is important that planning policy governing Quarles Campus allows flexibility for the College to be able to respond to changing land and property asset requirements so that it can deliver its educational objectives within the Borough.

However changing educational operational demands may mean that Quarles Campus becomes surplus to requirements in the lifetime of the plan. In this instance it is important that the future of the site is positively planned for. Designation of the site as an MDS would represent a mature planning policy that would provide the Council and the College with the flexibility to deal with the site in the future.

Designation as an MDSA would allow the future of the site to be positively planned for should it become surplus to requirements. This in turn will facilitate future enhancements in the wider educational offer provided by the College in Havering.

It is recommended that a site-allocation and supporting policy is inserted into the LDF Development Plan Documents that identifies Quarles Campus as a MDS in the Green Belt so that the College can manage its land and property assets in accordance with its future educational operational requirements.

**Council's recommended response **CHANGE****

Quarles Campus now designated as Major Developed Site in the Green Belt

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**Section/Policy**

A3AA Green Belt Boundary **CP14**  
Land East of Wingletye Lane

**ID**

898

**Consultee**

Denis Tyson Associates (carried forward from issues stage)

**Representation CS2228**

The following are comments on the council's own assessment of need and the options to provide for housing set out in the consultation on review of the Havering Unitary Development Plan.

When addressing housing provision the council's issue paper refers to the current estimate of 5,550 additional dwellings that will be provided between 1992 and 2006. Whilst this provision may be made within existing policies and proposals there is clearly doubt that more than 5,550 dwellings can be provided without changing other policies in order to identify land which could provide additional housing.

It seems highly probably if not inevitable, that further housing land would need to be identified to meet the increasing need for further housing.

Council's options to provide further housing

The first option in the issues paper is the 'building housing in the Green Belt'

The stated downside of this approach is stated as follows upon which we comment.

Government's Policy PPG2 of paragraph 2.6 deals with "defining boundaries". Whilst there is a presumption against altering Green Belt boundaries such alterations are allowed for in exceptional circumstances. What the London Borough Of Havering would need to do is to be able to satisfy the Secretary of State " that the authority has considered opportunities for development within the open areas contained by and beyond the Green Belt". We believe that the London Borough Of Havering would need to come to such a view and look for

- fringe urbanised Green Belt areas that can meet housing need without materially harming the openness and character of Green Belt, and/or.
- A major release of land to maximise the planning gain opportunities for e.g. leisure, Green Belt enhancement affordable housing.

Development of the Green Belt would see erosion of Havering's green and open character and the loss of agricultural land and leisure opportunities to the residents of the borough.

There are pockets of land on the urban fringe that can be developed without affecting the "green and open character of the green belt".

There are areas in the Green Belt of an urban and residential and business character that could be released for residential development not only not affecting the green and open character, but also of course not taking away agricultural land and leisure opportunities as they at present make no contribution to agriculture or leisure.

In addition, the release of a major site at present in one ownership provides and opportunity to provide leisure facilities and through public ownership(provided as part of planning gain) ensure future defence and positive use of the newly created urban fringe area.

The council are concerned that a precedent could be set and be difficult to resist further such development.

As long as the review is carried out as part of a comprehensive review of the whole of the Green Belt boundary against the background of specific housing need the adjusted Green Belt boundary that would result would have a "statutory basis" and be subsequently defensible from attack. Precedent would and should any problem.

## Alternative approaches to releasing land from the Green Belt

The alternatives identified in the council's issue paper of building on parks, allotments and school playing fields must, we submit, be the last and least attractive option having the most effect on the quality of the local environment.

Such an approach would seriously damage the existing quality of the urban environment.

We submit that the much preferred option to meet that housing need that cannot be met within the existing policies is the careful selection of Green Belt land not just to meet that need, but also provide other planning benefits. On the basis we make the following proposals in respect of the subject of these representations.

## Summary of issues regarding housing provision

1. There seems an ever increasing probability that all councils including London Boroughs, will be asked to maximise the opportunities for further housing provision irrespective of historic targets that have been set.
2. It is in the interests of the community that the further housing is provided to enable the existing resident community aspirations to be met.
3. Building in the Green Belt if handled correctly through the release of the appropriate land need not lead to the loss of Havering's green and open character, nor to leisure opportunities. Indeed the release of land in sufficiently large areas can increase the leisure opportunities and provide other public benefits such as affordable housing, through partnership with the council. Benefits of which public funds may not be available.
4. With regard to setting a precedent if the review of the Green Belt boundaries is tackled in comprehensive way, the boundary could be more logical and therefore stronger.
5. To provide the housing needed within the existing urban area will result in "Town Cramming" to the serious detriment of the amenities of existing residential areas. In terms of quality of life selective release of Green Belt areas is to be preferred as in addition other benefits referred to above can be achieved.

## The Proposals-Release of land from the Green Belt

The land lies to the east of Wingletye Lane immediately to rear of properties fronting Wingletye Lane.

The release of this land for residential development would be of sufficient size to achieve the following:

## **Cabinet 9 October 2006**

1. The provision of some open space to serve the new area the adjoining area as may be required.
2. A sufficiently substantial area for development to provide affordable housing. We note in the council's assessment of housing provision issues there is great need to provide additional affordable homes by the year 2000. The release of this land would be a substantial contribution to be made to that target.
3. Footpath access through this area to the Green Belt To the west linking with existing footpaths and thereby improving access to existing residents.

We therefore commend this proposal to the council as a preferred option to meet future housing targets that cannot be met within the existing Unitary Development Plan Policies.

### **Council's recommended response NO CHANGE**

The Council considers that this site satisfies the purposes of including land in the GB and therefore should remain within it and that there are no exceptional circumstances justifying its removal.

The GLA Housing Capacity Study and London Plan has set housing targets on the basis that Green Belt remains protected There is therefore no need to release Green Belt sites to meet the targets set out in the London Plan.

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### **Section/Policy**

A3AA Green Belt Boundary CP14

Land off Woodland Road, Harold Wood

### **ID**

898

### **Consultee**

Denis Tyson Associates (carried forward from issues stage)

### **Representation CS2229**

The following are comments on the council's own assessment of need and the options to provide for housing set out in the consultation on review of the Havering Unitary Development Plan.

When addressing housing provision the council's issue paper refers to the current estimate of 5,550 additional dwellings that will be provided between 1992 and 2006. Whilst this provision may be made within existing policies and proposals there is clearly doubt that more than 5,550 dwellings can be provided without changing other policies in order to identify land which could provide additional housing.

It seems highly probably if not inevitable, that further housing land would need to be identified to meet the increasing need for further housing.

Council's options to provide further housing

The first option in the issues paper is the 'building housing in the Green Belt'

The stated downside of this approach is stated as follows upon which we comment.

Government's Policy PPG2 of paragraph 2.6 deals with "defining boundaries". Whilst there is a presumption against altering Green Belt boundaries such alterations are allowed for in exceptional circumstances. What the London Borough Of Havering would need to do is to be able to satisfy the Secretary of State " that the authority has considered opportunities for development within the open areas contained by and beyond the Green Belt". We believe that the London Borough Of Havering would need to come to such a view and look for

- fringe urbanised Green Belt areas that can meet housing need without materially harming the openness and character of Green Belt, and/or.
- A major release of land to maximise the planning gain opportunities for e.g. leisure, Green Belt enhancement affordable housing.

Development of the Green Belt would see erosion of Havering's green and open character and the loss of agricultural land and leisure opportunities to the residents of the borough.

There are pockets of land on the urban fringe that can be developed without affecting the "green and open character of the green belt".

There are areas in the Green Belt of an urban and residential and business character that could be released for residential development not only not affecting the green and open character, but also of course not taking away agricultural land and leisure opportunities as they at present make no contribution to agriculture or leisure.

In addition, the release of a major site at present in one ownership provides and opportunity to provide leisure facilities and through public ownership(provided as part of planning gain) ensure future defence and positive use of the newly created urban fringe area.

The council are concerned that a precedent could be set and be difficult to resist further such development.

As long as the review is carried out as part of a comprehensive review of the whole of the Green Belt boundary against the background of specific housing need the adjusted Green Belt boundary that would result would have a "statutory basis" and be subsequently defensible from attack. Precedent would and should any problem.

Alternative approaches to releasing land from the Green Belt

The alternatives identified in the council's issue paper of building on parks, allotments and school playing fields must, we submit, be the last and least attractive option having the most effect on the quality of the local environment.

Such an approach would seriously damage the existing quality of the urban environment.

We submit that the much preferred option to meet that housing need that cannot be met within the existing policies is the careful selection of Green Belt land not just to meet that need, but also provide other planning benefits. On the basis we make the following proposals in respect of the subject of these representations.

#### SUMMARY OF ISSUES RE HOUSING PROVISION

1. There seems an ever increasing probability that all councils including London Boroughs, will be asked to maximise the opportunities for further housing provision irrespective of historic targets that have been set.
2. It is in the interests of the community that the further housing is provided to enable the existing resident community aspirations to be met.
3. Building in the Green Belt if handled correctly through the release of the appropriate land need not lead to the loss of Havering's green and open character, nor to leisure opportunities. Indeed the release of land in sufficiently large areas can increase the leisure opportunities and provide other public benefits such as affordable housing, through partnership with the council. Benefits of which public funds may not be available.
4. With regard to setting a precedent if the review of the Green Belt boundaries is tackled in comprehensive way, the boundary could be more logical and therefore stronger.
5. To provide the housing needed within the existing urban area will result in "Town Cramming" to the serious detriment of the amenities of existing residential areas. In terms of quality of life selective release of Green Belt areas is to be preferred as in addition other benefits referred to above can be achieved.

#### The Proposals- Release of the land from the Green Belt

The land is accessed from Woodlands and lies between the railway line and river.

The site makes no contribution to the openness or character of the Green Belt.

It is vulnerable to dumping and trespass.

Houses in Woodland Road have no on-site car parking and are forced to park their cars in the road and some utilise the land the subject of these representations.

The land cannot be put to any positive agricultural use by reason of its size and location and it is increasingly becoming an untidy dumping ground.

The release of this land from the Green Belt for residential development would achieve the following:

1. A small but meaningful contribution to meet the need for housing.
2. Benefits to local residents in Woodlands Road through the provision of a proper turning head at the end of Woodlands Road and an area of car parking for use by residents.
3. The Development of the site for residential would not impinge upon the openness and character of the Green Belt, the site being completely screened by the railway embankment to the north west and the existing housing in Woodlands Road to the south west. The site is well screened by tree growth from the other directions.
4. Public right of way access through the site from Woodlands Road to the Green Belt could be provided.
5. Sustainable development by reason of being close to public transport-bus and rail.

**Council's recommended response NO CHANGE**

The Council considers that this site satisfies the purposes of including land in the GB and therefore should remain within it and that there are no exceptional circumstances justifying its removal.

The GLA Housing Capacity Study and London Plan has set housing targets on the basis that Green Belt remains protected There is therefore no need to release Green Belt sites to meet the targets set out in the London Plan.

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**Section/Policy**

A3AA Green Belt Boundary CP14

Land North of St Mary's Lane, Upminster

**ID**

898

**Consultee**

Denis Tyson Associates (carried forward from issues stage)

**Representation CS2230**

The following are comments on the council's own assessment of need and the options to provide for housing set out in the consultation on review of the Havering Unitary Development Plan.

When addressing housing provision the council's issue paper refers to the current estimate of 5.550 additional dwellings that will be provided between

1992 and 2006. Whilst this provision may be made within existing policies and proposals there is clearly doubt that more than 5,550 dwellings can be provided without changing other policies in order to identify land which could provide additional housing.

It seems highly probably if not inevitable, that further housing land would need to be identified to meet the increasing need for further housing.

Council's options to provide further housing

The first option in the issues paper is the 'building housing in the Green Belt'

The stated downside of this approach is stated as follows upon which we comment.

Government's Policy PPG2 of paragraph 2.6 deals with "defining boundaries". Whilst there is a presumption against altering Green Belt boundaries such alterations are allowed for in exceptional circumstances. What the London Borough Of Havering would need to do is to be able to satisfy the Secretary of State "that the authority has considered opportunities for development within the open areas contained by and beyond the Green Belt". We believe that the London Borough Of Havering would need to come to such a view and look for

- fringe urbanised Green Belt areas that can meet housing need without materially harming the openness and character of Green Belt, and/or.
- A major release of land to maximise the planning gain opportunities for e.g. leisure, Green Belt enhancement affordable housing.

Development of the Green Belt would see erosion of Havering's green and open character and the loss of agricultural land and leisure opportunities to the residents of the borough.

There are pockets of land on the urban fringe that can be developed without affecting the "green and open character of the green belt".

There are areas in the Green Belt of an urban and residential and business character that could be released for residential development not only not affecting the green and open character, but also of course not taking away agricultural land and leisure opportunities as they at present make no contribution to agriculture or leisure.

In addition, the release of a major site at present in one ownership provides and opportunity to provide leisure facilities and through public ownership(provided as part of planning gain) ensure future defence and positive use of the newly created urban fringe area.

The council are concerned that a precedent could be set and be difficult to resist further such development.

As long as the review is carried out as part of a comprehensive review of the whole of the Green Belt boundary against the background of specific housing need the adjusted Green Belt boundary that would result would have a “statutory basis” and be subsequently defensible from attack. Precedent would and should not be any problem.

Alternative approaches to releasing land from the Green Belt

The alternatives identified in the council's issue paper of building on parks, allotments and school playing fields must, we submit, be the last and least attractive option having the most effect on the quality of the local environment.

Such an approach would seriously damage the existing quality of the urban environment.

We submit that the much preferred option to meet that housing need that cannot be met within the existing policies is the careful selection of Green Belt land not just to meet that need, but also provide other planning benefits. On the basis we make the following proposals in respect of the subject of these representations.

#### SUMMARY OF ISSUES RE HOUSING PROVISION

1. There seems an ever increasing probability that all councils including London Boroughs, will be asked to maximise the opportunities for further housing provision irrespective of historic targets that have been set.
2. It is in the interests of the community that the further housing is provided to enable the existing resident community aspirations to be met.
3. Building in the Green Belt if handled correctly through the release of the appropriate land need not lead to the loss of Havering's green and open character, nor to leisure opportunities. Indeed the release of land in sufficiently large areas can increase the leisure opportunities and provide other public benefits such as affordable housing, through partnership with the council. Benefits of which public funds may not be available.
4. With regard to setting a precedent if the review of the Green Belt boundaries is tackled in comprehensive way, the boundary could be more logical and therefore stronger.
5. To provide the housing needed within the existing urban area will result in “Town Cramming” to the serious detriment of the amenities of existing residential areas. In terms of quality of life selective release of Green Belt areas is to be preferred as in addition other benefits referred to above can be achieved.

The Proposal- Release of land from Green Belt

The main area of land immediately adjoins the urban area boundary to the west of the railway line to the north.

It has substantial road frontage to St Mary's Lane.

To the east lies Cranham Court (nursing home) and Westbury Farm.

The site is bounded on all sides by substantial landscaping- trees and shrubs. A Tree Preservation Order has identified a large number of trees worthy of protection.

See drawing 385.02.

All these trees can be protected in a development of residential.

Development of the main site(to the west of Cranham Hall and Westbury Farm would be a logical extension of the urban area.

The remaining land could provide leisure access to it and footpath access beyond. Woodland creation could be undertaken in conjunction with the Thames Forest Project.

In addition the release of this land for residential development would be of sufficient size to achieve the following:

1. The provision of some open space to serve the new area and the adjoining area as may be required.
2. A sufficiently substantial area for development to provide affordable housing. We note in the councils assessment of housing provision issues there is a great need to provide additional affordable homes by the year 2000. The release of this land would enable a substantial contribution to be made to the target.
3. Footpath access through this area to the Green Belt to the east linking with existing footpaths and thereby improving access to existing residents.

**Council's recommended response NO CHANGE**

The Council considers that this site satisfies the purposes of including land in the GB and therefore should remain within it and that there are no exceptional circumstances justifying its removal.

The GLA Housing Capacity Study and London Plan has set housing targets on the basis that Green Belt remains protected There is therefore no need to release Green Belt sites to meet the targets set out in the London Plan.

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**Section/Policy**

A3AA Green Belt Boundary CP14

Land off church Road And Beskins Lane, Noak Hill

**ID**

898

**Consultee**

Denis Tyson Associates (carried forward from issues stage)

**Representation CS2231**

The following are comments on the council's own assessment of need and the options to provide for housing set out in the consultation on review of the Havering Unitary Development Plan.

When addressing housing provision the council's issue paper refers to the current estimate of 5,550 additional dwellings that will be provided between 1992 and 2006. Whilst this provision may be made within existing policies and proposals there is clearly doubt that more than 5,550 dwellings can be provided without changing other policies in order to identify land which could provide additional housing.

It seems highly probably if not inevitable, that further housing land would need to be identified to meet the increasing need for further housing.

Council's options to provide further housing

The first option in the issues paper is the 'building housing in the Green Belt'

The stated downside of this approach is stated as follows upon which we comment.

Government's Policy PPG2 of paragraph 2.6 deals with "defining boundaries". Whilst there is a presumption against altering Green Belt boundaries such alterations are allowed for in exceptional circumstances. What the London Borough Of Havering would need to do is to be able to satisfy the Secretary of State " that the authority has considered opportunities for development within the open areas contained by and beyond the Green Belt". We believe that the London Borough Of Havering would need to come to such a view and look for

- fringe urbanised Green Belt areas that can meet housing need without materially harming the openness and character of Green Belt, and/or.
- A major release of land to maximise the planning gain opportunities for e.g. leisure, Green Belt enhancement affordable housing.

Development of the Green Belt would see erosion of Havering's green and open character and the loss of agricultural land and leisure opportunities to the residents of the borough.

There are pockets of land on the urban fringe that can be developed without affecting the "green and open character of the green belt".

There are areas in the Green Belt of an urban and residential and business character that could be released for residential development not only not affecting the green and open character, but also of course not taking away agricultural land and leisure opportunities as they at present make no contribution to agriculture or leisure.

In addition, the release of a major site at present in one ownership provides and opportunity to provide leisure facilities and through public ownership(provided as part of planning gain) ensure future defence and positive use of the newly created urban fringe area.

The council are concerned that a precedent could be set and be difficult to resist further such development.

As long as the review is carried out as part of a comprehensive review of the whole of the Green Belt boundary against the background of specific housing need the adjusted Green Belt boundary that would result would have a “statutory basis” and be subsequently defensible from attack. Precedent would and should any problem.

Alternative approaches to releasing land from the Green Belt

The alternatives identified in the council’s issue paper of building on parks, allotments and school playing fields must, we submit, be the last and least attractive option having the most effect on the quality of the local environment.

Such an approach would seriously damage the existing quality of the urban environment.

#### SUMMARY OF ISSUES RE HOUSING PROVISION

1. There seems an ever increasing probability that all councils including London Boroughs, will be asked to maximise the opportunities for further housing provision irrespective of historic targets that have been set.
2. It is in the interests of the community that the further housing is provided to enable the existing resident community aspirations to be met.
3. Building in the Green Belt if handled correctly through the release of the appropriate land need not lead to the loss of Havering’s green and open character, nor to leisure opportunities. Indeed the release of land in sufficiently large areas can increase the leisure opportunities and provide other public benefits such as affordable housing, through partnership with the council. Benefits of which public funds may not be available.
4. With regard to setting a precedent if the review of the Green Belt boundaries is tackled in comprehensive way, the boundary could be more logical and therefore stronger.
5. To provide the housing needed within the existing urban area will result in “Town Cramming” to the serious detriment of the amenities of existing residential areas. In terms of quality of life selective release of Green Belt areas is to be preferred as in addition other benefits referred to above can be achieved.

The Proposals- release of land from the Green Belt

The merits of the proposal put forward on behalf of Mr Taylor would also logically apply to the immediate adjoining properties in Benskins Lane that do not sit happily within The Green Belt and indeed conflict with the objectives of the Green Belt.

The land lies north of Church Road and could extend to the east side of Benskins Lane.

The size of ownership of Mr Taylor is an important aspect of the proposals put forward because through large ownership release of the land from Green Belt for residential development could achieve improvements and facilities as part of a planning gain package.

Such size of land to be released will achieve the following:

Affordable Housing:

We note in the council's assessment of housing provision issues there is great need to provide additional affordable homes by the year 2000.

The release of land the subject of these representations would enable a substantial contribution to be made to the target.

Screen Woodland Planting:

Any development of the land could be accompanied by substantial landscape woodland planting to soften the impact of the urban development and provide an enhanced appearance over that which has evolved to date.

Hamlet/Community Area:

The area which would embrace and include all the existing urban areas and developments north east of Church Road incorporating Benskins Lane, could through redevelopment and infilling provide for a well-designed residential development area bringing community benefits to existing residents.

Infill development:

If the larger concept of establishing a community area is not pursued then the second concept should be considered.

This concept is one of allowing infilling of individual plots limited to perhaps two or three houses in any development within the existing developments in Benskins Lane. The development would not cause any further harm to the openness and character of the Green Belt than the development that exists.

In the face of a statement that no further harm to the Green Belt will arise, there is no material case for not allowing infilling which would relieve the housing pressure on the urban area.

By way of an example we show on drawing No. 573.02 an infill plot for two or three dwellings sited between Orange Tree Kennels and Glenwood farm, the development of which would not cause any further harm over and above the harm that already has occurred. Indeed landscape planting in association with such development would improve the appearance of the area.

In summary therefore we ask the council to consider two options:

1. Establish a settlement area and allow residential development in an area already materially developed and causing harm to the appearance and character of the Green Belt.

2. establish a settlement area but restrict further development to infill areas only. This will achieve less development but would reduce the overall impact that would occur with the larger release of land.

**Council's recommended response NO CHANGE**

The Council considers that this site satisfies the purposes of including land in the GB and therefore should remain within it and that there are no exceptional circumstances justifying its removal.

The GLA Housing Capacity Study and London Plan has set housing targets on the basis that Green Belt remains protected. There is therefore no need to release Green Belt sites to meet the targets set out in the London Plan.

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**Section/Policy**

A3AA Green Belt Boundary CP14

Land off at Lodge Lane

**ID**

898

**Consultee**

Denis Tyson Associates (carried forward from issues stage)

**Representation CS2232**

The following are comments on the council's own assessment of need and the options to provide for housing set out in the consultation on review of the Havering Unitary Development Plan.

When addressing housing provision the council's issue paper refers to the current estimate of 5,550 additional dwellings that will be provided between 1992 and 2006. Whilst this provision may be made within existing policies and proposals there is clearly doubt that more than 5,550 dwellings can be provided without changing other policies in order to identify land which could provide additional housing.

It seems highly probable if not inevitable, that further housing land would need to be identified to meet the increasing need for further housing.

Council's options to provide further housing

The first option in the issues paper is the 'building housing in the Green Belt'

The stated downside of this approach is stated as follows upon which we comment.

Government's Policy PPG2 of paragraph 2.6 deals with "defining boundaries". Whilst there is a presumption against altering Green Belt boundaries such alterations are allowed for in exceptional circumstances. What the London Borough Of Havering would need to do is to be able to satisfy the Secretary of State "that the authority has considered opportunities for development within

the open areas contained by and beyond the Green Belt". We believe that the London Borough Of Havering would need to come to such a view and look for

- fringe urbanised Green Belt areas that can meet housing need without materially harming the openness and character of Green Belt, and/or.
- A major release of land to maximise the planning gain opportunities for e.g. leisure, Green Belt enhancement affordable housing.

Development of the Green Belt would see erosion of Havering's green and open character and the loss of agricultural land and leisure opportunities to the residents of the borough.

There are pockets of land on the urban fringe that can be developed without affecting the "green and open character of the green belt".

There are areas in the Green Belt of an urban and residential and business character that could be released for residential development not only not affecting the green and open character, but also of course not taking away agricultural land and leisure opportunities as they at present make no contribution to agriculture or leisure.

In addition, the release of a major site at present in one ownership provides and opportunity to provide leisure facilities and through public ownership(provided as part of planning gain) ensure future defence and positive use of the newly created urban fringe area.

The council are concerned that a precedent could be set and be difficult to resist further such development.

As long as the review is carried out as part of a comprehensive review of the whole of the Green Belt boundary against the background of specific housing need the adjusted Green Belt boundary that would result would have a "statutory basis" and be subsequently defensible from attack. Precedent would and should any problem.

Alternative approaches to releasing land from the Green Belt

The alternatives identified in the council's issue paper of building on parks, allotments and school playing fields must, we submit, be the last and least attractive option having the most effect on the quality of the local environment.

Such an approach would seriously damage the existing quality of the urban environment.

We submit that the much preferred option to meet that housing need that cannot be met within the existing policies is the careful selection of Green Belt land not just to meet that need, but also provide other planning benefits. On the basis we make the following proposals in respect of the subject of these representations.

SUMMARY OF ISSUES RE HOUSING PROVISION

1. There seems an ever increasing probability that all councils including London Boroughs, will be asked to maximise the opportunities for further housing provision irrespective of historic targets that have been set.
2. It is in the interests of the community that the further housing is provided to enable the existing resident community aspirations to be met.
3. Building in the Green Belt if handled correctly through the release of the appropriate land need not lead to the loss of Havering's green and open character, nor to leisure opportunities. Indeed the release of land in sufficiently large areas can increase the leisure opportunities and provide other public benefits such as affordable housing, through partnership with the council. Benefits or which public funds may not be available.
4. With regard to setting a precedent if the review of the Green Belt boundaries is tackled in comprehensive way, the boundary could be more logical and therefore stronger.
5. To provide the housing needed within the existing urban area will result in "Town Cramming" to the serious detriment of the amenities of existing residential areas. In terms of quality of life selective release of Green Belt areas is to be preferred as in addition other benefits referred to above can be achieved.

The Site

The area of land is approximately three hectares.

It lies behind a frontage development on Lodge Lane of a recently established nursing home.

To the north it adjoins the Lodge Lane school site now redundant.

To the south it adjoins the urban area fairly high density terraced housing.

The site is rectangular in shape and the smallest side of that rectangle to the west adjoins the remaining Green Belt agricultural land.

The proposal- release of land from Green Belt

The release of this land for residential development would be of sufficient size to achieve the following:

1. The provision of some open space to serve the new area and the adjoining area may be required.
2. A sufficiently substantial area for development to provide affordable housing. We note in the council's assessment of housing provision issues there is a great need to provide additional affordable homes by the year 2000. the release of this land would enable a substantial contribution to be made to that target.

3. Footpath access through this area to the Green Belt to the west linking with existing footpaths and thereby improving access to the residents in this part of Lodge Lane.

We therefore commend this proposal to the council as a preferred option to meet future housing targets that cannot be met within existing Unitary development Plan Policies.

The release of this land from the Green Belt together with the council's school playing fields to the north will establish a logical straight line boundary between the then amended Green Belt boundary with the newly established urban area boundary.

**Council's recommended response NO CHANGE**

The Council considers that this site satisfies the purposes of including land in the GB and therefore should remain within it and that there are no exceptional circumstances justifying its removal.

The GLA Housing Capacity Study and London Plan has set housing targets on the basis that Green Belt remains protected. There is therefore no need to release Green Belt sites to meet the targets set out in the London Plan.

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**Section/Policy**

A3AA Green Belt Boundary CP14  
Lincolns Close & Lillyputs Farm

**ID**

898

**Consultee**

Denis Tyson Associates (carried forward from issues stage)

**Representation CS2233**

The western boundary abuts properties off Hubbards Close, Essex Gardens and Lincoln Close. Again there is the mixture of small trees and hawthorn bushes along the boundaries.

The site is crossed by two public footpaths.

To the east and south east of the objection site land slopes towards the Ingrebourne river and comprises a mixture of refurbished plot land properties, paddocks and an area at the end of Hubbards Close which comprises numerous large corrugated iron sheds in various states of repair.

The site is of very poor agricultural quality and it is understood that since at least 1939 the land has not been put to any viable use for a consistent period of time.

Over the years the site has been the subject of considerable nuisance to neighbouring residents as a result of vandalism, use of the site for dumping and by motor cyclists and gypsies. Moody homes have made continuous efforts to prevent these problems and over the years considerable time,

money and effort has been spent on erecting fences and other measures to prevent these problems occurring although with little success.

The land shown on attached drawing No.418.01

Further to the south of Hubbards Close lies the land which is also the subject of these representations referred to as Lillyputs Farm, east of Wingleyte Lane.

Lillyputs Farm, east of Wingleyte Lane  
The area is approximately 54 hectares.

It extends from properties fronting Hubbards Close to the north to a line defined by Witchelm Road to the south, and extends from Wingleyte Lane and Ingrebourne river in the east.

The land slopes gently from Wingleyte Lane from 200m up to 400m and then more steeply down to the river. See the contour lines on drawing No. 418.01 which identifies the land the subject of these representations, and illustrates a package of residential development and open space/community planning gain.

The following are comments on the council's own assessment of need and the options to provide for housing set out in the consultation on review of the Havering Unitary Development Plan.

When addressing housing provision the council's issue paper refers to the current estimate of 5,550 additional dwellings that will be provided between 1992 and 2006. Whilst this provision may be made within existing policies and proposals there is clearly doubt that more than 5,550 dwellings can be provided without changing other policies in order to identify land which could provide additional housing.

It seems highly probably if not inevitable, that further housing land would need to be identified to meet the increasing need for further housing.

Council's options to provide further housing

The first option in the issues paper is the 'building housing in the Green Belt'

The stated downside of this approach is stated as follows upon which we comment.

Government's Policy PPG2 of paragraph 2.6 deals with "defining boundaries". Whilst there is a presumption against altering Green Belt boundaries such alterations are allowed for in exceptional circumstances. What the London Borough Of Havering would need to do is to be able to satisfy the Secretary of State "that the authority has considered opportunities for development within the open areas contained by and beyond the Green Belt". We believe that the London Borough Of Havering would need to come to such a view and look for

## **Cabinet 9 October 2006**

- fringe urbanised Green Belt areas that can meet housing need without materially harming the openness and character of Green Belt, and/or.
- A major release of land to maximise the planning gain opportunities for e.g. leisure, Green Belt enhancement affordable housing.

Development of the Green Belt would see erosion of Havering's green and open character and the loss of agricultural land and leisure opportunities to the residents of the borough.

There are pockets of land on the urban fringe that can be developed without affecting the "green and open character of the green belt".

There are areas in the Green Belt of an urban and residential and business character that could be released for residential development not only not affecting the green and open character, but also of course not taking away agricultural land and leisure opportunities as they at present make no contribution to agriculture or leisure.

In addition, the release of a major site at present in one ownership provides and opportunity to provide leisure facilities and through public ownership(provided as part of planning gain) ensure future defence and positive use of the newly created urban fringe area.

The council are concerned that a precedent could be set and be difficult to resist further such development.

As long as the review is carried out as part of a comprehensive review of the whole of the Green Belt boundary against the background of specific housing need the adjusted Green Belt boundary that would result would have "statutory basis" and be subsequently defensible from attack. Precedent would and should any problem.

### Alternative approaches to releasing land from the Green Belt

The alternatives identified in the council's issue paper of building on parks, allotments and school playing fields must, we submit,. Be the last and least attractive option having the most effect on the quality of the local environment.

Such an approach would seriously damage the existing quality of the urban environment.

We submit that the much preferred option to meet that housing need that cannot be met within the existing policies is the careful selection of Green Belt land not just to meet that need, but also provide other planning benefits. On the basis we make the following proposals in respect of the subject of these representations.

### The Proposals

Drawing No. 418.01 shows the two sites the subject of these representations.

The concept is that with a comprehensive review of the Green Belt boundary, and in particular the Green Belt boundary between Hornchurch and Upminster, if a substantial release is made the council could not only:

1. Meet or make a substantial contribution to meeting the housing needs.
2. At the same time achieve substantial planning benefits that could not otherwise be achieved, bearing in mind the restricted finances available to the council and other competing needs.

Drawing NO. 418.01 shows a possible development of the land in question which is intended to illustrate this concept of achieving other benefits. The proposals are indicative of what could be achieved and would be the subject of course of more detailed discussion and negotiation with the council.

The detail proposed in pursuance of this dual target concept is that approx 20 hectares of land are released for housing and some 34 hectares established for open space/community benefit.

The following is an indicative summary of what could be achieved.

1. A substantial provision of open space in the form of a leisure park with a network of footpaths established which would link with footpaths to the north, south and east, and provide ready access to that Green belt area from the urban area to the west.
2. A major footpath access along the Ingrebourne Valley could be achieved as part and parcel of this leisure park. This would be part of a wider strategic objective of a north south footpath link.
3. Playing pitches with supporting pavilion, tennis courts e.t.c., could be provided to improve the outdoor recreation provision.
4. A further school site provided if required.
5. The scale of development so released would provide ample opportunity for affordable housing as part of an agreement in line with their policy.

We consider that the advantages of this major release of land split between residential development and leisure open space provision is self evident, and well illustrated by drawing No. 418.01 attached.

We therefore commend this proposal to the council as a preferred option to meet future housing targets that cannot be met within the existing Unitary Development Plan Policies.

We would be pleased to discuss with the Council Officers during its process of reviewing the Unitary Development Plan, the concept and the benefits referred to and any other community gains the council may wish to be considered.

**Council's recommended response NO CHANGE**

The Council considers that this site satisfies the purposes of including land in the GB and therefore should remain within it and that there are no exceptional circumstances justifying its removal.

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**Section/Policy**

A3AA Green Belt Boundary CP14  
land West of Hacton Lane

**ID**

898

**Consultee**

Denis Tyson Associates (carried forward from issues stage)

**Representation CS2234**

The following are comments on the council's own assessment of need and the options to provide for housing set out in the consultation on review of the Havering Unitary Development Plan.

When addressing housing provision the council's issue paper refers to the current estimate of 5,550 additional dwellings that will be provided between 1992 and 2006. Whilst this provision may be made within existing policies and proposals there is clearly doubt that more than 5,550 dwellings can be provided without changing other policies in order to identify land which could provide additional housing.

It seems highly probably if not inevitable, that further housing land would need to be identified to meet the increasing need for further housing.

Council's options to provide further housing

The first option in the issues paper is the 'building housing in the Green Belt'

The stated downside of this approach is stated as follows upon which we comment.

Government's Policy PPG2 of paragraph 2.6 deals with "defining boundaries". Whilst there is a presumption against altering Green Belt boundaries such alterations are allowed for in exceptional circumstances. What the London Borough Of Havering would need to do is to be able to satisfy the Secretary of State "that the authority has considered opportunities for development within the open areas contained by and beyond the Green Belt". We believe that the London Borough Of Havering would need to come to such a view and look for

- fringe urbanised Green Belt areas that can meet housing need without materially harming the openness and character of Green Belt, and/or.
- A major release of land to maximise the planning gain opportunities for e.g. leisure, Green Belt enhancement affordable housing.

Development of the Green Belt would see erosion of Havering's green and open character and the loss of agricultural land and leisure opportunities to the residents of the borough.

There are pockets of land on the urban fringe that can be developed without affecting the "green and open character of the green belt".

There are areas in the Green Belt of an urban and residential and business character that could be released for residential development not only not affecting the green and open character, but also of course not taking away agricultural land and leisure opportunities as they at present make no contribution to agriculture or leisure.

In addition, the release of a major site at present in one ownership provides and opportunity to provide leisure facilities and through public ownership(provided as part of planning gain) ensure future defence and positive use of the newly created urban fringe area.

The council are concerned that a precedent could be set and be difficult to resist further such development.

As long as the review is carried out as part of a comprehensive review of the whole of the Green Belt boundary against the background of specific housing need the adjusted Green Belt boundary that would result would have a "statutory basis" and be subsequently defensible from attack. Precedent would and should any problem.

Alternative approaches to releasing land from the Green Belt

The alternatives identified in the council's issue paper of building on parks, allotments and school playing fields must, we submit, be the last and least attractive option having the most effect on the quality of the local environment.

Such an approach would seriously damage the existing quality of the urban environment.

We submit that the much preferred option to meet that housing need that cannot be met within the existing policies is the careful selection of Green Belt land not just to meet that need, but also provide other planning benefits. On the basis we make the following proposals in respect of the subject of these representations.

## **SUMMARY OF ISSUES RE HOUSING PROVISION**

1. There seems an ever increasing probability that all councils including London Boroughs, will be asked to maximise the opportunities for further housing provision irrespective of historic targets that have been set.
2. It is in the interests of the community that the further housing is provided to enable the existing resident community aspirations to be met.

3. Building in the Green Belt if handled correctly through the release of the appropriate land need not lead to the loss of Havering's green and open character, nor to leisure opportunities. Indeed the release of land in sufficiently large areas can increase the leisure opportunities and provide other public benefits such as affordable housing, through partnership with the council. Benefits of which public funds may not be available.
4. With regard to setting a precedent if the review of the Green Belt boundaries is tackled in comprehensive way, the boundary could be more logical and therefore stronger.
5. To provide the housing needed within the existing urban area will result in "Town Cramming" to the serious detriment of the amenities of existing residential areas. In terms of quality of life selective release of Green Belt areas is to be preferred as in addition other benefits referred to above can be achieved.

#### The Proposals- Release of land from the Green Belt

The site lies to the west of Hacton Lane and to the west, southwest and north adjoins land owned by the London borough of Havering.

The river Ingrebourne links along the northwest side of the site is an important informal leisure link in the Havering Unitary Development Plan.

The release of the land in question from the Green Belt for in part residential development, could be an important vehicle in improving the informal recreational facilities and the visual Green Belt link along the Ingrebourne valley.

The size of the land is sufficiently substantial and will also provide affordable housing as part of an agreement with the council for development of the area for residential purposes, coupled with enhanced leisure facilities, with extended footpath links around and through the area.

We therefore commend this proposal to the council as a preferred option to meet future housing targets that cannot be met with the existing Unitary Development Plan Policies.

#### **Council's recommended response NO CHANGE**

The Council considers that this site satisfies the purposes of including land in the GB and therefore should remain within it and that there are no exceptional circumstances justifying its removal.

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#### **Section/Policy**

A3AB Appropriate Development in the Green Belt DC46

**ID**

860

**Consultee**

Cluttons representing the Crown Estate

**Representation CS2235**

(Para 1.4) Council should consider and North of Marks Warren Farm for a park and ride facility. This land also forms part of the Dagenham Corridor and should be look at comprehensively by all three local authorities as encouraged by the London Plan. This area should become an action plan where all community representatives appropriate London Boroughs and other stakeholders have input in cross-borough boundary urban fringe management. This could explore the potential impact of a park and ride facility the potential to release some GB land for development which could aid regeneration and improvements to the environment whilst ensuring more access to the open countryside and ensure a holistic approach from the local boroughs who have jurisdiction of this part of the Dagenham Corridor.

**Council's recommended response NO CHANGE**

Park and ride feasibility studies have not been completed and it would therefore be premature to allocate specific sites. The Council does not consider it appropriate to undertake an Area Action Plan for the Dagenham Corridor as it is not anticipated that there will be significant change in this area which would warrant such an approach.

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**Section/Policy**

A3AB Appropriate Development in the Green Belt **DC46**

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2236**

Preferred Green Belt Policy A3 AB needs to better reflect paragraphs 3.4 and 3.5 of PPG2 (more than what is currently set out in paragraph 1.5).

**Council's recommended response NO CHANGE**

Policy DC46 (formerly A3AB) now better reflects paragraphs 3.4 and 3.5 of PPG2.

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**Section/Policy**

A3AB Appropriate Development in the Green Belt **DC46**

**ID**

563

**Consultee**

Highways Agency

**Representation CS2237**

The HA would ask that park and ride facilities will be provided in accordance with Annex E of PPG 13. However, whilst the HA supports the concept of Park and Ride in principle, impacts on the trunk road network would need to be considered. The HA would expect to see a robust transport assessment to identify the deliverability of park and ride sites. Depending upon the severity of the issues identified, transport modelling may be useful, or indeed necessary, within the LDF process. This would need to be done in support of the inclusion of these sites in the site-specific allocations. In addition, we would expect to see a reduction in town centre parking to support the strategy.

**Council's recommended response NO CHANGE**

Noted

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**Section/Policy**

A3AC Agriculture DC48

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2238**

The inclusion of considering appropriate farm diversification (that is consistent with Green Belt policy) is welcomed in Preferred Agriculture Policy A3 AC.

**Council's recommended response NO CHANGE**

Support welcomed

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**Section/Policy**

A3AD Crow Lane DC48

**ID**

680

**Consultee**

Government Office for London

**Representation CS2239**

Does not sit well with the Core Strategy and Development Control policies and problems with its content. First bullet is covered by A3AB second bullet and should not need to state that authorised or established uses can remain, as

they are legally permitted to, and the policy content generally is not obviously related to GB policy (esp third bullet). This policy material should be able to be covered by suitable wording in other generic policies.

**Council's recommended response NO CHANGE**

Policy now removed

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## **Urban Design, Crime and Accessibility**

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**Section/Policy**

B1AA Urban Design DC61

**ID**

846

**Consultee**

Environment Agency

**Representation CS2240**

Add following bullet point to 1.4. 'Are no closer than eight metres from the edge of a water course and do not result in excessive overshadowing any watercourse or its river corridor'. Negative impacts of tall buildings close to water courses include their visual impact, biodiversity impact on birds due to lighting and air currents, and shading which limits areas in which plants can grow.

**Council's recommended response-NO CHANGE**

The Council considers that this level of detail is inappropriate in this policy. This policy sets out the broad criteria for securing high quality design led development in the borough. The policy does not deal specifically with tall buildings.

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**Section/Policy**

B1AA Urban Design DC61

**ID**

680

**Consultee**

Government Office of London

**Representation CS2241**

(Para 1.7) Final plan should define what constitutes a major development

**Council's recommended response-CHANGE**

Reference to “major development” has been removed from the implementation section of this policy. This is as a result of amendments to the Town and Country Planning Act (Statutory Instrument 2006 No. 1062 The Town and Country Planning (General Development Procedure) (Amendment) (England) Order 2006) which details the types of applications where design and access statements apply.

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**Section/Policy**

B1AA Urban Design **DC61**

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2242**

The meaning of the reference to the first bullet point in the Preferred Policy Option B1 AA, relating to harnessing the topographical and ecological character of their site', is unclear in terms of policy application and would therefore be unenforceable as a guiding principle. The policy could promote an ecological approach to building and landscape design, if that is the intention. This can be done in a number of ways which the Council may wish to promote – further it could be promoted as part of a climate adaptation strategy by advocating the preservation of front gardens, promoting green roofs and walls and the environmental benefits that can be derived from this. Topography is often referred to in policy with reference to views policy. If that is what is intended here it is suggested that the reference be moved to the third bullet point.

**Council's recommended response-**CHANGE****

The first bullet point seeks to ensure that new development embraces rather than disregards site contours and land forms and existing ecological value. Ecological aspects will be supported by guidance in Biodiversity and Sustainable Design and Construction SPDs. The bullet point has been expanded to refer to the retention of existing trees and landscape features while providing appropriate landscaping.

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**Section/Policy**

B1AA Urban Design **DC61**

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2243**

Please also refer to PPG25, draft PPS25 and the design guidance in the London Climate Change Partnership Guidance on designing developments in a changing climate, published November 2005.

**Council's recommended response-NO CHANGE**

This will be covered in Sustainable Design and Construction SPD

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**Section/Policy**

B1AA Urban Design

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2244**

The second bullet point, which refers to distinctive local building forms and patterns of development, suggests a restraint on development by restricting proposed developments to heights of buildings that currently exist. This is unacceptable. Context is not just a set of visual characteristics and the appropriate response is not just a matter of relating a proposed development to the adjacent townscape. There is a need to relate development to its social functional and environmental context and particularly to matters relating to movement and land use. How a development relates to social character of its locality, how it relates to public realm, its vitality and safety and more functional aspects of land-use relationships and linkages are aspects for consideration relating to context and not the limited suggestion as drafted.

**Council's recommended response-CHANGE**

The Policy has been amended so that it now refers to the surrounding physical context and not to adjoining buildings. This is in line with 4B.7 of the London Plan which aims to ensure that new developments preserve or enhance the local social, physical, cultural, historic, environmental and economic characteristics, and 4B.1 which seeks to ensure that developments respect local context, character and communities.

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**Section/Policy**

B1AA Urban Design DC61

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2245**

Policy 4B.7 requires London Boroughs to work with local communities to

recognise and manage local distinctiveness etc. It is suggested that the policy wording should repeat or at least reflect Policy 4B.7 of the London Plan. Please also refer to PPS 1 on design which comments on what is inappropriate for context and why applications for permissions should be refused.

**Council's recommended response-NO CHANGE**

The justification to 4B.7 further clarifies that new buildings and spaces should be integrated with local built form. A policy aiming to define cultural environmental and economic characteristics would be very hard to construct and implement. The Council considers it legitimate to focus on townscape issues.

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**Section/Policy**

B1AA Urban Design DC61

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2246**

It would appear that the wording of By Design has been interpreted very literally here. It is suggested that a more balanced policy approach would suggest that in assessing scale etc account can be taken of the defining characteristics of a local area - delete reference to "adjoining buildings". Although quoted in "By Design" – some of this guidance is not appropriate in terms of up to date policy terms or appropriate for the context of London and the policy drivers of the London Plan.

**Council's recommended response-CHANGE**

Policy now refers to surrounding physical context rather than adjoining buildings.

---

**Section/Policy**

B1AA Urban Design DC61

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2247**

The meaning of the third bullet point is also not understood. This refers to utilising existing views, vistas and landmarks and creating new ones. Does this mean that new development should correspond to urban context with

reference to strategic and local views? It would be controversial to suggest that new development should provide “structure” in relation to views – existing policy on strategic and local viewing corridors and related view considerations take forward policy and guide development control decisions on patterns of development or structure. These considerations should be applied to new development. It is suggested that the policy should state that new development should not significantly harm the character and appearance of an area in this context.

**Council’s recommended response-NO CHANGE**

Existing views and vistas help provide legibility in the built environment. This is not considered to be controversial but an accepted part of good urban design. This is not intended to restrict development potential but to ensure that new development maintains or increases the legibility of the environment.

---

**Section/Policy**

B1AA Urban Design DC61

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2248**

In the fourth bullet point, the reinforcement of streetscape is only valid if the streetscape design itself is of a quality and pattern that is considered worthy of retaining. The design of many London streets needs improvement. Streetscape design is a complex subject and there are different design requirements for different types of streets in the London street hierarchy. It is suggested that the policy wording is qualified to “reinforces if appropriate”. More policy guidance on streetscape has been recently published by the GLA group to which the Council may wish to refer.

**Council’s recommended response-NO CHANGE**

This bullet point does not mention streetscape, what it does seek to ensure is that new development reinforces and defines the street, again an accepted part of good urban design.

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**Section/Policy**

B1AA Urban Design DC61

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2249**

In relation to implementation (paragraph 1.7), it is suggested that the statement is amended to accord with current proposals to implement the new Section 62 of the TCPA 1990 (inserted by Section 42(1) of the PCPA 2004). All planning applications will be required to produce a design and access statement (it is not known whether these will be combined or separate) – a statutory instrument is due to be published in the next few months.

An amendment is suggested which states that all planning applications should conform with the requirements of Section 62 TCPA and expected revised requirements to the GDPO requiring a design and access statement for all planning applications. Statements should be proportional to the complexity of the application.

**Council's recommended response-CHANGE**

Statutory Instrument 2006 No. 1062 The Town and Country Planning (General Development Procedure) (Amendment) (England) Order 2006 provides guidance on Design and Access Statements. This will be a combined statement on design and access and how these have been considered in the application.

Para 4C of the Statutory Instrument provides details on the type of development where a design and access statement would not apply, these include:

- (a) engineering or mining operations;
- (b) development of an existing dwelling-house, or development within the curtilage of such a dwelling-house for any purpose incidental to the enjoyment of the dwelling-house as such, where no part of that dwelling-house or its curtilage is within a designated area; or
- (c) a material change in the use of land or buildings

Access and Design Statements apply to all other types of development. The information which is required as part of the statement is detailed in the Order.

<http://www.opsi.gov.uk/si/si2006/20061062.htm>

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**Section/Policy**

B1AA Urban Design DC61

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2250**

The Council may want to refer applicants to future guidance the Council may publish for example to supplement the statutory provision which is expected to be fairly basic. The Council may also wish to refer to the requirements of the DDA.

**Council's recommended response-CHANGE**

## **Cabinet 9 October 2006**

The Council has currently no plans to prepare additional guidance on Design and Access Statement. Reference to the importance of the DDA has been included in the Access Policy DC62 (formerly B1AB).

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### **Section/Policy**

B1AA Urban Design DC61

### **ID**

622

### **Consultee**

Greater London Authority

### **Representation CS2251**

In line with Policy 4B.8 of the London Plan, the Council should identify suitable locations for tall buildings at the Submissions Stage. Insensitive locations for tall buildings can also be identified.

### **Council's recommended response-CHANGE**

A new policy DC66 on Tall Buildings has now been included which considers the London Plan and appropriate locations in the borough.

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### **Section/Policy**

B1AA Urban Design DC61

### **ID**

563

### **Consultee**

Highways Agency

### **Representation CS2252**

Whilst the HA does not have detailed comments to make on this policy, it supports the section in paragraph 1.4 that notes development should be designed around the needs of pedestrians, cyclists and have connectivity to the public transport network. This would encourage the use of alternative modes to the car.

### **Council's recommended response-NO CHANGE**

Noted

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### **Section/Policy**

B1AB Access DC62

### **ID**

66

**Consultee**

Countryside Agency

**Representation CS2253**

Supported, but linking it to G1 and G2 will strengthen it.

**Council's recommended response-NO CHANGE**

Support welcomed.

---

**Section/Policy**

B1AC Crime DC63

**ID**

491

**Consultee**

Havering Police Borough Crime Prevention Design Advisor (CPDA).

**Representation CS2254**

This policy needs to include a requirement for contributions from developers, where appropriate. Crime prevention needs to be applied through design interventions. In some instances the proposals may impact on the surrounding areas. In these instances or where appropriate the Council will seek contributions via legal agreements / conditions for crime prevention through environmental design or community safety initiatives. This should be reflected in the policy.

**Council's recommended response-CHANGE**

The policy has been amended to include the CPDA's comments. The policy now reads "Where appropriate the Council will seek contributions via legal agreements / conditions for crime prevention through environmental design or community safety initiatives i.e. CCTV, improved street lighting, alley gating, taxi marshalling schemes, provision of CCTV, neighbourhood wardens or late-night bus services".

---

**Section/Policy**

B1AC Crime DC63

**ID**

491

**Consultee**

Havering Police Borough Crime Prevention Design Advisor (CPDA).

**Representation CS2255**

Community safety conditions should be sought where necessary. In cases where it is inappropriate or simply not possible to impose a valid condition

informatives should be sought. It should also be recognised that the CPDA will be consulted with for the discharging of conditions.

**Council's recommended response-CHANGE**

The reasoned justification has been amended to reflect the response received from the CPDA. The implementation section now includes "In cases where it is either inappropriate or simply not possible to impose a valid condition, informatives on planning permissions drawing the applicant's attention to particular guidance on crime prevention or to technical publications that deal with security measures will be used. Where appropriate the CPDA will be consulted with in the discharging of conditions".

---

**Section/Policy**

B1AC Crime DC63

**ID**

491

**Consultee**

Havering Police Borough Crime Prevention Design Advisor (CPDA).

**Representation CS2256**

It would be beneficial to define within the reasoned justification what sustainable communities are. Safer Places (ODPM) promotes sustainable communities, we should encourage these communities in Havering. Sustainable communities are well designed places where people feel safe.

**Council's recommended response-CHANGE**

The reasoned justification has been amended to reflect the response received from the CPDA. The following has been inserted "sustainable communities are communities which succeed economically, socially and environmentally, and respect the needs of future generations. They are well-designed places where people feel safe and secure; where crime and disorder, or the fear of crime, doesn't undermine the quality of life or community cohesion".

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**Section/Policy**

B1AC Crime DC63

**ID**

491

**Consultee**

Havering Police Borough Crime Prevention Design Advisor (CPDA).

**Representation CS2257**

Reference to national policy guidance particularly PPS1, PPG3, PPS6, PPG13 and PPG17 which promote the importance of design, should be included in the reasoned justification. Additionally the Crime and Disorder Act

(Section 17 – HMSO – 1998) places a specific duty on the local authority to do all that is reasonable to prevent crime and disorder in the area. This should also be referenced.

**Council's recommended response-CHANGE**

The reasoned justification has been amended to include reference to this guidance.

---

**Section/Policy**

B1AC Crime **DC63**

**ID**

491

**Consultee**

Havering Police Borough Crime Prevention Design Advisor (CPDA).

**Representation CS2258**

It is important that pre-application advice is sought. The CPDA is available for free advice on all kinds of planning applications. This should be included in the supporting text of the policy.

**Council's recommended response-CHANGE**

The reasoned justification has been amended to encourage free pre-application advice from the CPDA.

---

**Section/Policy**

B1AC Crime **DC63**

**ID**

491

**Consultee**

Havering Police Borough Crime Prevention Design Advisor (CPDA).

**Representation CS2259**

Design Statements should be sought for licensed premises, entertainment, community facilities, restaurants and change of use.

**Council's recommended response-NO CHANGE**

It is not for the local planning authority to decide what types of applications can seek a design and access statement. Statutory Instrument 2006 No. 1062 The Town and Country Planning (General Development Procedure) (Amendment) (England) Order 2006, provides the statutory requirements for Design and Access Statements. Para 4C of the Statutory Instrument provides details on the type of development where a Design and Access Statement

would not apply. Design and Access Statements will apply to all other applications.

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**Section/Policy**

B1AC Crime **DC63**

**ID**

612

**Consultee**

CGMS representing the Metropolitan Police Authority

**Representation CS2260**

MPA welcomes the encouragement of all new development to adopt the principles and practices of the Secure by Design Award scheme and have regard to the criteria adapted from the Government publication 'Safer Places- the Planning System and Crime Prevention'.

**Council's recommended response-NO CHANGE**

Support welcomed

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## **Climate Change**

This chapter is now called Environmental Management and also includes Biodiversity.

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**Section/Policy**

Omission

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2261**

Omission - the Core Strategy should include proposals for restoring the river corridors through the borough. The Environment Agency will be publishing a River Restoration Strategy for North London (including Havering) later in 2006. This will identify areas where rivers should be restored and some of the restoration techniques that may be applicable.

**Council's recommended response-CHANGE**

New policy on River Restoration DC57 now included

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**Section/Policy**

C1A Environmental Protection **CP15**

**ID**

846

**Consultee**

Environment Agency

**Representation CS2262**

Reword point 3 as it may not be possible to protect the whole of the borough from flooding. 'To reduce fluvial, tidal and surface water flood risk'

**Council's recommended response-CHANGE**

CP15 (formerly C1A) has now been amended to "Reduce fluvial, tidal and surface water flood risk and manage residual risks".

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**Section/Policy**

C1A Environmental Protection **CP15**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2263**

Not consistent with PPG25 paragraph 54. Policy test is not whether a site is at risk of flooding but whether after appropriate mitigation measures the residual risks are unacceptable.

**Council's recommended response-CHANGE**

Strategic Policy C1A has now been amended to "Reduce fluvial, tidal and surface water flood risk and manage residual risks".

---

**Section/Policy**

C1AA Flood Risk **DC49**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2264**

Approach not consistent with PPG25 paragraph 54. The policy test is not whether a site is at risk of flooding but whether after appropriate mitigation measures the residual risks are unacceptable.

**Council's recommended response-CHANGE**

Policy now states that: "Planning permission will only be granted for development which it can be demonstrated that:

It is in the lowest appropriate flood risk zone with regard to table 1 of PPG25. Proposals in high risk zones must demonstrate that there are no other suitable sites in areas with a lower probability of flooding and that measures are put in place to safely manage any residual flood risks for the lifetime of the development"

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**Section/Policy**

C1AA Flood Risk DC49

**ID**

66

**Consultee**

Countryside Agency

**Representation CS2265**

Paragraph 1.1 supported

**Council's recommended response-NO CHANGE**

Support welcomed

---

**Section/Policy**

C1AA Flood Risk DC49

**ID**

846

**Consultee**

Environment Agency

**Representation CS2266**

(Para 1.1) Reword to 'To ensure that new development is located outside the flood plain and if needed protected from flood risk and does not add to flood risk elsewhere'.

**Council's recommended response-NO CHANGE**

PPG25 makes clear that inappropriate development should be avoided on underdeveloped and undefended flood plain rather than development per se. In line with the EA recommended changes to strategic policy the purpose of the policy has been reworded as follows: "To reduce fluvial, tidal and surface water flood risk and manage residual risks."

---

**Section/Policy**

C1AA Flood Risk DC49

**ID**

846

**Consultee**

Environment Agency

**Representation CS2267**

(Para 1.4) Reword. 'An important way of managing flood risk is to ensure that all new development is located outside of the floodplain. Furthermore new developments should be encouraged to develop Sustainable Urban Drainage Systems for their site to ensure that drainage from the site mimics that of a Greenfield site.'

**Council's recommended response-NO CHANGE**

PPG25 is clear that inappropriate development should be avoided on underdeveloped and undefended flood plain rather than development per se.

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**Section/Policy**

C1AA Flood Risk DC49

**ID**

846

**Consultee**

Environment Agency

**Representation CS2268**

(Para 1.5) Reword first sentence as it implies development will be acceptable in high risk flood zones.

**Council's recommended response CHANGE**

It is not considered that this part of the policy encourages development in high risk flood zones. The policy and reasoned justification has now been changed so it is clearer on the application of the sequential test as set out in PPG25 and the appropriate land uses and types of development in the different flood zones.

---

**Section/Policy**

C1AA Flood Risk DC49

**ID**

846

**Consultee**

Environment Agency

**Representation CS2269**

Recommend new development be kept outside of flood zone 3.

**Council's recommended response NO CHANGE**

Figure 1 of PPG25 states that Flood Zone 3 areas may be suitable for residential, commercial and industrial development provided the appropriate minimum standard of flood defence (including suitable warning and evacuation procedures) can be maintained for the lifetime of the development.

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**Section/Policy**

C1AA Flood Risk DC49

**ID**

846

**Consultee**

Environment Agency

**Representation CS2270**

Second sentence is acceptable though it should state that developers will be required to undertake Flood Risk Assessments in line with PPG25 if they submit a planning application in Flood Zone 3.

**Council's recommended response CHANGE**

The text will be amended, however, PPG25 seeks flood risk assessments for low to medium risk (2) and high risk(3) zones. These should be appropriate to the scale and nature of the development and should be provided with applications. The policy therefore has been amended to require a flood risk assessment for Zones 2 and 3.

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**Section/Policy**

C1AA Flood Risk DC49

**ID**

846

**Consultee**

Environment Agency

**Representation CS2271**

(Para 1.6) Support consideration of SUDs, also like to see surface water flood risk addressed in this section. Any developments over 1 hectare in size will be required to undertake a Surface Water Flood Risk Assessment.

**Council's recommended response CHANGE**

The policy has been amended to include reference to Surface Water Flood Risk Assessments. The policy includes the following "A Surface Water Flood

## **Cabinet 9 October 2006**

Risk Assessment must be submitted with the planning application for developments over 1 hectare in size

”  
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### **Section/Policy**

C1AA Flood Risk DC49

### **ID**

846

### **Consultee**

Environment Agency

### **Representation CS2272**

(Para 1.7) Last sentence should be removed as development in high risk flood zones should not be encouraged as they will increase the risk of flooding to people and property.

### **Council's recommended response CHANGE**

The last sentence of paragraph 1.7 has been deleted. However whilst the policy seeks to ensure new development with regard to its type and land use is located in the appropriate flood risk zone it also recognises that in certain circumstances development in high risk flood zones is acceptable in line with PPG25.

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### **Section/Policy**

C1AA Flood Risk DC49

### **ID**

846

### **Consultee**

Environment Agency

### **Representation CS2273**

The sequential test in PPG25 should be used to ensure that new development is located in low risk areas.

### **Council's recommended response CHANGE**

The policy and reasoned justification now provide clearer guidance about the application of the sequential test in line with PPG25.

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### **Section/Policy**

C1AA Flood Risk DC49

### **ID**

622

**Consultee**

Greater London Authority

**Representation CS2274**

Preferred Policy C1AA (Flood Risk) should acknowledge the emerging PPS25.

**Council's recommended response NO CHANGE**

The implementation section of the policy now states that "the Council will have regard to PPS25 once adopted, in operating this policy."

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**Section/Policy**

C1AA Flood Risk DC49

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2275**

The target set out in Para 1.11 'that there be no net loss of flood plain' is not likely to be met. The flood plain is defined as the area that would naturally flood (i.e. without any flood defences). It can be expected that a considerable amount of development will take place in this area.

**Council's recommended response NO CHANGE**

This target is taken from Havering's adopted Sustainability Appraisal Scoping Report, which seeks to ensure that there no further loss of flood plain in Havering.

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**Section/Policy**

C1AA Flood Risk DC49

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2276**

The target should consider functional flood plain as set out in the London Plan (Key Performance Indicator 24), although it is acknowledged that the Environment Agency has concerns about this as a target and it may be revised.

**Council's recommended response NO CHANGE**

## **Cabinet 9 October 2006**

The Council considers that it would be premature to include reference to Key Performance Indicator 24 as it may be revised in the future.

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### **Section/Policy**

C1AB Sustainable Construction **DC50**

### **ID**

1040

### **Consultee**

Barton Willmore representing Crest Nicholson

### **Representation CS2277**

BREEAM is simply the current method of assessment. The policy should be draft in the interests of longevity stating that the Council will assess the sustainability merits of schemes based on the current best practice form of assessment.

### **Council's recommended response **CHANGE****

The Reasoned Justification has been amended to acknowledge that this assessment standard may change in the future. Additional text reads "the Council recognises that this assessment may change in the future and will use the appropriate replacement standard".

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### **Section/Policy**

C1AB Sustainable Construction **DC50**

### **ID**

66

### **Consultee**

Countryside Agency

### **Representation CS2278**

Paragraph 1.1 supported. Can also link to H1 and links to London Plan policy 3A.4 by ensuring homes are Lifetime Homes compliant.

### **Council's recommended response **NO CHANGE****

Support welcomed

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### **Section/Policy**

C1AB Sustainable Construction **DC50**

### **ID**

680

### **Consultee**

Government Office for London

**Representation CS2279**

Policy should not seek to impose requirements that are covered in other legislation, (i.e. the Building Regulations). PPS22 only covers the issue of renewable energy not sustainable construction. (Para 1.6).

**Council's recommended response NO CHANGE**

This policy is necessary in order for the Core Strategy to be in general conformity with the London Plan and to implement the key priorities of Havering's Community Strategy.

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**Section/Policy**

C1AB Sustainable Construction **DC50**

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2280**

The preferred option to encourage high standards of Sustainable Construction and renewable energy needs to be substantially strengthened. Presently it is an 'encourage' rather than a 'require' policy, which is unacceptable

**Council's recommended response CHANGE**

Policy now requires rather than encourages.

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**Section/Policy**

C1AB Sustainable Construction **DC50**

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2281**

To be consistent with London Plan Policies 4A.7, 4A.8 and 4A.9, the policy approach at the Submissions Stage will need to require developments to be energy efficient; to generate at least 10% of the electricity or heat needs from renewables; and require energy statements to be submitted.

**Council's recommended response NO CHANGE**

Policy DC51 (formerly CA1C) now addresses these points.

**Section/Policy**

C1AB Sustainable Construction **DC50**

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2282**

Whilst the use of BREEAM and Eco-Homes is a practical way of measuring sustainability, the preferred policy should emphasise a requirement in principle to incorporate energy efficient design, and in particular heating technology in line with the Mayor's heating hierarchy (Policy 4A.8 of the London Plan).

**Council's recommended response NO CHANGE**

It is not considered necessary to refer to this within the Sustainable Construction policy as there is a separate Renewable Energy policy (DC51), which requires developers to provide energy assessments.

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**Section/Policy**

C1AB Sustainable Construction **DC50**

**ID**

1226

**Consultee**

RPS representing Fairview New Homes

**Representation CS2283**

Policy should say that the requirements for C1AB, C1AC and C1AD will be considered in the context of other requirements within the plan and the overall viability of the proposed development. It has yet to be demonstrated that the end purchasers pay higher prices for houses as a result of the provision of such initiatives. Such requirements potentially affect the viability of delivering development and meet key planning objectives such as housing targets particularly on sites which were bought some time ago in advance of such policies. Furthermore it is not always practicable or viable to deliver 10% renewable energy in all schemes, particularly small developments, and this must be recognised in the policy.

**Council's recommended response NO CHANGE**

This policy is necessary in order for the Core Strategy to be in general conformity with the London Plan and to implement the key priorities of Havering's Community Strategy. DC51 (formerly C1AC) has been changed so it now considers issues of viability. With regard to renewable energy the 10% target applies to major developments only

**Section/Policy**

C1AB Sustainable Construction **DC50**

**ID**

586

**Consultee**

Bellways

**Representation CS2286**

Policy needs to be updated to reflect the fact that the Government Code for Sustainable Homes is intended to replace the Eco-Homes standard.

**Council's recommended response **CHANGE****

The policy still refers to BREEAM, however, the Reasoned Justification of the policy recognises that this assessment standard may change in the future.

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**Section/Policy**

C1AB Sustainable Construction **DC50**

**ID**

566

**Consultee**

Royal Society for the Protection of Birds

**Representation CS2284**

As stated in the RSPB's previous representations on this policy, we believe that this policy should require that all major developments meet at least Eco-Homes 'very good' standard. Therefore, the RSPB supports the Sustainable Communities approach to this policy.

However, the RSPB recognises the Council's concern about imposing extra costs on developers and, therefore, restricting development opportunities. The RSPB has carried out some research into the costs associated with meeting the water and energy requirements of the Eco-Homes 'excellent' standard. This report can be found on the internet at:

[http://www.rspb.org.uk/Images/resources\\_ecohomes\\_tcm5-79744.pdf](http://www.rspb.org.uk/Images/resources_ecohomes_tcm5-79744.pdf) This states that the costs for reaching the 'excellent' standard on water and energy are around £160 per home. These two elements of the Eco-Homes standards are the most important to achieve the greatest benefits in terms of mitigating climate change and reducing environmental impacts. The resulting reductions in water and energy consumption will produce savings of over £100 per year on typical metered household bills. The householder would therefore, recoup the extra cost per home very quickly. In addition, there would be savings in terms of reducing the need for expensive new water resources developments (such as the proposed desalination plant at Beckton), the cost of which falls on the customer. Therefore, the RSPB believes that the benefits, both monetary and

environmental, outweigh the costs of requiring the additional standards for water and energy.

**Council's recommended response** **CHANGE**

Policy now requires EcoHomes very good standard.

---

**Section/Policy**

C1AC Renewable Energy **DC51**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2285**

There is no prescriptive statutory or legislative requirement for major developments to provide at least 10% of energy requirements from renewable resources. Moreover it is not clear what is defined as a major development.

**Council's recommended response** **CHANGE**

This policy is in line with paragraph 8 of PPS22 which states that local planning authorities may include policies in local development documents that require a percentage of the energy to be used in new residential, commercial or industrial developments to come from on-site renewable energy developments. Policy has been reword so that it focuses on developments incorporation on-site renewable energy equipment to reduce predicated CO2 emissions by at least 10%. Major development now defined.

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**Section/Policy**

C1AC Renewable Energy **DC51**

**ID**

1370

**Consultee**

Cleanaway

**Representation CS2287**

Keen to discuss with Havering the opportunities to develop facilities linked into renewable energy as part of a strategic integrated waste management facility at the Rainham site. This would allow increasing recovery of resources and value from the current waste arisings landfilled at the Rainham site in accordance with the recent consultation on the Government's Waste Strategy.

**Council's recommended response** **NO CHANGE**

Comments noted.

**Section/Policy**

C1AC Renewable Energy

**ID**

680

**Consultee**

Government Office for London

**Representation CS2288**

Should ensure that there is not a mandatory requirement on developers to provide renewable energy generating capacity. Also it is worth adding that it is open to developers to show why they should not have this imposition imposed on them.

**Council's recommended response NO CHANGE**

This policy is in line with paragraph 8 of PPS22 which states that local planning authorities may include policies in local development documents that require a percentage of the energy to be used in new residential, commercial or industrial developments to come from on-site renewable energy developments. Policy has been reword so that in focuses on developments incorporation on-site renewable energy equipment to reduce predicated CO2 emissions by at least 10%.

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**Section/Policy**

C1AD Water supply, drainage and quality DC52

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2289**

No statutory or legislative requirement for new development to make use of water conservation measures. Policy options is onerous, unjustified, not a planning matter and should be deleted.

**Council's recommended response CHANGE**

To bring it into line with revisions to policy DC50 (formerly C1AB) this policy now requires rather than encourages water conservation measures. This policy is necessary in order for the Core Strategy to be in general conformity with the London Plan

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**Section/Policy**

C1AD Water supply, drainage and quality DC52

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2290**

Contributions should only be sought in line with Circular 05/05, and acceptable development should not be refused simply because of an applicant's unwillingness to provide planning gain.

**Council's recommended response NO CHANGE**

Circular 05/05 Paragraph B16 states that planning obligations might be used when appropriate, to offset through substitution, replacement or regeneration the loss of, or damage to, a feature or resource present or nearby where the development is taking place. With this in mind it is considered acceptable to seek planning gain where there will be further loss to the quality of existing resources.

---

**Section/Policy**

C1AD Water supply, drainage and quality DC52

**ID**

846

**Consultee**

Environment Agency

**Representation CS2291**

Support this policy

**Council's recommended response NO CHANGE**

Support welcomed

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**Section/Policy**

C1AD Water supply, drainage and quality DC52

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2292**

The Preferred Policy set out in C1 AD is supported as it is seeking to take forward a more sustainable approach to water management. For information, the Mayor will be producing a Water Action Plan for London in 2006.

**Council's recommended response NO CHANGE**

Support welcomed

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**Section/Policy**

C1AD Water supply, drainage and quality DC52

**ID**

617

**Consultee**

Thames Water

**Representation CS2293**

Thames Water's comments in respect of a new policy on utility infrastructure were set out in our letter of 8<sup>th</sup> September 2005 and it was suggested that the Core Strategy should include a Policy on utility infrastructure. Policy C1 AD Water supply, drainage and quality of the revised Core Strategy refers to water supply and it is considered that this policy should also make reference to sewerage and wastewater infrastructure. The preferred policy approach as set out in paragraphs 1.4 - 1.6 is therefore supported as it makes reference to foul drainage, sewage and wastewater facilities.

**Council's recommended response NO CHANGE**

Support is welcomed for this policy. Policy C1 AD includes the following "New development must be co-ordinated and phased inline with the provision of the appropriate utility infrastructure including adequate water, foul drainage and sewerage treatment capacity to serve all developments" it is considered that this part of the policy sufficiently considers sewerage and wastewater infrastructure.

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**Section/Policy**

C1AD Water supply, drainage and quality DC52

**ID**

617

**Consultee**

Thames Water

**Representation CS2294**

The availability of land for utility infrastructure is also a key consideration. A Framework for Assessing Soundness and Focusing Representations on Development Plan Documents and Statements of Community Involvement" (March 2005) states in Para 3.4.2. that when assessing the 'soundness' of the plan, one of the key questions in assessing whether a plan has had regard to the relevant plans, policies and strategies is:-

Has adequate account been taken of the relationship between the proposal in the plan and other requirements, notably those of utility companies and agencies providing services in the area which have a requirement for land and premises? We therefore consider that it is very important that the Core Strategy includes a reference to land that maybe required by utility infrastructure.

**Council's recommended response NO CHANGE**

The Council has consulted all known utility providers with an interest in the future planning of Havering and has not received any submissions from utility providers for site allocations. Furthermore it has met with Thames Water Property Services to discuss their infrastructure requirements with regard to the proposals put forward in the preferred options. On this basis the Council does not consider that it can include reference to land which could be required for utility infrastructure as no indication has been given that this is required.

---

**Section/Policy**

C1AE Air quality DC53

**ID**

563

**Consultee**

Highways Agency

**Representation CS2295**

The core strategy that Havering is an air Quality Management Area, the HA feels it is important to contribute to improving this through the spatial planning process. The HA supports the preferred policy approach which involves the promotion of sustainable development to help reduce emissions.

**Council's recommended response**

Support welcomed

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**Section/Policy**

C1AF Contaminated land DC54

**ID**

846

**Consultee**

Environment Agency

**Representation CS2296**

Support this policy. Development of any brownfield site should be carried out in line with PPS23 and CLR11

**Council's recommended response**

Support welcomed

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**Section/Policy**

C1AG Noise DC55

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2297**

The preferred policy approach in C1 AG is welcomed as being generally in line with the Mayor's Ambient Noise Strategy.

**Council's recommended response**

Support welcomed.

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**Section/Policy**

C1AH Light DC56

**ID**

846

**Consultee**

Environment Agency

**Representation CS2298**

Support this policy. Artificial outdoor lighting can be disruptive to insects, birds and bats using/inhabiting rivers and their corridor habitat. External artificial lighting should be kept to a minimum required for safety and security and should be designed specifically to avoid light pollution along the river.

**Council's recommended response**

Support welcomed and advice noted.

## **Recreation and Leisure**

This chapter is now included with a new Culture chapter

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### **Section/Policy**

General comments

### **ID**

1027

### **Consultee**

Friends of Dagnam Park

### **Representation CS2299**

All receipts from Council land disposals should be ringfenced and used solely to purchase land within Havering that would be used as replacement open space. Such a fund could have been used to purchase Maylands Fields, and the land at the corner of Straight Road and Noak Hill Road currently the site of an illegal caravan encampment. (The Council is currently engaged in a legal planning enforcement battle with the occupants of this site in which a lot of money will be spent in what may prove to be a fruitless effort). It would be more sensible to have funds available to secure the sites before contentious planning proposals arise. Not expressing support or opposition to any particular new land sale merely pointing out that any sales or rationalisation of land usage may well be more acceptable to the public if the losses in some areas are offset by gains in others.

### **Council's recommended response NO CHANGE**

The intention of the policy is to improve the provision of open space in terms of location and quality. The ringfencing of any receipts is not a planning matter

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### **Section/Policy**

General comments

### **ID**

622

### **Consultee**

Greater London Authority

### **Representation CS2300**

The Core Strategy should adopt the principles and strategic objectives of the Green Grid into policies seeking the provision and improvement of open spaces and linkages as an integrated, multi-functional network. The East London Green Grid Report (published August 2005) outlines the green infrastructure principles and areas of deficiency in access to public open space, which need to be addressed in the Core Strategy.

**Council's recommended response** **CHANGE**

CP7 (formerly D1A) now makes it clear that the council will support implementation of the Green Grid

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**Section/Policy**

D1A Recreation and leisure **CP7**

**ID**

860

**Consultee**

Cluttons representing the Crown Estate

**Representation CS2301**

Support the objectives of improving opportunities for informal recreation in the GB particularly in the Dagenham Corridor An Action Plan is important for this area as it would be an effective tool to ensure cross boundary co-ordination between Boroughs a way to proactively review the GB boundaries and ascertaining the needs of the Dagenham Corridor.

**Council's recommended response** **NO CHANGE**

Support welcomed. The Council does not consider that an Action Plan is necessary of this area given that it is not anticipated to be an area of significant change.

---

**Section/Policy**

D1A Recreation and leisure **CP7**

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2302**

Strategic Policy D1A, relating to access to recreation and leisure, should seek to protect, enhance and promote open spaces that are of value, or have the potential to be of value, to local communities.

**Council's recommended response** **CHANGE**

Policy DC18 (formerly D1AA) seeks to retain and enhance public open space and recreation, sports and leisure facilities that are in private and public ownership

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**Section/Policy**

D1A Recreation and leisure **CP7**

**ID**

727

**Consultee**

Romford and District Allotments and Gardens Association

**Representation CS2303**

Council need to give some thought and support to areas of open space they already control. Association has a site of 3 acres in Gidea Park and has not received a lot of support in recent times. Having achieved self management the priority of the Committee was to ensure the safety of tenants and for this sought outside financial help which only partially met the cost so reducing funds. The preparation, printing, production and distribution of this project must be extremely costly which does not stand comparison to what has been drawn attention to.

**Council's recommended response NO CHANGE**

This matter lies outside the remit of the Core Strategy. The preparation, printing, production and distribution of consultation material is necessary to satisfy Government regulations and guidance. The Council has endeavoured to ensure that the right balanced is maintained between ensuring the community and other stakeholders are targeted effectively and the cost of consultation exercises.

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**Section/Policy**

D1AA Access to recreation and leisure DC18 and DC20

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2304**

This prescriptive policy should be based on a robust and credible evidence base, until it is published and the community has had a chance to comment on it then the policy should be deleted.

**Council's recommended response NO CHANGE**

The open space standards proposed by the policy are the same as those in the existing UDP. The Open Space Assessment has now endorsed the appropriateness of the standards.

---

**Section/Policy**

D1AA Access to recreation and leisure DC18 and DC20

**ID**

586

**Consultee**

Bellways

**Representation CS2305**

Needs to refer to the quality of provision whereby better quality provision will quite often allow greater use and access and therefore make best use of the existing stock.

**Council's recommended response **CHANGE****

DC18 states that any loss of open space to a non recreation/leisure use must be accompanied by an improvement to the quality of open space in the vicinity or to remedying qualitative and quantitative deficiencies in open space elsewhere in the Borough.

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**Section/Policy**

D1AA Access to recreation and leisure **DC18 and DC20**

**ID**

66

**Consultee**

Countryside Agency

**Representation CS2306**

Paragraph 1.1 supported

**Council's recommended response **NO CHANGE****

Support welcomed.

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**Section/Policy**

D1AA Access to recreation and leisure **DC18 and DC20**

**ID**

860

**Consultee**

Cluttons representing the Crown Estate

**Representation CS2307**

Support the objective of ensuring that adequate recreation and leisure facilities are available for residents. In particular it is considered important to keep the demand and supply of allotments under review. The current allocated allotments to the rear of Pretoria Road , south of the A12, are overgrown and not used. The poor use of such facilities means that they

should be reduced in size or consolidated elsewhere. This could provide an important opportunity for alternative uses such as housing.

**Council's recommended response NO CHANGE**

This may be acceptable provided that the allotments were surplus when assessed against published standards and any proceeds of sale (bearing in mind the site is in the Green Belt where built development is unacceptable) were used to help improve the quality of existing open spaces or provide new spaces to serve areas of deficiency.

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**Section/Policy**

D1AA Access to recreation and leisure DC18 and DC20

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2308**

Support and agree that open spaces can help increase biodiversity and manage flood risk as well as increasing general environmental quality.

**Council's recommended response NO CHANGE**

Support welcomed

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**Section/Policy**

D1AA Access to recreation and leisure DC18 and DC20

**ID**

680

**Consultee**

Government Office for London

**Representation CS2309**

Surprising that the assessment of the need for open space has not been completed before the CS has reach Preferred Options stage as it would be expected to inform the plan approach. Also it is likely to have an effect on other policies other than just D1AA, specifically in areas of deficiency, how will it be possible to rectify the position by allocations that have not yet been tested at an earlier stage and which might need to be on land designated for other uses.

**Council's recommended response NO CHANGE**

The approach taken is in line with PPG17.

The Council does not intend to designate land to address open space deficiencies but use the report as evidence when assessing major

applications in determining the quantum and type of open space to be secured. It will also inform the approach taken to the release of any surplus open space. The study has confirmed that the UDP existing open space standards as put forward for consultation in the preferred options should be maintained.

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**Section/Policy**

D1AA Access to recreation and leisure **DC18 and DC20**

**ID**

612

**Consultee**

Greater London Authority

**Representation CS2310**

Public Open Space Hierarchy (page 134, paragraph 1.9) - there is no justification given for increasing the distance threshold to 800m for local parks. The London Plan hierarchy sets a benchmark standard for this level of public space at 400m. No reasoning is given to indicate significant differences between Havering and the rest of London to justify increasing the threshold by 100%. This has the effect of reducing the amount of public open space that is required to meet the standard, which will mean Havering residents will have less access to public open space at the local level than the rest of London. This represents a serious flaw in the policy approach and this should be amended to reflect the hierarchy in the London Plan.

**Council's recommended response NO CHANGE**

This standard is included within Havering's 1993 UDP and reflects the fact that many residents in Havering have access to large gardens which is not true of other parts of London. It also takes into account the fact that residents also enjoy convenient access to country parks and a network of public rights of way in the Green Belt again something which is not typical of other London Boroughs. The Open space Assessment has also ratified the validity of using this standard in Havering.

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**Section/Policy**

D1AA Access to recreation and leisure **DC18 and DC20**

**ID**

612

**Consultee**

Greater London Authority

**Representation CS2311**

The hierarchy should also include the Regional Park level. The East London SRDF highlights the London Riverside Conservation Park as an opportunity to

provide a regional park that would address an identified deficiency in the area. The Core Strategy should include support for this aspiration. The Core Strategy should also set out proposals to meet the indicated Metropolitan and District park deficiencies set out in the SRDF.

**Council's recommended response** **CHANGE**

London Riverside Conservation Park included as a Site Specific Allocation. It is not allocated as a Regional Park in this policy as the Council has been advised that Core Strategies cannot allocate sites.

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**Section/Policy**

D1AA Access to recreation and leisure **DC18 and DC20**

**ID**

1066

**Consultee**

London Thames Gateway Development Corporation

**Representation CS2312**

Support inclusion of policy which seeks to promote access to river Thames with an aspiration to create a continuous Thames Path.

**Council's recommended response** **CHANGE**

DC34 Walking, (formerly G2AD) now includes reference to creation of continuous Thames Path.

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**Section/Policy**

D1AB Development of surplus open space **DC18**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2313**

On the basis that the Council has yet to complete their Open Space Needs Assessment and Sports Assessment Study the policy should be deleted until the evidence base is published and members of the public given the opportunity to review it and make informed comments on the policy option.

**Council's recommended response** **NO CHANGE**

The approach taken is in line with PPG17 and the Open space assessment is now complete.

**Section/Policy**

D1AB Development of surplus open space **DC18**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2314**

Contributions should only be sought where they meet the tests set out in Circular 05/05.

**Council's recommended response **CHANGE****

Approach taken is in line with Circular 05/05 and PPG17 para 33. Moreover PO1 states that tests of Circular 05/05 must be satisfied.

---

**Section/Policy**

D1AB Development of surplus open space **DC18**

**ID**

586

**Consultee**

Bellway

**Representation CS2315**

Although a sound approach in principle it will need to be guaranteed in some way to whereby any revenue is pumped back into open space and leisure services rather than into other aspect of Council expenditure.

**Council's recommended response **NO CHANGE****

This would be ensured through the wording of the S106 agreement in line with Circular 05/05.

---

**Section/Policy**

D1AB Development of surplus open space **DC18**

**ID**

66

**Consultee**

Countryside Agency

**Representation CS2316**

Support aim to reduce area deficiencies but needs to make clear that the overall size and amount of open space within the Borough will be maintained.

There should be no loss of open or green space because of the redevelopment of open land.

**Council's recommended response NO CHANGE**

The focus of the policy is on ensuring a more equitable distribution of open space.

---

**Section/Policy**

D1AB Development of surplus open space DC18

**ID**

860

**Consultee**

Cluttons representing the Crown Estate

**Representation CS2317**

National guidance set out in PPS6 and PPG13 states that a sequential test should be applied to future leisure uses. There is an emphasis that new sites should be well served by public transport. However the Council also acknowledges that PPG17 states that countryside around towns can provide important sport and recreational facilities. Support the development of surplus open space for development where there is no need for open space and as such development of underused allotments should be allowed.

**Council's recommended response NO CHANGE**

The countryside will cater for the most part for the more informal recreation opportunities and it is therefore unlikely that there will be large concentrations of people at any one location at any one time. Support welcomed re surplus open space.

---

**Section/Policy**

D1AB Development of surplus open space DC18

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2318**

Preferred Policy D1 AB (surplus open space) - it is unclear what is meant by 'surplus' sites, or whether the Council has already identified such sites. Open spaces that are of value to the community or of potential value should be protected. Open spaces that are to be identified as surplus should only be considered as such where they have been shown to be so in a robust open space strategy that meets the requirements of London Plan Policy 3D.11, and only after other alternative open space uses have been considered, including

addressing deficiencies in provision identified in an open space strategy. Any remaining surplus sites should then be designated for development on the Proposals Map to ensure clarity of the status of sites. A policy approach suggesting a caveat allowing the part development of open spaces, in return for improvements, would not be consistent with the London Plan and should be deleted.

**Council's recommended response NO CHANGE**

Surplus sites are those which are surplus with regard to the standards in the open space hierarchy and cannot be used for other open spaces uses for which there is an identified need. The policy conforms to PPG17 which clearly states that development of open space may provide an opportunity for local authorities to remedy deficiencies in provision. PPG17 also quite clearly supports the concept of open space being "surplus to requirements"

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**Section/Policy**

D1AB Development of surplus open space DC18

**ID**

597

**Consultee**

Cushman and Wakefield representing TESCO stores

**Representation CS2319**

Preferred policy approach appears contradictory: under the policy open space would only be allowed to be developed if it were 'surplus to requirements', if this were the case then there would be no basis to seek contributions from its redevelopment towards other open space either on the site or elsewhere. The policy should be reworded to make it clear that any decision is to be based on a robust assessment of existing supply versus national standards.

**Council's recommended response NO CHANGE**

The policy recognises that deficiencies can be qualitative as well as quantitative. Therefore qualitative improvements can be secured through funds generated by releasing genuinely surplus open space when assessed against quantitative standards. Deficiencies will be identified from the Open Space Assessment. The policy is in line with PPG17

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**Section/Policy**

D1AC Major developments and developers contributions DC21

**ID**

586

**Consultee**

Bellway

**Representation CS2320**

Wording should be altered to reflect the fact that there are other Development Contributions being sought, and that the leisure facility and open space contributions have to be considered alongside other development contributions.

**Council's recommended response NO CHANGE**

It is quite normal for contributions to be sought in respect of a number of items in relation to a specific development

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**Section/Policy**

D1AC Major developments and developers contributions DC21

**ID**

586

**Consultee**

CGMS representing the Metropolitan Police Association

**Representation CS2321**

There is no planning policy link between the development of police facilities and the need to provide public open space. The MPA therefore suggest that the scope of D1AC be refined to ensure that the development of police facilities are exempt from this requirement and therefore do not have to make any contribution.

**Council's recommended response NO CHANGE**

It is not the intention that contributions for open space would be sought from applications for police facilities nevertheless the Council does not consider appropriate to make specific reference to this exclusion as there are other forms of development where this would also not apply and listing them all would end up with an unwieldy policy.

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**Section/Policy**

D1AC Major developments and developers contributions DC21

**ID**

563

**Consultee**

Highways Agency

**Representation CS2322**

Whilst the HA has no specific comment on this policy, it supports the concept of developers contributing towards improvements needed as a result of development. The HA supports policies that require developers to mitigate against transport impacts that may be caused as a result of developments,

after every effort has been made to reduce demand through sustainable initiatives. As a part of this process, the HA recommends that the impacts on the trunk network are given specific consideration.

Further, we would be keen to participate in discussions for any mechanisms that might be developed to ensure a consistent approach towards transport infrastructure funding or the joint funding of specific improvements.

**Council's recommended response NO CHANGE**

Support welcomed

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**Section/Policy**

D1AC Major developments and developers contributions DC21

**ID**

1226

**Consultee**

RPS representing Fairview New Homes

**Representation CS2323**

Developer contributions to open space, recreation and leisure facilities should be based on need for such provision and should be applied on a site by site basis. Contributions should only be made where there are insufficient levels of such facilities which can be reasonably accessed from the site. This accords with PPG3 which states that 'new housing developments should incorporate sufficient provision where such spaces are not already adequately provided within easy access of the new housing'. Fairview object to the statement that areas which are deficient in open space may be required to address current deficiencies. This is contrary to Circular 05/05.

**Council's recommended response NO CHANGE**

In assessing whether major new developments had adequate access to recreation and leisure facilities including open space the Council would have regard to its open space and sport assessment produced in line with PPG17. PPG17 clearly states in para 33 that "planning obligations should be used as a means to remedy local deficiencies in the quantity or quality of open space , sports and recreational provision". The policy is therefore clearly in line with Government policy. Furthermore the council considers that where developments are located in areas deficient in open space provision, that not remedying this would exacerbate this deficiency and create spatial inequalities between new development (where open space was provided to contemporary standards) and existing development where deficiencies would remain. Whilst the Council would not expect individual developments to completely remedy existing deficiencies it considers that it is reasonable for developments in areas of deficiency to help remedy, not least because the land being developed removes the potential for it to be used as open space in the first place.

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**Section/Policy**

D1AC Major developments and developers contributions **DC21**

**ID**

597

**Consultee**

Cushman and Wakefield representing TESCO stores

**Representation CS2324**

Contrary to government guidance on the operation of planning obligations. Contributions towards new provision of recreation and leisure facilities and open space are only appropriate where a deficiency exists, therefore if there is an adequate provision within an area there would be no basis to require any new development to provide for an additional provision. Equally government guidance is very clear that planning contributions should not be sought to address current deficiencies as suggested by paragraph 1.5. The policy requires redrafting in order to accord with government guidance on planning obligations.

**Council's recommended response NO CHANGE**

See response to RPS (Fairview). In addition the major development may generate a deficiency where one currently does not exist due to the extra population it brings into an area. In these circumstances the Council considers that it is entirely appropriate and consistent with Circular 05/05 to seek contributions towards the provision of recreation and leisure facilities and open space to meet the needs of the new development.

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**Section/Policy**

D1AD Location of intensive leisure and recreation facilities **DC19**

DC19 amalgamates preferred options policies D1AD, I1AB and I1AD

**ID**

66

**Consultee**

Countryside Agency

**Representation CS2325**

Paragraph 1.1 Supported

**Council's recommended response NO CHANGE**

Support welcomed

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**Section/Policy**

D1AD Location of intensive leisure and recreation facilities **DC19**

DC19 amalgamates preferred options policies D1AD, I1AB and I1AD

**ID**

860

**Consultee**

Cluttons representing the Crown Estate

**Representation CS2326**

Support the purpose of ensuring that intensive leisure and recreation facilities which attract large numbers of people are located in areas readily accessible by public transport. As a Metropolitan Centre Romford should be able to provide a full range of leisure facilities. Hence a sequential test should only be applied to intensive recreation facilities or those facilities which would otherwise cause detrimental harm to neighbouring uses if sited in an urban context. It should be recognised that some leisure facilities are best suited to an open countryside location albeit a location close to a metropolitan centre in the GB.

**Council's recommended response **CHANGE****

Policy has now been amended in line with PPS6 advice and then sets out additional criteria for the location of cultural facilities within London Riverside.

---

**Section/Policy**

D1AD Location of intensive leisure and recreation facilities **DC19**

DC19 amalgamates preferred options policies D1AD, I1AB and I1AD

**ID**

1066

**Consultee**

London Thames Gateway Development Corporation

**Representation CS2327**

Policy should be amended in line with PPS6 advice and should apply to the consideration of the regional casino proposal and also the development at the proposed Conservation Park and others.

**Council's recommended response **CHANGE****

Policy has now been amended in line with PPS6 advice and then sets out additional criteria for the location of cultural facilities within London Riverside.

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**Section/Policy**

D1AE Countryside recreation **DC22**

**ID**

66

**Consultee**

Countryside Agency

**Representation CS2328**

Paragraph 1.1 Supported

**Council's recommended response NO CHANGE**

Support welcomed

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**Section/Policy**

D1AE Countryside recreation DC22

**ID**

860

**Consultee**

Cluttons representing the Crown Estate

**Representation CS2329**

Support policy which encourages open air recreational facilities in the GB. Should also be stated that ancillary buildings which help facilitate these uses would also be acceptable in GB locations in accordance with PPS2. Furthermore policy should allow for some enabling development where walkways and the green chain network can be provided improved enhanced and maintained.

**Council's recommended response NO CHANGE**

This is clarified in policy DC46 Appropriate Development in the Green Belt. Enabling development is likely to be contrary to national and local Green Belt policy.

---

**Section/Policy**

D1AE Countryside recreation DC22

**ID**

1370

**Consultee**

Cleanaway

**Representation CS2330**

Look forward to working with the Council to further open the restored Rainham landfill site for the benefit of Havering residents. So support D1AE

**Council's recommended response NO CHANGE**

Support welcomed

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**Section/Policy**

D1AE Countryside recreation DC22

**ID**

846

**Consultee**

Environment Agency

**Representation CS2331**

Add to 1.10 'Blue Ribbon Network' Wildlife corridors along the Blue Ribbon Network should be protected from development by provision of a buffer zone. Footpaths should meander away from the river to provide a more dynamic experience for users. Footpaths set directly against the bank top form a break between river and land habitats. It is important to have a continuous transition between these habitats to maintain the integrity of the river corridor for movement of wildlife. PPS9 states at para 12 that local authorities should aim to maintain networks by avoiding or repairing the fragmentation and isolation of natural habitats through policies in plans. Such networks should be protected from development and where possible strengthened by or integrated within it.

**Council's recommended response NO CHANGE**

The Blue Ribbon Network is covered by Policy DC58 in the context of nature conservation.

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**Section/Policy**

D1AE Countryside recreation **DC22**

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2332**

Preferred Policy D1 AE (access to the countryside) - the Green Arc partnership is actively seeking to achieve the aims of this policy in this quadrant of London and Essex and the Core Strategy should support the aims and vision of the partnership. The active participation of the borough in the Green Arc partnership would be welcomed.

**Council's recommended response CHANGE**

Green Arc is now referred to.

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**Section/Policy**

D1AE Countryside recreation **DC22**

**ID**

1226

**Consultee**

RPS representing Fairview New Homes

**Representation CS2333**

Contributions towards the implementation of the Green Chain network and related initiatives should be based on the need for such provision as created by the development in question and should be applied on a site by site basis, and accord with tests in Circular 05/05.

**Council's recommended response** **CHANGE**

The policy is consistent with Circular 05/05.

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## **Waste and Minerals**

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**Section/Policy**

E1A Waste **CP11**

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2334**

Havering's commitment to waste minimisation is welcomed, as is the borough's recognition in Strategic Policy E1A that it will of necessity have to manage a proportionate amount of commercial and domestic waste arising from Central London. This is a significant strategic acknowledgement and deserving of support. Development control policy E1 AA on waste and recycling storage facilities in new developments is also welcomed. Both are broadly in accord with government policy (PPS10) and the objectives of the London Plan. However, to fully accord with the London Plan's target of achieving 85% self-sufficiency by 2020 (London Plan Policy 4A.1 Waste strategic policy and targets) and the provisions of London Plan Policy 4A.2 (Spatial policies for waste management), Strategic Policy E1A should indicate that the borough will develop policy to:

- safeguard all existing waste management sites,
- identify new sites in suitable locations for new facilities,
- support appropriate developments for manufacturing related to recycled waste,
- support treatment facilities to recover value from residual waste, and
- identify and forecast total waste arisings and the amount of waste that will be imported or exported.

**Council's recommended response** **CHANGE**

Please note that the Council does not consider that the London Plan alterations as presented would result in a proportionate amount of waste from central London being managed within Havering. The Council's position is that proportionate means that all London Boroughs play an equal role in managing Central London's waste and this is now clarified within the policy and the reasoned justification. The issues listed by the GLA which they think should be covered by the Core Strategy will be covered by the Joint Waste Plan, where in line with PPS10 the planning provision of new capacity and its spatial distribution will be based on a robust analysis of available data and information and an appraisal of options.

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**Section/Policy**

E1A Waste **CP11**

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2335**

The Mayor believes that a strong commitment to this policy framework (London Plan alterations) should appear in Strategic Policy E1A. Without this, the policy framework under Objective E1 is unbalanced - Strategic Policy E1A sets out a partial approach, and development control Policy E1AA tackles waste collection, but waste disposal is barely mentioned.

**Council's recommended response **CHANGE****

Strategic Waste Policy now sets out in more detail the strategic principles for waste management in Havering. However in line with PPS10 the planning provision of new capacity and its spatial distribution will be based on a robust analysis of available data and information and an appraisal of options. DC40 (formerly E1AA) deals specifically with recycling facilities in new developments, which is dealt with separately to the Joint Waste Plan as each borough is likely to have a different approach to this.

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**Section/Policy**

E1A Waste **CP11**

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2336**

The borough should also take the opportunity to recast its approach to waste management in a strongly positive light. Havering's strategic waste

management potential is of London wide importance. This gives the borough a tremendous opportunity to be at the forefront of the capital's inevitable expansion of the new green economy. Havering can assist in maximising the amount of material available for remanufacturing, embracing new technologies producing renewable energy and renewable hydrogen, and reducing London's contribution to climate change. If it can do this it stands to reap significant job creation benefits from recycling and reprocessing. The existing Cleanaway site in the borough has the potential to become an emerging eco site to support new recovery technology.

**Council's recommended response NO CHANGE**

The Joint Waste Plan will present Havering's approach to waste management. It is not possible in advance of this process to set out the Council's future approach to waste management beyond the broad principles set out in CP11. Once the existing waste uses have ceased on the Cleanaway site the Council does not consider that it is appropriate for new waste uses to be placed there. The existing uses are ancillary to the time limited landfill facility. The Council considers that extending this sites waste usage would conflict with the use of the London Riverside Conservation Park.

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**Section/Policy**

E1A Waste CP11

**ID**

617

**Consultee**

Thames Water

**Representation CS2337**

With regards to Objective E1 and Strategic Policy E1A it should be noted that Thames Water has to respond to any increase in the amount of sewage sludge produced as a consequence of the increase in production of wastewater from development.

**Council's recommended response NO CHANGE**

Noted.

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**Section/Policy**

E1AA Waste recycling DC40

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2338**

There is no statutory or legislative requirement for all development to make provision for waste disposal and recycling. It is onerous, unjustified not a planning matter and should be deleted.

**Council's recommended response NO CHANGE**

In line with the principals of spatial planning this is necessary in order for nationally set waste disposal and recycling targets to be met. Moreover through SPG the Council has been successfully implementing this approach for a number of years.

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**Section/Policy**

E1AA Waste recycling DC40

**ID**

680

**Consultee**

Government Office for London

**Representation CS2339**

Needs to make clear that the detailed approach to waste will be as set out in the Joint waste DPD

**Council's recommended response NO CHANGE**

This is made clear in CP11.

---

**Section/Policy**

E1AA Waste recycling DC40

**ID**

1226

**Consultee**

RPS representing Fairview New Homes

**Representation CS2340**

Object to the requirements to provide suitable waste and recycling storage in all new developments or offsite facilities. The provision of specific storage facilities is not necessary in all dwellings, for example where appropriate locations for storage already exist within the design of a development. Furthermore the requirement for contributions towards offsite facilities should be considered in conjunction with the range of other contributions required, in view of the impact that these may have on the viability of the development.

**Council's recommended response NO CHANGE**

In line with the principals of spatial planning this is necessary in order for nationally set waste disposal and recycling targets to be met. Moreover through SPG the Council has been successfully implementing this approach

for a number of years. Where applicant can demonstrate that appropriate locations for storage already exist within the design of a development then the terms of the policy will have been met.

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**Section/Policy**

E1AA Waste recycling DC40

**ID**

614

**Consultee**

Environomics representing Brett Aggregates

**Representation CS2341**

Waste uses including local community civic amenity sites do not necessarily have to be based within regionally important industrial areas. It is often the case that waste management facilities are best located in close proximity to suitable mineral workings and restoration areas. Existing policy MWD13 reflects this fact in that it states that "waste transfer and treatment....need to be located where they will not have an adverse effect on local environment by reason of smell, noise, dust and visual impact".

Inert waste which cannot be recycled from South Essex and possibly North Kent may need to be used for the restoration of mineral workings in South East London. The importation of inert waste from other locations for the restoration of mineral workings should not be ruled out by policy.

Only waste which cannot be economically recycled or composted should be directed to incineration or landfill. However suitable inert waste (which cannot be recycled or composted) is always required for the restoration of mineral workings. The Council should assist in directing excavation materials from contract sites to mineral workings requiring the inert fill for restoration.

**Council's recommended response NO CHANGE**

These issues will be addressed in the development of the Joint Waste Development Plan Document

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**Section/Policy**

E2A Minerals CP12

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2342**

There is no statutory or legislative requirement for all development to make provision for the reuse and recycling of aggregates. It is onerous, unjustified not a planning matter and should be deleted.

**Council's recommended response NO CHANGE**

This is necessary in order to achieve the regional target of 80 percent re-use of construction and demolition waste and to achieve 60 percent re-use of that waste as aggregates in London by 2011.

---

**Section/Policy**

E2B Minerals **CP13**

**ID**

565

**Consultee**

Quarry Products Association

**Representation CS2343**

The London Aggregates Working Party have identified that there are reserves of sand and gravel of 5.1 million tonnes (2003) in London and that these only amount to a landbank of just over 5 years, which is short of the existing central government recommendation for sand and gravel landbanks to be at least 7 years. The sand and gravel reserves in London have decreased by 25% since 2000 as the volume of permissions has failed to keep up with supplies. The LAWP have recommended to the GLA and ODPM that the regional apportionment is set at 1 mtpa for sand and gravel in London and that this figure should be divided equally between east and west. Havering is in the eastern sector. To address the reserves position the LAWP recommends the boroughs in the west and east sectors identify further potential sites or areas of search. QPA consider that there is sufficient evidence available through the LAWP to show that new sites should be identified by Havering at this stage without waiting for a response to the Mayor of London's new minerals target.

**Council's recommended response NO CHANGE**

The Council intends to prepare a separate Development Plan Document to identify 'preferred areas of search' for minerals extraction. In the meantime the areas of search for minerals extraction are identified.

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**Section/Policy**

E2B Minerals **CP13**

**ID**

614

**Consultee**

Enviro-nomics representing Brett Aggregates

**Representation CS2344**

The London Plan requires Boroughs to identify and safeguard aggregate resources suitable for extraction. This preferred option of stalling any consideration of sites already put forward by industry as being proven, economic mineral deposits until the Council has responded to the Mayor of London's new mineral extraction target and in the meantime 'to assess the suitability of proposals through the planning applications process' is not in accordance with Government and Regional guidance which requires the identification of areas suitable for extraction.

**Council's recommended response NO CHANGE**

The Council intends to prepare a separate Development Plan Document to identify 'preferred areas of search' for minerals extraction. In the meantime the areas of search for minerals extraction are identified.

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**Section/Policy**

E2B Minerals **CP13**

**ID**

614

**Consultee**

Environomics representing Brett Aggregates

**Representation CS2345**

There is an urgent need to bring new mineral sites forward, in view of the timescale of the London Plan review and the timescale for the Havering LDF process. MPS1 recognises that it typically takes 7 years to bring a new site to full production. It is therefore imperative the further resources are identified for immediate release. Where possible these mineral sites should be extensions to existing operations where the processing plant and associated infrastructure are established and traffic routing has been agreed in order to mitigate potentially adverse impacts. Preferred sites should be identified in the LDF for future mineral working in the short term.

**Council's recommended response NO CHANGE**

The Council intends to prepare a separate Development Plan Document to identify 'preferred areas of search' for minerals extraction. In the meantime the areas of search for minerals extraction are identified.

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**Section/Policy**

E2AA Re-use and recycling of aggregates **DC41**

**ID**

563

**Consultee**

Highways Agency

**Representation CS2346**

Supports the policy approach of moving processed material by methods other than road based transport.

**Council's recommended response NO CHANGE**

Support welcomed

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**Section/Policy**

E2BA Minerals extraction DC42

**ID**

860

**Consultee**

Cluttons representing Crown Estate

**Representation CS2347**

Support mineral extraction in the GB in line with PPG2, housing should be considered an appropriate after use. It is considered that the prior extraction of commercially viable mineral resources from site to be used for permanent development goes to the heart of sustainability. The allocation of the Crown Farm site could allow Havering to achieve mineral extraction targets in the short term. Resumption of agricultural use post extraction is highly unlikely as is not of sufficient size to be farmed economically, and increasingly cut off from other agricultural holdings. Innovative approach to restoration could allow for potential housing development as well as opportunities for enhanced recreational facilities and habitat management. By the time extraction is complete Havering is likely to have developed a substantial amount of previously developed land. In line with the London Plan Havering should take a long term approach and will need to consider alternative sites in the most sustainable location. Potential residential development east of Crown Farm would be located next to adjacent built development and could take advantage of existing social and public transport infrastructure, helping ensure the future Green Belt boundary is well defined and defensible for the future. It will also demonstrate that Havering is taking a long term approach to the supply of land for permanent development in a way which does not result in the sterilisation of valuable mineral deposits.

**Council's recommended response NO CHANGE**

The Council intends to prepare a separate Development Plan Document to identify 'preferred areas of search' for minerals extraction. In the meantime the areas of search for minerals extraction are identified. Havering's housing provision target makes no allowance for capacity from green belt sites.

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**Section/Policy**

E2BA Minerals extraction DC42

**ID**

614

**Consultee**

Environomics representing Brett Aggregates

**Representation CS2348**

Advocate the current wording in MWD1 in that it seeks to ensure that there is no 'significant adverse effect' on sites of nature conservation importance. Does not like the word 'protect' as this implies that there should be no disturbance what so ever which would rule out any possibility of mineral extraction. Biodiversity sites should be ranked according to a hierarchy of protection with the most important sites (internationally important ones) given the highest level of protection. Even in these cases mineral extraction should not be totally precluded.

**Council's recommended response NO CHANGE**

Policy states 'there is no significant adverse effect on sites of protected or priority species or habitats in line with Havering's Biodiversity Action Plan, sites of historical, geological or archaeological importance'.

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**Section/Policy**

E2BA Minerals extraction DC42

**ID**

614

**Consultee**

Environomics representing Brett Aggregates

**Representation CS2349**

Civic amenity sites are better located away from sensitive locations and receptors.

**Council's recommended response NO CHANGE**

Noted

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**Section/Policy**

E2BA Minerals extraction DC42

**ID**

614

**Consultee**

Environomics representing Brett Aggregates

**Representation CS2350**

Environmental standards during mineral extraction and the restoration of mineral sites are agreed as part of the planning application and the planning authority has the power to set stringent conditions relating to these issues. Existing mineral guidance in MPG7 already sets out the need for a 5 year aftercare period for mineral restoration works particularly where restored to agriculture. The same approach could be applied to sites restored to other end uses such as wildlife areas or parks.

**Council's recommended response NO CHANGE**

Noted

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**Section/Policy**

E2BA Minerals extraction **DC42**

**ID**

614

**Consultee**

Environomics representing Brett Aggregates

**Representation CS2351**

Competent professional operators comply with the agreed terms and conditions whereas low quality operators do not. It is very often the enforcement of the planning conditions that needs to be tightened not the standards within them. Notwithstanding this issue, agree with the London Plan that minerals operators should adopt the highest environmental standards for aggregate extraction in line with National Minerals Policy Guidance. There should be a preferred option to identify and safeguard aggregate resources for extraction in line with the requirements of the London Plan.

**Council's recommended response NO CHANGE**

Noted

Policy DC43 (formerly E2BB) sets out the approach to safeguarding minerals reserves. A separate Development Planning Document will be prepared to identify 'preferred areas' for minerals extraction.

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**Section/Policy**

E2BA Minerals extraction **DC42**

**ID**

1224

**Consultee**

David L Walker

**Representation CS2352**

(response to options carried forward).

(Land off Wennington Road). The allocation of clients land would form part of a larger development including land East Hall Farm. This would form a site with a reserve large enough to make a contribution to the landbank but not large enough to result in over concentration of minerals workings.

**Council's recommended response NO CHANGE**

The Council intends to prepare a separate Development Plan Document to identify 'preferred areas of search' for minerals extraction. In the meantime the areas of search for minerals extraction are identified. Havering's housing provision target makes no allowance for capacity from green belt sites.

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**Section/Policy**

E2BA Minerals extraction DC42

**ID**

614

**Consultee**

Environomics representing Brett Aggregates

**Representation CS2353**

(response carried forward from issues stage)

Include South Hall Farm Extension which is likely to yield around 700,000 tonnes over 4 years. Mineral would continue to be processed at the existing plant site. Restoration would be back to agricultural use at original ground level using inert fill. Access for infill operations would be via existing South Hall Farm entrance of the old A13.

**Council's recommended response NO CHANGE**

The Council intends to prepare a separate Development Plan Document to identify 'preferred areas of search' for minerals extraction. In the meantime areas of search for minerals extraction are identified.

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**Section/Policy**

E2BA Minerals extraction DC42

**ID**

614

**Consultee**

Environomics representing Brett Aggregates

**Representation CS2354**

(response carried forward from issues stage)

Put forward for inclusion area known as Spring Farm that is subject to a current planning application

**Council's recommended response NO CHANGE**

The Council intends to prepare a separate Development Plan Document to identify 'preferred areas of search' for minerals extraction. In the meantime the areas of search for minerals extraction are identified.

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**Section/Policy**

E2BA Minerals extraction DC42

**ID**

614

**Consultee**

Environomics representing Brett Aggregates

**Representation CS2355**

(response carried forward from issues stage)

Marks Warren Extension. Forms the eastern part of Crown Farm and would be processed at the existing Marks Warren site via a conveyor link crossing the A12 that will be subject to Highways Agency approval. The area is likely to yield around 1,500,000 tonnes to be worked over 10 years. Restoration would be back to agricultural use at original ground level using inert fill. Access for infill operations would need to be made off the A118 with vehicles limited to the direction of Whalebone Lane North to prevent access via Romford town centre. This is an important strategy that does not seek to increase productive capacity but maintains capacity in line with the aggregate need identified in the London Plan and by the ODPM. In order to increase the recovery of inert materials for recycling with the production of recycled aggregates both complexes should also be included for inert waste recycling.

**Council's recommended response NO CHANGE**

The Council intends to prepare a separate Development Plan Document to identify 'preferred areas of search' for minerals extraction. In the meantime the areas of search for minerals extraction are identified.

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**Section/Policy**

E2BA Minerals extraction DC42

**ID**

909

**Consultee**

Brown Mineral Partnership

**Representation CS2356**

(response carried forward from issues stage)

Act as consultants on behalf of Essex County Council's Rainham Lodge Farm which is subject to an option agreement with Messrs RMC for proposed

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minerals development. The site was extensively test drilled and contains approximately 1.9 million tonnes of sand and gravel which the company are hoping to extract in due course.

### **Council's recommended response NO CHANGE**

The Council intends to prepare a separate Development Plan Document to identify 'preferred areas of search' for minerals extraction. In the meantime the areas of search for minerals extraction are identified.

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#### **Section/Policy**

E2BA Minerals extraction DC42

#### **ID**

563

#### **Consultee**

Highways Agency

#### **Representation CS2357**

The Highways Agency supports the policy approach to adopting voluntary site transport plans but would prefer that this is made compulsory at each location. The HA supports consideration of the effect on the road network.

### **Council's recommended response NO CHANGE**

Support welcomed

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#### **Section/Policy**

E2BC Ready mixed and processing plant DC44

#### **ID**

563

#### **Consultee**

Highways Agency

#### **Representation CS2358**

The HA supports the purpose of this policy to help reduce traffic movements by confining work to current mineral sites.

### **Council's recommended response NO CHANGE**

Support welcomed

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#### **Section/Policy**

E2BD Transport of aggregate by rail or river DC45

#### **ID**

563

**Consultee**

Highways Agency

**Representation CS2359**

The HA supports this policy as it encourages the sustainable movement of aggregate via non-road based modes of transport.

**Council's recommended response NO CHANGE**

Support welcomed.

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## **Community facilities**

This chapter is now called Community Needs

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**Section/Policy**

F1A Community facilities CP8

**ID**

1040

**Consultee**

Barton Willmore representing Fairview New Homes

**Representation CS2360**

It is the requirement of statutory bodies to plan for the forecast growth in the LDF period in terms of providing the prerequisite education facilities, policy suggests Council intends to achieve these transport requirements on a site by site basis through planning obligations which would be contrary to Circular 05/05.

**Council's recommended response NO CHANGE**

Policy is clear that new facilities would be required to meet new demand and is therefore consistent with Circular 05/05.

---

**Section/Policy**

F1A Community facilities CP8

**ID**

612

**Consultee**

CGMS representing the Metropolitan Police Authority

**Representation**

Welcome the recognition that major developments should make provision for facilities which create new demands on services subject to ensuring the scope of the policy incorporates police facilities and services

**Council's recommended response NO CHANGE**

Support welcomed

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**Section/Policy**

F1AA Community facilities DC26

**ID**

1369

**Consultee**

ICENI projects

**Representation CS2361**

Supports policy but it should be modified so that specific reference is made of the need for community facilities within retirement homes and complexes for the elderly and infirm.

**Council's recommended response NO CHANGE**

The Council considers that it is not always appropriate for community facilities to be within retirement homes and complexes for the elderly and infirm. At the same time the current wording of the policy does not preclude this, so no change is necessary.

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**Section/Policy**

F1AB Protecting existing community facilities DC27

**ID**

1040

**Consultee**

Barton Willmore representing Fairview New Homes

**Representation CS2362**

Trigger should be determined on a site by site basis as it may be more appropriate or desirable for the trigger for re-provision to be prior to 50% of the associated development being occupied

**Council's recommended response NO CHANGE**

Determining this on a site by site basis introduces uncertainty and unnecessary delay.

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**Section/Policy**

## **Cabinet 9 October 2006**

F1AB Protecting existing community facilities **DC27**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2363**

Define what is a community facility.

**Council's recommended response **CHANGE****

CP8 now provides definition of a Community Facility.

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**Section/Policy**

F1AB Protecting existing community facilities **DC27**

**ID**

612

**Consultee**

CGMS representing the Metropolitan Police Authority

**Representation CS2364**

MPA believe it is reasonable to allow surplus police facilities to be redeveloped for alternative uses where the police service use has been relocated yet retained in the local area.

**Council's recommended response **NO CHANGE****

The policy would allow this

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**Section/Policy**

F1AC Dual use of school facilities **DC28**

**ID**

586

**Consultee**

Bellway

**Representation CS2365**

This is welcomed and supported

**Council's recommended response **NO CHANGE****

Support welcomed

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**Section/Policy**

## **Cabinet 9 October 2006**

F1AC Dual use of school facilities **DC28**

**ID**

612

**Consultee**

CGMS representing the Metropolitan Police Authority

**Representation CS2366**

Supported

**Council's recommended response NO CHANGE**

Support welcomed

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**Section/Policy**

F1AD Education premises **DC29**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2367**

It is the requirement of statutory bodies to plan for the forecast growth in the LDF period in terms of providing the prerequisite education facilities, policy suggests Council intends to achieve these transport requirements on a site by site basis through planning obligations which would be contrary to Circular 05/05.

**Council's recommended response NO CHANGE**

Policy seeks education contributions to address need arising from the development therefore the policy is consistent with Circular 05/05.

---

**Section/Policy**

F1AD Education premises **DC29**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2368**

No clear mechanism for monitoring the policy

**Council's recommended response NO CHANGE**

Policy will be monitored through the Council's S106 working party.

**Section/Policy**

F1AD Education premises DC29

**ID**

1226

**Consultee**

RPS representing Fairview New Homes

**Representation CS2369**

Request that contributions towards education facilities are only sought where new housing will create additional demand for such facilities and there is a lack of capacity in existing schools to meet that demand. Contributions should only be sought from family sized housing and should accord with the tests of Circular 05/05.

**Council's recommended response NO CHANGE**

Current guidance seeks contributions from all forms of housing except studio flats as they can all generate children who need schooling, but makes clear that S106 agreements will only be sought where need exists in local schools. This approach is likely to be maintained in forthcoming Supplementary Planning Document. The Council considers that its approach to seeking contributions for education needs is in line with Circular 05/05. Moreover it has been successfully implementing this policy for a number of years.

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**Section/Policy**

F1AD Education premises DC29

**ID**

597

**Consultee**

Cushman and Wakefield representing TESCO stores

**Representation CS2370**

(Para 1.7) The preferred policy approach as detailed at paragraph 1.7 is contrary to government guidance on the operation of planning obligations. Contributions towards new provision of educational facilities are only appropriate where a deficiency exists, therefore if there is an adequate provision within an area there would be no basis to require any new development to provide for an additional provision.

**Council's recommended response NO CHANGE**

Current guidance makes clear that S106 agreements will only be sought where need exists in local schools. This approach is likely to be maintained in forthcoming Supplementary Planning Document. The Council considers that its approach to seeking contributions for education needs is in line with

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Circular 05/05. Moreover it has been successfully implementing this policy for a number of years.

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### **Section/Policy**

F1AE Planning gain DC30

### **ID**

1040

### **Consultee**

Barton Willmore representing Crest Nicholson

### **Representation CS2371**

Does not comply with paragraph B8 of Circular 05/2005. Planning obligations should not be used solely to resolve existing deficiencies in infrastructure provision or to secure contributions to the achievement of wider planning objectives that are not necessary to allow permission to be given for a particular development.

### **Council's recommended response CHANGE**

This policy now only refers to contributions towards the provision of essential new community facilities. Moreover policy PO1 makes clear that the tests of Circular 05/2005 must be met

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### **Section/Policy**

F1AE Planning gain DC30

### **ID**

586

### **Consultee**

Bellways

### **Representation CS2372**

Suggests that planning gain will be used to target community and other provisions in less-off areas, this is not in accordance with planning policy where Circular 05/05 which states that contributions should be directly related to the proposed development and fairly and reasonably related in scale and kind to the proposed development, amongst other criteria. This section should therefore be altered to reflect the correct planning position.

### **Council's recommended response NO CHANGE**

This policy now only refers to contributions towards the provision of essential new community facilities. Moreover policy PO1 makes clear that the tests of Circular 05/2005 must be met

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### **Section/Policy**

## **Cabinet 9 October 2006**

F1AE Planning gain **DC30**

**ID**

680

**Consultee**

Government Office for London

**Representation**

Needs to be as concise as possible with its detailed application contained in an SPD. No SPD is currently proposed other than for education needs in connection with residential development so it is hard to see how the detail can be included without an overlong policy.

**Council's recommended response NO CHANGE**

This policy now only refers to contributions towards the provision of essential new community facilities. Moreover policy PO1 makes clear that the tests of Circular 05/2005 must be met

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**Section/Policy**

F1AE Planning gain **DC30**

**ID**

563

**Consultee**

Highways Agency

**Representation CS2373**

The HA supports the use of planning gain in securing funding for local improvements required as a result of development. Whilst the preferred approach for this policy is related to the provision of community facilities, the HA recommends including transport related benefits in this policy where appropriate. For example, a contribution towards required transport infrastructure or the provision of new or existing bus services to encourage the use of alternative modes to the private car.

**Council's recommended response CHANGE**

This is now covered in policy PO1

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**Section/Policy**

F1AE Planning gain **DC30**

**ID**

1066

**Consultee**

London Thames Gateway Development Corporation

**Representation CS2374**

Should be a single overarching S106 policy to provide clarity to developers which should reflect the emerging LTGDC S106 strategy and be included within the CS policies.

**Council's recommended response NO CHANGE**

This is now covered in policy PO1.

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**Section/Policy**

F1AE Planning gain DC30

**ID**

1226

**Consultee**

RPS representing Fairview New Homes

**Representation CS2375**

Needs to state that it conforms with Circular 05/05 and need for such provision will apply on a site by site basis.

**Council's recommended response CHANGE**

This is now covered in policy PO1.

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**Section/Policy**

F1AE Planning gain DC30

**ID**

1226

**Consultee**

Woolf Bond Planning representing George Wimpey Homes

**Representation CS2376**

Need for developer contributions toward the provision of necessary infrastructure should relate, for the most part, to direct impact mitigation and should be based upon a robust evidence base to justify the necessary commuted sums. An onerous requirement for developer contributions in addition to that for affordable housing provision on site, could make schemes unviable and could as a result limit the number of sites released for development. This is likely to have further implications for the affordability or otherwise of housing.

**Council's recommended response NO CHANGE**

## **Cabinet 9 October 2006**

This policy now only refers to contributions towards the provision of essential new community facilities. Moreover policy PO1 makes clear that the tests of Circular 05/2005 must be met

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### **Section/Policy**

F1AE Planning gain DC30

### **ID**

597

### **Consultee**

Cushman and Wakefield representing TESCO stores

### **Representation CS2377**

Contrary to government guidance on the operation of planning obligation. Contributions towards new infrastructure are only appropriate where a deficiency exists, therefore if there is an adequate provision within an area there would be no basis to require any new development to provide for an additional provision

### **Council's recommended response NO CHANGE**

This policy now only refers to contributions towards the provision of essential new community facilities. Moreover policy PO1 makes clear that the tests of Circular 05/2005 must be met

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## **Transport**

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### **Section/Policy**

General Comments

### **ID**

1066

### **Consultee**

London Thames Gateway Development Corporation

### **Representation CS2378**

Generally support the proposed transport policies

### **Council's recommended response NO CHANGE**

Support welcomed.

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### **Section/Policy**

General Comments

**ID**

923

**Consultee**

London City Airport

**Representation CS2379**

Note the consultation documents make no reference to the need for, and easy access to, air travel. In this connection it should be noted that London City Airport provides business and other air travellers in Havering with low travel, time saving access to key destinations in the UK and Europe. The borough enjoys very good connections by road (via the newly upgraded A13 and also the A127/A13/A406) and following the opening of the DLR City Airport Extension very much improved access by public transport. The DLR's Stratford International project will enhance the rail connections still further. The documents should perhaps recognise the presence of these facilities might help in attracting investment or retaining business interests in the borough.

Although the Council's obvious desire to pursue planning policies which allow its residents to live and work in the borough the drafts recognises that many will continue to travel further afield to work. Already many Havering residents travel to work in Central London and Canary Wharf but plans for the regeneration of the Thames Gateway highlight a number of areas of opportunity to the west of Havering which will offer employment opportunities to residents of the borough including the Olympic facilities, the Royal Docks where employment opportunities are expected to grow at the Airport and at Excel and Aquarium and other major developments. The Areas to be set aside for employment uses in Barking Riverside.

Large increases in employment in these areas underline the need for the continued development of the transport infrastructure across the Thames Gateway and the support of the Council and other agencies will be required in securing these. In this connection we note the Council will continue its support for Crossrail (Line 1) and to lobby for and generally to facilities the Thames Gateway Transits, the proposed new station at Beam Reach on the Southend-Fenchurch St line and improvements to the local bus network particularly in London Riverside.

Looking further afield the drafts also refer to the Council's support for the Thames Gateway Bridge but there is no specific reference to the proposed branch of Crossrail to Abbey Wood, the proposed Barking Reach extension to the DLR extending from Gallions Reach at the eastern end of the Royal Docks to link with the LTS line at Dagenham Dock, the proposed Stratford International Branch of the DLR which will provide a link between Stratford International Station on the CTRL via Stratford low level station (on the main line to Liverpool St) to the existing DLR Beckton line and to the London City Airport extension which is now being further extended to Woolwich Arsenal.

## **Cabinet 9 October 2006**

These projects will all be of importance in opening up employment opportunities for Havering residents in the wider Thames Gateway as well as facilitating access to LCA and the Council may wish to take account of them in its thinking.

### **Council's recommended response **CHANGE****

Policy CP10 (formerly G2AA) now refers to ELT linking to Dagenham Dock DLR station with connections on to London City Airport and Olympic Park.

---

#### **Section/Policy**

G1A Reducing need to travel **CP9**

#### **ID**

1040

#### **Consultee**

Barton Willmore representing Crest Nicholson

#### **Representation CS2380**

No definition provided of E-enabled.

### **Council's recommended response **CHANGE****

Reference to e-enabled now removed.

---

#### **Section/Policy**

G1A Reducing need to travel **CP9**

#### **ID**

586

#### **Consultee**

Bellways

#### **Representation CS2381**

Concerned that requiring all new development to be E-enabled will be passed on to the development industry. This is a matter of personal choice and out of developers control.

### **Council's recommended response **NO CHANGE****

Reference to e-enabled now removed.

---

#### **Section/Policy**

G1A Reducing need to travel **CP9**

#### **ID**

563

**Consultee**

Highways Agency

**Representation CS2382**

The HA supports this policy and its promotion of reducing the need to travel. However, it would like to see the inclusion of encouraging the use of alternative modes to the car. The HA supports the co-location of major trip generating land uses to encourage trip linking and the use of good public transport services

**Council's recommended response NO CHANGE**

The overall aim of this policy is to reduce the need to travel by all forms of transport whilst recognising that many people will continue to use their cars for travel, particularly in the suburbs.

---

**Section/Policy**

G2A Transport choice **CP10**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2383**

Seeking improvements to public transport in connection with major new developments fails to comply with the provisions of Circular 05/05. Developers should not be expected to pay for facilities which are needed solely in order to resolve existing deficiencies. Major development needs to be clarified.

**Council's recommended response CHANGE**

This part of the policy has now been changed to 'Seeking contributions to improvements to public transport where this is necessary to serve the new development.'

---

**Section/Policy**

G2A Transport choice **CP10**

**ID**

563

**Consultee**

Highways Agency

**Representation CS2384**

Supports seeking improvements to public transport in connection with new developments and ensuring that the design of new development encourages cyclists and pedestrians.

**Council's recommended response NO CHANGE**

Support welcomed

---

**Section/Policy**

G2A Transport choice **CP10**

**ID**

538

**Consultee**

Transport for London

**Representation CS2385**

Although the intention to relate car parking standards to transport accessibility is supported, it should be made clear that this refers to *public* transport accessibility. The policy wording relating to parking standards needs to better reflect London Plan policies. It should state that on-site car parking at new developments will be the minimum necessary and that there will be no over-provision that could undermine the use of more sustainable non-car modes. Reference to providing sufficient car parking for those who want to travel by car should be deleted as this would conflict with London Plan Policy 3C.22.

**Council's recommended response CHANGE**

Policy has been changed so it refers to public transport. The Council considers that the policy does reflect the London Plan by relating car parking standards to public transport accessibility. Paragraph 3.205 of the London Plan states that; 'This plan sets out a parking restraint regime that balances the desirability of reducing car use with the need to provide for attractive, viable development in town centres, whilst recognising that many people will continue to use their cars for travel, particularly in the suburbs. Policy DC33 (formerly G2AG) incorporates London Plan parking standards.'

---

**Section/Policy**

G1AA Reducing the need to travel **CP9**

Now incorporated within CP 9 to remedy the duplication that existed between preferred options policies G1A and G1AA.

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2386**

G1 AA Reducing the need to travel - the previous UDP option sought to “reinforce the town centre hierarchy by supporting high trip generating development only at locations with high public transport accessibility levels”. It is recommended that this approach should remain in line with London Plan 3C.1, which supports high trip generating development only at locations with high public transport accessibility and capacity.

**Council’s recommended response** **CHANGE**

Policy G1AA is now incorporated within CP 9 to remedy the duplication that existed between preferred options policies G1A and G1AA. Strategic Policy G1A is consistent with London Plan policy 3C.1 as it aims to: ‘Co-locate major trip generating retail, services, leisure, art, entertainment, office, and community uses in places with good public transport accessibility and ensure that new development reinforces the town centre hierarchy’.

---

**Section/Policy**

G1AA Reducing the need to travel **CP9**

Now incorporated within CP 9 to remedy the duplication that existed between preferred options policies G1A and G1AA.

**ID**

538

**Consultee**

Transport for London

**Representation CS2387**

The policy purpose should make it clear that this would particularly apply to reducing car journeys in line with London Plan Policy 3C.16 on tackling congestion and reducing traffic.

**Council’s recommended response** **CHANGE**

Reasoned justification to CP9 now refers specifically to the Transport for London transport targets.

---

**Section/Policy**

G2AA Facilitating public transport **CP10**

Now incorporated within CP 10 to remedy the duplication that existed between preferred options policies G2A and G2AA.

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2388**

It is the requirement of statutory bodies to plan for the forecast growth in the LDF period in terms of providing the prerequisite transport, policy suggests Council intends to achieve these transport requirements on a site by site basis through planning obligations which would be contrary to Circular 05/05.

**Council's recommended response** **CHANGE**

Policy G2AA is now incorporated within CP 10 to remedy the duplication that existed between preferred options policies G2A and G2AA. CP10 clearly states that the Council will continue to lobby and create the conditions for public transport improvements. Policy on contributions has been amended so that it now refers to: 'seeking contributions to improvements to public transport where this is necessary to serve the new development.'

---

**Section/Policy**

G2AA Facilitating public transport **CP10**

Now incorporated within CP 10 to remedy the duplication that existed between preferred options policies G2A and G2AA.

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2389**

Policy should express a commitment from the Council to work with the relevant statutory authorities to provide the pre-requisite transport infrastructure to facilitate the growth targets in the London Plan.

**Council's recommended response** **CHANGE**

Policy G2AA has now been deleted as the Council considers that it duplicates Strategic Policy G2A. This commitment is now included in the reasoned justification. However these schemes are not only necessary to facilitate the growth targets in the London.

---

**Section/Policy**

G2AA Facilitating public transport **CP10**

Now incorporated within CP 10 to remedy the duplication that existed between preferred options policies G2A and G2AA.

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2390**

Requirement for developments to be accompanied by a Travel Plan and Transport Assessment is onerous and unjustified. Not clear what a major development is. No clear mechanism for the implementation of the policy.

**Council's recommended response** **CHANGE**

Policy G2AA is now incorporated within CP 10 to remedy the duplication that existed between preferred options policies G2A and G2AA. Requirement for a transport assessment and travel plan is in line with policy 3C.2 of the London Plan. In line with the London Plan reference to major development has been replaced so that policy G2A now refers to: 'Requiring the submission of a travel plan and transport assessment with developments with significant transport implications.'

---

**Section/Policy**

G2AA Facilitating public transport **CP10**

Now incorporated within CP 10 to remedy the duplication that existed between preferred options policies G2A and G2AA.

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2391**

Include indicators for the Council's performance in terms of securing the support of statutory bodies to provide the requisite public transport infrastructure to meet predicated growth.

**Council's recommended response** **NO CHANGE**

The Council does not consider that this can be monitored.

---

**Section/Policy**

G2AA Facilitating public transport **CP10**

Now incorporated within CP 10 to remedy the duplication that existed between preferred options policies G2A and G2AA.

**ID**

563

**Consultee**

Highways Agency

**Representation CS2392**

Particularly supportive of the requirement for new development to have a travel plan and transport assessment, which will reduce the impact of development on the trunk network. The HA supports policies that require developers to mitigate against any transport impact that may be caused as a

result of developments, after every effort has been made to reduce demand through sustainable initiatives.

**Council's recommended response NO CHANGE**

Support welcomed

---

**Section/Policy**

G2AA Facilitating public transport **CP10**

Now incorporated within CP 10 to remedy the duplication that existed between preferred options policies G2A and G2AA.

**ID**

528

**Consultee**

Transport for London

**Representation CS2393**

The intention to secure transport improvements is welcomed. However, the policy needs to be expanded to encompass improvements to transport accessibility and capacity in line with London Plan Policy 3C.1. The intention to show indicative routes for Thames Gateway Transits in line with London Plan Policy 3C.13 is welcomed. Reference should also be made in the accompanying text to the need to take into account cumulative transport impacts. Reference to providing sufficient car parking for those who want to travel by car should be deleted as this would conflict with London Plan Policy 3C.22.

**Council's recommended response **CHANGE****

Policy G2AA is now incorporated within CP 10 to remedy the duplication that existed between preferred options policies G2A and G2AA. CP10 now refers to: 'Seeking contributions to improvements to public transport accessibility and capacity where this is necessary to serve the new development.'

And 'Ensuring that new development does not overload the capacity of the public transport network'.

Reasoned justification now states: 'attention will be paid to ensuring that new developments do not overload the public transport network, either individually or cumulatively.' Please see response to earlier TfL comments for policy G2A with regard to car parking standards

---

**Section/Policy**

G2AA Facilitating public transport **CP10**

Now incorporated within CP 10 to remedy the duplication that existed between preferred options policies G2A and G2AA.

**ID**

528

**Consultee**

London Thames Gateway Development Corporation

**Representation CS2394**

Should stress the importance of increasing the permeability of the Borough within the LTGDC area, with explicit reference to linkages to the areas to the north, the proposed ELT route and the Ingrebourne Creek proposal (which it is recommended should also be reflected in the Site Specific Allocations document)

**Council's recommended response **CHANGE****

This is now covered in paragraph 1.7 of the reasoned justification to CP10

---

**Section/Policy**

G2AB The road network **DC32**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2395**

Policy option should recognise the role of mitigation measures to minimise the impact of new developments.

**Council's recommended response **NO CHANGE****

The Council does not consider that there is a need to include this. The policy clearly states: 'New development which has an adverse impact on the functioning of the road hierarchy will not be allowed.' If mitigation measures ensure that new development does not have an adverse impact then they will satisfy this policy. Therefore the Council consider that this is implicit within the policy.

---

**Section/Policy**

G2AB The road network **DC32**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2396**

Policy is unsound as it does not set a clear mechanism for implementation.

**Council's recommended response **NO CHANGE****

Policy will be implemented through its application.

---

**Section/Policy**

G2AB The road network **DC32**

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2397**

G2 AB The Road Network - the "Council's road hierarchy" and "preferred approach on p.169 need to be consistent with London Plan 3C.15 and 3C.17. In particular, the preferred approach does not include reference to improved safety and integration with local and strategic planning policies as per 3C.17.

**Council's recommended response **CHANGE****

Policy now includes reference to: 'improved safety for all users' and 'consistency with Havering's Local Implementation Plan and the Mayor of London's Transport Strategy.'

---

**Section/Policy**

G2AB The road network **DC32**

**ID**

563

**Consultee**

Highways Agency

**Representation CS2398**

The HA supports the preferred policy approaches as they seek to promote sustainable forms of travel and that new development does not adversely affect the functioning of the road hierarchy. In particular, the HA supports paragraph 1.10 G2 AB The Road Network

**Council's recommended response**

Support welcomed

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**Section/Policy**

G2AB The road network **DC32**

**ID**

528

**Consultee**

Transport for London

**Representation CS2399**

Any proposals for new road schemes will also need to be in conformity with the criteria set out in London Plan Policy 3C.15. The Council's road hierarchy should be consistent with London Plan Policy 3C.17 on the allocation of street space. The intention to review guidance on road layouts is welcomed and should take account of London Plan Policies 3C.17 – 3C.21. It would be helpful to state that there will be close working with TfL on issues affecting management of the road network (TLRN and SRN) particularly given the intention to develop a Network Management Plan for the A12

**Council's recommended response **CHANGE****

Policy now refers to the allocation of street space in accordance with London Plan policy 3C.17

---

**Section/Policy**

G2AB The road network **DC32**

**ID**

NA

**Consultee**

Cllr Curtin

**Representation CS2400**

Concerned to see effective traffic management in relation to town centres.

**Council's recommended response **CHANGE****

Policy now refers to the allocation of street space in accordance with London Plan policy 3C.17

---

**Section/Policy**

G2AC Car parking **DC33**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2401**

Object to car parking standards in SPD these should be in policy to enable them to be properly scrutinised.

**Council's recommended response **CHANGE****

Whilst Havering's Local Development Scheme clearly states that car parking standards will be included in a Supplementary Planning Document, the

Council has now included these within the Core Strategy so that they can be properly scrutinised.

---

**Section/Policy**

G2AC Car parking DC33

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2402**

Reasoned justification is not consistent with policy therefore not sound with regard to soundness test 6 for example with regard to car free housing in Upminster and Romford and the withholding of permits from residents of new developments.

**Council's recommended response NO CHANGE**

Car free housing in Upminster and Romford Town Centre is consistent with the London Plan Density Matrix, which has been successfully implemented through Interim Planning Guidance since 2004. Moreover policy does require car free housing as the range that applies in these centres is 0-1 spaces per unit.

---

**Section/Policy**

G2AC Car parking DC33

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2403**

Issues over car free permits and restrictions on residents applying for permits should be determined on a site by site basis.

**Council's recommended response NO CHANGE**

In the interests of controlling on street car parking it is important that policy makes clear that car free parking is only appropriate where on street car parking can be controlled.

---

**Section/Policy**

G2AC Car parking DC33

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2404**

Requiring contributions for public transport improvements to enable the level of car parking to be reduced conflicts with Circular 05/905. Council cannot require applicants to enter into legal agreements rather than can seek to enter into them.

**Council's recommended response **CHANGE****

Policy now refers in paragraph 1.2 of the reasoned justification to DC33 to 'seeking' rather than 'requiring' contributions to public transport improvements.

---

**Section/Policy**

G2AC Car parking **DC33**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2405**

Policy is unsound as it does not set out a clear mechanism for the monitoring of the policy.

**Council's recommended response **NO CHANGE****

Monitored at Core Strategy level through AMR 29-35.

---

**Section/Policy**

G2AC Car parking **DC33**

**ID**

586

**Consultee**

Bellways

**Representation CS2406**

Not providing parking spaces will not prevent owners and tenants owning one of more cars and therefore needs to be catered for. A more pragmatic approach is needed which reflects the CABA study and draft PPS3.

**Council's recommended response **CHANGE****

Guidance has now been included within this policy which makes clear that less than one for one car parking will only be allowed where parking controls are in place to control on street car parking.

---

**Section/Policy**

G2AC Car parking DC33

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2407**

G2 AC Car Parking - the preferred approach should adopt London Plan Annex 4 Maximum Parking Standards approach.

**Council's recommended response CHANGE**

Policy is now based on the London Plan Maximum Parking Standards as set out in Annex 4 of the London Plan.

---

**Section/Policy**

G2AC Car parking DC33

**ID**

563

**Consultee**

Highways Agency

**Representation CS2408**

The HA supports the use of PTAL to determine parking standards and adherence to national guidelines as contained within PPG13. The HA is generally supportive of the preferred approach where it seeks to control parking provision in relation to accessibility to public transport. However, the HA considers that accessibility to public transport should be promoted. With regard to the criteria to which developers would need to satisfy, the HA supports the submission of transport assessments for major developments. The HA would not however wish to see this policy as an opportunity to lose focus on the promotion of more sustainable modes of transport.

**Council's recommended response**

Support welcomed and comments noted.

---

**Section/Policy**

G2AC Car parking DC33

**ID**

528

**Consultee**

Transport for London

**Representation CS2409**

Standards provided in SPD on car parking standards should be reviewed and updated to reflect maximum standards in annex 4 of the London Plan. In the interim London Plan parking standards would apply to development control decisions. Consideration should be given to the extension of on street parking controls to enable the range of areas where car free housing is acceptable to be increased. The approach to parking in town centres should take account of London Plan policy 3C.23. The need to enter into an agreement for a management scheme and pricing structure should apply to all town centre off street parking including parking to serve retail and leisure uses. The Indicators and Targets should include the percentage of completed non-residential development complying with car parking standards (currently a core output target for G2AA).

**Council's recommended response **CHANGE****

Car parking standards are now consistent with Annex 4 of the London. Any extensions to parking controls will be taken forward through the LIP process. Target has now been moved up to the Strategic Policy level. The Council considers that reference to 'public off street parking' encapsulates retail and leisure uses. To refer to 'all town centre off street parking' would also include residential which the Council considers would not be appropriate.

---

**Section/Policy**

G2AD Walking **DC34**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2410**

Contributions should only be sought where they satisfy the provision of Circular 05/05

**Council's recommended response **CHANGE****

This is now covered in PO1.

---

**Section/Policy**

G2AD Walking **DC34**

## **Cabinet 9 October 2006**

### **ID**

1040

### **Consultee**

Barton Willmore representing Crest Nicholson

### **Representation CS2411**

The design and location of access and circulation of a proposed development are matters to be determined on a site by site basis.

### **Council's recommended response NO CHANGE**

The Council considers that in order to ensure that the pedestrian environment is improved there are certain criteria which for the reasons given in the policy should be applied on a site by site basis.

---

### **Section/Policy**

G2AD Walking DC34

### **ID**

622

### **Consultee**

Greater London Authority

### **Representation CS2412**

Suggest adding reference to education facilities. There is no reference to Safer Routes to School or improving pedestrian routes to schools in line with 3C.20.

### **Council's recommended response CHANGE**

Policy now refers to safer routes to schools, and routes to schools.

---

### **Section/Policy**

G2AD Walking DC34

### **ID**

1066

### **Consultee**

London Thames Gateway Development Corporation

### **Representation CS2413**

Support the inclusion of a policy which seeks to promote access to river Thames with an aspiration to create a continuous Thames Path.

### **Council's recommended response CHANGE**

Policy now refers to the implementation of a continuous path across the Borough which increases access to the Thames frontage.

---

**Section/Policy**

G2AD Walking DC34

**ID**

528

**Consultee**

Transport for London

**Representation CS2414**

The preferred policy approach set out under this heading is welcomed and closely reflects London Plan Policy 3C.20. It would be helpful to clarify that contributions would be sought towards improving the pedestrian environment at stations and bus stops as well as larger transport interchanges.

**Council's recommended response**

Policy has now been expanded so it refers to improving the pedestrian environment at stations and bus stops as well as transport interchanges.

---

**Section/Policy**

G2AE Cycling DC35

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2415**

Contributions should only be sought where they satisfy the provision of Circular 05/05

**Council's recommended response NO CHANGE**

This is now covered in PO1.

---

**Section/Policy**

G2AE Cycling DC35

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2416**

No reference is made to the London Cycling Action Plan (2004), and no reference to TfL Cycling Parking Standards. A stronger emphasis should also be given to identifying, completing and promoting the relevant sections of the London Cycling Network Plus (LCN+), incorrectly referred to by Havering as "London Cycle Network", in line with 3C.21.

**Council's recommended response** **CHANGE**

London Cycling Network Plus now referred to. Policy has now been changed so that it states: 'In applying this policy regard will be had to the Transport for London Cycling Action Plan and London Cycle Design standards'. Cycle standards are included in Annex 6.

---

**Section/Policy**

G2AE Cycling **DC35**

**ID**

528

**Consultee**

Transport for London

**Representation CS2417**

The preferred policy approach set out under this heading is broadly welcomed and closely reflects London Plan policy 3C.19. However there should be reference to the adoption of cycle parking standards, which need to be set in accordance with London wide standards.

**Council's recommended response** **CHANGE**

Cycle parking standards now included.

---

**Section/Policy**

G2AF Servicing **DC36**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2418**

Servicing of a site should be determined on a by site basis having regard to the nature of the site and the layout of surrounding roads.

**Council's recommended response** **NO CHANGE**

There are certain criteria which for the reasons given in the policy the Council should think should be applied on a site by site basis.

**Section/Policy**

G2AF Servicing DC36

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2419**

There is no reference to parking for freight and servicing – this could be referenced here to G2 AF Servicing on p176.

**Council's recommended response NO CHANGE**

There is no reference in London Plan policy to parking for freight and servicing.

---

**Section/Policy**

G2AF Servicing DC36

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2420**

Suggest this section is renamed to “Deliveries and Servicing” because the two activities have different parking requirements and should be both referenced here. Also, the preferred option has discounted “...that developments include appropriate servicing facilities off road wherever practicable”. The discounting of this approach is at odds with the London Plan Policy 3C.24, which still favours ensuring developments include appropriate servicing facilities off road wherever practicable.

**Council's recommended response NO CHANGE**

The policy states that new industrial housing shopping and commercial developments will be expected to provide adequate servicing arrangements as far as possible within the curtilage of the development.

---

**Section/Policy**

G2AF Servicing DC36

**ID**

528

**Consultee**

Transport for London

**Representation CS2421**

The preferred policy approach set out under this heading is welcomed and reflects guidance on servicing set out in London Plan Policy 3C.24.

**Council's recommended response NO CHANGE**

Support welcomed.

---

**Section/Policy**

G2AH Park and ride **DC38**

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2422**

The approach to park and ride should be in line with strategic guidance issued by TfL "Park and Ride Strategic Assessment Framework for London (2004)".

**Council's recommended response CHANGE**

This was included in the 'Implementation Section' but has now been moved to into the body of the policy.

---

**Section/Policy**

G2AH Park and ride **DC38**

**ID**

563

**Consultee**

Highways Agency

**Representation CS2423**

The Agency would wish to be involved in the consultation for the development of any park and ride sites.

**Council's recommended response**

Noted.

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**Section/Policy**

G2AH Park and ride **DC38**

**ID**

528

**Consultee**

Transport for London

**Representation CS2424**

The preferred policy approach would need to reflect TfL guidance on Park and Ride as well as guidance in PPG 13. Any parking provided through a Park and Ride facility would need to be matched by an equivalent reduction in town centre parking.

**Council's recommended response **CHANGE****

TfL "Park and Ride Strategic Assessment Framework for London (2004)" is now referred to in the policy. Justification now states that a successful park and ride scheme may enable town centre parking to be reduced.

---

**Section/Policy**

G2AG Safeguarding **DC37**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2425**

London Plan states that only approved public transport routes should be safeguarded, however the preferred policy approach proposes to plot an indicative route on the proposals plan for the unapproved TGT and will ensure that all new development will be designed with regard to its future implementation. Therefore policy conflicts with London Plan, is premature and could fetter the ability of sites along the indicative routes to come forward for redevelopment. Delete policy.

**Council's recommended response **CHANGE****

The route of East London Transit is now included as a separate plan within the written statement. Policy CP10 (formerly G1A) does not require new development to be designed with regard to TGTs future implementation, but aims to ensure new development is designed with regards to its future implementation.

---

**Section/Policy**

G2AG Safeguarding **DC37**

**ID**

528

**Consultee**

Transport for London

**Representation CS2426**

The preferred policy approach to safeguarding is welcomed in particular the intention to safeguard North Street bus garage from redevelopment through a site specific allocation. The policy wording should provide for protection of other land that is needed for an existing or future transport use in line with London Plan Policy 3C.4. There are additional bus garage facilities within the borough in Ferry Lane North, Rainham. Account should also be taken of the emerging London Plan SPG on Land for Transport, which will shortly be issued for consultation.

**Council's recommended response NO CHANGE**

The Council does not consider it necessary to safeguard any depots along Ferry Lane as they are within the Rainham Employment Area. The Council has decided not to safeguard the North Street depot and instead replaced this with a borough wide policy seeking to ensure that the change of use of land from transport and transport support functions is resisted.

---

**Section/Policy**

G2AG Safeguarding DC37

**ID**

528

**Consultee**

Transport for London

**Representation CS2427**

North Street bus garage site allocation - the intention to protect the current use of the site is welcomed.

**Council's recommended response NO CHANGE**

The Council has decided not to safeguard the North Street depot and instead replaced this with a borough wide policy seeking to ensure that the change of use of land from transport and transport support functions is resisted.

---

**Section/Policy**

G2AG Safeguarding DC37

**ID**

528

**Consultee**

Transport for London

**Representation CS2428**

The intention to safeguard Crossrail and CTRL in line with directions from the

Secretary of State is welcomed.

**Council's recommended response NO CHANGE**

Support welcomed

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**Section/Policy**

G2AG Safeguarding DC37

**ID**

528

**Consultee**

Transport for London

**Representation CS2429**

The intention to include an indicative route for ELT on the proposals map is welcomed

**Council's recommended response CHANGE**

The proposals map does not include an indicative route for ELT this is now shown within the Core Strategy on a separate plan.

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**Section/Policy**

G2AG Safeguarding DC37

**ID**

923

**Consultee**

London City Airport

**Representation CS2430**

It is important that operations at the airport should be carefully protected and indeed this is assured by Circular 1/2003 and the Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002. These require that the airport should be consulted in relation to all applications for planning permission for sites within the areas defined on the Airport's safeguarding map which involve tall buildings or wind farms or developments for other aviation uses which might attract birds.

In this connection it is LCAs policy to encourage early pre-planning consultation between the developers of any significant development which requires formal referral to the airport under the Safeguarding Direction and may wish to consider whether to make reference to this in these drafts and as appropriate in other LDF documentation.

**Council's recommended response**

Noted

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**Section/Policy**

G2AG Freight DC39

**ID**

528

**Consultee**

Transport for London

**Representation CS2431**

Although the preferred policy approach supports the use of river wharves, it should be extended to include protection for existing and potential rail connected freight sites.

**Council's recommended response NO CHANGE**

The Council does not consider that there are any existing or potential rail freight sites worth protecting.

---

**Section/Policy**

G2AG Freight DC39

**ID**

563

**Consultee**

Highways Agency

**Representation CS2432**

The HA supports the encouragement of sustainable freight movement using rail and river measures. Development that generates high levels of freight movement is likely to be close to the M25, mitigation measures that may be required need to be assessed in the LDF process. The HA supports paragraph 1.6 and its management of the impact on the local network.

**Council's recommended response**

Support welcomed

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**Section/Policy**

G2AG Freight DC39

**ID**

859

**Consultee**

Port of London Authority

**Representation CS2433**

Development of riverside facilities is seen as being beneficial in supporting industrial and commercial development without adding corresponding congestion to the road system. The PLA would hope that when the employment policies are being developed that they can take into account the existence of these wharves and the role that the river can play in transporting material to and from these wharves and to other employment sites.

**Council's recommended response NO CHANGE**

Noted

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**Section/Policy**

G2AG Freight DC39

**ID**

859

**Consultee**

Port of London Authority

**Representation CS2434**

Similarly the transport section of the document makes reference to relieving pressure on the borough's roads by encouraging the use of alternatives to the private car. As identified in paragraph 4.100 of the London Plan the use of the waterway network can contribute to reducing congestion and minimising the environmental effects of heavy goods movements. Policy 4C.14 of the London Plan seeks to support new development and facilities on the Blue Ribbon Network to transport freight and general goods. It is therefore hoped that the use of the river will be encouraged when the Council's policies are being developed. Whilst it is appreciated that sites for waste management will be covered in a joint waste plan the waste and minerals section of the preferred options document makes no reference to the river and the important role that it can play in the transport of waste and minerals. It is hoped that this issue will be addressed in future consultation documents particularly given Policy 4C.14 of the London Plan seeks to support new development and facilities that increase the use of the Blue Ribbon Network to transport freight and general goods.

**Council's recommended response NO CHANGE**

Policy DC39 (formerly G1AG) safeguards the Tilda and Pheonix Wharves from development which would prejudice their use for freight related purposes, and refers to criteria in paragraph 4.105 of the London Plan. DC39 seeks to encourage the use of river and rail freight facilities within and without the borough where this represents the most sustainable option.

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## **Housing**

This chapter is now called places to live.

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### **Section/Policy**

General Comments

### **ID**

1066

### **Consultee**

London Thames Gateway Development Corporation

### **Representation CS2435**

Generally support the proposed housing policies with a comments that there is a need to prepare a masterplan for the main areas of proposed development within the LTGDC area, in order to provide a suitable framework within which these sites should come forward, avoiding a piecemeal approach. There is a need to ensure that development is phased appropriately alongside public transport infrastructure to avoid over dependence on the car.

### **Council's recommended response NO CHANGE**

This will be addressed within the Masterplan for London Riverside to be taken forward as SPD as identified in Havering's LDS.

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### **Section/Policy**

H1-H3A Housing CP1 and CP2

This policy has now been split up into CP1 Housing Supply and CP2 Sustainable Communities. CP1 now incorporates preferred options policy H1AA Housing Supply.

### **ID**

622

### **Consultee**

Greater London Authority

### **Representation CS2436**

The preferred option to achieve attractive, mixed and balanced communities with the right sizes and types of homes in the right locations is generally supported. However, achieving this aspiration will require the inclusion of a number of detailed policies in the Core Strategy at the Submissions Stage

### **Council's recommended response NO CHANGE**

Noted

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**Section/Policy**

H1-H3A Housing **CP1 and CP2**

This policy has now been split up into CP1 Housing Supply and CP2 Sustainable Communities. CP1 now incorporates preferred options policy H1AA Housing Supply.

**ID**

563

**Consultee**

Highways Agency

**Representation CS2437**

In terms of this policy the HA wishes to be involved in consultation about development locations. The HA supports the location of housing in areas with good access to public transport, however the effect of development on the trunk road network must also be considered.

**Council's recommended response NO CHANGE**

Noted

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**Section/Policy**

H1-H3A Housing **CP1 and CP2**

This policy has now been split up into CP1 Housing Supply and CP2 Sustainable Communities. CP1 now incorporates preferred options policy H1AA Housing Supply.

**ID**

1369

**Consultee**

ICENI

**Representation CS2438**

Requires modification to reflect the importance of the provision of specialist facilities for the elderly and infirm. The proposed amendment to the policy wording as set out below would provide the appropriate strategic context for allocating sites for this purpose and enable the provision of specialist care facilities in the Borough. Add new penultimate bullet point, 'Ensuring that the housing and community needs of the elderly and infirm are met in one location'.

**Council's recommended response NO CHANGE**

The Council does not consider it appropriate to amend a borough wide policy which sets the framework for all housing schemes to this effect.

**Section/Policy**

H1-H3A Housing **CP1 and CP2**

This policy has now been split up into CP1 Housing Supply and CP2 Sustainable Communities. CP1 now incorporates preferred options policy H1AA Housing Supply.

**ID**

597

**Consultee**

Cushman and Wakefield representing TESCO stores

**Representation CS2439**

(Para 1.3) Policy and supporting paragraph as currently drafted fail to recognise the important source of new dwellings which might be realised from the redevelopment and intensification of existing developed sites which are not identified through any Site Specific Allocation or Area Action Plan.

**Council's recommended response **CHANGE****

CP1 now includes reference to the redevelopment or intensification of existing out of centre retailing sites.

---

**Section/Policy**

H1AA Housing supply **CP1**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2440**

This policy does not include sufficient flexibility to meet the new target of 535 new homes per year.

**Council's recommended response **NO CHANGE****

CP1 covers all the sources of new housing included in the Housing Capacity Study in calculating Havering's figure.

---

**Section/Policy**

H1AA Housing supply **CP1**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2441**

Reasoned justification in line with paragraph 2.31 of PPS12 should show how the policy contributes to the soundness of the document

**Council's recommended response NO CHANGE**

The policy takes forward the results of the Housing Capacity Study which is the core evidence base for this policy

---

**Section/Policy**

H1AA Housing supply CP1

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2442**

In the absence of the Employment Land Review there is no clear mechanism for the implementation of the policy.

**Council's recommended response NO CHANGE**

Employment Land Review now published. Policy CP3 details which sites have been de-designated.

---

**Section/Policy**

H1AA Housing supply CP1

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2443**

Monitoring should review any possible issues that restrain the provision of housing, specifically the affordable housing policy and whether its provisions are fettering the ability of sites to come forward for development.

**Council's recommended response NO CHANGE**

Havering's 35% target balances housing needs against the economics of supply.

---

**Section/Policy**

H1AA Housing supply CP1

**ID**

612

**Consultee**

CGMS representing Metropolitan Police Authority

**Representation CS2444**

Policies for allocating employment land should take into account the potential need for the development of a patrol base and custody centre in Havering which operate 24/7 and require good accessibility to the local road network. In other London Boroughs patrol bases have been introduced in employment areas.

**Council's recommended response NO CHANGE**

This is clarified in DC9.

---

**Section/Policy**

H1AA Housing supply CP1

**ID**

860

**Consultee**

Cluttons representing the Crown Estate

**Representation CS2445**

Not all development will be built on brownfield land hence greenfield sites should be considered in appropriate circumstances whilst most development will be concentrated near the Thames this should not be at the expense of the existing communities to the north. Support 535 homes per year. It will not be appropriate in all circumstances that this increase target is met through increased density rates. Family accommodation will still be a requirement and should be catered for. This will inevitably involve the release of GB land where appropriate and provision should be made within the LDF. As such the following land should be considered for potential housing sites suitable for family accommodation. Land to the rear of Pretoria Road, East side of Crown Farm south of A12, Triangular Area north of A12 and south of Marlborough Road, Gobions Farm south of Collier Row Road and east of White Hart Lane, Triangular area north of Collier Row Road and south of Hog Hill Road. (See Site Specific Allocations)

**Council's recommended response NO CHANGE**

Havering's new housing provision target is not based on supply from Green Belt sites.

---

**Section/Policy**

H1AA Housing supply CP1

**ID**

571

**Consultee**

CEMEX

**Representation CS2446**

Supports the Council's aim to ensure the provision of 535 new homes per year however if there is a demand for more provision should be made to enable this.

**Council's recommended response NO CHANGE**

The new homes per year figure is not a maximum but a minimum target.

---

**Section/Policy**

H1AA Housing supply CP1

**ID**

680

**Consultee**

Government Office for London

**Representation CS2447**

As the London Plan alteration is only draft the housing requirement set for period should be 350 as set out in the London Plan, although the wording could state that the Council will seek to exceed this figure and has identified the capacity to achieve the higher figure of 535. Also reference should be provided to draft PPS3.

**Council's recommended response CHANGE**

535 figure has been retained as this has been confirmed by Examination in Public. Justification also now refers to the requirements of both PPG3 and PPS3.

---

**Section/Policy**

H1AA Housing supply CP1

**ID**

680

**Consultee**

Greater London Authority

**Representation CS2448**

Welcome housing provision target of 535 homes a year. This is higher than the published London Plan figure of 350 homes a year, but is consistent with the draft alteration figure.

**Council's recommended response** **NO CHANGE**

Support welcomed.

---

**Section/Policy**

H1AA Housing supply **CP1**

**ID**

680

**Consultee**

Greater London Authority

**Representation CS2449**

Preventing loss of housing and masterplanning for large sites supported

**Council's recommended response** **NO CHANGE**

Support welcomed

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**Section/Policy**

H1AA Housing supply **CP1**

**ID**

563

**Consultee**

Highways Agency

**Representation CS2450**

The HA is generally supportive of the preferred approach. It is supportive of the use of the town centres for the purpose of high density mixed use development particularly as this will mean development is close to public transport and will encourage the use of alternative modes to the car. In terms of implementation of this policy, the HA is supportive of the preparation of development briefs and master plans for housing sites over 500, however we would wish to see transport assessments to assess the deliverability of sites within the LDF process. Depending upon the severity of the issues identified transport modelling may be useful, or indeed necessary, within the LDF process.

**Council's recommended response**

Noted. Transport assessments required for development with significant transport implications. Please see DC33.

---

**Section/Policy**

H1AA Housing supply **CP1**

**ID**

1368

**Consultee**

Woolf Bond Planning

**Representation CS2451**

Should as a minimum plan to provide for the levels of housing growth identified in the July 2005 alterations to the London Plan, this requires 525 dwellings per annum in the period 2007-2018. Such housing should be provided at the right place and at the right time in order to help bridge the identified housing affordability gap. Generally satisfied that additional large scale housing developments should be allowed to come forward where they can contribute to meeting specific and identified housing needs such as inter alia better community facilities.

**Council's recommended response NO CHANGE**

This policy seeks to maximise housing supply with regard to the London Plan housing provision target for Havering.

---

**Section/Policy**

H1AB Housing mix and density DC2

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2452**

Referring applicants to the SPD on Residential Density and SPD on Housing Need (even though housing need assessment has yet to be undertaken) does not comply with the provisions of PPS12. Wording of the policy should be set out clearly in the DPD and tested through detailed scrutiny. LDS does not include Housing Need SPD. Halt preparation of DPD and SPD pending the preparation of the required evidence base.

**Council's recommended response CHANGE**

Residential density matrix now included in the policy rather than as SPD. Policy now clear that SPD on Housing Need will be included in LDS once PPS3 requirements are clear and that in the interim mix data from the GLA SPG on Housing will apply to market housing and data from Havering's Housing Need Survey and the East London Affordable Housing Investment Framework for affordable housing

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**Section/Policy**

H1AB Housing mix and density DC2

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2453**

Having regard to PPS1, PPG3 and draft PPS3 and the London Plan in determining the density of development the overriding objective is of maximising the efficient use of land. Amend policy accordingly.

**Council's recommended response NO CHANGE**

It is clear in all these documents that density is a product of scheme requirements which is the approach taken.

---

**Section/Policy**

H1AB Housing mix and density DC2

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2454**

What evidence is therefore to support the Council's claim that the variable concerning type and size of housing in the density matrix has resulted in mixed and balanced communities being sacrificed, and therefore why has this been excluded.

**Council's recommended response CHANGE**

This variable has not been excluded from the matrix which is now included within the policy.

---

**Section/Policy**

H1AB Housing mix and density DC2

**ID**

586

**Consultee**

Bellways

**Representation CS2455**

Principle of achieving a mix of densities and tenures is agreed and in many cases what is developed is influenced by other factors, over and above design, such as land cost and what has to be achieved on a site to make it viable, planning policy relating to best use of land and the market itself.

**Council's recommended response NO CHANGE**

Noted

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**Section/Policy**

H1AB Housing mix and density **DC2**

**ID**

680

**Consultee**

Government Office for London

**Representation CS2456**

Minimum density of 30 units per hectare should be included as it is required by PPG3 and draft PPS3.

**Council's recommended response CHANGE**

The density matrix is now included in the policy which is consistent with the London Plan and draft PPS3.

---

**Section/Policy**

H1AB Housing mix and density **DC2**

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2457**

Housing mix - a core policy is required on housing mix, rather than be left solely to SPD. The housing mix policy should take into account the guidance on social and intermediate mix contained in the East London Housing Investment Framework and in the Mayor's Housing SPG.

**Council's recommended response CHANGE**

The housing mix policy now includes reference to mix requirements of GLA Housing SPG. Affordable housing policy includes reference to mix identified in Havering's Housing Need Survey and East London Housing Investment Framework.

---

**Section/Policy**

H1AB Housing mix and density **DC2**

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2458**

Density – clearer guidance is required than provided in the preferred policy approach, which just refers to an average density for new housing of 30 – 50 dwellings per hectare.

The London Plan density matrix should be adopted.

**Council's recommended response **CHANGE****

Havering's density matrix now provided within the body of the policy. This matrix is taken from Havering's IPG on Housing Density and is consistent with the London Plan matrix.

---

**Section/Policy**

H1AB Housing mix and density **DC2**

**ID**

563

**Consultee**

Highways Agency

**Representation CS2459**

The HA supports paragraph 1.3 of the preferred policy approach that includes having regard to the accessibility of a site to public transport.

**Council's recommended response **CHANGE****

Havering's density matrix now provided within the body of the policy. This matrix is taken from Havering's IPG on Housing Density and is consistent with the London Plan matrix.

---

**Section/Policy**

H1AB Housing mix and density **DC2**

**ID**

1226

**Consultee**

RPS representing Fairview New Homes

**Representation CS2460**

Object to specific housing mixes being set for developments. Must be sufficient flexibility for the composition of residential development to be determined by developers at the time an application is submitted. Goes beyond the normal responsibilities of planning and the intentions of the

original Town and Country Planning Act. This imposes an unacceptable burden on the housing builder industry. It is unreasonable because:

Takes away the ability of the private sector to respond to market demands at any one given time, which was made clear in the Barker Report. Erodes the ability of the private sector to appropriately assess market demand in an area and to respond with initiative and innovation. Takes away the ability of house builders to assess the viability of individual schemes and to establish the appropriate mix to make this viable, undermining completely the economics of supply and demand, and hands complex decisions about development surveying and environmental analysis to LPAs who are not in the best position to make such decisions. If sizes and types of housing are specifically defined in an LDD policy there is limited scope to react or respond quickly to changes in the market

Strongly request that the approach is not adopted and that it is made clear that there will always be an appropriate level of flexibility for house builders to be determine the appropriate requirements of a site based on market and commercial considerations having regard also to general planning policies and environmental considerations.

**Council's recommended response CHANGE**

Draft PPS3 which the ODPM has published in response to the Barker Report states at para 21 that:

'Local planning authorities should have regard to the relevant sub-regional housing market assessment and the relevant Regional Spatial Strategy, Regional Housing Strategy and Local Housing Strategy in determining the overall balance between different household types to be provided for across the plan area, to ensure that housing provision is made for example for family, single person and multi-person households. In planning at site level, it is important that a broad mix of housing suitable for different household types is provided for on larger sites. For smaller sites, the mix of housing should contribute to the creation of mixed communities.' In advance of the sub-regional data the policy has regard to the GLAs Housing Requirement Study in setting the mix of units. Removing this policy would mean the Core Strategy was not in general conformity with the London Plan (policy 3A.4) or consistent with National Guidance.

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**Section/Policy**

H1AB Housing mix and density DC2

**ID**

1368

**Consultee**

Woolf Bond Planning representing George Wimpey

**Representation CS2461**

535 units could be provided in part through increasing densities on sites in accordance with draft PPS3 as well as providing for housing development on redundant employment sites. In addition the CS should seek to provide for an appropriate mix of dwelling types as an over provision of a particular form is unlikely to provide for an appropriate mix to meet the needs of the borough.

**Council's recommended response** **CHANGE**

The policy now includes the borough's density matrix which is consistent with the GLA's density matrix. Policy seeks an appropriate mix of dwelling types with regard to the GLA's Housing Requirements Study.

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**Section/Policy**

H1AC Housing design and layout **DC3**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2462**

Referring applicants to the SPD on Housing Density and Residential Amenity Space for guidance on amenity space does not comply with the provisions of PPS12. Wording of the policy should be set out clearly in the DPD and tested through detailed scrutiny.

**Council's recommended response** **NO CHANGE**

Council's current amenity space guidance is set out in SPG and in line with its LDS the Council intends to maintain this approach. Moreover densities in Havering have risen from 35 units per hectare in 1995-1998 to 73 units per hectare in 2004-2005. (GLA AMR2 2006). Throughout this period the SPG on Residential Amenity Space has applied thus demonstrating its flexibility.

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**Section/Policy**

H1AC Housing design and layout **DC3**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2463**

PPG3 Housing advocates the flexible approach to planning standards

**Council's recommended response** **NO CHANGE**

Noted

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**Section/Policy**

H1AC Housing design and layout DC3

**ID**

680

**Consultee**

Government Office for London

**Representation CS2464**

Needs to be clear that if development briefs and masterplans are not prepared as DPDs they will have only minimal weight in determining planning applications.

**Council's recommended response NO CHANGE**

It is the Council's intention to adopt Masterplans and Development Briefs as DPDs/SPDs.

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**Section/Policy**

H1AC Housing design and layout DC3

**ID**

680

**Consultee**

Greater London Authority

**Representation CS2465**

Supported

**Council's recommended response NO CHANGE**

Support welcomed

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**Section/Policy**

H1AC Housing design and layout DC3

**ID**

578

**Consultee**

AERC

**Representation CS2466**

Suggested policy 'The location of residential villages for the frail elderly'

The development of residential villages for the frail elderly shall be acceptable within the defined settlement boundaries of existing or proposed towns and

villages and maybe acceptable at identifiable sites that immediately adjoin or are within close proximity to existing or proposed settlements where there is a proven demand for these facilities within the area. Where this might lead to a cluster of similar uses close together the LPA will discuss with the applicants whether there is a local need for additional developments. Residential Villages for the Frail Elderly shall be permitted where they demonstrably provide specific residential sheltered units and high dependency units such as nursing home and elderly mentally infirmed units and if required convalescence facilities, and shall provide amenities, services and housing for the Frail Elderly in areas of proven or predicated demand.

**Explanation**

People in the UK are now living longer and as a consequence their residential care requirements have dramtically changed. The number and proportion of elderly and very frail elderly (those approaching 80 years of age or over) is predicated to rise much faster over the next twenty years as the post war generation reaches retirement age and becomes progressively older.

People in the UK are now living longer and as a consequence their residential care requirements have dramtically changed. The number and proportion of elderly and very frail elderly (those approaching 80 years of age or over) is predicated to rise much faster over the next twenty years as the post war generation reaches retirement age and becomes progressively older.

The consequences of this increase in longevity is that people's changing housing and care requirements need to be catered for during a much longer period of retirement. These requirements range from relatively active elderly who need some support but high levels of security; much greater support and a range of communal facilities; increased medical and nursing support; to one to one nursing and supervision with a full range of services provided 24 hours a day. At present many retired people need to move sometimes several times often involving partners being separated and invariably to different towns to accommodated their changing requirements. Villages for the frail elderly would provide all the necessary services together with accommodation for the frail elderly and very frail elderly, together with health and social care in one location within a village environment, and would act as a focus for community involvement by elderly people from outside in adjoining towns and villages.

**Suggested policy 'Residential Villages for the Frail Elderly: Their Requirements'.**

In accordance with Policy X, Residential Villages for the Frail Elderly will be acceptable where the following requirements are satisfied.

\* The development shall include residential accommodation for the elderly, Classes C2 and Class C3 Uses for the elderly and provide residential accommodation, medical and nursing support and one-to one nursing and supervision with a full range of services provided 24 hours a day within a village community and setting.

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- \* The site shall be of an agreed size which will fit into the landscape satisfactorily and can be supported by existing services with an agreed expansion areas reserved for the uses under the policy
- \* Where the development might lead to a cluster of similar uses in the immediate locality the LPA will discuss with the applicants whether sufficient local demand justified additional developments
- \* The site shall be located within, or adjoining or close to existing or proposed settlement boundaries and close to support services including public transport
- \* There shall be an appropriate and agreed number of units for the frail elderly and high dependency units
- \* The development shall include facilities for doctor and health worker visits and examinations minor medical procedures a community hall kitchen and dining facilities indoor and outdoor leisure and recreation facilities and transport facilities
- \* The buildings shall be designed specifically for the frail elderly and disabled with high levels of securing and high energy efficiency
- \* There shall be sufficient external space in the proposal to accommodate the normal recreation and other needs of residents, visitors or employees without adversely affecting highway safety or the residential amenities enjoyed by adjoining properties and
- \* The villages shall be set within a substantial landscaped area which will be planted and maintained.

### **Explanation**

For residential villages for the frail elderly to be acceptable in planning terms they must be designed specifically for the elderly and frail elderly and include all the residential, community health and care services needed by the frail, very frail and not so frail elderly within the one scheme. This presents the need for residents to move when individuals circumstances change and combines residential, Classes C2 and C3 uses as defined by the Use Classes Order.

Villages should be large enough to include all the necessary facilities within a landscaped setting; small enough to provide an intimate village atmosphere and a development which would blend in with its surroundings; and include a limited amount of space for future expansion in a logical manner. The villages should therefore be of an appropriate and agreed size which will fit satisfactorily into the landscape and be supported by existing transport and other services, with additional land for expansion in the future. Ideally they would immediately adjoin towns or large villages to allow use of the facilities by others. They should include an appropriate number of sheltered residential units and high dependency and EMI units including convalescence facilities where required. The units should be designed specifically for the frail elderly and disabled with high levels of security and energy efficiency and should be set in a well landscaped and maintained setting. The villages will include a community hall, health rooms for minor procedures and visiting health workers (including doctors and dentists) community transport (for arranged leisure and other trips) and 24 health and social care and supervision. As such they will be more than simply a combination of Class 2 and 3 planning uses and will provide a sustainable living environment for the frail elderly.

**Council's recommended response NO CHANGE**

Within the urban area outside the Green Belt such complexes/villages would be allowed on land considered suitable for housing. However within the Green Belt they would need to satisfy DC46 'Appropriate Development in the Green Belt', and therefore are unlikely to be acceptable unless they are on the identified Major Developed Sites. Within the Green Belt there are no defined settlement boundaries of existing or proposed towns and villages and therefore this aspect of the policy is not relevant.

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**Section/Policy**

H1AF Affordable housing DC6

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2467**

Definition of affordable housing not consistent with the London Plan and related SPG.

**Council's recommended response CHANGE**

Low cost market housing is acceptable if it meets the affordability criteria of Intermediate Housing.

---

**Section/Policy**

H1AF Affordable housing DC6

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2468**

Havering Housing Needs Survey only covers 2002/07 so it is not appropriate or robust, or conform with GLA Housing SPG which says housing assessments should be set within a regional and sub-regional framework. Until the Council's local housing market assessment is prepared consulted on and subject to scrutiny the policy cannot be said to be founded on a robust evidence base and is therefore unsound, and prepared of the Core Strategy should therefore be halted pending the preparation of the required evidence base.

**Council's recommended response NO CHANGE**

The mismatch between local house prices and households incomes is the root cause of Havering's acute housing need, this gap has widened since the borough's housing needs survey was conducted so the Council considers it is appropriate to put forward a 35% target.

---

**Section/Policy**

H1AF Affordable housing DC6

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2469**

In accordance with policy 3A.8 of the London Plan the policy should state that the percentage provision of a scheme should be determined on a site by site basis taking into account not just site location and characteristics but the individual site costs the availability of public subsidy and other scheme requirements.

**Council's recommended response NO CHANGE**

Policy makes clear that in applying this indicative target regard would be had to the economics of provision.

---

**Section/Policy**

H1AF Affordable housing DC6

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2470**

Object to 70:30 split between intermediate and social forms of affordable housing on the basis that it is contrary to the provisions of national and regional planning policy which advocates the need to create mixed and balanced communities. In addition when considering the appropriate tenure balance to be provided in a scheme the role that shared equity plays in enabling existing social rented tenants to staircase to intermediate housing and thus freeing social rented accommodation for new tenants should be recognised.

**Council's recommended response NO CHANGE**

The policy makes clear that the Council will seek this split and that in applying it will have regard to local and sub-regional housing needs, site size suitability

and the economics of provision. Moreover the definition of affordable housing includes shared ownership housing.

---

**Section/Policy**

H1AF Affordable housing **DC6**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2471**

Amend policy to recognise that where an element of affordable housing is appropriate it may be preferable for a financial or other contribution to be made towards the provision of an element of affordable housing.

**Council's recommended response **CHANGE****

This detail will be covered in SPD.

---

**Section/Policy**

H1AF Affordable housing **DC6**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2472**

SPD should not be used to raise new matter or policies with regard to setting out the approach applicants would need to take in respect of financial appraisals

**Council's recommended response **CHANGE****

Detailed implementation matters in line with PPS12 will be covered in SPD.

---

**Section/Policy**

H1AF Affordable housing **DC6**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2473**

Proposed monitoring should not simply ensure that the policy is being implemented but provide for a review of the reasons why a policy may not be working as intended. Monitoring should link to housing trajectory and an assessment of whether the policy is overly restrictive and fettering the delivery of housing to meet the London Plan annual monitoring target.

**Council's recommended response NO CHANGE**

Proposed indicators relate to housing need and affordable housing completions. These indicators will enable the Council to determine how many affordable homes are being completed. Where the target is not being met the Council would then investigate the reasons why and review the policy accordingly so that its effectiveness can be improved. However target will be disaggregated so it is clear what the level of supply is from all sources.

---

**Section/Policy**

H1AF Affordable housing DC6

**ID**

586

**Consultee**

Bellways

**Representation CS2474**

Pragmatic approach of policy is welcomed, with aiming to achieving a minimum of 35% housing.

**Council's recommended response NO CHANGE**

Support welcome

---

**Section/Policy**

H1AF Affordable housing DC6

**ID**

586

**Consultee**

Bellways

**Representation CS2475**

Support reference in paragraph 1.8 to 70% intermediate and 30% social rented. However have concerns if other way round with regard to development viability.

**Council's recommended response CHANGE**

This reference was wrong and should in fact be other way around, in line with the London Plan.

**Section/Policy**

H1AF Affordable housing DC6

**ID**

586

**Consultee**

CGMS representing Metropolitan Police Authority

**Representation CS2476**

MPA have a shortage of suitable, available residential accommodation for young police officers. The MPA are therefore keen for the quantum of intermediate housing suitable for key workers and therefore police officers to be maximised. The imposition of a tenure split 70:30 between social rented and intermediate housing is contrary to Government guidance in Circular 6/98. This element of the policy should be deleted.

**Council's recommended response NO CHANGE**

The policy is consistent with London Plan policy 3A.7.

---

**Section/Policy**

H1AF Affordable housing DC6

**ID**

612

**Consultee**

Cluttons representing the Crown Estate

**Representation CS2477**

Support target of 35% housing. This should not constitute an absolute requirement. In some instances where there is already a significant amount of affordable housing in the locality it may be appropriate for new development to provide more market housing to support a more balanced community and help local regeneration.

**Council's recommended response CHANGE**

Havering has a housing need of 875 affordable new homes per year, in this light there can be no justification for excepting less than 35% on the basis of the nature of existing housing in the locality.

---

**Section/Policy**

H1AF Affordable housing DC6

**ID**

612

**Consultee**

Cluttons representing the Crown Estate

**Representation CS2478**

Definition of affordable housing is supported.

**Council's recommended response NO CHANGE**

Support noted

---

**Section/Policy**

H1AF Affordable housing

**ID**

680

**Consultee**

Government Office for London

**Representation CS2479**

Makes no reference to the London Plan requirements for housing. Overall indicated provision of 35% is below the London Plan target for London Borough's of 50%, also the site size threshold is below the figures typically being set in London. In this respect directions recently issued by SoS to Richmond, Kingston, Westminster and Barnet required thresholds of 10 units.

**Council's recommended response NO CHANGE**

Threshold remains at 15 units in line with draft PPS3, and approach of neighbouring local authorities.

---

**Section/Policy**

H1AF Affordable housing DC6

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2480**

In relation to the affordable housing threshold of fifteen units, the GLA would support a reduction in this threshold to ten units, which would be consistent with the thresholds adopted in other outer London boroughs.

**Council's recommended response NO CHANGE**

Threshold remains at 15 units in line with draft PPS3, and approach of neighbouring local authorities.

**Section/Policy**

H1AF Affordable housing DC6

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2481**

Object to the 35% affordability target. This is not acceptable as the variation from the London Plan 50% target has not been not justified in accordance with criteria in London Plan Policy 3A.7. It is significant that only 12.5% of the existing stock in Havering is social housing provision - one of the lowest proportions in London, as compared to the 25% London average. The inclusion of a borough wide affordable housing target of 35% will be unacceptable from a strategic perspective.

**Council's recommended response NO CHANGE**

Revised policy now sets out Havering's justification for proposing a 35%. This is due to low land values in Havering which suppress a developments ability to absorb the cost of providing affordable housing. This is substantiated by London Plan Technical Report 1. The Council considers that a 50% would render residential developments unviable and therefore contrary to Draft PPS3 would not take into account economic viability issues. The tenure of Havering's existing housing is not atypical for an Outer London Borough. The Council does not agree with the GLA approach to homogenise the tenure of housing stock across all Boroughs. The Council considers that it is legitimate for different London authorities to have different proportions of social housing as this is rooted in their historical social development. Moreover it is equally valid to compare Havering with neighbouring non London authorities and on this basis its character is not anomalous.

---

**Section/Policy**

H1AF Affordable housing DC6

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2482**

Support 70:30 social housing: intermediate split

**Council's recommended response NO CHANGE**

Support welcomed

**Section/Policy**

H1AF Affordable housing DC6

**ID**

1226

**Consultee**

RPS representing Fairview New Homes

**Representation CS2483**

Object to the statement that the Council will seek the provision of 35% affordable housing in determining planning applications. Paragraph 1.4 states that the Council will seek a minimum of 35% of all new homes as affordable from all sources of provision including 100% affordable schemes. It stands that in order to achieve this target the proportion of affordable homes necessary from market based housing developments will be lower than 35%.

**Council's recommended response NO CHANGE**

Affordable housing from other sources compensate for the 'loss' of affordable units on sites below 15 units in size. For this reason the site specific and global targets are the same.

---

**Section/Policy**

H1AF Affordable housing DC6

**ID**

1226

**Consultee**

RPS representing Fairview New Homes

**Representation CS2484**

Object to the statement that the Council will seek the provision of affordable housing on sites of 15 or more dwellings and on residential sites of 0.5 hectares or more. Guidance in circular in 6/98 states that the threshold for developments on which affordable housing can be sought should be housing developments of 25 or more dwellings or residential sites of 1 hectare or more. Although the ODPMs paper on PPS3 proposes the use of lower thresholds where there are high levels of need which cannot be met by larger sites alone this has not yet been adopted as government policy and so it premature to adopt this option.

**Council's recommended response NO CHANGE**

Threshold remains at 15 units in line with draft PPS3, and approach of neighbouring local authorities.

---

**Section/Policy**

H1AF Affordable housing DC6

**ID**

1368

**Consultee**

Woolf Bond representing George Wimpey Homes

**Representation CS2485**

Object to the requirement for a minimum provision of 35% affordable housing on sites of 15 or more dwellings or sites of 0.5 hectares or more irrespective of the number of dwellings. An over arching requirement to be met on all qualifying sites on or above the threshold levels identified above could adversely impact upon the viability and deliverability of potential housing sites. Development schemes must be attractive in economic terms for the development industry if they are to be viable. The amount of affordable housing sought should depend upon local constraints and the developer costs that apply to a particular site. Accordingly, the affordable housing requirement should be subject to a caveat requiring the testing of site specific constraints.

**Council's recommended response NO CHANGE**

The Council considers that the 35% target is deliverable. This target is lower than the London Plan target because the Council in line with draft PPS3 has had regard to the economics of supply in determining an appropriate site specific target. The Council's IPG clarifies that where a developer can prove through an independently verified financial appraisal that their development can not deliver 35% affordable housing than they may have recourse to Social Housing Grant. Where none is available the policy enables either a lower percentage of affordable housing to be provided, or a variation in the 70:30 split between social rented and intermediate forms of social housing. This approach will be considered in producing supporting SPD. Therefore the Council considers that this policy is sufficiently flexible so as to not adversely affect the economic viability of housing schemes.

---

**Section/Policy**

H1AF Affordable housing DC6

**ID**

1368

**Consultee**

Woolf Bond representing George Wimpey Homes

**Representation CS2486**

Also object to 70:30 split. Social housing is provided to RSLs at a greater cost to the development industry. Accordingly the strategy should allow for a degree of flexibility in assessing the percentage split of provision between

social rented and shared ownership to allow for local circumstances including related infrastructure costs associated with bringing forward development sites.

**Council's recommended response NO CHANGE**

This is consistent with London Plan policy 3A.7.

---

**Section/Policy**

H1AG Lifetime homes and mobility housing DC7

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2487**

Not all dwellings can be built to wheelchair and mobility standards and on this basis the policy should be amended to state that the Council will encourage rather than require 10% of all new homes as being wheelchair accessible. Policy should also clarify that this is a target to be achieved from all sources on a site by site basis.

**Council's recommended response** [REDACTED]

Policy does not require that all dwellings be built to these standards only 10% which is line with the London Plan. Whilst the London Plan does say 'seek to ensure' the best way to ensure this target is met is through requiring it. Policy is clear that it applies to all new homes.

---

**Section/Policy**

H1AG Lifetime homes and mobility housing DC7

**ID**

586

**Consultee**

Bellways

**Representation CS2488**

Target of 100% not appropriate where a large percentage of the accommodation will be flats and town houses and therefore more likely than not appropriate to be a Lifetime Home

**Council's recommended response NO CHANGE**

GLA SPG 'Accessible London' Implementation Point 12 clarifies that Lifetimes Homes should apply to all forms of housing and gives examples of successful case studies.

---

**Section/Policy**

H1AG Lifetime homes and mobility housing DC7

**ID**

680

**Consultee**

Government Office for London

**Representation CS2489**

Policy too inflexible and goes beyond Building Regulations. Policy should seek to ensure that as many homes as possible are built to this standard but it should not be a mandatory requirement.

**Council's recommended response NO CHANGE**

The Council considers that the policy as worded is in line with the London Plan and SPG Accessible London.

---

**Section/Policy**

H1AG Lifetime homes and mobility housing DC7

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2490**

Supported

**Council's recommended response NO CHANGE**

Support welcomed

---

**Section/Policy**

H1AG Lifetime homes and mobility housing DC7

**ID**

1226

**Consultee**

RPS representing Fairview New Homes

**Representation CS2491**

Object to the requirement that new housing be designed to Lifetime Home standards, including 10 per cent being wheelchair accessible. Fairview request that the policy recognises the potential for the combined effect of requirements such as these and others in the document to affect the viability

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of delivering development. As such the policy should also state that accessibility standards will be taken into account with consideration also given to other planning requirements and the impact that these have on the viability of the scheme.

### **Council's recommended response NO CHANGE**

The Council considers that the policy as worded is in line with the London Plan and SPG Accessible London.

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#### **Section/Policy**

H1AG Lifetime homes and mobility housing

#### **ID**

622

#### **Consultee**

Greater London Authority

#### **Representation CS2493**

Supported

### **Council's recommended response NO CHANGE**

Support welcomed

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#### **Section/Policy**

H1AH Gypsy and Travellers

#### **ID**

680

#### **Consultee**

Government Office for London

#### **Representation CS2492**

Text needs to be revised to refer to final version of new Gypsy and Travellers Circular

### **Council's recommended response **CHANGE****

Text changed accordingly

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## **Arts Culture and Entertainment**

This chapter is now incorporated in the Culture chapter.

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### **Section/Policy**

Omission

### **ID**

622

### **Consultee**

Greater London Authority

### **Representation CS2494**

There is no policy option for providing a diverse range of day and night time uses in town centers, and that seeks to manage the impacts of these uses, as set out in Policy 3D.4 of the London Plan. Night time economy uses are appropriate in town centres, and policies should not seek to prevent their development there, but should be part of an integrated approach to managing any impacts based on local evidence of the impact of the night time economy. The GLA is currently preparing best planning guidance on this issue.

### **Council's recommended response NO CHANGE**

This is most significant in Romford Town Centre for which a separate Romford Area Action Plan is being produced and Hornchurch Town Centre for which an SPD is being produced. Otherwise policy DC19 (formerly I1AB) applies and DC23 (formerly I1AC) applies.

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### **Section/Policy**

Omission

### **ID**

655

### **Consultee**

GVA Grimley representing Sun International

### **Representation CS2495**

Strongly support the identification of Rainham as a suitable location of a Regional Casino complex. Rainham is situated in the centre of the London Riverside Regeneration Area which is one of the largest and most important opportunities in the Thames Gateway, whilst there have been progress in other initiatives to the west there has been little stimuli in the east. Thus a regional casino at Ferry Lane will bring extensive regeneration benefits to a

wide area of the Thames Gateway, stimulating much needed investment and development. Planning should focus on the issues of land use and the way in which land is developed, therefore having identified a need it is appropriate in planning terms for the Council to make provision for such a facility. The 2003 GLA Industrial Capacity SPG concluded that demand for employment land in London would continue to decline, therefore before allocating employment land the Council should establish the quantity and quality of land required to meet the borough's needs over the plan period. Due to limited demand for innovation and high technology manufacturing in the area, the Council should consider what could be done to facilitate such development and to unlock the wider potential of London Riverside. In this context it is considered that the Casino development will act as a catalyst for regenerating the wider employment designation.

**Council's recommended response NO CHANGE**

Support welcomed.

---

**Section/Policy**

I1AD Part 2-Arts and culture in Hornchurch DC24

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2496**

Policy seeks Live/Work units for artists and creative workers in Hornchurch and states the preferred form and mix of such units. Delete policy until the evidence base is published and community given the opportunity to review it.

**Council's recommended response NO CHANGE**

Policy does not require these units it only encourages them, moreover this is in line with the Hornchurch Urban Strategy on which there has been extensive consultation

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**Section/Policy**

I1AD Part 2-Arts and culture in Hornchurch DC24

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2497**

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Contributions should only be sought where they satisfy the provision of Circular 05/05.

### **Council's recommended response NO CHANGE**

In line with new policy PO1 contributions will only be sought where they satisfy Circular 05/05.

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#### **Section/Policy**

I1AD Part 2-Arts and culture in Hornchurch DC24

#### **ID**

1040

#### **Consultee**

Barton Willmore representing Crest Nicholson

#### **Representation CS2498**

Policy fails to meet soundness test 8 in that it fails to set clear mechanisms for implementation.

### **Council's recommended response NO CHANGE**

More detail on the implementation of this policy will be provided in DC24.

---

#### **Section/Policy**

I1AE Public art DC25

#### **ID**

1040

#### **Consultee**

Barton Willmore representing Crest Nicholson

#### **Representation CS2499**

Contributions should only be sought where they satisfy the provision of Circular 05/05. This does not satisfy tests of paragraph B5.

### **Council's recommended response NO CHANGE**

In line with new policy PO1 contributions will only be sought where they satisfy Circular 05/05.

---

#### **Section/Policy**

I1AE Public art DC25

#### **ID**

1040

#### **Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2500**

Policy fails to meet soundness test 8 in that it fails to set clear mechanisms for implementation. Definition of major development site not clear.

**Council's recommended response NO CHANGE**

No definition of major development provided because each application will be treated on its merits. The policy will be implemented through its application.

---

**Section/Policy**

I1AE Public art DC25

**ID**

586

**Consultee**

Bellways

**Representation CS2501**

Public art does not always have to include a piece of commissioned art and this needs to be reflected in the policy.

**Council's recommended response NO CHANGE**

This is made clear in the reasoned justification to the policy.

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## **Retail and Services**

This chapter is now called Town Centres

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**Section/Policy**

General Comments

**ID**

1167

**Consultee**

Turley Associates representing Hammersons

**Representation CS2502**

In agreement with the option chosen for shops and services for the reasons detailed in original representation at the options stage.

**Council's recommended response NO CHANGE**

Support welcomed

**Section/Policy**

J1+2A CP4

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2503**

Delete this section until evidence base is published and community has had a chance review and comment on it.

**Council's recommended response CHANGE**

Strategic retail and services policy has been updated with regard to the findings of Havering's Retail and Leisure Study. This study corroborates the strategy set out in the preferred options which itself was faithful to the GLA Convenience and Comparison Reports. Strategic policy now begins by setting out the town centre hierarchy and then follows by setting out how the hierarchy will be promoted and enhanced. The reasoned justification then summarises briefly the strategy for Romford and the District Centres.

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**Section/Policy**

J1+2A CP4

**ID**

995

**Consultee**

CGMS representing Royal Mail Property Holdings

**Representation**

Agree with general approach in shops and services.

**Council's recommended response NO CHANGE**

Support welcomed.

---

**Section/Policy**

J1+2A CP4

**ID**

597

**Consultee**

Cushman and Wakefield representing TECSO stores

**Representation CS2504**

Policy promotes the enhancement of retail and service uses within Rainham to serve new communities within London Riverside, this is supported but should be expanded to include reference to the need to meet expenditure growth within the existing local resident population.

**Council's recommended response** **CHANGE**

CP4 now includes data from Havering's Retail and Leisure Needs Study which shows indicative convenience and comparison floorspace requirements up to 2018.

---

**Section/Policy**

J1+2A **CP4**

**ID**

563

**Consultee**

Highways Agency

**Representation CS2505**

We support the promotion of the town centres via the points noted, the use of the sequential test and the improvement of access to the two mentioned centres.

**Council's recommended response** **CHANGE**

Support welcomed

---

**Section/Policy**

J1AA Network of centres **CP4**

This policy has been incorporated in CP4 as the Council considers it this detail is more appropriate as Core Policy than DC policy.

**ID**

680

**Consultee**

Government Office for London

**Representation CS2506**

Policy should mention that the AAP is to be prepared for Romford as the AAP needs to conform with the policies of the Core Strategy rather than leaving it to the implementation section.

**Council's recommended response** **CHANGE**

Reference to Romford Area Action Plan is now made within CP4

---

**Section/Policy**

J1AA Network of centres **CP4**

This policy has been incorporated in CP4 as the Council considers it this detail is more appropriate as Core Policy than DC policy.

**ID**

1373

**Consultee**

Roger Tym and Partners representing Somerfields

**Representation CS2507**

Generally support approach to establish a hierarchy of centres, however the text states that 'in the centres of Harold Hill, Collier Row and Upminster, new development appropriate to the scale of the centres should be supported'. Suggest that any such policy or supporting text should make specific reference to PPS6 namely Annex A, whereby the types of centres and their main characteristics are defined. The Annex also provides an outline as to what is an appropriate scale of development for each of the centres. Considered that this is particularly appropriate for convenience goods retailing.

**Council's recommended response **CHANGE****

Strategic policy now sets out indicative convenience and comparison floorspace requirements up to 2018. Policy DC15 'Locating retail and service development', now includes indicative upper limit for additional retail and leisure floorspace in Romford and the district centres.

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**Section/Policy**

J1AA Network of centres **CP4**

This policy has been incorporated in CP4 as the Council considers it this detail is more appropriate as Core Policy than DC policy.

**ID**

563

**Consultee**

Highways Agency

**Representation CS2508**

The HA supports paragraph 1.4 in its intention to improve the accessibility of the town centres through traffic management schemes. It is hoped these will improve the environment for and encourage the use of alternative modes of transport. In terms of implementation, the HA supports paragraph 1.18 which looks at the accessibility of town centres particularly with application of transport policies. The HA supports the concentration of development in the centres, as this will make access to modes of transport easier.

**Council's recommended response**

Support welcomed

**Section/Policy**

J1AB Locating retail and service development **DC15**

**ID**

680

**Consultee**

Government Office for London

**Representation CS2509**

Policy needs strengthening to indicate that developers will be required not simply encouraged in appropriate instances to provide information about need and the sequential test for sites outside designated centres. Encouraging is not in line with PPS6.

**Council's recommended response **CHANGE****

DC15 now says that sequential test must be satisfied rather than 'encourage'.

---

**Section/Policy**

J1AB Locating retail and service development **DC15**

**ID**

891

**Consultee**

Rapleys representing Morrisons

**Representation CS2510**

Note that the authority may provide criteria to ensure that the size of new development is appropriate to the role and function of the town centre it is within. Consider that such criteria should not be overly restrictive and show allow applications to be determined on their own merits, where there is a proven need

**Council's recommended response **CHANGE****

DC15 now includes indicative upper limit for additional retail and leisure floorspace in Romford and the district centres.

---

**Section/Policy**

J1AB Locating retail and service development **DC15**

**ID**

563

**Consultee**

Highways Agency

**Representation CS2511**

With regard to the preferred policy approach, the HA supports the purpose of this policy to encourage retail centres to be accessible and located in the town centres. The promotion of sustainable travel choices is also encouraged. In terms of the policy approach itself, the HA agrees with the promotion of central sites for development.

**Council's recommended response**

Support welcomed

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**Section/Policy**

J1AB Locating retail and service development DC15

**ID**

563

**Consultee**

Highways Agency

**Representation CS2512**

Where there are no available or suitable central sites, those in non central locations will be considered, however the HA would wish for these sites to be very carefully considered with the noted further information made compulsory. The HA feels greater importance should be attached to the accessibility of these sites, particularly how car based traffic will be minimised. The HA also supports the inclusion of the sequential test in relation to site selection which it notes is not preferred policy approach. The HA wish to be consulted where there are site designations, in order to assess impacts on the trunk network.

**Council's recommended response**

Noted

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**Section/Policy**

J1AB Locating retail and service development DC15

**ID**

1373

**Consultee**

Roger Tym and Partners representing Somerfields

**Representation CS2513**

This approach is generally correct particularly in respect of the supporting information which developers/applicants would be expected to provide in justification of their proposals. However consider that the term 'central sites' used in paragraph 1.5 could be misleading and does not allow for a strict

interpretation. Instead it would be more appropriate to use the terminology stated in PPS6. Therefore the policy should refer to the primary shopping frontage or for centres where this is not defined, the town centre boundary.

**Council's recommended response** **CHANGE**

DC15 now makes clear that when applying the sequential test to retail uses reference to central sites means within the retail core of Romford and the District Centres.

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**Section/Policy**

J1AB Locating retail and service development

**ID**

597

**Consultee**

Cushman and Wakefield representing TECSO stores

**Representation CS2514**

(Para 1.19) Objection is made to the Site Allocation TQ5282SW Rainham Central.

The feasibility of a remodelled Tesco store and road layout has not been explored in any detail to date with either the main landowners or the relevant authorities.

We must therefore question the deliverability of the proposal and therefore its appropriateness within the Council's Site Specific Allocations Preferred Options Document.

Detailed discussions should be first held with the main parties effected to determine whether it is appropriate and feasible to progress any redevelopment proposals which might incorporate a remodelled Tesco store.

The existing Tesco store is a modern facility which operates extremely well and is popular with customers. The existing highway layout, site access and car parking arrangements are adequate and function well for the existing store.

**Council's recommended response**

Please see response to Site Specific Allocation representation

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**Section/Policy**

J1AC Core and fringe frontages in district and local centres. **DC16**

**ID**

612

**Consultee**

CGMS representing the Metropolitan Police Association

**Representation CS2515**

Policy should allow the introduction of police shops in the core and fringe frontages in the Town District and Local Centres.

**Council's recommended response NO CHANGE**

DC16 includes reference to police shop uses being considered as an A2 use for the purposes of this policy

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**Section/Policy**

J1AC Core and fringe frontages in district and local centres. DC16

**ID**

1373

**Consultee**

Roger Tym and Partners representing Somerfields

**Representation CS2516**

General approach is considered to accord with national policy. However suggest that particularly in the case of new convenience goods floorspace proposed for district or local centres, there needs to be some indication as to what would be considered the appropriate scale of development. In this instance Annex 1 of PPS6 should be directly referenced.

**Council's recommended response CHANGE**

With regard to Havering's Retail and Leisure Study Indicative upper limits for district centres are now set out in policy DC15

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**Section/Policy**

J1AD Out of town centre development deleted

**ID**

680

**Consultee**

Government Office for London

**Representation CS2517**

Policy does not appear to discourage out of town development. Should state that town centres are the location for such uses but that applications for out of town development will be subject to the various tests set out in the policy.

**Council's recommended response CHANGE**

This policy has now been deleted and incorporated within the general policy on locating retail and service uses as the sequential test applies to all new

development, the redevelopment of existing facilities and extensions to existing facilities include mezzanines over 200 metres squared. Therefore the Council does not consider it necessary to have a separate policy. Therefore where the applicant can demonstrate that there are no appropriate sites within existing centres or on the edge of centres, then preference will be given to existing out of centres for new retail development.

---

**Section/Policy**

J1AD Out of town centre development deleted

**ID**

563

**Consultee**

Highways Agency

**Representation CS2518**

Supports the use of the sequential test in assessing applications and does not wish to see substantial developments in non-sustainable locations.

**Council's recommended response**

Support welcomed

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**Section/Policy**

J1AD Out of town centre development deleted

**ID**

1373

**Consultee**

Roger Tym and Partners representing Somerfields

**Representation CS2519**

For reasons of clarity mezzanine developments should be specifically mentioned with regard to the application of the sequential test

**Council's recommended response CHANGE**

Mezzanines now mentioned within D15 on locating retail and service development.

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## **Employment**

This chapter is now called Places to Work

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### **Section/Policy**

General Comments

### **ID**

680

### **Consultee**

Government Office for London

### **Representation CS2520**

No indication that the Council has undertaken an assessment of how much land is needed for employment uses. Both in SELs and other employment areas it is necessary to show there is need for the retention of the land in employment uses and that there it is all in use or there is the prospect of uses arising

### **Council's recommended response NO CHANGE**

The Employment Land Review with regard to the principle of managed transfer established in the GLA SPG on Industrial Capacity aims to identify surplus employment land for transfer to other uses. The study has confirmed the strategy set out in the preferred options to redefine the boundary of the Rainham Employment Area as also set out in the IPG on London Riverside and intimated in the London Plan. The only other changes it suggests are to de-designate the Victoria Road Commercial Area, Bridge Close, Spring Gardens and Chesham Close. The first two sites will be dealt with in the Romford Area Action Plan. A significant part of Chesham Close has already been lost to residential development, so its de-designation was inevitable. Spring Gardens is a small secondary employment area, which is constrained by its size, close proximity to residential and poor access. Whilst the Council accepts that the study should have been completed earlier to enable stakeholder consultation on it, it does not consider that the results of the study fundamentally challenge the strategy and policies of the Core Strategy as consulted on at the issues, options and preferred options stages, indeed it corroborates them.

---

### **Section/Policy**

K1-K2A Employment CP3

### **ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2521**

Policy should be deleted and based on an evidence base that has been informed by targeted public involvement.

**Council's recommended response **CHANGE****

With regard to the results of Havering's Employment Land Review policy now quantifies the precise amount of designated employment land to be released in line with the principles of managed transfer set out in the GLA SPG on Industrial Land Capacity. Through the issues and options and preferred options consultation the Council consulted on the principles of managed transfer.

---

**Section/Policy**

K1-K2A Employment **CP3**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2522**

With regard to bullet points 5 and 6 obligations should only be sought where they satisfy the provisions of Circular 05/05

**Council's recommended response **CHANGE****

In line with PO1 obligations will only be sought where they satisfy circular 05/0-5

---

**Section/Policy**

K1-K2A Employment **CP3**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2523**

Support the release of employment land for housing though there is no clear mechanism for its implementation

**Council's recommended response **CHANGE****

With regard to the results of Haverings Employment Land review the policy now quantifies the precise amount of designated employment land to be

## **Cabinet 9 October 2006**

released in line with the principles of managed transfer set out in the GLA SPG on Industrial Land Capacity. Through the issues and options and preferred options consultation the Council consulted on the principles of managed transfer.

---

### **Section/Policy**

K1-K2A Employment CP3

### **ID**

995

### **Consultee**

CGMS representing Royal Mail Property Holdings

### **Representation CS2524**

Support principles in economy section with regard to allowing where appropriate the release of redundant employment sites for housing.

### **Council's recommended response NO CHANGE**

Supported welcomed

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### **Section/Policy**

K1-K2A Employment

### **ID**

622

### **Consultee**

Greater London Authority

### **Representation CS2525**

The preferred option to prioritise high technology and advanced manufacturing uses in the Beam Reach industrial area is supported from a strategic perspective, as is the Council's option to retain the Romford office quarter, but allow the introduction of new mixed use development provided there is no net loss of office space.

### **Council's recommended response NO CHANGE**

Support welcomed

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### **Section/Policy**

K1-K2A Employment CP3

### **ID**

622

**Consultee**

Greater London Authority

**Representation CS2526**

The preferred option to release employment sites, including Coldharbour Lane and some consolidation of the Rainham Employment Area (both SELs), will have to be fully justified at the Submissions Stage. Consultants commissioned jointly by the GLA and LDA are currently looking at developing a strategy for the East London sub region for industrial land management up to 2020. If the strategy concludes that there is justification to release surplus industrial land within Havering, then there may then be scope to introduce non-industrial uses on sites within the employment areas, subject to Mayoral agreement

**Council's recommended response** **CHANGE**

With regard to the results of Haverings Employment Land review the policy now quantifies the precise amount of designated employment land to be released in line with the principles of managed transfer set out in the GLA SPG on Industrial Land Capacity. The Reasoned Justification sets out the sites which make up the 34 hectares for release. Coldharbour Lane has now been incorporated within the London Riverside Conservation Park Site Specific Allocation.

---

**Section/Policy**

K1-K2A Employment **CP3**

**ID**

563

**Consultee**

Highways Agency

**Representation CS2527**

The HA does not object to the provision of employment sites but wishes transport considerations to be fully considered. We also support the requirement of contributions to be made towards improved public transport. With regard to the preferred policy approach, the HA is generally supportive, however it would wish to see that transport considerations are given more priority in the preferred policy text. Where the site north of A13 to the West of Ferry Lane has been allocated, the HA would wish to see transport assessments as evidence of the deliverability of this site in the LDF process. Depending upon the severity of the issues identified transport modelling may also be useful, or indeed necessary.

**Council's recommended response**

DC33 requires the submission of a Transport Assessment for development with significant transport implications in line with PPG13

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**Section/Policy**

K1AA Strategic employment locations **DC9**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2528**

Failure to involve the community in the evidence base is unsound. Policy fails to comply with PPG3 paragraph 42a and Objective 3 and Policy 3A.2 of the London Plan. With regard to these the policy is overly restrictive, employment use which is no longer needed should be released for other uses specifically residential.

**Council's recommended response **CHANGE****

CP3 policy sets out the quantity of employment land which will no longer be needed for employment uses and that can be released for non-employment uses, based on the results of Havering's Employment Land Review. Through the issues and options and preferred options consultation the Council consulted on the principles of managed transfer.

---

**Section/Policy**

K1AA Strategic employment locations **DC9**

**ID**

622

**Consultee**

Greater London Authority

**Representation CS2529**

The Council has stated a preferred option that the Coldharbour Lane Commercial Area be de-designated from an SEL as it is remote from the trunk road network and its use by heavy lorries conflicts with the surrounding leisure and conservation uses. Consultants commissioned jointly by the GLA and LDA are currently looking at developing a strategy for the East London sub region for industrial land management up to 2020. If the strategy concludes that there is justification to release surplus industrial land within Havering, and agreement can be reached with the Borough, there may then be scope to introduce non-industrial uses on sites within the Borough, subject to Mayoral agreement. The consultants are expected to report some time towards the end of February 2006.

**Council's recommended response **CHANGE****

Coldharbour Lane has now been incorporated within the London Riverside Conservation Park Site Specific Allocation. Please see CP3 and SSA19 for more detail.

**Section/Policy**

K1AA Strategic employment locations **DC9**

**ID**

1066

**Consultee**

London Thames Gateway Development Corporation

**Representation CS2530**

Any reference to the proposed regional casino within the LDF should make reference to the need to satisfy the PPS6 and PPG13 tests and provide a full assessment of the anticipated regeneration benefits.

**Council's recommended response NO CHANGE**

DC19 covers these points.

---

**Section/Policy**

K1AA Strategic employment locations **DC9**

**ID**

1066

**Consultee**

London Thames Gateway Development Corporation

**Representation CS2531**

Policy should exceptionally make provision for other employment uses within the Beam Reach Business Park, where they are capable of a high standard of design appropriate for its business park locations and where the numbers of employees and the quality of jobs are comparable, and that the final draft policy should make some reference to the acceptability or otherwise of waste uses within the remainder of the SEL.

**Council's recommended response CHANGE**

Policy with regard to Beam Reach has been changed accordingly. Policy now clarifies that waste uses are acceptable within the remainder of the employment area but that the scale of such provision will be set out in the Joint Waste Plan.

---

**Section/Policy**

K1AB Secondary employment areas **DC10**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2532**

Delete policy and base on evidence base that has been informed by community involvement

**Council's recommended response **CHANGE****

Through the issues and options and preferred options consultation the Council consulted on the principles of managed transfer in line with GLA SPG on Industrial Capacity. Havering's Employment Land Review corroborates this strategy.

---

**Section/Policy**

K1AB Secondary employment areas **DC10**

**ID**

1066

**Consultee**

London Thames Gateway Development Corporation

**Representation CS2533**

Clear criteria based policies are required to ensure that all of the existing employment land falling under these policies is not lost to residential, and that it is balanced with the retention of employment land where appropriate. Criteria could include whether the site is located within a residential area, whether the site characteristics are suitable for reuse for employment uses, and the availability of land for employment uses. This should be informed by Havering's forthcoming employment land study.

**Council's recommended response **CHANGE****

As a number of sites have been de-designated as Secondary Employment Land policy now only allows in exceptional circumstances loss of land within designated Secondary Employment Areas. In these cases three criteria need to met relating to whether the site is needed for future business needs, whether the site is considered fit for purpose and whether the site has proved easy to dispose of for its designated uses.

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**Section/Policy**

K1AB Secondary employment areas **DC10**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2534**

What evidence is there to justify the provision of small scale and affordable units on transferred sites. Delete policy. Small scale affordable industrial units not defined or affordable workspaces or large development

**Council's recommended response** **CHANGE**

For the reasons given reference to provision of small scale and affordable units on transferred sites has been deleted

---

**Section/Policy**

K1AB Secondary employment areas **DC10**

**ID**

563

**Consultee**

Highways Agency

**Representation CS2535**

The HA supports the purpose of this policy to regulate the supply of employment land in the borough and the use of an employment land review to assess available land for suitability. However, it would wish that transport considerations were noted in the preferred policy approach.

**Council's recommended response**

Noted. Transport issues are covered in CP3.

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**Section/Policy**

K1AC Non-designated sites **DC11**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2536**

What is the evidence base to support the provision of accommodation for small businesses

**Council's recommended response** **CHANGE**

Policy has been deleted.

---

**Section/Policy**

K1AD Offices **DC12**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2537**

No evidence base to support no net loss of office space in Romford Town Centre. Office use should be released if it is demonstrated that there is no need for such use. Retention of vacant office space will not contribute to the policy aims of the LDF. Accordingly this approach should be deleted.

**Council's recommended response NO CHANGE**

Havering Employment Land Review justifies retention of office space in Romford

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**Section/Policy**

K1AD Offices DC12

**ID**

563

**Consultee**

Highways Agency

**Representation CS2538**

There has been little consideration of access to office developments. With developments being located in the district centres, there will be much better opportunities for utilising the public transport network. This should be encouraged, as it will ease the pressure on congested networks. However the HA supports the use of the sequential test in to assist in the provision of office space in the town and district centres.

**Council's recommended response**

Noted

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**Section/Policy**

K1AD Offices DC12

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2539**

ICT and E-Business not defined. There is no policy requirement to install such technology in residential units.

**Council's recommended response** **CHANGE**

This policy has been deleted.

---

**Section/Policy**

K1AD Offices **DC12**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2540**

Not appropriate to encourage e-business on transferred employment land

**Council's recommended response** **CHANGE**

This policy has been deleted.

---

**Section/Policy**

K1AF Access to employment opportunities **DC13**

**ID**

1040

**Consultee**

Barton Willmore representing Crest Nicholson

**Representation CS2541**

Contrary to para 8 of Circular 05/2005 in that the issues covered would not be a direct impact of a development proposal.

**Council's recommended response** **CHANGE**

Please see new Planning Obligations Policy PO1 which clarifies that all contributions sought must meet the tests in Circular 5/05.

---

**Section/Policy**

K1AG Hotels **DC14**

**ID**

563

**Consultee**

Highways Agency

**Representation CS2542**

Supports the use of the sequential test in deciding the location for hotels in the district and the emphasis placed on the access to public transport for hotels.

**Council's recommended response**

Support welcomed.

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## **Site Specific Allocations Preferred Options Representations**

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### **5 Introduction**

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**Section/Policy**

5.3

**ID**

1246

**Consultee**

Forge Developments

**Representation SSA2543**

By not allocating the site being promoted for an EMI the Council has failed in the key objective of making suitable land available to meet social requirements, not improved the lives of those persons in need nor created truly mixed and inclusive communities nor provided essential key services accessible to all members of the community. Therefore it would appear the Council is not adhering fully with the sustainable and inclusive communities objectives as outlined.

**Council's recommended response NO CHANGE**

As this site is within the Green Belt and the land meets the purposes of including land in the GB as set out in PPG2 and there are no exceptional circumstances justifying its removal, then the Council does not consider that this site is suitable for an EMI facility.

## **7 Range of sites that need to be covered**

This is now covered in section 3 'The Sites'

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### **Section/Policy**

7.1

### **ID**

860

### **Consultee**

Cluttons representing the Crown Estate

### **Representation SSA2544**

The Core Strategy should review the green belt boundary and those sites to be excluded from the GB should be considered as part of all other site specific allocations. In line with PPS12 para 2.15 and PPG3 paras 34 and 67 the GB should be reviewed and where appropriate sites allocated for development as there is a finite supply of brownfield land which is not always deliverable.

### **Council's recommended response NO CHANGE**

Please see response to Green Belt representations.

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### **Section/Policy**

7.1

### **ID**

987

### **Consultee**

Atisreal representing Barking, Havering and Redbridge NHS Trust

### **Representation SSA2545**

Following completion of the new Oldchurch Hospital existing services at both the Harold Wood and St Georges Hospital sites will be relocating to the new facilities and therefore part of the land at both Harold Wood Hospital and Oldchurch Park will become surplus to requirements. In realising best value for the NHS the Trust is promoting both sites for residential purposes.

Oldchurch has been granted outline permission for key worker and market housing whilst proposals for a mental health facility on the sites are still being pursued by the NELMHT. BHRT support BELMHT. However if NELMHT do not decide to pursue the mental health facility the land should come forward for residential development. The Trust is currently seeking to dispose of the permitted residential development in order to realise the approved permission.

Outline planning permission has recently been applied for with regards to Harold Wood Hospital for approximately 480 units across 5.86 hectares. The remainder of this site will be retained for Primary Care Trust requirements.

Therefore the Trust would wish to support the allocations as outlined in promoting Oldchurch and Harold Wood sites for residential purposes. With regard to Oldchurch this support is subject to the mental health scheme not coming forward in which instance residential development would be a fall back position for the surplus land.

**Council's recommended response **CHANGE****

Support welcomed. Oldchurch allocation has now been removed as this has planning permission.

---

**Section/Policy**

7.1

**ID**

563

**Consultee**

Highways Agency

**Representation SSA2546**

Whilst individual smaller housing sites in the Romford Town Centre vicinity are unlikely to produce many trips, when examined in combination their individual small impacts on the trunk road network will be compounded. From preliminary analysis, in combination these sites have the capability of producing up to 6000 daily trips if developed as housing land. When these sites are further combined with other development areas or land –uses, their potential overall impact could then become significant despite their distance to the trunk road network. The agency would expect to see transport assessments to demonstrate the deliverability of potential sites. Depending upon the severity of the issues identified transport modelling may be useful, or indeed necessary, within the LDF process.

**Council's recommended response **NO CHANGE****

DC33 requires the submission of a Transport Assessment for development with significant transport implications in line with PPG13

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**Section/Policy**

7.6-London Riverside

**ID**

NA

**Consultee**

154 members of the public

**Representation SSA2547-2700**

Objection to 5000 homes proposed for London Riverside Development Area including Rainham

I totally object to the intention to build 5000 homes in the London Riverside Area, as indicated in your Local Development Framework, as a vast amount of these homes will be in Rainham/Wennington or South Hornchurch Wards. I also object to the loss/re-designation of green belt, which contravenes the following policies of Havering's Unitary Development Plan:

STR1:

- (2) To give a high priority to protecting and improving the environment
- (4) To prevent inappropriate development in the Green belt

ENV1 Maintain Havering's existing open and spacious residential character. Page 28 (67) states that the "The plan aims to ensure that Havering's character and environment are maintained and enhanced". The concreting over of Rainham cannot achieve this.

The Council should adhere to the responses to their expensive consultation exercise, the London Riverside Development Options, where the residents made it perfectly clear that they don't want over development, mass housing or tower blocks.

Please make my comments known to all of Havering's Councillors who unanimously pledged support for the Adamsgate vision.

**Council's recommended response **CHANGE****

Whilst the Council is still committed to building sustainable new communities in London Riverside reference to 5000 new homes in London Riverside has now been deleted from the Site Specific Allocations as the Council considers that the development of this area should not be driven by a predetermined capacity. In line with the approach of the Core and DC policies development should be design led with regard to delivering the right mix of homes to meet housing need, public transport accessibility and the surrounding physical context. Limits on housing densities and storey heights go some way to meeting the concerns expressed by residents in earlier consultations. It is important to emphasise that the new homes planned for Rainham are on sites previously designated as Employment Sites, or on brownfield sites within Rainham Village. One of the functions of the green belt is to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

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**Section/Policy**

7.6-Dovers Corner

**ID**

NA

**Consultee**

372 members of the public

**Representation SSA2701-3072**

Objection to 5000 homes proposed for London Riverside Development Area including Rainham

Totally object to the intention to build 5000 homes in the London Riverside Area, as indicated in your Local Development Framework, as a vast amount of these homes will be in a narrow area of the Rainham/Wennington and South Hornchurch Wards. This is far too high a density and is indicative of mainly flats/apartment blocks.

Also object to the loss/re-designation of green belt, which contravenes the following policies of Havering's Unitary Development Plan:

STR1:

(2) To give a high priority to protecting and improving the environment

(4) To prevent inappropriate development in the Green belt

ENV1

Maintain Havering's existing open and spacious residential character.

Page 28 (67) states that the "The plan aims to ensure that Havering's character and environment are maintained and enhanced". The concreting over of Rainham cannot achieve this.

The Council should adhere to the responses to their expensive consultation exercise, the London Riverside Development Options, where the residents made it perfectly clear that they don't want over development, mass housing or tower blocks.

Specifically object to suggestions that 575 units be built on Dovers Corner as noted in the Site Specific Allocations, Development Plan Section 7, paragraphs 6 & 9.

Please make comments known to all of Havering's Councillors who unanimously pledged support for the Adamsgate Vision.

**Council's recommended response **CHANGE****

Whilst the Council is still committed to building sustainable new communities in London Riverside reference to 5000 new homes in London Riverside and 575 new homes at Dover's Corner has now been deleted from the Site Specific Allocations as the Council considers that the development of this area should not be driven by a predetermined capacity. In line with the approach of the Core and DC policies development should be design led with regard to delivering the right mix of homes to meet housing need, public transport accessibility and the surrounding physical context. Limits on housing densities and storey heights go some way to meeting the concerns expressed by residents in earlier consultations. It is important to emphasise that the new homes planned for Rainham are on sites previously designated as

Employment Sites, or on brownfield sites within Rainham Village. One of the functions of the green belt is to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

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**Section/Policy**

7.6-Como Street

**ID**

NA

**Consultee**

40 members of the public

**Representation SSA3073-SSA3112**

Objection to 8000 Homes proposed for Havering.

I totally object to the intention to build at least 8000 homes in Havering, as indicated in your Local Development Framework.

I also object to the loss/re-designation of green belt, which contravenes the following policies of Havering's Unitary Development Plan:

STR1:

(2) To give a high priority to protecting and improving the environment

(4) To prevent inappropriate development in the Green belt

ENV1

Maintain Havering's existing open and spacious residential character.

Page 28 (67) states that the "The plan aims to ensure that Havering's character and environment are maintained and enhanced". Your plan to allow so many properties, many of the m flats, will impact negatively on the quality of life of the Borough's residents.

I specifically object to your suggestion that 100 units be built on Como Street Car Park as noted in the Development Plan, Section 7, paragraph 6.

**Council's recommended response **CHANGE****

Please see response to section 8.5 of the Core Strategy. Reference to 100 new homes at Como Street has been dropped. This will now be addressed in Romford Area Action Plan.

## **The Sites**

These responses relate to sections 8 and 9 of the Site Specific Allocations Preferred Options Report. Which are now covered in Section 6 of the Site Specific Allocations submission document. The sites are now ordered according to the structure of the Core Strategy.

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### **Section/Policy**

Romford Ice Rink SSA7

### **ID**

846

### **Consultee**

Environment Agency

### **Representation SSA3113**

In Flood Zone Risk 1. Only concern is surface water flood risk and therefore should all include SUDs. For sites over 1 hectare in size developer would be required to undertake a Surface Water Flood Risk Assessment for the site to ensure that discharge rates are restricted to Greenfield and 1 in 100 year on-site attenuation is provided.

Possibly contaminated

### **Council's recommended response NO CHANGE**

DC 49 Flood Risk states that a surface water flood risk assessment must be submitted with planning applications for developments over 1 hectare in size. In line with DC54 a full technical assessment would be required where the development is on or near to a site where contamination is known or expected to exist. The applicant would be required to agree long term remediation measures before planning permission is granted if the assessment identifies an unacceptable risk to people, flora or fauna and the water environment.

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### **Section/Policy**

Romford Ice Rink SSA7

### **ID**

1373

### **Consultee**

Roger Tym and Partners representing Somerfields

### **Representation SSA3114**

As the Council's retail and leisure assessment has not been completed it is only appropriate that specific sites for retail development have not been included within this paper. However a number of sites are put forward for

mixed use development including retail which are entirely out of centre in retail terms. This is particularly so for the Ice Rink. Whilst opposite an existing retail destination is not within or on the edge of a defined centre and is therefore not sequentially preferable, but is sufficiently close to Romford centre that depending on the type of retail proposed could impact on the town centre. The finding of the assessment should establish whether there is a need for retailing on the site.

**Council's recommended response** **CHANGE**

Any application including retail use for this site would need to satisfy the policies of the Core Strategy.

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**Section/Policy**

Romford Ice Rink **SSA7**

**ID**

617

**Consultee**

Thames Water

**Representation SSA3115**

Thames Water has no concerns regarding wastewater capability in relation to this site.

**Council's recommended response** **NO CHANGE**

Noted

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**Section/Policy**

St George's Hospital **deleted**

**ID**

691

**Consultee**

CRPE North East London

**Representation SSA3116**

Development should be limited to the existing footprint and the green area on the east side facing the river should be integrated into the popular but narrow riverside green way.

**Council's recommended response** **CHANGE**

This site allocation has now been removed as it is covered by CP14 and DC47. The criteria in Annex C of PPG2 will be applied when determining planning applications for this site. Proposals for alternative uses must be in line with CP1 therefore the first priority will be housing. In line with DC26 community facilities essential to meet the specific needs of the community

either as part of a mixed use scheme or sole use depending on the scale of land available will also be allowed.

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**Section/Policy**

St George's Hospital deleted

**ID**

846

**Consultee**

Environment Agency

**Representation SSA3117**

Located in Flood Zone 3 (1 in 100 year floodplain). In order to determine whether these sites are developable and if so decide what type of development may be appropriate it will be necessary to undertake a Fluvial Flood Risk Assessment to determine the risk of flooding from rivers. If site is over 1 hectare in size we would require developer to undertake a Surface Water Flood Risk Assessment for the site which ensures that discharge rates are restricted to Greenfield and 1 in 100 year on site attenuation is provided.

Possibly contaminated

**Council's recommended response CHANGE**

This site allocation has now been removed as it is covered by CP14 and DC47. Flood risk issues are covered by DC49.

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**Section/Policy**

St George's Hospital deleted

**ID**

528

**Consultee**

Transport for London

**Representation SSA3118**

TfL would like to explore with the Council the possibility of including the bus stand on Suttons Lane within the proposed Major Developed Site boundary for the hospital. TfL intends to provide limited improvements to the existing stand to include drivers' toilets, lighting, CCTV and new paving.

**Council's recommended response CHANGE**

This site allocation has now been removed as it is covered by CP14 and DC47.

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**Section/Policy**

## **Cabinet 9 October 2006**

St George's Hospital deleted

### **ID**

617

### **Consultee**

Thames Water

### **Representation SSA3119**

Thames Water has no concerns regarding wastewater capability in relation to this site.

### **Council's recommended response NO CHANGE**

Noted

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### **Section/Policy**

St George's Hospital deleted

### **ID**

NA

### **Consultee**

209 members of the public

### **Representation SSA3120-SSA3328**

Objection to 8000 Homes proposed for Havering.

I totally object to the intention to build at least 8000 homes in Havering, as indicated in your Local Development Framework.

I also object to the loss/re-designation of green belt, which contravenes the following policies of Havering's Unitary Development Plan:

STR1:

(2) To give a high priority to protecting and improving the environment

(4) To prevent inappropriate development in the Green belt

ENV1

Maintain Havering's existing open and spacious residential character.

Page 28 (67) states that the "The plan aims to ensure that Havering's character and environment are maintained and enhanced". Your plan to allow so many properties, many of them flats, will impact negatively on the quality of life of the Borough's residents.

I specifically object to your suggestion that houses be built on the existing site of St George's hospital, as noted in the Site Specific Allocations, Development Plan, Section 8, paragraph 4, St George's Hospital.

### **Council's recommended response CHANGE**

This site allocation has now been removed as it is covered by CP14 and DC47. The criteria in Annex C of PPG2 will be applied when determining planning applications for this site. Proposals for alternative uses must be in line with CP1 therefore the first priority will be housing. In line with DC26 community facilities essential to meet the specific needs of the community either as part of a mixed use scheme or sole use depending on the scale of land available will also be allowed.

The designation of this site as a Major Developed Site continues the UDP approach and still gives the Trust the flexibility to release the site if it chooses in line with its overall strategy for Havering's hospitals. Equally it enables the hospital to remain if the Trust so decide.

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**Section/Policy**

St George's Hospital deleted

**ID**

NA

**Consultee**

475 members of the public

**Representation SSA3329-3803**

Delete all references to St George's Hospital as being an identified site for housing within the Council's Local Development Framework

Delete all references to St George's Hospital being a "Major Development Site within the Green Belt".

St George's Hospital is an important strategic location for healthcare within the Borough particularly for the provision of older people's services. Given the projected increase in housing within the Borough over the course of the period 2007/08-2017/18 there will be a need for significant health facilities within the South of Havering and healthcare should remain the primary use of this site. This approach is supported by the Government's most recent White Paper on healthcare which emphasises the need to retain community hospitals such as St George's.

Havering Primary Care Trust and the North East London Strategic Health Authority have not made any formal decisions regarding the continuing provision of services currently provided from St George's Hospital and they are reviewing their approach in the light of the White Paper and other Department of Health guidance and advice. Therefore, it would be premature to suggest that the site should be considered for anything other than healthcare.

Housing development on this site would be entirely inappropriate given its important location within the Green Belt and proximity to the Country Park-

housing development would only harm the enjoyment of this valuable public open space.

**Council's recommended response **CHANGE****

This site allocation has now been removed as it is covered by CP14 and DC47. The criteria in Annex C of PPG2 will be applied when determining planning applications for this site. Proposals for alternative uses must be in line with CP1 therefore the first priority will be housing. In line with DC26 community facilities essential to meet the specific needs of the community either as part of a mixed use scheme or sole use depending on the scale of land available will also be allowed.

The designation of this site as a Major Developed Site continues the UDP approach and still gives the Trust the flexibility to release the site if it chooses. Equally it enables the hospital to remain if the Trust so decide.

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**Section/Policy**

Oldchurch Hospital deleted

**ID**

846

**Consultee**

Environment Agency

**Representation SSA3804**

In Flood Zone Risk 1. Only concern is surface water flood risk and therefore should all include SUDs. For sites over 1 hectare in size developer would be required to undertake a Surface Water Flood Risk Assessment for the site to ensure that discharge rates are restricted to Greenfield and 1 in 100 year on-site attenuation is provided.

Possibly contaminated

**Council's recommended response NO CHANGE**

This site now has planning permission and consequently the allocation has been removed.

---

**Section/Policy**

Oldchurch Hospital deleted

**ID**

987

**Consultee**

Atis Real representing Barking Havering and Redbridge NHS Trust

**Representation SSA3805**

The provision of a mental health unit in this location is required owing to the relocation of services from Mascalls Park Brentwood to provide locally based services to the communities of Havering and Barking and Dagenham. NELMHT are therefore retaining part of the land at Oldchurch Hospital with the aim of providing a mental health facility. Should permission not be granted for such a use the current landowner Barking, Havering and Redbridge NHS Trust will seek to promote the remainder of the site for residential purposes. The Trust is seeking an allocation of part of the site for mental healthcare facilities. Therefore seeking to alter the existing allocation so as to provide part of the site for residential purposes reflecting the recent planning permission and part for healthcare purposes. Therefore objecting to the use of Oldchurch Hospital solely for residential purposes. Should permission not be granted the fallback position is to promote the site for residential uses in realising best value for the NHS through the promotion of surplus land for residential development. In this instance the Trust would support an allocation of the site for residential.

**Council's recommended response NO CHANGE**

This site now has planning permission and consequently the allocation has been removed.

---

**Section/Policy**

Elm Park **SSA3**

**ID**

846

**Consultee**

Environment Agency

**Representation SSA3806**

In Flood Zone Risk 1. Only concern is surface water flood risk and therefore should all include SUDs. For sites over 1 hectare in size developer would be required to undertake a Surface Water Flood Risk Assessment for the site to ensure that discharge rates are restricted to Greenfield and 1 in 100 year on-site attenuation is provided.

**Council's recommended response NO CHANGE**

Any application would need to satisfy DC49 which covers these issues.

---

**Section/Policy**

Elm Park **SSA3**

**ID**

NA

**Consultee**

185 members of the public

**Representation SSA3807-SSA3991**

Objection to 8000 Homes proposed for Havering.

Totally object to the intention to build at least 8000 homes in Havering, as indicated in your Local Development Framework.

Also object to the loss/re-designation of green belt, which contravenes the following policies of Havering's Unitary Development Plan:

STR1:

(2) To give a high priority to protecting and improving the environment

(4) To prevent inappropriate development in the Green belt

ENV1

Maintain Havering's existing open and spacious residential character.

Page 28 (67) states that the "The plan aims to ensure that Havering's character and environment are maintained and enhanced". Your plan to allow so many properties, many of the m flats, will impact negatively on the quality of life of the Borough's residents.

Specifically object to your suggestion that Elm Park Station and Tadworth Parade should be re-developed, primarily for housing, as noted in the Site Specific Allocations; Development Plan, Section 8, paragraph 8, Elm Park Centre.

**Council's recommended response NO CHANGE**

In line with the Havering Retail and Leisure Study the primary purpose of the allocation is to increase retail floor space, improve the pedestrian and cyclist environment and provide better functional and visual linkages to the Broadway, Elm Park Station and the rest of Elm Park District Centre, as well as provide new and a better mix of housing. The allocation policy states that retail floorspace must be retained at ground floor level.

---

**Section/Policy**

Harold Wood Hospital SSA1

**ID**

846

**Consultee**

Environment Agency

**Representation SSA3992**

In Flood Zone Risk 1. Only concern is surface water flood risk and therefore should all include SUDs. For sites over 1 hectare in size developer would be required to undertake a Surface Water Flood Risk Assessment for the site to ensure that discharge rates are restricted to Greenfield and 1 in 100 year on-site attenuation is provided.

Possibly contaminated

**Council's recommended response NO CHANGE**

Any application would need to satisfy DC49 which covers these issues.

---

**Section/Policy**

Harold Wood Hospital SSA1

**ID**

NA

**Consultee**

90 Members of the public

**Representation SSA3993-4082**

Objection to 8000 Homes proposed for Havering.

I totally object to the intention to build at least 8000 homes in Havering, as indicated in your Local Development Framework.

I also object to the loss/re-designation of green belt, which contravenes the following policies of Havering's Unitary Development Plan:

STR1:

- (2) To give a high priority to protecting and improving the environment
- (4) To prevent inappropriate development in the Green belt

ENV1

Maintain Havering's existing open and spacious residential character.

Page 28 (67) states that the "The plan aims to ensure that Havering's character and environment are maintained and enhanced". Your plan to allow so many properties, many of the m flats, will impact negatively on the quality of life of the Borough's residents.

I specifically object to the planning application for residential development of up to 480 dwellings at Harold Wood hospital. Consider this application an overdevelopment, because of the problems of traffic access, from Gubbins Lane and Whitelands Way, which are often gridlocked with cars already.

**Council's recommended response NO CHANGE**

Any application which is submitted after this document is adopted would need to provide a Transport Assessment which provides details of proposed measures to improve access by public transport, walking and cycling, to reduce associated parking and mitigate adverse transport impacts.

---

**Section/Policy**

Aherns Crow Lane deleted

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4083**

Possibly contaminated

**Council's recommended response NO CHANGE**

This site has been removed as it now has planning permission.

---

**Section/Policy**

Roneo Corner deleted

**ID**

671

**Consultee**

CRPE North East London

**Representation SSA4084**

A design statement is required to ensure that the river is used to full advantage as part of an amenity space.

**Council's recommended response NO CHANGE**

This site has now been removed so as not to prejudice detailed discussions about its future redevelopment.

---

**Section/Policy**

Roneo Corner deleted

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4085**

In the flood plain and next to the River Rom. FRA necessary in line with PPG25, would object at planning application stage if these proposals were not supported by a FRA. Surface Water Flood Risk Assessment which ensures that discharge rates are restricted to Greenfield and 1 in 100 year attenuation provided also necessary.

**Council's recommended response NO CHANGE**

This site has now been removed so as not to prejudice detailed discussions about its future redevelopment.

---

**Section/Policy**

Roneo Corner deleted

**ID**

617

**Consultee**

Thames Water

**Representation SSA4086**

Do not have any objection in respect of wastewater capability in relation to this site providing;

- (i) Surface water flows are attenuated such that there is no increase in peak discharge from the site;
- (ii) Density of development is at a maximum of 83 properties/ha with an associated occupancy rate of 2.5 persons/dwelling. Proposed higher density development would require further information to be supplied relating to the number of proposed dwellings in order for Thames Water to assess sewerage capacity.

**Council's recommended response NO CHANGE**

This site has now been removed so as not to prejudice detailed discussions about its future redevelopment.

---

**Section/Policy**

Broxhill Centre SSA2 Whitworth and Broxhill Centres

**ID**

691

**Consultee**

CPRE North East London

**Representation SSA4087**

Redevelopment should be limited to the existing footprint and the remainder given full green belt protection and integrated with adjacent public open space

**Council's recommended response NO CHANGE**

Please see CP14 and SSA2 which explain that the Broxhill Centre has now been combined with the Whitworth Centre, and that the Broxhill Centre buildings are demolished and a new public open space provided.

---

**Section/Policy**

Broxhill Centre SSA2 Whitworth and Broxhill Centres

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4088**

In Flood Zone Risk 1. Only concern is surface water flood risk and therefore should all include SUDs. For sites over 1 hectare in size developer would be required to undertake a Surface Water Flood Risk Assessment for the site to ensure that discharge rates are restricted to Greenfield and 1 in 100 year on-site attenuation is provided.

**Council's recommended response NO CHANGE**

Any planning application for this site will need to satisfy Core Strategy Development Control policy DC49 'Flood Risk'.

---

**Section/Policy/Site**

London Riverside Conservation Park SSA19

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4089**

Is in the floodplain over 1 hectare in size and close to the River Thames, Rainham main sewer and tributaries. FRA necessary in line with PPG25, would object at planning application stage if these proposals were not supported by a FRA. Surface Water Flood Risk Assessment which ensures that discharge rates are restricted to Greenfield and 1 in 100 year attenuation provided also necessary.

**Council's recommended response NO CHANGE**

Any planning application for this site will need to satisfy Core Strategy Development Control policy DC49 'Flood Risk' which stipulates the need for a Flood Risk Assessment with proposals in flood risk zones 2 and 3.

---

**Section/Policy/Site**

London Riverside Conservation Park SSA19

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4090**

Possibly contaminated

**Council's recommended response NO CHANGE**

Any planning application for this site will need to satisfy Core Strategy Development Control policy DC54 'Contaminated Land'.

---

**Section/Policy/Site**

London Riverside Conservation Park **SSA19**

**ID**

622

**Consultee**

Greater London Authority

**Representation SSA4091**

Paragraph 8.16 refers to a partnership for developing proposals to create the London Riverside Conservation Park. The London Thames Gateway Development Corporation (LTGDC) has committed funding towards the implementation of this proposal. Their involvement should be acknowledged.

**Council's recommended response **CHANGE****

This is now made clear in SSA19.

---

**Section/Policy/Site**

London Riverside Conservation Park **SSA19**

**ID**

622

**Consultee**

Greater London Authority

**Representation SSA4092**

The Mayor has expressed his support for the proposal to create a Conservation Park at Rainham. There is, however, still the need for a formal assessment of the proposals through the LDF process and specifically for a clear steer from the Mayor on his strategic planning priorities for different areas within the proposed conservation park, including the waste and recycling uses on the Cleanaway site at Coldharbour Lane and the commercial activities on the Coldharbour Lane Strategic Employment Location (SEL) [Refer PDU/1241/01].

**Council's recommended response **NO CHANGE****

The Coldharbour Lane Commercial Area is now included within the London Riverside Conservation Park SSA19. Please see reasoned justification for this policy which clarifies the Council's position.

---

**Section/Policy/Site**

## **Cabinet 9 October 2006**

London Riverside Conservation Park **SSA19**

### **ID**

1066

### **Consultee**

London Thames Gateway Development Corporation

### **Representation SSA4093**

Supports the principle of the conservation park but highlights the need for a criteria based policy for the assessment of proposals for visitor facilities and other built form proposed to facilitate the use of the site as a conservation park. Such a policy should include criteria such as public transport, accessibility, design and siting of buildings.

### **Council's recommended response NO CHANGE**

Criteria now added to policy DC19 'Locating Cultural Facilities'. This covers public transport and access. Any new buildings would need to satisfy DC 61 Urban Design and DC62 Access.

---

### **Section/Policy/Site**

London Riverside Conservation Park **SSA19**

### **ID**

566

### **Consultee**

Royal Society for the Protection of Birds

### **Representation SSA4094**

The Site Allocations map for London Riverside Conservation Park excludes the area at the tip of the landfill site where there are currently Cleanaway and Freightmaster buildings. The RSPB objects to the exclusion of this part of the site because it impedes the development of the whole area as a Conservation Park. The RSPB advocates that this part of the site be brought into the site allocation for the Conservation Park, to make it clear about its intended future use, and bring it into line with previous documentation on the Conservation Park.

### **Council's recommended response NO CHANGE**

The Coldharbour Lane Commercial Area is now included within the London Riverside Conservation Park SSA19. Please see reasoned justification for this policy which clarifies the Council's position.

---

### **Section/Policy/Site**

London Riverside Conservation Park **SSA1**

### **ID**

566

**Consultee**

Royal Society for the Protection of Birds

**Representation SSA4095**

The RSPB supports the inclusion of London Riverside Conservation Park in the Site Specific Allocations for London Riverside. However, would like to comment on the text for the Conservation Park in the table on page 34 of the Preferred Options report.

Under the 'Implementation' column in the table on page 34 of the Preferred Options report, the RSPB would like it noted that a large amount of work vital for the delivery of the Conservation Park is already underway on the RSPB reserve. The RSPB has secured funding from sources including ODPM, HLF and Thurrock Thames Gateway Development Corporation for facilities to improve the public's enjoyment and understanding of everything the site has to offer. This Refeind the parts of the reserve in LB Havering, as well as the Environment and Education Centre in Thurrock. The success of the Environment and Education Centre will signal the development of the further facilities on the rest of the Conservation Park

The area of the London Riverside Conservation Park in LB Havering is around 523 hectares, not 5.15 hectares as stated in the table in the Preferred Options report.

**Council's recommended response **CHANGE****

Reference to funding already secured has now been added and site area changed.

---

**Section/Policy/Site**

Rainham Historic Core **SSA21 Rainham Hall and Grounds**

This site now excludes St Helens and St Giles Church and now focuses on Rainham Hall and Grounds

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4096**

Located in Flood Zone 3 (1 in 100 year floodplain). In order to determine whether these sites are developable and if so decide what type of development may be appropriate it will be necessary to undertake a Fluvial Flood Risk Assessment to determine the risk of flooding from rivers. If site is over 1 hectare in size we would require developer to undertake a Surface Water Flood Risk Assessment for the site which ensures that discharge rates are restricted to Greenfield and 1 in 100 year on site attenuation is provided.

**Council's recommended response NO CHANGE**

Any planning application for this site will need to satisfy Core Strategy Development Control policy DC49 'Flood Risk' which stipulates the need for a Flood Risk Assessment with proposals in flood risk zones 2 and 3..

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**Section/Policy/Site**

Rainham Historic Core **SSA21 Rainham Hall and Grounds**

**ID**

1066

**Consultee**

London Thames Gateway Development Corporation

**Representation SSA4097**

Highlights the potential to capitalise on the heritage assets within the areas as a basis for regeneration, and the need for a masterplan to coordinate development of the group of allocations centred on Rainham Village, this could be taken forward as SPD.

**Council's recommended response NO CHANGE**

This can be addressed within the Masterplan for London Riverside to be taken forward as SPD as identified in Havering's LDS.

---

**Section/Policy/Site**

Rainham Station Transport Interchange and Civic Square **SSA16**

**ID**

995

**Consultee**

CGMS representing Royal Mail Property Holdings

**Representation SSA4098**

Note that comments on the Royal Mail Delivery Office, Wennington Road, has been acknowledged and of the Council's intention to work with Royal Mail for an alternative site, like to reiterate its relocation would need to be carefully considered in light of Royal Mail's operational needs. If it is deemed essential to relocate the premises it is imperative that a suitable alternative site is found. Therefore wish to maintain a dialogue with the Council and other bodies involved in the regeneration of the area.

**Council's recommended response NO CHANGE**

Noted

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**Section/Policy/Site**

## **Cabinet 9 October 2006**

Rainham Station Transport Interchange and Civic Square **SSA16**

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4099**

Is in the floodplain over 1 hectare in size and is close to Rainham Main Sewer and tributaries. FRA necessary in line with PPG25, would object at planning application stage if these proposals were not supported by a FRA. Surface Water Flood Risk Assessment which ensures that discharge rates are restricted to Greenfield and 1 in 100 year attenuation provided also necessary.

**Council's recommended response NO CHANGE**

Any planning application for this site will need to satisfy Core Strategy Development Control policy DC49 'Flood Risk' which stipulates the need for a Flood Risk Assessment with proposals in flood risk zones 2 and 3 and a Surface Water Flood Risk Assessment with planning applications for developments over 1 hectare in size.

---

**Section/Policy/Site**

Rainham Station Transport Interchange and Civic Square **SSA16**

**ID**

1066

**Consultee**

London Thames Gateway Development Corporation

**Representation SSA4100**

A masterplan is necessary which could also include Rainham Historic Core, Ingrebourne Creek, Rainham Central and Rainham Traffic Management System.

**Council's recommended response NO CHANGE**

This can be addressed within the Masterplan for London Riverside to be taken forward as SPD as identified in Havering's LDS.

---

**Section/Policy/Site**

Rainham Station Transport Interchange and Civic Square **SSA16**

**ID**

293

**Consultee**

Network Rail

**Representation SSA4101**

Welcomes this as it provides for the enhancement of the station. Allocation should be extended to include the station car park. A certain number of spaces will need to be retained to serve the station (a matter to be resolved through discussion with the Train Operation Company and other rail stakeholders) it seems a majority of the spaces are not used. Even if spaces are required to be retained to accommodate growth then this would not preclude building above the car park. Therefore request site be reconsidered for inclusion as part of the allocations for development.

**Council's recommended response NO CHANGE**

The Council considers that the car park should be retained in its entirety as it is currently well used and likely to be more so as new developments come forward along the A1306.

---

**Section/Policy/Site**

Beam Park **SSA11**

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4102**

Is in the floodplain over 1 hectare in size and is close to River Beam and an ordinary water course. FRA necessary in line with PPG25, would object at planning application stage if these proposals were not supported by a FRA. Surface Water Flood Risk Assessment which ensures that discharge rates are restricted to Greenfield and 1 in 100 year attenuation provided also necessary.

**Council's recommended response NO CHANGE**

Any planning application for this site will need to satisfy Core Strategy Development Control policy DC49 'Flood Risk' which stipulates the need for a Flood Risk Assessment with proposals in flood risk zones 2 and 3 and a Surface Water Flood Risk Assessment with planning applications for developments over 1 hectare in size.

---

**Section/Policy/Site**

Beam Park **SSA11**

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4103**

Possibly contaminated

**Council's recommended response NO CHANGE**

Any planning application for this site will need to satisfy Core Strategy Development Control policy DC54 'Contaminated Land'.

---

**Section/Policy/Site**

Beam Park **SSA11**

**ID**

528

**Consultee**

Transport for London

**Representation SSA4104**

The reference to minimum car parking requirements would conflict with London Plan policies on residential car parking and should be deleted.

**Council's recommended response NO CHANGE**

If London Plan car parking standards were used based on existing Public Transport Accessibility Levels (PTALS) a car parking standard of 1.5-2 spaces per unit should be used. Instead the Council has set a based on anticipated future PTALs.

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**Section/Policy/Site**

Beam Park **SSA11**

**ID**

622

**Consultee**

Greater London Authority

**Representation SSA4105**

In relation to Beam Park, the Preferred Options identifies a strip of land, between the railway line and the A1306 between the Borough boundary and Rainham village, for an intensive mix of residential and employment uses. The GLA will need to consider carefully the planning merits of this site-specific proposal against London Plan policies. It is likely that this site specific proposal will be included in the London Riverside Opportunity Area planning framework (OAPF), which will at some stage be subject to public consultation and a formal assessment against London Plan strategic planning objectives.

**Council's recommended response NO CHANGE**

The Council considers that the proposals for this site are in general conformity with London Plan policies.

---

**Section/Policy/Site**

Beam Park **SSA11**

**ID**

1066

**Consultee**

London Thames Gateway Development Corporation

**Representation SSA4106**

Residential uses should be developed in association with public transport improvements and provision of social infrastructure and that this area together with Rainham West should be subject to a masterplanning exercise which will identify sites for the relevant community facilities appropriate densities and urban design principles.

**Council's recommended response NO CHANGE**

Noted. This can be addressed within the Masterplan for London Riverside to be taken forward as SPD as identified in Havering's LDS. Residential densities and car parking standards are based on future Public Transport Accessibility Levels.

---

**Section/Policy/Site**

Rainham West (Dovers Corner) **SSA12**

**ID**

1066

**Consultee**

372 members of the public

**Representation SSA4107-4478**

Objection to 5000 homes proposed for London Riverside Development Area including Rainham

Totally object to the intention to build 5000 homes in the London Riverside Area, as indicated in your Local Development Framework, as a vast amount of these homes will be in a narrow area of the Rainham/Wennington and South Hornchurch Wards. This is far too high a density and is indicative of mainly flats/apartment blocks.

Also object to the loss/re-designation of green belt, which contravenes the following policies of Havering's Unitary Development Plan:

STR1:

- (2) To give a high priority to protecting and improving the environment
- (4) To prevent inappropriate development in the Green belt

ENV1

Maintain Havering's existing open and spacious residential character. Page 28 (67) states that the "The plan aims to ensure that Havering's character and environment are maintained and enhanced". The concreting over of Rainham cannot achieve this.

The Council should adhere to the responses to their expensive consultation exercise, the London Riverside Development Options, where the residents made it perfectly clear that they don't want over development, mass housing or tower blocks.

Specifically object to suggestions that 575 units be built on Dovers Corner as noted in the Site Specific Allocations, Development Plan Section 7, paragraphs 6 & 9.

Please make comments known to all of Havering's Councillors who unanimously pledged support for the Adamsgate Vision.

**Council's recommended response NO CHANGE**

Whilst the Council is still committed to building sustainable new communities in London Riverside reference to 5000 new homes in London Riverside and 575 new homes at Dover's Corner has now been deleted from the Site Specific Allocations as the Council considers that the development of this area should not be driven by a predetermined capacity. In line with the approach of the Core and DC policies development should be design led with regard to delivering the right mix of homes to meet housing need, public transport accessibility and the surrounding physical context. Limits on housing densities and storey heights go some way to meeting the concerns expressed by residents in earlier consultations. It is important to emphasise that the new homes planned for Rainham are on sites previously designated as Employment Sites, or on brownfield sites within Rainham Village. One of the functions of the green belt is to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

---

**Section/Policy/Site**

Rainham West SSA12

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4479**

Is in the floodplain over 1 hectare in size and is close to Pooles Sewer and Ingrebourne. FRA necessary in line with PPG25, would object at planning application stage if these proposals were not supported by a FRA. Surface Water Flood Risk Assessment which ensures that discharge rates are restricted to Greenfield and 1 in 100 year attenuation provided also necessary.

**Council's recommended response NO CHANGE**

Any planning application for this site will need to satisfy Core Strategy Development Control policy DC49 'Flood Risk' which stipulates the need for a Flood Risk Assessment with proposals in flood risk zones 2 and 3 and a Surface Water Flood Risk Assessment with planning applications for developments over 1 hectare in size.

---

**Section/Policy/Site**

Rainham West SSA12

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4480**

Possibly contaminated

**Council's recommended response NO CHANGE**

Any planning application for this site will need to satisfy Core Strategy Development Control policy DC54 'Contaminated Land'.

---

**Section/Policy/Site**

Rainham West SSA12

**ID**

563

**Consultee**

Highways Agency

**Representation SSA4481**

The exact land use mix of Dover's Corner site has yet to be made clear, however it has the potential to produce up to 2500 daily trips, which, in this location could have a material impact on the trunk road network, unless carefully managed from the outset. The HA is keen to remain involved with the consultation process as details regarding the land use mix emerge or alter. We would wish to remain involved as further specific development proposals emerge at these sites.

**Council's recommended response NO CHANGE**

Noted. Any planning application for this site, as required by DC33, would need to be supported by a Transport Assessment which should include measures to mitigate any identified adverse transport impacts.

---

**Section/Policy/Site**

Rainham West **SSA12**

**ID**

563

**Consultee**

London Thames Gateway Development Corporation

**Representation SSA4482**

Residential uses should be developed in association with public transport improvements and provision of social infrastructure and that this area together with Rainham West should be subject to a masterplanning exercise which will identify sites for the relevant community facilities appropriate densities and urban design principles.

**Council's recommended response NO CHANGE**

Noted. This can be addressed within the Masterplan for London Riverside to be taken forward as SPD as identified in Havering's LDS. Residential densities and car parking standards are based on future Public Transport Accessibility Levels.

---

**Section/Policy/Site**

Ingrebourne Creek **SSA20**

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4483**

Is in the floodplain and is close to Ingrebourne. FRA necessary in line with PPG25, would object at planning application stage if these proposals were not supported by a FRA. Surface Water Flood Risk Assessment which ensures that discharge rates are restricted to Greenfield and 1 in 100 year attenuation provided also necessary.

**Council's recommended response NO CHANGE**

Any planning application for this site will need to satisfy Core Strategy Development Control policy DC49 'Flood Risk' which stipulates the need for a Flood Risk Assessment with proposals in flood risk zones 2 and 3 and a

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Surface Water Flood Risk Assessment with planning applications for developments over 1 hectare in size.

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### **Section/Policy/Site**

Ingrebourne Creek **SSA20**

### **ID**

1066

### **Consultee**

London Thames Gateway Development Corporation

### **Representation SSA4484**

A masterplan is necessary which could also include Rainham Historic Core, Ingrebourne Creek, Rainham Central and Rainham Traffic Management System.

### **Council's recommended response NO CHANGE**

This can be addressed within the Masterplan for London Riverside to be taken forward as SPD as identified in Havering's LDS.

---

### **Section/Policy/Site**

Land Between Railway and Broadway **SSA13**

### **ID**

846

### **Consultee**

Environment Agency

### **Representation SSA4485**

Located in Flood Zone 3 (1 in 100 year floodplain). In order to determine whether these sites are developable and if so decide what type of development may be appropriate it will be necessary to undertake a Fluvial Flood Risk Assessment to determine the risk of flooding from rivers. If site is over 1 hectare in size we would require developer to undertake a Surface Water Flood Risk Assessment for the site which ensures that discharge rates are restricted to Greenfield and 1 in 100 year on site attenuation is provided.

### **Council's recommended response NO CHANGE**

Any planning application for this site will need to satisfy Core Strategy Development Control policy DC49 'Flood Risk' which stipulates the need for a Flood Risk Assessment with proposals in flood risk zones 2 and 3 and a Surface Water Flood Risk Assessment with planning applications for developments over 1 hectare in size.

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### **Section/Policy/Site**

Land Between Railway and Broadway

**ID**

1066

**Consultee**

London Thames Gateway Development Corporation

**Representation SSA4486**

A masterplan is necessary which could also include Rainham Historic Core, Ingrebourne Creek, Rainham Central and Rainham Traffic Management System.

**Council's recommended response NO CHANGE**

This can be addressed within the Masterplan for London Riverside to be taken forward as SPD as identified in Havering's LDS.

---

**Section/Policy/Site**

Rainham regional casino and entertainment complex SSA18

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4487**

Is in the floodplain over 1 hectare in size and is close to Rainham Creek. FRA necessary in line with PPG25, would object at planning application stage if these proposals were not supported by a FRA. Surface Water Flood Risk Assessment which ensures that discharge rates are restricted to Greenfield and 1 in 100 year attenuation provided also necessary.

**Council's recommended response NO CHANGE**

Any planning application for this site will need to satisfy Core Strategy Development Control policy DC49 'Flood Risk' which stipulates the need for a Flood Risk Assessment with proposals in flood risk zones 2 and 3 and a Surface Water Flood Risk Assessment with planning applications for developments over 1 hectare in size.

---

**Section/Policy/Site**

Rainham regional casino and entertainment complex SSA18

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4488**

Possibly contaminated

**Council's recommended response NO CHANGE**

Any planning application for this site will need to satisfy Core Strategy Development Control policy DC54 'Contaminated Land'.

---

**Section/Policy/Site**

Rainham regional casino and entertainment complex **SSA18**

**ID**

680

**Consultee**

Government Office for London

**Representation SSA4489**

Site is well away from any centre and does not appear to accord with national policy or the proposed DC policies for the siting of either the aspiration use or the preferred uses.

**Council's recommended response CHANGE**

DC19 'Locating Cultural Facilities' para 1.5 states that: 'the Council considers that there are no sequentially preferable sites within the Borough or this part of the Thames Gateway, to the one identified. Moreover in order to maximise the centre's regeneration impacts in line with the Government's policy statement on gambling and to reduce the risk of ambient gambling the Council does not consider that such a complex is best suited to a town centre location. At the same time it is still important that the complex is sustainably located and therefore access to public transport and by walking and cycling remain important criteria.'

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**Section/Policy/Site**

Rainham regional casino and entertainment complex **SSA18**

**ID**

1372

**Consultee**

GVA Grimley representing Sun International

**Representation SSA4490**

Welcome the Council's intention to do an Employment Land Review. Strongly support the identification of Rainham as a suitable location of a Regional Casino complex. Rainham is situated in the centre of the London Riverside Regeneration Area which is one of the largest and most important opportunities in the Thames Gateway, whilst there have been progress in

other initiatives to the west there has been little stimuli in the east. The Government regards the regenerative impact of a regional casino as the greatest potential benefit that could flow from such a development. Thus a regional casino at Ferry Lane will bring extensive regeneration benefits to a wide area of the Thames Gateway, stimulating much needed investment and development. With regard to current uses the complex will create more jobs and more training opportunities. It will unlock the wider potential of the site through increased accessibility, better infrastructure, improved image/perception etc. Such a development is fundamental to attracting the investment needed to meet the aspirations of the London Plan.

**Council's recommended response NO CHANGE**

Support welcomed.

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**Section/Policy/Site**

Rainham regional casino and entertainment complex **SSA18**

**ID**

622

**Consultee**

Greater London Authority

**Representation SSA4491**

Setting aside the process put in place by Government to decide where a regional casino would best be located, there are planning policy concerns in relation to the proposal for a regional casino in the location proposed in the Preferred Options. The land is Strategic Employment Land and its loss has not been justified by an industrial land study (policy 3B.5 and draft Industrial Capacity SPG). The proposal is also considered to conflict with PPS6 and the London Plan, in terms of the site's out-of-centre location. Policies 2A.5, 3D.1 and 3D.2 of the London Plan seek to encourage leisure and high trip generating uses within town centres. Although near a railway station, it is not a particularly accessible location by a choice of means of transport in a London-wide context.

**Council's recommended response **CHANGE****

DC19 'Locating Cultural Facilities' para 1.5 states that: 'the Council considers that there are no sequentially preferable sites within the Borough or this part of the Thames Gateway, to the one identified. Moreover in order to maximise the centre's regeneration impacts in line with the Government's policy statement on gambling and to reduce the risk of ambient gambling the Council does not consider that such a complex is best suited to a town centre location. At the same time it is still important that the complex is sustainably located and therefore access to public transport and by walking and cycling remain important criteria.'

The Site Allocation policy now explains in detail how it is consistent with national and regional planning policy guidance and how good public transport access will be secured to the site.

**Section/Policy/Site**

Rainham regional casino and entertainment complex **SSA18**

**ID**

1066

**Consultee**

London Thames Gateway Development Corporation

**Representation SSA4492**

Prospective developers need to set out a convincing case for this proposal in terms of the advice set out in PPS6 and PPS13 concerning the location of leisure facilities which should normally be directed to a town centre. All references to this proposal in the LDF should refer to the need for PPS6 tests of need, impact and sequential test to be met. The case for the loss of land designated as Strategic Employment Land should also be made. The anticipated regeneration effects of the proposal should be fully appraised and understood.

**Council's recommended response **CHANGE****

DC19 'Locating Cultural Facilities' para 1.5 states that: 'the Council considers that there are no sequentially preferable sites within the Borough or this part of the Thames Gateway, to the one identified. Moreover in order to maximise the centre's regeneration impacts in line with the Government's policy statement on gambling and to reduce the risk of ambient gambling the Council does not consider that such a complex is best suited to a town centre location. At the same time it is still important that the complex is sustainably located and therefore access to public transport and by walking and cycling remain important criteria.'

The Site Allocation policy now explains in detail how it is consistent with national and regional planning policy guidance and how good public transport access will be secured to the site. It also explains the anticipated regeneration effects of the proposal.

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**Section/Policy/Site**

Rainham Central **SSA17**

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4493**

Is in the floodplain over 1 hectare in size and is close to Ingrebourne and Ingrebourne branch. FRA necessary in line with PPG25, would object at

planning application stage if these proposals were not supported by a FRA. Surface Water Flood Risk Assessment which ensures that discharge rates are restricted to Greenfield and 1 in 100 year attenuation provided also necessary.

**Council's recommended response NO CHANGE**

Any planning application for this site will need to satisfy Core Strategy Development Control policy DC49 'Flood Risk' which stipulates the need for a Flood Risk Assessment with proposals in flood risk zones 2 and 3 and a Surface Water Flood Risk Assessment with planning applications for developments over 1 hectare in size.

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**Section/Policy/Site**

Rainham Central SSA17

**ID**

1066

**Consultee**

London Thames Gateway Development Corporation

**Representation SSA4494**

A masterplan is necessary which could also include Rainham Historic Core, Ingrebourne Creek, Rainham Central and Rainham Traffic Management System.

**Council's recommended response NO CHANGE**

This can be addressed within the Masterplan for London Riverside to be taken forward as SPD as identified in Havering's LDS.

---

**Section/Policy/Site**

Rainham Central SSA17

**ID**

597

**Consultee**

Cushman and Wakefield, Healey and Baker representing TESCO stores

**Representation SSA4495**

Objection is made to the Site Allocation TQ5282SW Rainham Central.

The feasibility of a remodelled Tesco store and road layout has not been explored in any detail to date with either the main landowners or the relevant authorities.

We must therefore question the deliverability of the proposal and therefore its appropriateness within the Council's Site Specific Allocations Preferred Options Document.

Detailed discussions should be first held with the main parties effected to determine whether it is appropriate and feasible to progress any redevelopment proposals which might incorporate a remodelled Tesco store.

The existing Tesco store is a modern facility which operates extremely well and is popular with customers. The existing highway layout, site access and car parking arrangements are adequate and function well for the existing store.

**Council's recommended response NO CHANGE**

There is significant potential to improve the integration of the store with the rest of the district centre, and to make better use of the site which has potential for significant residential development. A separate representation on Core Strategy policy CP1 'Housing Supply' by TESCOs highlights the potential of achieving new dwellings which might be realised from the redevelopment and intensification of existing developed sites. Discussions are on going with TESCOs with regard to the deliverability of this allocation.

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**Section/Policy/Site**

Rainham traffic management system SSA15

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4496**

In Flood Zone Risk 1. Only concern is surface water flood risk and therefore should all include SUDs. For sites over 1 hectare in size developer would be required to undertake a Surface Water Flood Risk Assessment for the site to ensure that discharge rates are restricted to Greenfield and 1 in 100 year on-site attenuation is provided.

**Council's recommended response NO CHANGE**

Any planning application for this site will need to satisfy Core Strategy Development Control policy DC49 'Flood Risk' which stipulates the need for a Flood Risk Assessment with proposals in flood risk zones 2 and 3 and a Surface Water Flood Risk Assessment with planning applications for developments over 1 hectare in size.

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**Section/Policy/Site**

Rainham traffic management system SSA15

**ID**

1066

**Consultee**

London Thames Gateway Development Corporation

**Representation SSA4497**

A masterplan is necessary which could also include Rainham Historic Core, Ingrebourne Creek, Rainham Central and Rainham Traffic Management System.

**Council's recommended response NO CHANGE**

This can be addressed within the Masterplan for London Riverside to be taken forward as SPD as identified in Havering's LDS.

---

**Section/Policy/Site**

Beam Park Station SSA11

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4498**

Is in the floodplain and close to an ordinary water course. FRA necessary in line with PPG25, would object at planning application stage if these proposals were not supported by a FRA. Surface Water Flood Risk Assessment which ensures that discharge rates are restricted to Greenfield and 1 in 100 year attenuation provided also necessary.

**Council's recommended response NO CHANGE**

Any planning application for this site will need to satisfy Core Strategy Development Control policy DC49 'Flood Risk' which stipulates the need for a Flood Risk Assessment with proposals in flood risk zones 2 and 3 and a Surface Water Flood Risk Assessment with planning applications for developments over 1 hectare in size.

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**Section/Policy/Site**

Beam Park Station SSA11

**ID**

1066

**Consultee**

London Thames Gateway Development Corporation

**Representation SSA4499**

Station proposals should form part of the Masterplan for the adjacent housing proposals in order that the transport node can be fully integrated into the residential schemes, and contributions should be sought through S106 towards funding the provision of the new station and other public transport improvements.

**Council's recommended response** **CHANGE**

Policy (SSA11) has been changed accordingly.

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**Section/Policy/Site**

Beam Park Station **SSA11**

**ID**

850

**Consultee**

Network Rail

**Representation SSA4500**

Is aware of three possible new stations along this line. Discussions needed between any developer of Beam Park about asset protection, impact of station on network capacity and impact in train operators services and timetables, whether it complies with the guidelines set out in the SRAs New Stations: A guide for promoters, and whether the proposals has DoT support and an industry business case.

**Council's recommended response** **NO CHANGE**

Noted

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**Section/Policy/Site**

Arnolds Field **SSA4**

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4501**

Is in the floodplain over 1 hectare in size and is close to Southall Sewer. FRA necessary in line with PPG25, would object at planning application stage if these proposals were not supported by a FRA. Surface Water Flood Risk Assessment which ensures that discharge rates are restricted to Greenfield and 1 in 100 year attenuation provided also necessary.

**Council's recommended response** **NO CHANGE**

Any planning application for this site will need to satisfy Core Strategy Development Control policy DC49 'Flood Risk' which stipulates the need for a Flood Risk Assessment with proposals in flood risk zones 2 and 3 and a Surface Water Flood Risk Assessment with planning applications for developments over 1 hectare in size.

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**Section/Policy/Site**

Arnolds Field **SSA4**

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4502**

Possibly contaminated

**Council's recommended response NO CHANGE**

Any planning application for this site will need to satisfy Core Strategy Development Control policy DC54 'Contaminated Land'.

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**Section/Policy/Site**

Rainham Quarry **SSA5**

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4503**

In Flood Zone Risk 1. Only concern is surface water flood risk and therefore should all include SUDs. For sites over 1 hectare in size developer would be required to undertake a Surface Water Flood Risk Assessment for the site to ensure that discharge rates are restricted to Greenfield and 1 in 100 year on-site attenuation is provided.

**Council's recommended response NO CHANGE**

Any planning application for this site will need to satisfy Core Strategy Development Control policy DC49 'Flood Risk' which stipulates the need for a Flood Risk Assessment with proposals in flood risk zones 2 and 3 and a Surface Water Flood Risk Assessment with planning applications for developments over 1 hectare in size.

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**Section/Policy/Site**

Warwick Lane **SSA6**

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4504**

Is in the floodplain over 1 hectare in size and is close to Running Water Brook. FRA necessary in line with PPG25, would object at planning application stage if these proposals were not supported by a FRA. Surface Water Flood Risk Assessment which ensures that discharge rates are restricted to Greenfield and 1 in 100 year attenuation provided also necessary.

**Council's recommended response NO CHANGE**

Any planning application for this site will need to satisfy Core Strategy Development Control policy DC49 'Flood Risk' which stipulates the need for a Flood Risk Assessment with proposals in flood risk zones 2 and 3 and a Surface Water Flood Risk Assessment with planning applications for developments over 1 hectare in size.

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**Section/Policy/Site**

Warwick Lane SSA6

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4505**

Possibly contaminated

**Council's recommended response NO CHANGE**

Any planning application for this site will need to satisfy Core Strategy Development Control policy DC54 'Contaminated Land'.

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**Section/Policy/Site**

Upminster Cemetery SSA8

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4506**

Possibly contaminated

**Council's recommended response NO CHANGE**

Any planning application for this site will need to satisfy Core Strategy Development Control policy DC54 'Contaminated Land'.

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**Section/Policy/Site**

South Essex Crematorium SSA8

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4507**

Possibly contaminated

**Council's recommended response NO CHANGE**

Any planning application for this site will need to satisfy Core Strategy Development Control policy DC54 'Contaminated Land'.

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**Section/Policy/Site**

North Street Bus Garage deleted

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4508**

Possibly contaminated

**Council's recommended response NO CHANGE**

This site has been deleted

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**Section/Policy/Site**

Channel Tunnel Rail Link SSA9

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4509**

## **Cabinet 9 October 2006**

Is in the floodplain over 1 hectare in size and is close to main rivers. FRA necessary in line with PPG25, would object at planning application stage if these proposals were not supported by a FRA. Surface Water Flood Risk Assessment which ensures that discharge rates are restricted to Greenfield and 1 in 100 year attenuation provided also necessary.

### **Council's recommended response NO CHANGE**

This designation just shows the limit of land of subject to consultation procedures

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#### **Section/Policy/Site**

Crossrail SSA10

#### **ID**

691

#### **Consultee**

CPRE North East London

#### **Representation SSA4510**

Crossrail proposals for Crow Lane and Westlands Fields are called into question by a LB Redbridge LDF option scheduling the Ilford Rail Depot for housing. LB Havering should be promoting the overriding requirement for the site to be protected for continued rail use pending decisions on the construction of Crossrail. Any land safeguarded for CTRL and Crossrail that is surplus to requirements should be the subject of public consultation on completion of works if changes of use are proposed.

### **Council's recommended response NO CHANGE**

Noted.

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#### **Section/Policy/Site**

Crossrail SSA10

#### **ID**

846

#### **Consultee**

Environment Agency

#### **Representation SSA4511**

Is in the floodplain over 1 hectare in size and is close to main rivers. In Flood Zone 3. FRA necessary in line with PPG25, would object at planning application stage if these proposals were not supported by a FRA. Surface Water Flood Risk Assessment which ensures that discharge rates are restricted to Greenfield and 1 in 100 year attenuation provided also necessary.

**Council's recommended response NO CHANGE**

This designation just shows the limit of land of subject to consultation procedures

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**Section/Policy/Site**

Rainham Central, Rainham Historic Core, Rainham West, Rainham Station, Land between Rainham Railway and Broadway

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**ID**

691

**Consultee**

CPRE North East London

**Representation SSA4512**

Development must be kept within scale and designed to enhance existing character along the lines of the vernacular development at Greenhithe. This would add distinctive and attractive built diversity and regenerate retail leisure and tourism via LTGDC high density riverside mixed development to the west and existing settlement to the north. Rainham Historic Core should include the war memorial and all vernacular and historic buildings on the eastern and southern edges of the designated area, also historic and vernacular buildings not already included in the proposed development on the west side of the Broadway.

**Council's recommended response **CHANGE****

The Council recognises that the original boundary of Rainham Historic Core did not include all of Rainham's Historic Core. The Council has therefore decided to instead focus on Rainham Hall and Grounds where the Council is working with the National Trust to improve this attraction and heritage asset. Respective Site Policies within Rainham require the submission of a heritage statement to ensure that any new development preserves or enhances the character of the conservation area and setting of listed buildings. The policy on Rainham Hall and Grounds recognises that these listed buildings are important in creating a sense of place and civic pride and act as a reference point for the redevelopment opportunities within the rest of the village.

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**Section/Policy**

General comments

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4513**

At planning application stage 8 metre undeveloped buffer strip between proposed development and brink of main river requested open channel or culvert. To provide adequate access through the site to the watercourse to allow for future maintenance or improvements to the river banks and its defences. Also likely to require environmental enhancements to reaches of these watercourse which cross through the site. If the site falls next to a culverted watercourse likely to require these culverts to be opened up and made a feature of. Due to their biodiversity importance watercourse buffer zones should be identified as exclusion zones in the document.

**Council's recommended response NO CHANGE**

Noted

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**Section/Policy**

General comments

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4514**

PPS23 rests firmly on the precautionary principle and sites must be investigated with regard to land contamination before planning permission is given. Council should be in process of identifying potential Part IIA sites within the Borough, The development of any brownfield site should be carried out in line with PPS23 and CLR11.

**Council's recommended response NO CHANGE**

Any planning application for this site will need to satisfy Core Strategy Development Control policy DC54 'Contaminated Land' which refers to CLR11 'Model Procedures for the Management of Land Contamination'.

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**Section/Policy**

General comments

**ID**

846

**Consultee**

Environment Agency

**Representation SSA4515**

PPS9 para 12 states that networks of natural habitats such as river corridors are important for linking sites of biodiversity importance and to provide routes or stepping stones for migration, dispersal and genetic exchange of species in

the wider environment. It says local authorities should aim to maintain networks by avoiding or repairing the fragmentation and isolation of natural habitats through policies in plans. Such networks should be protected from development and where possible strengthened by or integrated within.

**Council's recommended response NO CHANGE**

DC58 refers to the need to protect and enhance the biodiversity of the Blue Ribbon Network including rivers and their associated corridors. DC57 is a separate policy on River Restoration.

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**Section/Policy**

General comments

**ID**

1373

**Consultee**

Roger Tym and Partners representing Somerfields

**Representation SSA4516**

In making any allocations which could include an element of retail there should be strict guidance as to the type, scale, floorspace and function of the retail appropriate to the site

**Council's recommended response CHANGE**

Any applications including retail on these sites would need to satisfy Core Strategy policy.

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**Section/Policy**

General comments

**ID**

617

**Consultee**

Thames Water

**Representation SSA4517**

In order for Thames Water to determine whether the development of allocated sites would necessitate sewage infrastructure upgrades it is necessary that Thames Water is consulted as early as possible regarding the capacity of sewerage systems. Adequate time should be allowed to consider development options and proposals so that an informed response can be formulated. It is not always possible to provide detailed responses within a matter of weeks; for example, the modelling of water and sewerage infrastructure systems will be important to many consultation responses and this can take a long time to carry out (e.g. modelling of sewerage systems can

be dependant on waiting for storm periods when the sewers are at peak flows).

Thames Water have to consult with the Environment Agency to obtain a clear picture as to possible water abstraction and waste water discharge consent limits prior to undertaking modeling from a treatment perspective. This process itself can take a considerable period of time, especially if it depends on the EA undertaking its own evaluation exercise. Therefore, realistic consultation periods with water and sewerage undertakers will need to be taken account of in the preparation of the LDDs.

**Council's recommended response NO CHANGE**

Noted. The consultation period for the preferred options was twelve weeks, double that required by Government regulations.

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**Section/Policy**

No reference provided

**ID**

563

**Consultee**

Highways Agency

**Representation SSA4519**

The HA would suggest that a detailed package of sustainable transport initiatives and essential infrastructure options should be developed for delivery through an appropriate mechanism that would be funded, at least in part, by relevant developers. The HA is keen to remain involved with the consultation process as and when further specific details are put forward.

The HA is also very keen to be involved in the future plans and development proposals for the London Riverside regeneration area. The land use breakdown of this area has yet to be made clear. Given the potential size of the site the HA is concerned that the trunk road network will sustain impact without careful management.

**Council's recommended response NO CHANGE**

Noted. Any planning application for this site, as required by DC33, would need to be supported by a Transport Assessment which should include measures to mitigate any identified adverse transport impacts.

---

**Section/Policy**

No reference provided

**ID**

563

**Consultee**

Highways Agency

**Representation SSA4520**

With the new planning system, in accordance with PPS12 requirements (paragraphs 4.8-4.11), the increased emphasis on evidence based plans means that more attention is likely to be needed to transport impacts as part of the LDF process. In general terms, the HA now expects more specific details including transport assessments of LDD proposals in order to consider impacts or issues relating to the trunk network. Depending upon the severity of the issues identified transport modelling may also be useful, or indeed necessary.

Where developments or blocks of development are likely to have a material and detrimental impact on the trunk network, the HA may need to object to site allocations where these are not supported by an adequate assessment of their transport needs and appropriate policies and proposals to address these.

**Council's recommended response NO CHANGE**

Noted.

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**Section/Policy**

No reference provided

**ID**

563

**Consultee**

Highways Agency

**Representation SSA4521**

The HA supports a sequential approach to identify retail development locations. This is most likely to be achieved through the allocation of major retail sites in existing urban centres, with provision in local centres being restricted to meet local needs. This approach directly supports the objectives of sustainable travel as it should reduce the need to travel long distances between home and retail facilities, but provides focal point for retail in centres that have been sustainable travel options available. The HA would expect to see transport assessments (or possibly modelling) to demonstrate the deliverability of large scale out of town retail development sites within the LDF process.

**Council's recommended response NO CHANGE**

Noted. Any planning application for this site, as required by DC33, would need to be supported by a Transport Assessment which should include measures to mitigate any identified adverse transport impacts.

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**Section/Policy**

No reference provided

**ID**

563

**Consultee**

Highways Agency

**Representation SSA4522**

The HA suggests that a potential traffic and transport effects of all proposed employment development locations should be considered as a proactive input to the sustainable planning process. In particular, it is critical that local level land-use development strategies take full consideration of opportunities to reduce the need to travel and reliance on the private car, reduce the distance travelled and encourage travel by sustainable modes. This could be achieved by balancing the supply of housing and employment to address current concerns as well as avoid the creation of additional demand for travel between home, work and other facilities.

**Council's recommended response NO CHANGE**

Noted. Any planning application for this site, as required by DC33, would need to be supported by a Transport Assessment which should include measures to mitigate any identified adverse transport impacts.

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**Section/Policy**

No reference provided

**ID**

563

**Consultee**

Highways Agency

**Representation SSA4523**

In general the HA would prefer that development is situated where there is easy access to a range of transport modes. However, it recognises this is not always possible although it should remain a priority for site selection.

**Council's recommended response NO CHANGE**

Noted

## **Omitted sites**

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### **Section/Policy**

Omitted site-Maylands Fields

### **ID**

1277 (Mr Stovold)

### **Consultee**

Maylands Action Group

### **Representation SSA4524**

The Community Vision for Maylands Fields is set out in three parts, the sites history and value, the vehicles necessary to effect change, and community proposals for Maylands Fields. The Mission statement for Maylands Field is: 'Working in partnership to secure Maylands Fields as a fully protected wildlife haven that promotes access through recreation, education and links with other green spaces'. Only by targeting the priority areas of nature conservation/enhancement and public use can the sites enormous social and environmental benefits be realised. The future of Maylands Field should be recognised as a multifunctional greenspace: A Local Nature Reserve- supported by LBH, English Nature, the GLA, Thames Gateway Partnership: 'Green Gird' and managed in partnership with the wildlife trusts. Part of the Community Forest-in partnership with Thames Chase and the Woodland Trust. A strategic gateway into the Ingrebourne Valley and wider open space network-in support of LBH, Thames Chase, the HWP and the Green 'Grid'/'Arc' initiatives. If this opportunity is lost the Maylands Fields that local people have known and enjoyed for more than 60 years will almost inevitably cease to be-all vestiges of its character and value slowly but surely eroded away.

Failure to support community efforts would not only undermine the raft of policy commitments highlighted in Part 2 but condone prior abuses at Maylands Fields and serve to encourage similar damaging incursions into other ecologically sensitive sites. It is therefore imperative that those charged with the conservation and enhancement of the environment seize this opportunity to make a difference and send a very clear signal of intent. (Summary of 20 page document)

### **Council's recommended response NO CHANGE**

The Council is aware of the issues faced at Maylands Field. The site is designated by the Core Strategy as a Metropolitan Site of Importance for Nature Conservation (part of Ingrebourne Valley Site). It is also part of the Thames Chase Community Forest, which the Core Strategy supports the implementation of. Whilst the Council recognises the benefits of the

Community Vision for Maylands Fields, as the Council does not own the land then it is difficult for the Core Strategy to achieve this.

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**Section/Policy**

Omitted site-Mardyke

**ID**

1002

**Consultee**

Hepher Dixon representing Barratts

**Representation SSA4525**

Seek a site specific policy for the proposed Mardyke development. The representation is supported by a series of specialist reports which build upon the work undertaken in preparing the initial master plan and respond to the areas of further investigation identified in the letter from the Mayor of London dated 16th November 2006. These include a Planning Statement, Masterplan and Design Concept Framework, Outline Ground Contamination Remediation Strategy, Initial Landscape Framework and Access and Movement Framework.

In order to enable the Mardyke masterplan to proceed a suitable site specific policy is required for the development itself as follows:

The Mardyke Farms Waste Site and Mardyke Estate is allocated as a special policy area. The purpose of the special policy area is to facilitate the restoration of a GB site and create a strategic network of green space which will sustain the separation and openness between the built up areas, together with the redevelopment of the Mardyke Estate as part of a new mixed community. Within the special policy area proposals for residential development will be favourably considered, providing that the development is carried out in accordance with a masterplan for the whole of the special policy area that provides for:

1. The phased redevelopment of the MArdyke Estate providing at least 550 replacement affordable homes
2. A new local centre including shops community and healthcare facilities
3. A primary school
4. The provision of at least 750 units of affordable housing which will include 550 units in replacement of the existing Mardyke Estate in a mix of sizes, types and tenure to be determined in accordance with an up to date assessment of local housing needs.
5. A new park, including facilities for formal and informal outdoor recreation and the arrangements necessary to secure its long term management
6. Sufficient open market housing to enable a balanced community and to secure the implementation of the master plan.

The master plan should demonstrate how the new community will be integrated with its surroundings through a combination of design and the provision of a network of pedestrian cycle and public transport routes.

Planning conditions and planning obligations will be used to ensure that the open market housing element of the development is implemented in stages in order to secure the delivery of the other elements of the master plan.

Justification. The Mardyke Estate requires regeneration. To replace the existing housing stock with modern housing to a decent standard requires significant investment and additional land so that a well-planned neighbourhood can be created. Mardyke Farm is a wasted asset: a substantial piece of open space on the edge of the built-up area with significant recreational potential that is currently cut-off from the communities around it. There is currently no public rights access to this area of land and there is limited funding in place to restore the site to an appropriate standards once the landfill operations have been completed, which is unlikely in the foreseeable future.

The designation of a special policy area is intended to act as a catalyst for a major regeneration project that will enable the creation of a new neighbourhood at Mardyke focussed upon a new local centre and linked through a network of paths and cycleways to a new park.

This requires some land to be released from the GB and the policy will ensure that the land is only taken for development if the wider benefits of the development, including the new park, have been secured.

**Council's recommended response** **CHANGE**

The Site Specific Allocation Document includes a Site Specific Allocation (SSA14) covering the Mardyke Estate and Mardyke Farm. The Council considers that there are exceptional circumstances justifying the removal of part of the Mardyke Farm site from the Green Belt more detail is provided in CP14.

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**Section/Policy**

Omitted sites- Land at Station Road, Land at Ardleigh Close, Land at south side of Arterial Road

**ID**

850

**Consultee**

Network Rail

**Representation SSA4526**

Land at Station Road, Land at Ardleigh Close, Land at south side of Arterial Road. These site are all affected by the Crossrail safeguarding designation in the site allocations documents but this does not preclude all development of these sites. There is precedent whereby any land that may be affected by the broad designation can be released following consultation with Crossrail. In particular the Arterial Road site is actively being considered for development

and discussions are taking place with Crossrail and the Council about this. Provided these sites are not required for the Crossrail project they would be available to come forward within the planning period.

**Council's recommended response NO CHANGE**

The Council considers that these sites are too small to warrant inclusion in the SSA document and would best come forward as windfall sites.

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**Section/Policy**

Omitted site-Land North of A12

**ID**

860

**Consultee**

Cluttons representing the Crown

**Representation SSA4527**

Crown Land north of the A12 (Marks Warren Farm) may be a suitable site for park and ride given its proximity to the metropolitan centre, its ability to link up with existing bus routes and the size and the nature of the land. It will be more sustainable to release sites from the GB which can take advantage of the public transport network associated with a park and ride facility. These include:

- Land North of A12
- Land to the rear of Pretoria Road
- East side of Crown Farm
- Traingular Area north of A12 and South of Marlborough Road
- Gobions Farm, south of Colliers Row Road and east of White Hart Lane
- Traingular area north of Colliers Row Road and south of Hogs Hill Road

**Council's recommended response NO CHANGE**

The Council considers that these sites meet the purposes of including land in the GB and therefore should not be removed and there are no exceptional circumstances justifying their removal. (See also response to Green Belt representation).

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**Section/Policy**

Omitted site-South Hall Farm

**ID**

571

**Consultee**

CEMEX

**Representation SSA4528**

Add to SSA schedule so it can be used to meet future housing needs in a sustainable location, and ensure LDF is sufficiently flexible and reflects the tests of soundness in PPS12.

Site at South End Road Rainham known as South Hall Farm has potential to meet Borough's housing requirement within the plan period or beyond. In this location designation as Thames Chase Community Forest does not make a significant contribution to the forest as a whole. Site is convenient for primary and secondary schools, employment areas and is in good proximity to public transport including Rainham Station. This makes it advantageous in helping to sequentially meet long term housing need. This would meet two of the Governments objectives in PPG3 concerning sustainability and car dependence set out in paragraph 2 of PPG3. Therefore substantial portion of the northern end of the site can help meet the borough's housing need.

**Council's recommended response NO CHANGE**

The Council considers that these sites meet the purposes of including land in the GB and therefore should not be removed and there are no exceptional circumstances justifying their removal. (see also response to Green Belt representation)

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**Section/Policy**

Omitted site-land adjacent to Lodge Residential Care Home

**ID**

1246

**Consultee**

Forge Developments

**Representation SSA4529**

Seeing a SSA to enable the development of an Elderly and Mentally Infirm unit on land immediately adjacent to the Lodge Residential Care Home. The EMI unit would be within a new wing erected as an extension to the home. EMI unit would comprise 60 urgently required bed spaces. With regard to para 2.7 of PPG2 that exceptional circumstances exist to necessitate a GB revision here, due to the chronic lack of bed spaces in the Borough to meet demand levels, and that no other such facilities are proposed.

Equally for the same reasons with regard to para 3.2 of PPG2 very special circumstances exist to warrant planning permission and/or allocation for this facility. Para 3,6 of PPG2 is also relevant. Although this refers to dwellings the implication of this is that the impact of any extension to an existing built has a lesser impact upon overall GB objectives specifically the feeling of openness than a standalone building unrelated to an existing use, as such it is considered that the proposal is permissible under PPG2.

Failure to allocate this site given that need exists within borough for this facility means the Council has not met through the framework its stated intent to

provide essential social infrastructure to meet existing and future demand as outlined in Core Strategy objective F1. Allocating this site would further Objective G1 by enabling staff and resource sharing and facilitating shared trips, through the adoption of a Green Travel Framework. Not allocating this site also fails Objective H1, as the individual housing needs of infirm elderly persons with mental health problems are not currently being met within the borough due to a lack of bed spaces, with borough's life time residents being forcibly relocated to other London Borough's where suitable bed spaces exist in the later years of life. Similarly H2 is not met either. It should be noted that the commercial values resulting from the proposed EMI use prevent client from being able to compete with residential housing builders and other types of developer to acquire higher value and sequentially favourable brownfield sites with obvious development potential. As such having regard to the above and the fact that no alternative EMI sites are being promoted in the borough through the LDF process the Council should allocate land at Lodge Lane for the EMI use.

**Council's recommended response NO CHANGE**

The Council considers that these sites meet the purposes of including land in the GB and therefore should not be removed and there are no exceptional circumstances justifying their removal, moreover para 3.6 refers to residential development and therefore cannot be used to justify this proposal. (see also response to Green Belt representation)

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**Section/Policy**

Omitted site-Ingrebourne Creek Crossing

**ID**

1066

**Consultee**

London Thames Gateway Development Corporation

**Representation SSA4530**

Include Ingrebourne Creek Crossing proposal as a SSA due to its importance in facilitating the provision of a circuitous bus route in the area.

**Council's recommended response NO CHANGE**

This has been included within policy with reasoned justification of CP10 (paragraph 1.3).

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# **Havering Council**

## **Core Strategy & Development Control Policies Submission Development Plan Document**

**October 2006**



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# 1 Introduction

- 1.1 Havering's Local Development Framework (LDF) is a portfolio of different documents which have been prepared to provide for the future planning of the borough. This document is the most important LDF document. It is the Core Strategy, so called because it sets the Council's approach to the planning of the whole borough up to 2020, and sets the framework for the Action Plans and topic specific planning documents which compliment it and address other planning issues in the borough.

## 2 How to use this document

- 2.1 The Core Strategy establishes the Council's vision for how the borough will look in 2020, and the objectives for delivering this. It then includes two sets of planning policies. The first set state the Council's strategy for balancing the need to deliver economic prosperity and new and affordable housing with the protection and enhancement of the borough's environmental quality. The second set are more detailed development control policies which provide more detailed guidance on the criteria against which planning proposals will be determined.
- 2.2 **Section 2** of this document explains how to use this document and its background.
- 2.3 **Section 3** of this document explains the different documents which comprise Havering's Local Development Framework, their purpose, how they relate to each other, and when they will be prepared.
- 2.4 **Sections 4 and 5** of this document set the context of the Core Strategy.

In developing the Core Strategy the Council has not started from a clean sheet of paper. The vision, objectives and related policies within the Core Strategy have to be:

- 
- Consistent with national guidance in the form of Planning Policy Guidance Notes, Statements and Circulars as issued by the Government
  - In general conformity with the London Plan prepared by the Greater London Authority.
  - In support of the Havering Strategic Partnership's Community Strategy and have regard to relevant local strategies.
  - Founded on a robust evidence base. This is an analysis of the relevant background data to help identify the key issues that need addressing

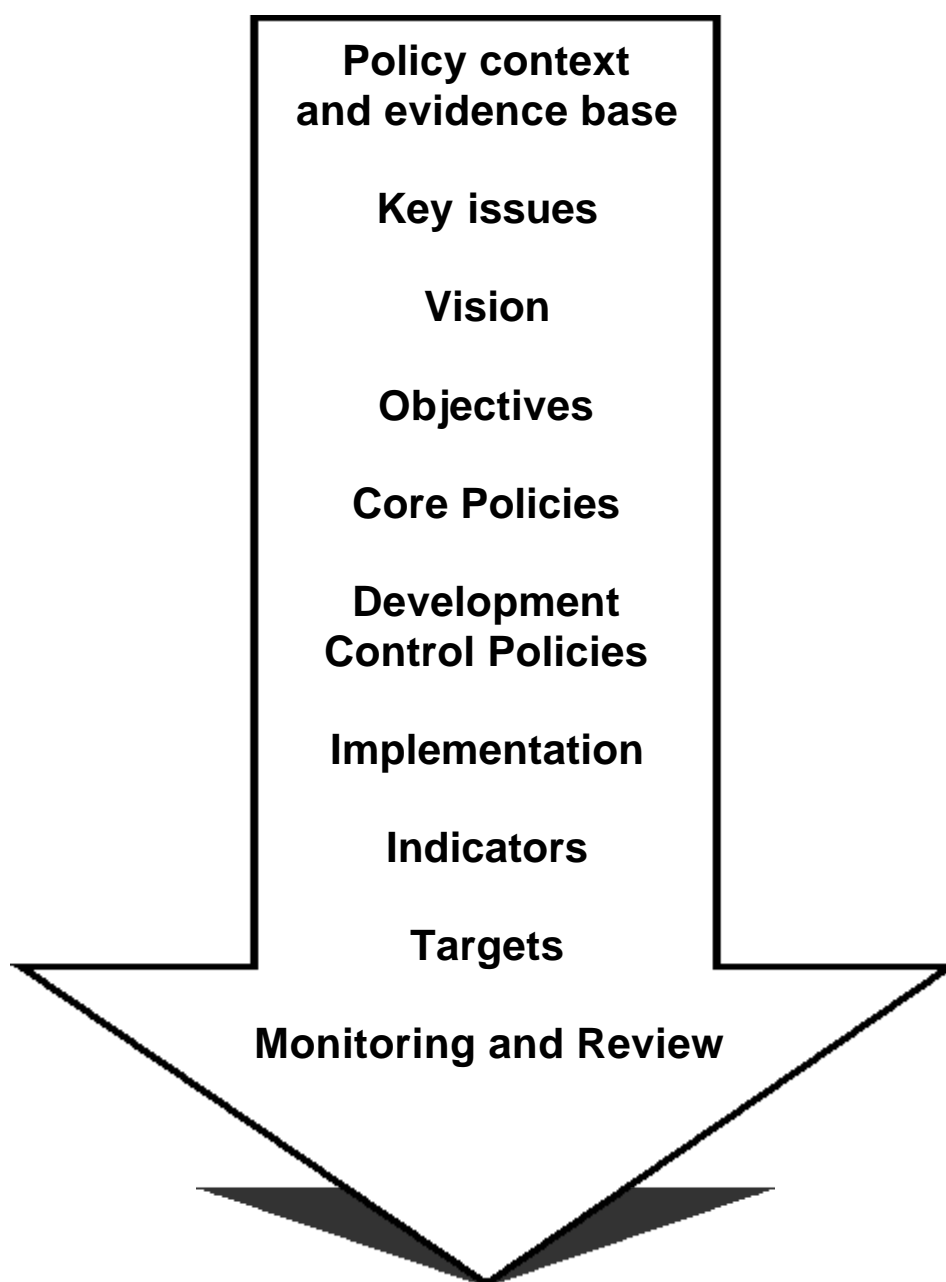
- Issues arising from the feedback received from the community and other stakeholders throughout the various consultation initiatives undertaken in preparing the Core Strategy

**Section 4** explains the national, regional and local policy context within which the Core Strategy operates.

**Section 5** provides a snapshot of the environmental, social and economic character of Havering, highlighting the key issues the Core Strategy must address. The evidence base is developed in more detail in the explanation provided for each Core policy. However in the interests of keeping this document usable, a lot of the evidence base is 'signposted' rather than repeated.

The whole consultation process and how the responses received have been addressed in developing the Core Strategy is provided in a separate document called a **Statement of Compliance**.

- 2.5 **Section 6** sets out the Vision for how the Havering Strategic Partnership wants Havering to look in 2020, and a set of objectives is provided in **Section 7** for how this will be delivered. **Section 8** provides a visual summary of the Core Strategy in the form of a key diagram, looking first at Havering's place in East London and the Thames Gateway and then focusing on the borough itself.
- 2.6 The Core Policies are provided in **Section 9**. These are ordered according to the objectives they are focused on delivering. Each Core Policy includes an explanation of the need for the policy with regard to the policy context and evidence base and sets out how the policy will be monitored so the Council can keep track of its effectiveness and the need for review. An overview of the implementation and monitoring strategy for the Core Strategy is provided in **Sections 10**. The document then signposts the reader to the related Development Control Policies which are provided in **Section 11** and supporting guidance.
- 2.7 The diagram on the following page shows the Golden Thread which runs through this document.



## 3 Havering's Local Development Framework

- 3.1 Havering's Local Development Framework (LDF) is a collection of documents called Local Development Documents (LDDs). There are two types of Local Development Documents: Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs) which provide supplementary planning guidance to the policies within DPDs. Development Plan Documents carry more weight as they are subject to an independent examination by a Planning Inspector before they are adopted, whereas the Council can prepare SPDs and adopt them without any independent scrutiny. In order to ensure that Havering's Local Development Framework is helping to deliver sustainable development all Local Development Documents must be subject to Sustainability Appraisal. (Please see the glossary for a definition of sustainable development). All of Havering's Local Development Documents (LDDs) must be in general conformity with the London Plan.<sup>1</sup>
- 3.2 The Development Plan Documents within Havering's Local Development Framework along with the London Plan comprise the Development Plan for the borough.<sup>2</sup> If to any extent a policy contained in the Development Plan for an area conflicts with another policy in the Development Plan the conflict must be resolved in favour of the policy which is contained in the last document to be approved or published.
- 3.3 To let people know in advance when they can become involved in the preparation of LDDs, the Council has produced a document showing the timetable for each Local Development Document it intends to produce over the next three years. This document is called a Local Development Scheme (LDS) and is available to view at [www.havering.gov.uk](http://www.havering.gov.uk).

### Development Planning Documents

- 3.4 As well as the Core Strategy, the Local Development Scheme (LDS) shows that initially the Council intends to produce the following Development Plan Documents:

- **Site Specific Allocation**

This document will set out where there are specific allocations for individual sites such as sites allocated for housing and sites within the London Riverside regeneration area. Collectively these

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<sup>1</sup> Part 2, Section 24, Planning and Compulsory Purchase Act 2004

<sup>2</sup> Part 3, Section 38, Planning and Compulsory Purchase Act 2004

sites will help deliver the vision and objectives of the Core Strategy.

- **Proposals Map** This will show the boundary of development control policy designations, the extent of the Romford Area Action Plan, and the boundary of site-specific allocations.
- **Romford Town Centre Action Plan** Havering Council will prepare an Action Plan for Romford Town Centre reflecting the continuing priority that the Council is giving to the economic, social, cultural and environmental regeneration of the town centre and the need for high quality development. The Area Action Plan will build on the extensive work that the Council and its partners have undertaken in preparing the approved Romford Urban Strategy Framework and recent stakeholders investment. This DPD will need to conform to the Spatial Strategy set out in Havering's Core Strategy.
- **Joint Waste (DPD)** Havering Council will prepare a Joint Waste DPD with the London Boroughs of Barking and Dagenham, Redbridge and Newham, who form the East London Waste Authority. This DPD will need to conform to the Spatial Strategy set out in Havering's Core Strategy.

### **Supplementary Planning Documents**

3.5 These will provide additional guidance to policies in the Core Strategy and have been highlighted under the core and development control policies they supplement.

- London Riverside
- Hornchurch Town Centre
- Sustainable Construction
- Heritage Strategy
- Hall Lane, Upminster
- Emerson Park
- Gidea Park
- Educational Needs Generated by New Development

- Residential Density and Amenity Space
- Noise and Vibration standards for Railways
- Protection of Trees During Development
- Havering Conservation Areas: Shopfront Design Guide
- Protecting the Borough's Biodiversity
- Affordable Housing
- Residential Extensions and Alterations
- Secured by Design

**Relationship to other 'saved' policies.**

- 3.6 Havering's Local Development Framework will replace Havering's Unitary Development Plan adopted in March 1993. The policies within this were saved for three years from the commencement of the Planning and Compulsory Purchase Act which came into force September 2004. The table provided in Annex 1 shows which policies within the Core Strategy replace those within the UDP, which policies will be replaced by the Romford Area Action Plan and Joint Waste Plan, and which policies will be deleted.

## **4 Policy Context**

4.1 The Core Strategy will only be adopted if it is considered sound by the inspector at the independent examination against nine soundness tests. One of the 'soundness' tests requires that Development Plan Documents are:

- consistent with national planning policy
- in general conformity with the London Plan
- have regard to any other relevant plans, policies and strategies relating to the area or adjoining areas
- based on a robust and credible evidence base

### **National Planning Policy**

4.2 The Government determines national policies on different aspects of planning and the rules that govern the operation of the planning system. National planning policies are set out in Planning Policy Statements (PPSs) and Planning Policy Guidance notes (PPGs), Minerals Policy Statements (MPS) and Minerals Planning Guidance Notes (MPG), Circulars and Parliamentary Statements. Local authorities must take their contents into account in preparing their Core Strategies by ensuring that the plans and policies within them are consistent with these national guidance.

4.3 In preparing the policies and proposals in the Core Strategy, the Council has, therefore, had regard to the whole range of PPGs, PPSs, MPGs and MPSs where they are relevant to the issues faced in Havering. The current range of national planning guidance is provided on the following page. In addition there are fifteen Mineral Planning Statements/Guidance Notes. Up to date copies of all these statements and guidance can be found at [www.dclg.gov.uk](http://www.dclg.gov.uk). References to planning policy statements and guidance in the reasoned justification of the Core Policies and Development Control Policies is to the most up to date version at the time the policy was written. The Council recognises that these may have been updated or replaced since, and the current versions should be referred to.

## Cabinet 9 October 2006

<b>Planning Policy Statement 1: Delivering Sustainable Development</b>	<b>Feb 05</b>
PPS1 sets out the Government's overarching planning policies on the delivery of sustainable development, by ensuring that environmental, economic and social objectives are balanced over time, by addressing the causes and potential impacts of climate changes, promoting high quality inclusive design, and by achieving environments accessible to the whole community.	
<b>Planning Policy Guidance 2: Green Belts</b>	<b>Mar 00</b>
PPG2 sets out the Government's policy on the purpose of Green Belt and appropriate development within it.	
<b>Planning Policy Guidance 3 and updates: Housing</b>	<b>Mar 00 and updated Jan 05</b>
PPG3 sets out Government's policy on ensuring housing needs of community are met, that wider housing choice is provided and that housing is provided in a sustainable manner.	
<b>Planning Policy Guidance 4: Industrial, Commercial Development and Small Firms</b>	<b>Nov 92</b>
PPG4 sets out the Government's policy on facilitating economic development in a way which is compatible with its stated environmental objectives.	
<b>Planning Policy Statement 6: Planning for Town Centres</b>	<b>Mar 05</b>
PPS6 sets out the Government's policy on planning for the future of town centres.	
<b>Planning Policy Statement 7: Sustainable Development in Rural Areas</b>	<b>Aug 04</b>
PPS7 sets out the Government's planning policies for rural areas.	
<b>Planning Policy Guidance 8 : Telecommunications</b>	<b>Aug 01</b>
PPG8 gives guidance on planning for telecommunications development - including radio masts and towers, antennas of all kinds, radio equipment housing, public call boxes, cabinets, poles and overhead wires.	
<b>Planning Policy Statement 9: Biodiversity and Geological Conservation</b>	<b>Aug 05</b>
PPS9 sets out planning policies on protection the of biodiversity and geological conservation through the planning system.	
<b>Planning Policy Statement 10: Planning for Sustainable Waste Management</b>	<b>July 05</b>
PPS10 sets out the Government's policy to be taken into account by waste planning authorities and forms part of the national waste management plan for the UK.	
<b>Planning Policy Statement 12: Local Development Frameworks</b>	<b>Sep 04</b>
PPS12 sets out the Government's policy on the preparation of local development documents which will comprise the local development framework.	
<b>Planning Policy Guidance 13: Transport</b>	<b>Mar 01</b>
PPG3 sets out the Government's policy on integrating planning and transport to promote more sustainable transport choices, improved accessibility and reduce the need to travel.	
<b>Planning Policy Guidance 14: Development on unstable land</b>	<b>1990</b>
PPG14 sets out the broad planning and technical issues to be addressed for the development on unstable land.	
<b>Planning Policy Guidance 15: Planning and the historic environment</b>	<b>Sep 94</b>
PPG15 provides a full statement of Government policies for the identification and protection of historic buildings, conservation areas, and other elements of the historic environment.	
<b>Planning Policy Guidance 16: Archaeology and Planning</b>	<b>Nov 90</b>
PPG16 sets out Government policy on archaeological remains on land, and how they should be preserved or recorded and gives advice on the handling of archaeological remains and discoveries	
<b>Planning Policy Guidance 17: Planning for open space, sport and recreation</b>	<b>July 02</b>
PPG17 sets out Government policy for securing high quality, well managed and maintained and accessible open spaces, sports and recreational facilities in the urban area and the countryside.	
<b>Planning Policy Guidance 19: Outdoor advertisement control</b>	<b>Mar 92</b>
PPG19 sets out the Government's policies for controlling the impact of outdoor advertisements.	
<b>Planning Policy Guidance 21: Tourism</b>	<b>Sep 92</b>
PPG21 outlines the economic significance of tourism and its environmental impact, and therefore its importance in land-use planning.	
<b>Planning Policy Statement 22: Renewable energy.</b>	<b>Aug 04</b>
PPS22 sets out the Government's policies for renewable energy, which planning authorities should have regard to when preparing local development documents and when taking planning decisions.	
<b>Planning Policy Statement 23: Planning and pollution control</b>	
PPS23 complements the new pollution control framework under the Pollution Prevention and Control Act 1999 and the PPC Regulations 2000.	
<b>Planning Policy Guidance 24: Planning and noise</b>	<b>Sep 94</b>
PPG24 gives guidance on the use of planning powers to minimise the adverse impact of noise	
<b>Planning Policy Guidance 25: Development and Flood Risk</b>	<b>July 01</b>
PPG25 gives guidance on ensuring development is not exposed to flood risk through the application of the precautionary principle using a risk-based search sequence with regard to flood plains and the wider catchment	

**The London Plan**

- 4.4 The Core Strategy is required to be in general conformity with the London Plan prepared by the Greater London Authority.
- 4.5 The London Plan was adopted in February 2004.
- 4.6 The vision of the London Plan is to develop London as an exemplary, sustainable world city, based on three interwoven themes:
- Strong, diverse long term economic growth
  - Social inclusivity to give all Londoners the opportunity to share in London's future success
  - Fundamental improvements in London's environment and use of resources.
- 4.7 Working with strategic partners, setting priorities for the Greater London Authority (GLA) group, and in exercising his planning functions, the Mayor of London seeks to implement the following objectives, which he stresses DPD objectives should take fully into account:
- To accommodate London's growth within its boundaries without encroaching on open spaces
  - To make London a better city for people to live in
  - To make London a more prosperous city with strong and diverse economic growth
  - To promote social inclusion and tackle deprivation and discrimination
  - To improve London's accessibility
  - To make London a more attractive, well designed and green city
- 4.8 In October 2005, the Mayor of London published Draft Alterations to the London Plan. These seek to update the London Plan by:
- Bringing forward new housing provision targets based on the London Housing Capacity Study published in 2000
  - Identifying the number and type of new or enhanced waste processing facilities required and opportunities for their broad location
  - Setting out the necessary provision for land won aggregates in East and West London.
- 4.9 Supplementary Planning Guidance (SPG) to the London Plan provides additional information to support the implementation of the Mayor's London Plan (the Spatial Development Strategy). As SPG this does not set new policy, however, it has been taken into account in preparing the Core Strategy as it is a further material consideration due to the weight it has as a supplement to the London Plan. As of July 2006 the following SPG has been published by the Mayor of London:
- Sustainable Design and Construction (May 2006)
  - Housing (November 2005)
  - Accessible London: Achieving an Inclusive Environment (April 2004)

- 4.10 The Mayor of London has also published development frameworks for each of London's sub-regions. Havering is within the East London sub-region along with the City of London and the boroughs of Hackney, Tower Hamlets, Newham, Barking and Dagenham, Redbridge, Lewisham, Greenwich and Bexley.
- 4.11 Part one of the East London Sub Regional Development Framework (SRDF) sets out an overall direction for the sub-region reflecting the fact that East London is the Mayor's priority area for development, regeneration and infrastructure improvement. Part Two looks at implementation. In particular, it quantifies the various impacts of the growth that is projected to take place in the sub-region and proposes how it can be accommodated in the right place, at the right time and in a sustainable way.
- 4.12 The SRDF provides non-statutory guidance on the implementation of the London Plan, and, therefore, does not usurp, supercede or otherwise change London Plan policy. New information is only included as best practice guidance and to secure and inform the implementation of existing policy. However, as it has been issued by a key strategic partner, following three months of consultation, it is a material consideration for stakeholders.

#### **Other relevant plans, policies and strategies**

- 4.13 PPS12 explains that; 'local planning authorities should adopt a spatial planning approach to local development frameworks.....(and that).....spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they function..... Local planning authorities should therefore take account of the principles and characteristics of other relevant strategies and programmes when preparing local development documents and in particular the core strategy.'<sup>3</sup>
- 4.14 Havering Council has therefore thoroughly appraised all relevant policies and programmes to ensure that the Core Strategy fully integrates the existing and future plans of all those with a stake in the future planning of the borough. The most important of these is the Havering Strategic Partnership's Community Strategy. In line with PPS12 this provides the framework for the Vision of the Core Strategy and is set out in **Section 6**. The other policies and programmes are covered where relevant under the respective Core Strategy policy, and are too numerous to mention here. Annex 2 provides a selected list of strategies and programmes at the national, regional and local level which have been taken into account in preparing the Core Strategy. This list also includes the key components of the evidence base, and in some instances important parts of the evidence base are contained within local and regional strategies.

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<sup>3</sup> PPS12, Local Development Frameworks, ODPM July 2006



## 5 Key Issues for the Core Strategy

5.1 This section focuses on the key issues that the Core Strategy addresses. It looks first at Havering's key strategic location and then focuses on the headline data in each of the twelve key themes looking first at the major pressures on land. It then looks at how to balance development pressures so that present needs can be met without compromising the ability of future generations to meet their own needs as a precursor to establishing a vision that the plan is working towards. The structure of this and succeeding sections is therefore as follows:

- Places to Live
- Places to Work
- Town Centres
- Culture
- Community Needs
- Transport
- Waste
- Minerals
- Green Belt
- Environmental Management
- Design
- Heritage

5.2 This then leads into a presentation of the Core Strategy Vision and related objectives based on these themes and the framework set by the Havering Strategic Partnership's Community Strategy. This section does not present the entire evidence base, as this is covered in more detail or signposted within the reasoned justification of the respective Core Strategy policy.

### **Introduction to Havering**

5.3 Havering is the third largest London Borough and is located in north east London. It covers 11,227 hectares. It is adjoined by the London Boroughs of Redbridge, Bexley, and Barking and Dagenham and by the Essex Districts of Thurrock, Brentwood, and Epping Forest. The River Thames forms the southern boundary to Havering. It is a mainly prosperous borough with a diverse and successful economy although there are local pockets of social deprivation. More than half of the borough is in the Green Belt with significant areas of the remainder mainly suburban in character and appearance. The borough includes Romford which is an important town centre for north east London. There are smaller but significant centres at Hornchurch, Upminster, Rainham, Elm Park, Harold Hill and Collier Row.

## **Havering's Strategic Location**

5.4 Havering enjoys a key strategic location within London, the Thames Gateway and the South East and is in close proximity to the heart of the Olympic Games.

- Is less than 20 minutes away from Central London

Nearly 60,000 Havering residents commute into other parts of London in particular central London and Canary Wharf. Liverpool Street Station which is the Gateway to the square mile and is less than 20 minutes away from Romford and Fenchurch Street less than 30 minutes from Upminster. Accessibility will be improved the Romford in the future by the proposed Crossrail scheme.

- At the heart of the Thames Gateway

Thames Gateway is a key priority for London and national government. Government regional planning guidance on Thames Gateway (RPG9a, 1996) identified the area (within and outside London) as presenting 'the main opportunity for growth' within London and the South East.<sup>4</sup> In February 2003, the Office of the Deputy Prime Minister launched the Sustainable Communities Action Plan (SCAP).<sup>5</sup> This confirmed that the Thames Gateway would be one of four priority areas for the development of new residential communities, in order to tackle South East England's persistent housing supply crisis. The Mayor's London Plan confirms its importance.<sup>6</sup> Within the Thames Gateway area defined by RPG9a are fourteen 'zones of change', six of which are within London. London Riverside which covers the riverside areas of Havering and Barking and Dagenham is identified as a Zone of a Change, and in April 2004 the Mayor of London endorsed the London Riverside Urban Strategy. This sets out a vision to 2016 for the regeneration of this area which focuses on the creation of compact mixed urban communities, a leading centre for innovation and high-tech manufacturing, for industries that serve London and environmental technology.<sup>7</sup> The Rainham Marshes are highlighted as potentially a regionally important environmental and leisure asset for East London. Rainham Village is recognised by English Heritage as the key historic centre in the Thames Gateway.

- Minutes away from the Olympic Park

The heart of the Olympics will be the Olympic Park in Stratford. This is less than 10 minutes from Romford by train and, therefore, Havering

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<sup>4</sup> Regional Planning Guidance Note 9a, The Thames Gateway Planning Framework, ODPM, 1996

<sup>5</sup> Sustainable Communities Building for the Future, ODPM, February 2003

<sup>6</sup> The London Plan, GLA, 2004

<sup>7</sup> London Riverside Urban Strategy, London Riverside Action Group, April 2004

has the potential to play a key role in supporting this event during the early part of the plan period.

- Enjoys good access to the London Stansted Cambridge Corridor

The origin of the London-Stansted-Cambridge Growth Area concept lies in the Regional Planning Guidance for the South East (RPG9), published in March 2001.<sup>8</sup> It too has been confirmed as one of the four priority areas in the Sustainable Communities Action Plan.

- Has good access to M25 and routes into South East and Europe

The A12, A13 and A127 provide high quality trunk road access to the M25 which in turn provides access to London and the south east; the nation's economic engine-room, and good access to the Essex and Kent ports. The new Channel Tunnel Rail Link stations at Ebsfleet and Stratford will further enhance Havering's strategic position which looks west to the rest of London and East to Europe.

## **Places to live**

- 5.5 In 2001 Havering's population was 224,000<sup>9</sup>. Although Havering's population fell by 3% between 1991 and 2001 it is forecast to grow by 3% by 2021.<sup>10</sup> More significantly, the number of households is forecast to grow by 7.5% in the same period. This reflects the trend towards households becoming smaller in size. However it must be seen in the context of Havering, compared to London as a whole having a low proportion of one person households and a low proportion of households comprising of married couples with no dependent children. Conversely, Havering has the highest proportion in London of households comprising couples with dependent children.<sup>11</sup>

*Table 1 – Household and Population growth (thousands)*

	2001	2004	2011	2016	2021	2026	2031
Persons	224.7	224.2	230.3	231.6	231.8	232.9	234.5
Households	91.9	93.5	96.8	98.5	99.3	100.0	100.6
Ave Household size	2.45	2.40	2.38	2.35	2.33	2.33	2.33

*Source - DMAG Briefing 2005/33-GLA-September 2005*

- 5.6 In 2001 Havering had the highest proportion of older people of any London Borough. The proportion of elderly people 65 + will actually decrease from 17.7%-15.6% from 2001-2021 due to the increase in new households. Within the same period there are forecast increases in the proportion of the very

<sup>8</sup> Regional Planning Guidance for the South East, ODPM, March 2001

<sup>9</sup> Census 2001

<sup>10</sup> DMAG Briefing 2005/33, GLA, September 2005

<sup>11</sup> Focus in London, GLA, 2005

young (under 4). However, there are also increases in the very old (over 85). By 2011 there will be a 13% increase in the number of people aged 80-84 and a 30% increase in those over 85.

- 5.7 A key issue for the Core Strategy to address therefore is the needs of the borough's ageing population, in particular demands on extra care accommodation, and the need to create accessible environments and homes adapted to the exigencies of life which are equally important for households with very young children.
- 5.8 These population/households figures reflect the results of the 2005 London Housing Capacity Study. This estimates that there is the potential for 535 new homes per year to be built for the ten year period 2007/8 to 2016/17. This housing capacity comprises capacity from known large sites and presumed capacity from small sites. The two main sources of housing are within the plan period are at London Riverside and Romford Town Centre. Between 2001-2005 an average of 392 new homes per year have been completed. 95% of these were developed on brownfield land at an average density of 75 units per hectare double that achieved in 1995, although the fifth lowest in London.<sup>12</sup>
- 5.9 535 new homes a year represents an increase of the existing number of dwellings in the borough of 0.6%. Most of Havering's existing 92000 dwellings are suburban in character. In fact Havering has the second highest number of semi detached homes in London as a proportion of total stock (42%) and the lowest proportion of flats of any London Borough. It is the only East London Borough with more than 10% of its stock being detached. Havering has the highest proportion of owner-occupied housing in East London; however, there are important local concentrations of local authority/housing association stock in Waterloo Road, the Mardyke Estate and Harold Hill.
- 5.10 Sub-regionally therefore Havering plays an important role in offering a diversity of and quality of housing stock and a residential environment which is scarce in other parts of East London. This is particularly true of the pockets of executive housing which exist in Emerson Park, Hall Lane and Gidea Park. These housing areas play an important function in the local economy by providing housing for high earners and play an important part in retaining and attracting business into the borough as well as contributing to the character of the borough.
- 5.11 Falling household sizes may be offset by increasing birth rates, and moderated by people wanting to live in properties greater in size than they need. This is often the case with older people and can influence then number of large dwellings available within the housing market. House price data for January-March, 2004/05/06 shows that detached houses prices have increased 16%, semi-detached by 10%, terraced by 4%, and flats by 14% with prices increasing overall by 11%.

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<sup>12</sup> London Annual Monitoring Report 2, GLA, February 2006

*Table 2 – Housing prices 1<sup>st</sup> quarter 2004 - 2006*

Detached		Semi-Detached		Terraced		Flat/Maisonette		Overall	
Av Price £	Sales	Av Price £	Sales	Av Price £	Sales	Av Price £	Sales	Av Price £	Sales
January-March 2006									
390519	87	238282	301	194441	274	155290	209	219782	871
January-March 2005									
411032	95	232485	251	194566	259	150915	170	223806	775
January-March 2004									
329584	99	214710	428	186981	436	133935	288	195540	1251

Source – Land Registry

- 5.12 A key issue for the Core Strategy to address will be to ensure the right mix of new housing is provided with regard to Havering's changing composition whilst maintaining and enhancing Havering's residential character.
- 5.13 As well as ensuring that the types and sizes of new housing meets forecast demand it is also important that housing 'affordability' is addressed. The Barker Report (March 2004) found that the supply of new homes consistently lags behind demand and, therefore, the numbers of new homes must rise substantially to reduce house price inflation and increase the number of affordable new homes to buy or rent. The plan will need to address the nature of this supply to ensure that local and sub-regional housing need is met. The affordability issue is striking. In 2006, the estimated average gross earned household income in Havering was £27730.<sup>13</sup> In Jan-March 2006 the average dwelling price was £219782, 8 times the average household income.<sup>14</sup> The Havering Housing Needs Survey Update 2006 identifies a need in Havering for 875 additional affordable homes between 2006-2011 years. This survey also evidenced that there was a significant need for family sized accommodation amongst those seeking 'affordable' housing.
- 5.14 A key issue for the Core Strategy will be to ensure an appropriate level and type of affordable housing is provided for those on low and intermediate incomes to help address increased incidences of homelessness, ensure everyone has access to a decent home, whilst having regard to the economics of supply.

### **Places to Work**

- 5.15 In 2004 unemployment in Havering was 2.8% which was significantly less than London (7.4%). However differences in economic inactivity, 20.7% for Havering against 25.5% for London are less marked and reflect the high proportion of elderly people in the borough.

<sup>13</sup> Havering Housing Needs Survey Update, LB Havering, 2006

<sup>14</sup> Land Registry

- 5.16 In 2003 over 85% of people working in Havering were employed in service industries with only 6% working in manufacturing. By far the two most significant sectors are retail, accounting for 1 in every 6 jobs and business services, accounting for 1 in every 8 jobs. All the major sectors enjoyed significant employment growth from 1993-2003 except manufacturing and public administration.
- 5.17 Altogether there are 9000 businesses in Havering. 75% of businesses in Havering employ fewer than 10 people but larger employers such as Ford, Aon, Tilda Rice and Martindale Pharmaceuticals and Havering Council employ over half the local workforce.
- 5.18 Havering's Employment Land Review shows that by 2018 Havering is predicted to have the following employment profile.<sup>15</sup> The numbers of people employed in the construction sector may increase with the pace and scale of construction activity in the borough.

*Table 3 – Future employment by sector*

Employment Sector	Year		%change
	2005	2018	
Primary and utilities	876	436	-50%
Manufacturing	5700	4573	-20%
Construction	7513	4882	-35%
Wholesale	6196	7580	+22%
Retail	12272	13003	+6%
Hotels and Restaurants	5665	7685	+36%
Transport and Communications	6942	6651	-4%
Financial Services	4984	6356	+28%
Business Services	16675	21897	+31%
Public Administration	2478	2668	+8%
Health and Education	16675	17674	+6%
Other services	4941	7975	+61%

*Source – URS Havering Employment Land Survey 2006*

- 5.19 Employment growth is expected to be centred on town centre based jobs such as financial and business services, hotel and restaurants and retail. The forecast reduction in primary and utilities, manufacturing, construction and transport and communications employment will reduce the amount of employment land needed throughout the plan period.
- 5.20 The Core Strategy will need to consider how much employment land can be released to address Havering's changing employment profile. At the same time it will have to meet the needs of business, and ensure their growth in predominantly town centre based sectors can be delivered. The Core Strategy also needs to consider what role it can play in stimulating particular sectors of the economy, for example:

<sup>15</sup> Table 8.1, Havering Employment Land Review, URS, 2005

- Rainham has the potential to become a major centre for leisure and tourism with plans well advanced for the London Riverside Conservation Park, and the proposed nearby Thames Gateway Regional Casino and Entertainment Centre offering exciting synergies and wider regeneration benefits for London Riverside.
- In 2006 Ford announced a plan to invest £1 billion in research and development across its UK sites including Dagenham. This reaffirms the future of advanced manufacturing in Havering and the potential to establish related clusters adjacent to the Ford estate and the Centre of Engineering and Manufacturing Excellence.

- 5.21 Improving access to training will help increase employment opportunities for Havering residents, reduce the mismatch between available skills and skills required and help alleviate spatial inequalities in the borough. Havering is the best performing all-comprehensive Education Authority in England but the pattern in post-school qualification achievement is more mixed. Relatively few students from Havering schools go into higher education including university.

*Table 4 – NVQ qualifications 2003/2004*

	<b>Havering (numbers)</b>	<b>Havering (%)</b>	<b>London (%)</b>	<b>GB (%)</b>
<b>NVQ4 and above</b>	20,000	14.4	30.8	25.2
<b>NVQ3 and above</b>	43,000	31.9	45.0	43.1
<b>NVQ2 and above</b>	74,000	54.8	59.0	61.5
<b>NVQ1 and above</b>	100,000	74.0	69.7	76.0
<b>Other Qualifications</b>	15,000	11.4	16.4	8.8
<b>No Qualifications</b>	20,000	14.6	13.9	15.1

*Source: Local Area Labour Force Survey (3/03 – 2/04)*

## **Town Centres**

- 5.22 Havering's town centres are a focus for retailing, services, employment and increasingly a place to live. Romford is Havering's main centre serving Essex, East London and the Thames Gateway and has thrived on the competition offered by Lakeside. It has benefited hugely from major new developments and investment. Romford is a Metropolitan Centre. There are six district centres, with Upminster and Hornchurch classified as major district centres. There are a diffuse network of major and minor local centres which provide day to day shops and services for residents especially the borough's elderly and those who are less mobile.
- 5.23 Retailing is the main function of Havering's town centres and is, by far, the main source of employment in the borough. Whilst the future viability of the town centres will depend on securing the right mix of shops, services, cultural

and community facilities and housing, retail will continue to be their raison d'être.

- 5.24 Data from Havering's Retail and Leisure Study (2006) shows that whilst expenditure in both the comparison and convenience goods sectors is forecast to grow by 2018, growth in comparison goods is significantly stronger than in convenience goods.

*Table 5 - Comparison and convenience goods expenditure 2006 – 2018*

	£ million								
Year	Z1	Z2	Z3	Z4	Z5	Z6	Z7	Z8	All Zones
Growth in comparison goods expenditure									
2006-18	36.9	37.9	56.6	38.1	112	94.6	117.3	73	566.4
Growth in convenience goods expenditure									
2006-18	4.8	4.0	8.1	5.1	20.5	10.8	21.9	12.9	88.1

Zone	Name
Zone 1	Rainham
Zone 2	Upminster
Zone 3	Harold Hill
Zone 4	Collier Row
Zone 5	Romford
Zone 6	Hornchurch and Elm Park
Zone 7	Dagenham Heathway
Zone 8	Chadwell Heath

*Source – Havering Retail and Leisure Study 2006*

- 5.25 By applying market shares, spending patterns, sales densities and taking into account new retail floorspace, and making an allowance for increase in trading performance of existing retail floorspace. These have been derived from future comparison and convenience floorspace requirements for Romford and the district centres are identified which the Core Strategy/Romford Area Action Plan will need to plan for.

*Table 6 – Havering centres future floorspace requirements*

<b>Centre</b>	<b>Existing gross retail floorspace m<sup>2</sup></b>	<b>Strategy</b>	<b>Indicative comparison floorspace requirement to 2018 (m<sup>2</sup> gross)</b>	<b>Indicative convenience floorspace requirement to 2018 (m<sup>2</sup> gross)</b>
<b>Metropolitan</b>				
Romford	152600	Consolidation /expansion	12000-30000	1000-1400
<b>Major District</b>				
Hornchurch	32300	Consolidation	800-2000	1500-1900
Upminster	33900	Consolidation	600-1600	300-400
<b>Minor District</b>				
Rainham	12500	Expansion	200-600	600-900
Elm Park	11200	Consolidation	100	1500-1900
Collier Row	9900	Consolidation	100	300-400
Harold Hill	9400	Consolidation	200-400	1000-1400

*Source – Havering Retail and Leisure Study 2006*

- 5.26 The Havering Retail and Leisure Study found that there are low levels of expenditure 'leakage' as Havering residents tend to shop locally rather than outside the borough. This is especially true for convenience goods and reflects the good spread of foodstores throughout Havering. There is more leakage in comparison expenditure but the overall level is relatively low considering the proximity of Lakeside. In addition there is a significant amount of inflow of retail expenditure into the borough particularly for comparison goods which is forecast to total £170 million by 2018. A key issue for the Core Strategy will be to maintain and enhance the viability of Havering's town centres by planning for future retail growth and increasing their attractiveness by facilitating a diversity of different uses.

*Table 7 - Main destinations for leakage of comparison and convenience goods expenditure – 2006*

<b>Comparison</b>			<b>Convenience</b>		
<b>Centre</b>	<b>Comparison turnover drawn from residents of study area 2006 (£m)</b>	<b>% of comparison turnover drawn from residents of study area 2006 (%)</b>	<b>Store</b>	<b>Convenience turnover drawn from residents of study area 2006 (£m)</b>	<b>% convenience turnover from residents of study area 2006 (%)</b>
Lakeside	243.6	24	Asda Walmart, Dagenham	35.0	6.7
Bluewater	20.0	2	Tesco Extra, Goodmayes	25.5	4.9
Ilford	18.1	2	Tesco Extra, Lakeside	6.4	1.2
West End	14.6	1	Other	33.6	6.4
Other centres	53.8	5	Total Leakage	100.5	19.2
<b>Total leakage</b>	<b>350.1</b>	<b>34</b>			

Source: Havering Retail and Leisure Study 2006

## Culture

- 5.27 Culture covers indoor and outdoor sports and leisure facilities, parks and open spaces, arts and creative activities and industries, libraries, heritage, museums and entertainments uses.
- 5.28 Havering has 126 parks and other publicly owned open spaces. There is a relatively good quantity of public parks with some 3.32ha per 1,000 population.
- 5.29 Havering's Open Space and Sports Needs Assessment (2005) identifies that in terms of sports facilities up to 2016 there will be a need for up to twenty junior football pitches, two additional artificial turf pitches, three additional sports halls and a swimming pool in Romford. A key issue for the Core Strategy is to ensure that residents have convenient access to open spaces in line with the open space hierarchy and adequate access to sports facilities.
- 5.30 Havering's urban fringe offers a number of informal recreation opportunities. Over 50% of the borough is green belt, and 70% of this is covered by the Thames Chase Community Forest, which includes over 400 hectares of tree cover. Adjacent to the Thames Chase Forest near Rainham are the Rainham and Wennington Marches SSSI which provide the basis for the London Riverside Conservation Park. Penetrating the urban fringe and linking it with the urban area is a network of public footpaths, green chains and bridleways. A key issue for the Core Strategy will be how to maintain and enhance the

important recreational function of Havering's urban fringe in view of its contribution to the local quality of life and attendant health benefits.

- 5.31 In terms of entertainment and arts facilities, centres in Havering have different strengths. Whilst Hornchurch is the centre for arts in Havering, Romford has been the centre for evening entertainment. Upminster and Hornchurch also have a strong eating out offer. The remaining district centres contain limited non-sport cultural facilities.

*Table 7 - Number of entertainment, culture and arts facilities in town centres*

	Romford	Hornchurch	Rainham	Elm Park	Harold Hill	Collier Row	Upminster
Restaurants and cafes	69	34	6	7	9	9	31
Pubs and Bars	22	8	3	2	4	3	7
Nightclubs	6	0	0	0	0	0	0
Cinemas	1	0	0	0	0	0	0
Theatres	0	1	0	0	0	0	0
Other arts and culture facilities	1	2	1	0	1	1	1
Other entertainment facilities	3	1	1	0	0	0	0

*Source - GLA Town Centre Health Checks 2004*

- 5.32 Havering's Retail and Leisure study estimates that growth in leisure spending will grow significantly by 2018.

*Table 8 - Expenditure to support new leisure facilities*

Year	Expenditure per capita (£m)	Available Expenditure (£m)	Growth in Expenditure (£m)
2006	1712	576	0
2009	1785	612	35
2013	1887	661	81
2018	2023	722	139

*Source - Havering Retail and Leisure Study 2006*

- 5.33 An important issue for the core strategy will be to ensure that residents have convenient access to professional and community arts provision, and therefore that this household expenditure leads to a diversified cultural provision within Havering's town centres. An important objective will be to avoid the difficulties that have arisen in Romford where there has been an overconcentration of a limited range of particular entertainment facilities that have a relatively limited appeal and have prevented the centre from appealing to a wider cross section of the community.

## **Community Needs**

- 5.34 The infrastructure needed to serve existing and new households is vital to ensuring social inclusion and improved quality of life. This infrastructure covers a person's needs from birth to death and includes, childcare facilities school, healthcare, facilities for the elderly, places of worship and cemeteries and crematoria. The preparation of this plan is based upon an understanding and awareness of demographic changes taking place in Havering as this is necessary to ensure the right infrastructure is provided in the right place. Demographic changes in Havering are likely to increase not only the need for community facilities but require a more diverse range of facilities than have previously been provided. The demographic changes taking place will be complex and have a number of implications for the delivery of community services and facilities. It is possible to identify three main trends which the Core Strategy will need to plan for in particular:
- An aging population and significant forecast increase in the numbers of people over 85 years old
  - An increasing birth rate but falling school rolls
  - Overall population growth with increasing ethnic diversity
- 5.35 Regard also needs to be had to remedying any existing deficiencies in service and facility provision, especially spatial inequalities in the distribution and availability of facilities in different parts of the borough. Havering is a relatively affluent borough but this hides localised deprivation. In particular, parts of Harold Hill, Mardyke in Rainham, and Waterloo Road in Romford, fall within the 20% most deprived areas in England.<sup>16</sup> These areas tend to suffer from poor education achievement, poor health and poor housing conditions.
- 5.36 In general terms Havering is a relatively healthy borough but over 11,000 households (almost 12% of the borough total) contain someone with a physical disability, equating to 11.8% of all households.<sup>17</sup> Moreover, there are significant spatial variations in health. The north of the borough, primarily Gooshays and Heaton wards, has poorer health with regard to most measures. Other areas that experience worse than average health occur in the west and south of the borough for example in the Waterloo and Mardyke Estates. Residents in the centre and east of Havering experience better than average health, in some cases markedly so.<sup>18</sup> Premature deaths under 75 years occur at twice the rate in the most deprived wards, compared with wards having least deprivation. Reporting of long-term, limiting illness (or condition or disability affecting ability to work), collected through Census returns, ranges from 10.2% (Heaton) to 5.1% (Upminster).
- 5.37 One of the main access issues affecting quality of life is access to local doctors and medical services, and this is governed mainly by length of GP lists. In Havering the average list at 2004 was 2,346 patients per full-time equivalent (similar to Newham), against the NHS standard of 1,800 patients.

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<sup>16</sup> The Indices of Multiple Deprivation, 2004

<sup>17</sup> Havering Housing Needs Survey Update, LB Havering, 2006

<sup>18</sup> OFSTED 2004

- 5.38 Havering was the highest performing all-comprehensive Education Authority in England overall in 2004. However, although adult attainment to NVQ2 or equivalent level is just above the London average, only 11.6% of working age population is qualified to NVQ4 level or above – the London average was 19.8%.
- 5.39 A key issue for the Core Strategy will be to ensure that the needs of existing and new households are met, that existing spatial inequalities particularly in healthcare are remedied, and that local deprivation is tackled at source.

### **Transport**

- 5.40 Transport for London measures public transport accessibility using Public Transport Accessibility Levels on a scale of 1-6 with 6 being very accessible and 1 indicating poor public transport accessibility.

*Table 9 – Havering Public Transport Accessibility Levels*

<b>Centre</b>	<b>Public Transport Accessibility Level</b>	<b>Principal public transport modes</b>
Romford	5-6	Train and bus
Upminster	3-4	Tube, train and bus
Hornchurch	3-4	Bus
Upminster Bridge	3-4	Tube and bus
Gidea Park	3-4	Train and bus
Harold Wood	3-4	Train and bus
Elm Park	3-4	Tube and bus
Rest of Borough	1-2	Bus

*Source – LB Havering 2003*

- 5.41 Outside of these centres there is a relatively low density of public transport across much of the Borough. In percentage terms from 1994-1999 to 2004 whilst bus and coach traffic increased by 10% or more across London, Havering's levels have decreased by 10% or more. Car ownership levels in Havering reflect this and are high compared to those parts of inner London where there is much greater provision of and accessibility to public transport facilities. In 2001 in Havering there were, on average, more than 1 car per household. Consequently, the car is the dominant mode of transport in Havering with 47% of journeys in Havering made by car, compared to 33% for the whole of London. 18% of journeys are made by train and only 7% by bus, compared to 12% and 11% for the whole of London. Between 1994-2004 traffic growth increased by 5.6% or 0.5% per annum, compared to 4.9% and 0.4% per annum for London. This coincided with a growth in the number of people in employment locally and a growth in the number of households.
- 5.42 A significant percentage of all journeys are those made to and from work. Of the 41,000 people who work in the Borough, 62% commute by car, whilst

12% travel by bus and 11% arrive on foot. 23,000 people travel into the borough from surrounding areas and around 50% of Havering's residents commute to work outside the borough. Twice as many people in Havering (28%) commute over 20 km to work than from any other authority in London.

- 5.43 A key issue for the Core Strategy will be to aim to minimise the need to travel through the location and design of new development and its relationship to transport links and users. Where travel is necessary to promote sustainable forms of transport whilst recognising that people will continue to use their cars. This is a major issue in London Riverside where future growth particularly housing and tourism is predicated on significant improvements to public transport.

### **Waste**

- 5.44 Havering Council is taking forward a Joint Waste Development Plan Document with the London Boroughs of Redbridge, Barking and Dagenham and Newham. As part of its preparation the evidence base will be developed and options explored for how the amount of waste which these boroughs will need to plan for may grow or decline over the plan period and how best to manage this with regard to the waste hierarchy, waste recycling and composting targets, and the principles of proximity and self sufficiency. This not only needs to consider waste generated within ELWA but also waste from outside the ELWA area.
- 5.45 The Core Strategy, therefore, needs to set the broad strategy for waste management and for the broad location of waste management facilities to provide the framework for the preparation of the Joint Waste Plan without prejudicing the conclusions that it may reach. Broad data on current waste arisings is provided below but the detailed evidence base is being prepared separately through the preparation of the Joint Waste Plan.
- 5.46 There are four main waste 'streams', Municipal Solid Waste, Commercial and Industrial Waste, Construction and Demolition Waste, and Hazardous Waste.
- 5.47 Analysis of recorded and estimated data from 2002/03 and 2004/05 shows that approximately 1.9 million tones of waste was produced within ELWA Boroughs, enough to fill one and a half Wembley Stadiums. Just over a quarter of this total is municipal solid waste (26%), with the majority arising from construction and demolition activities (42%) and commercial and industrial activities (29%).
- 5.48 Within the East London Waste Authority Area the following amounts of waste were generated in each of these streams:

*Table 10– Waste arisings in East London Waste Authority Area*

Waste Stream	Tonnes	Year
Municipal Solid Waste	497,000	2004/05
Commercial and Industrial Waste	545,000	2002/03
Construction and Demolition Waste	800,000	2003
Hazardous Waste	34,376	2003

*Source – East London Joint Waste Development Plan Document, Building the Evidence Base and Identifying Issues and Options Draft Final Report – Land Use Consultants and Environmental Resources Management Ltd –July 2006*

- 5.49 Management routes in ELWA varied between the four waste streams, with around 82% of municipal solid waste being disposed to landfill and only 9% recycled, while the majority of construction and demolition waste (84%) and commercial and industrial waste (42%) was recycled. However 16% of municipal solid waste was recycled in 2004/05 in Havering.

### **Minerals**

- 5.50 The Government's national and regional guidelines for aggregates provision in England 2001-2016 identify a need for land won minerals and gravel in London of 1.2 million tonnes per annum. In response to this amendments to the London Plan published in August 2005 identify a requirement for London to meet an output of 1 million tonnes per annum until 2016, apportioning half of this to East London. Currently there are about 1 million tonnes of permitted reserves in Havering including dormant sites or currently non-working sites.
- 5.51 A key issue for the Core Strategy is to set in place a framework which will, with regard to the current supply position, make an appropriate contribution to the need to make provision across London for an output of 1 million tones per year whilst ensuring that any mineral extraction in Havering does not have an unacceptable impact on the environment or human health.

### **Green Belt**

- 5.52 Over 50% of Havering is in the Green Belt which apart from in the South of the Borough almost entirely surrounds the built up area of the Borough separating it from the rest of London to the west and the built up area of Essex to the north and east. It has helped check urban sprawl and therefore direct development pressures to urban brownfield sites and in the process safeguarded the countryside from encroachment. This has enabled Havering's urban fringe to be protected and play an important role in providing accessible recreation and leisure opportunities close to local communities, as well as maintaining and enhancing biodiversity value.
- 5.53 A key issue for the Core Strategy is how to ensure that the Green Belt boundary remains defensible with regard to the purposes of including land

within it and how to ensure that best use is made of this valuable resource with regard to Green Belt objectives.

## **Environmental Management**

- 5.54 The key issue for the Core Strategy will be how to enhance and protect the environment and plan for and minimise its impact on the causes of climate change, whilst planning for adaptation and mitigation of its effects through the development process focusing particularly on reducing the need to travel through more sustainable patterns of development, promoting sustainable forms of transport and promoting sustainable forms of construction and maximising local renewable energy production potential.
- 5.55 The tables below show that whilst progress is forecast in tackling some emissions, CO<sub>2</sub> emissions (which are the principal contributor to climate change) is forecast to rise. The urgent need to address climate change has led the London Mayor to set challenging CO<sub>2</sub> reduction targets for London, with a reduction of 20% from 1990 levels by 2010 instead of the 12.5% target for the UK identified in the Kyoto agreement. The two principal sources of CO<sub>2</sub> emissions in Havering are transport and buildings which approximately account for 30% and 70% of all emissions respectively.
- 5.56 Likewise, there is still considerable work to be done to improve the quality of river water in Havering. The Core Strategy also needs to focus on other environment management issues such as biodiversity, (Havering has 93 sites of importance for nature conservation including 3 Sites of Special Scientific Interest and is also host to a number of protected species) geodiversity, land contamination, air pollution, noise and light pollution and flood risk.

*Table 11 - Apportionment of LAEI 2002 emission estimates to London boroughs from all emission sources in 2002, 2005 and 2010*

	<b>London borough PM10 (tonnes/yr)</b>	<b>NOX (tonnes/yr)</b>	<b>CO (tonnes/yr)</b>	<b>CO2 (tonnes/yr)</b>
<b>Havering 2002</b>	143.873	2,622.134	3,996.385	546,813.602
<b>Havering 2005</b>	129.604	2,170.345	2,512.131	553,038.980
<b>Havering 2010</b>	108.435	1,648.558	1,713.038	562,925.128

	<b>NMVOC (tonnes/yr)</b>	<b>Benzene (tonnes/yr)</b>	<b>Butadiene (tonnes/yr)</b>	<b>SO2 (tonnes/yr)</b>	<b>Methane (tonnes/yr)</b>
<b>Havering 2002</b>	2,102.220	24.448	6.091	57.536	425.032
<b>Havering 2005</b>	1,843.702	20.711	4.417	55.090	416.788
<b>Havering 2010</b>	1,712.568	18.306	3.153	44.548	408.778

*Table 12 – River Water Quality in Havering*

<b>River Water Quality in Havering (Source: Environment Agency)</b>		
<b>Environment Agency Category</b>	<b>Proportion of Rivers</b>	<b>Proportion of Rivers where action required</b>
Very good	16.6 %	c. 33.3% acceptable
Fairly good	16.6 %	
Fair	33.3 %	c. 66.7% unacceptable

*Source - Environment Agency 2005*

## **Heritage**

- 5.57 Havering has a major inventory of important heritage sites and areas. There are currently:
- 200 statutory & 224 locally listed buildings
  - 3 Scheduled Ancient Monuments and 139 unscheduled sites
  - Around half of the Borough comprises Areas of Archaeological Potential
  - 9 Conservation Areas have been designated (3.5% of Borough) as well as an Area of Distinctive Character & other design policy areas. All of the areas have unique characters which add considerable value to the Borough's environment.
  - Upminster Court is included in the national Register of Parks & Gardens and Dagnam Park will be considered for inclusion.
  - Also there are the Council's Romford and Hornchurch Heritage Strategies and work carried out by the London Parks and Gardens Trust on historic green spaces.
- 5.58 Havering also has significant archaeological interest for example the vestiges of Roman settlements and infrastructure, Hornchurch Priory, the medieval village centres, the marshes and the two Havering Palaces.
- 5.59 The key issue for the Core Strategy will be how best to preserve and enhance sites, buildings, areas and landscapes of special architectural or historic importance and to consider the role they can play in regeneration.

## 6 The planning of the borough up to 2020: The Core Strategy Vision

### **Havering Strategic Partnership**

- 6.1 In 2005, Havering Strategic Partnership updated the Havering Community Strategy, taking account of the issues and opportunities identified in the previous section, and after wide consultation with the community.

The Vision for Havering in the 2005 Community Strategy is:

- To create a safe, welcoming, healthier and more prosperous place where people choose to live, work and visit.

To realise the vision, the Partnership has adopted this mission:

- Make Havering an inclusive place in which to live, work and visit;
- Create a dynamic, prosperous economy driven by a well-educated and trained workforce;
- Create a thriving, successful and healthy community for all;
- Create a good quality of life in Havering for now and the future, through actions that contribute locally, nationally and internationally to sustainable development.

This will be delivered through a Community Strategy with six themes:

- A More Prosperous Community
- Improved Lifelong Learning
- Better Health and Welfare
- Increased Community Participation
- Protect and Improve the Environment
- A Safer Community

- 6.2 Achieving the vision will involve securing and managing positive changes in the towns, suburbs, and countryside areas which make Havering the place that it is. Therefore, the aim of Havering's Local Development Framework,

and especially the Core Strategy, is to protect and strengthen what is best about Havering, to create places of real quality which are enjoyable and fulfilling to live in, and to improve social, economic, and environmental opportunities for the whole community.

- 6.3 The following table shows how the Vision themes relate to the Community Strategy themes. The Vision is focused on delivering the Community Strategy themes and is also a product of an analysis of the policy context and evidence base as explained in Section 2 of this document.

		<b>Community strategy themes</b>					
		A more prosperous community	Improved life long learning	Better health and welfare	Increased community participation	Protect and improve the environment	A safer community
<b>Vision themes</b>	Places to live	✓		✓			
	Places to work	✓	✓	✓	✓		
	Town centres	✓			✓	✓	✓
	Culture	✓	✓	✓	✓		✓
	Community needs		✓	✓	✓		
	Transport	✓		✓		✓	✓
	Waste management					✓	
	Minerals					✓	
	Green Belt			✓		✓	
	Environmental management			✓		✓	
	Design	✓		✓		✓	✓
	Heritage	✓				✓	

### **The Vision for the Core Strategy**

- 6.4 This leads to the following vision for how Havering will change and develop by 2020.

#### **Places to live**

1. Through partnership working with the Development Corporation and other agencies. London Riverside will have become a major mixed urban centre on the River Thames. Sustainable expansion of the communities of Rainham and South Hornchurch will have taken place within London Riverside, which will be home to 12,000 more people. Over 3000 people will be living in Romford Town Centre. Collectively, these developments will help address housing need in the borough. Elsewhere mixed use developments will be encouraged within Havering's town centres, promoting linked trips and helping sustain the local economy.

2. Outside the town centres the borough's suburban character will be maintained and enhanced by sympathetic residential development which respects and makes a positive contribution to the existing context. All groups within the community will have good, affordable access to the housing they need, including those needing larger, family-sized accommodation.

### **Places to work**

3. Havering will have a dynamic, prosperous economy founded on a strong skills base, a quality environment and a hierarchy of strategic and local employment sites. In particular London Riverside will be a centre for advanced manufacturing and a wide range of modern industries clustered around the Centre for Engineering and Manufacturing Excellence, with tourism and leisure destination centred on the London Riverside Conservation Park and Thames Gateway Regional Casino and Entertainment Centre. Environmental and 'green' industries will provide further new opportunities for economic growth and jobs. There will be a range of e-enabled knowledge-based industries within new mixed used developments in and around the borough's town centres. Havering residents will be equipped to get good quality, well-paid, jobs locally and in the Thames Gateway.

### **Town centres**

4. Romford Town Centre, with the help of the Romford Town Centre Partnership, will continue to be East London's Premier Town Centre thriving on the competition offered by Stratford to the west and Lakeside and Bluewater to the east. It will have built upon its traditional character, and have a safe, diverse, culturally rich and well managed evening economy offering a range of activities for people of all ages.
5. Upminster and Hornchurch will continue to be thriving town centres, providing a diverse mix of uses with a high quality retail offer and convenient local services. Hornchurch will be a sub-regionally important cultural centre anchored by the Queens Theatre and Fairkytes Arts Centre in attractive settings which complement their role.
6. Havering's town, district and local centres will be the focus of community life, offering a diverse mix of shops, services, housing, cultural and community facilities which meet the needs of the communities they serve. They will enjoy good public transport access and will be places to and in which more people choose to walk and cycle.

### **Culture**

7. In recognition of its importance to its residents and visitors' quality of life, Havering will have a strong and well-developed cultural provision,

including opportunities for sport and leisure activities, indoor and outdoor, convenient access to a network of open space, arts and creative activities and industries, and libraries, heritage centres or museums. Voluntary and community groups, including faith groups, will be able to find suitable premises and will be encouraged and supported.

8. Havering's countryside will offer an array of recreation and leisure opportunities through the continuing development of the Thames Chase Community Forest, the extension of Havering Country Park and Dagnam Park and the provision of the London Riverside Conservation Park.

### **Community Needs**

9. Spatial inequalities in Havering's health system will be reduced through the provision of additional, accessible facilities. Havering's cultural and leisure provision will enable people to pursue a healthier lifestyle through personal well-being and fitness from activities such as walking and cycling. Older people will be supported to live healthily and safely at home whenever possible. The new Oldchurch Hospital will be up and running in conjunction with a network of Primary Care Trust Centres. Improved availability of services and facilities in Havering's health care system will be achieved through the provision of additional accessible facilities.
10. Havering schools and colleges will maintain and build upon their reputation for excellence. More Havering residents will participate in further and higher education (including at universities, colleges and CEME), and lifelong learning, so that Havering residents improve their skills and qualifications, as well as extending their personal development at all stages of life.

### **Transport**

11. Havering will enjoy a first class, integrated system for getting people and goods around the Borough, that will provide choice, reduce the need to travel and promote healthier lifestyles and improve the quality of life for all sections of the community, including those who are less mobile and people with impairments. This will provide a competitive advantage for local businesses and will be a major attraction for people moving into the borough. New development will be focused on those parts of the borough most accessible to public transport.
12. Havering's transport system will consist of a comprehensive clean fuel bus network, rail links across London that provide convenient access to the Stratford EuroStar station, the Crossrail service through Romford, a new station on the Fenchurch Street line serving the new residents and

employees of London Riverside, and East London Transit which will run from Barking to Rainham, then onto Elm Park, Romford, Harold Hill and Collier Row. Provision will continue to be made for cars in recognition that many people will continue to use them for travel, particularly in the suburbs but overall traffic growth will be falling and many more people will choose to walk and cycle. The borough will continue to have excellent road links due to the A12, A13, A127 and M25.

### **Waste management**

13. Havering will be dealing with a proportionate amount of domestic and commercial waste arising in the East London Waste Authority Area and Central London. Municipal and domestic recycling rates will be over 33% and the borough's landfill sites will no longer be used.

### **Minerals**

14. The mineral industry in Havering will be sustainably managed, balancing the needs of society and the economy with the protection of the environment and the people who live, work and visit in Havering.

### **Green Belt**

15. Development pressures will continue to be directed to brownfield land due to the continuing strong protection of the Green Belt which will cover over 50% of the borough.

### **Environmental management**

16. Havering will be helping to address climate change by encouraging the highest standards of sustainable construction and design and ensuring development is protected from its effects.
17. The London Riverside Conservation Park will be London's premier environmental attraction. Generally wildlife in Havering will flourish in all habitats, particularly in priority habitats, through the implementation of Havering's Biodiversity Action Plan.

### **Design**

18. Havering will continue to be a safe place for residents, users of public open space, commercial enterprises and those employed within the borough as new developments will be designed to increase the safety of the borough's public and private realms.

19. Overall, Havering will continue to be an attractive, liveable, safe and fully accessible borough where developments are required to be high quality and design-led, contributing positively to the character of the borough, respecting the local heritage and creating an environment in which people want to live, stay and prosper.

### **Heritage**

20. Havering's heritage will be maintained and enhanced and will provide a rich context for new development. Therefore creative and sensitive responses will be demanded which recognise that the buildings and environments created in the future will be tomorrow's heritage.

## 7 Strategic objectives for the planning of the borough up to 2020

- 7.1 These strategic objectives are focused on delivering the Vision of the Core Strategy and are therefore organised under the same twelve key themes.

### **Places to Live**

- LV (A) Make Havering a place where people will want to live and where local people are able to stay and prosper, by ensuring that local and sub-regional housing need is addressed whilst maintaining and enhancing the character of Havering's residential environment which makes the borough such an attractive place to live.
- LV (B) Ensure the housing needs of the borough's more vulnerable people are met.
- LV (C) Achieve sustainable new communities in London Riverside and support the continuing urban renaissance of Romford Town Centre.

### **Places to Work**

- WK (A) Create a dynamic prosperous economy driven by a well educated and trained workforce by addressing current land surpluses and skills shortages.
- WK (B) Promote London Riverside as a centre for advanced manufacturing and a wide range of modern industries including environmental and 'green' industries, supported by a tourist and leisure economy focused on the London Riverside Conservation Park and Thames Gateway Regional Casino and Entertainment Centre.

### **Town Centres**

- TC (A) Promote and enhance the centres, including local centres, within the town centre hierarchy, ensuring their future vitality and viability by enabling a diverse range of shops, services, housing, cultural and community facilities to be provided in convenient and accessible locations, and securing environmental improvements with recourse to external funding wherever possible.

- TC (B) Promote Romford as a leading Metropolitan Centre serving Essex, East London and the Thames Gateway.

### **Culture**

- CU (A) Improve the provision for culture within the borough, including sport and leisure, parks and open spaces, arts and creative activities and industries, and libraries, and promote equality of access.
- CU (B) Promote Hornchurch as the borough's key cultural centre.
- CU (C) Promote the diversification of the borough's evening economy for the safe enjoyment of all sections of the community, particularly in Romford Town Centre.

### **Community Needs**

- CM (A) Address spatial inequalities in health in Havering, maintain and build upon Havering's reputation as centre of excellence for education and ensure that other essential social infrastructure is planned for to meet the demands of existing and new communities.

### **Transport**

- TR (A) Integrate planning and transport to reduce the need to travel, by concentrating major trip generating development in the borough's main centres and other places with good public transport access, and supporting the important role and function of the borough's local centres whilst recognising that many people will continue to use their cars for travel, particularly in the suburbs.
- TR (B) Ensure that where travel is necessary that there is a choice of accessible modes of transport for people to take through improved public transport particularly in the borough's most deprived areas and London Riverside, and creating the conditions for people to walk and cycle.

### **Waste Management**

- WM (A) Promote minimisation of waste and re-use of waste in line with the waste hierarchy and strive for sub-regional (ELWA) self-sufficiency in managing commercial and domestic waste arisings in line with the proximity principle.

**Minerals**

MN (A) Promote re-use of minerals and only extract minerals within Havering provided strict sustainability criteria are met.

**Green Belt**

GB (A) Provide strong protection to the Green Belt and ensure recreational value is maintained and enhanced.

**Environmental Management**

EN (A) Ensure Havering reduces its impact on the environment (land, air quality, water and flooding) and minimises its impact on the causes of climate change, whilst planning for adaptation and mitigation of its effects.

EN (B) Maintain and enhance the Borough's biodiversity and geodiversity, in particular the priority species and habitats identified in the London, UK and Havering Biodiversity Action Plans and the sites identified by the GLA Ecological Survey.

**Design**

DE (A) Create safe, liveable, accessible environments with distinct characters through high quality design-led development.

**Heritage**

HE (A) Preserve and enhance sites, buildings, areas and landscapes of special architectural or historic importance.

## **8 Key Diagrams**

**Key diagram 1 - Havering's strategic position within the sub-region (to be inserted)**

**Key diagram 2 – A visual summary of the Core Strategy (to be inserted)**

## 9 Core Policies

- 9.1 The Core Policies establish a spatial framework for the borough up to 2020. They are ordered according to the objectives they are focused on delivering. Each Core Policy includes an explanation of the need for the policy with regard to the policy context and evidence base and sets out how the policy will be monitored so the Council can keep track of its effectiveness and the need for review. The Core Policies are also the product of the Sustainability Appraisal process and take account of the feedback received from the community and other stakeholders during the various consultation initiatives undertaken in perpetrating the Core Strategy, at the issues and options, preferred options and submission stages. The Core Strategy Sustainability Appraisal Report and Statement of Compliance should be consulted for more information on this.
- 9.2 The Core Policies are cross cutting and provide the framework for the Development Control Policies and therefore should not be read in isolation.

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## **PLACES TO LIVE**

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## **CP1- HOUSING SUPPLY**

**A minimum of 535 new homes will be built in Havering each year by:**

- **prioritising the development of brownfield land and ensuring it is used efficiently**
- **developing the residential and mixed use sites identified in the Site Specific Allocation Development Plan Document (DPD) which includes sites within the London Riverside Opportunity Area**
- **bringing forward housing capacity through the Romford Area Action Plan**
- **outside town centres and the Green Belt prioritising all non designated land for housing, including that land released from Main and Secondary Employment Areas as detailed in CP3**
- **promoting mixed use development within town centres**
- **enabling high density mixed use development within Romford and the district centres**
- **the residential redevelopment or intensification of existing out of centre retailing sites**
- **bringing vacant properties back into use through the Council's Empty Property Strategy**
- **resisting the loss of housing**
- **preparing development briefs/masterplans/design codes as Local Development Documents for larger housing sites**
- **monitoring housing provision levels through the Housing Trajectory within the Annual Monitoring Report and provided in Annex 3.**

## **REASONED JUSTIFICATION**

### Housing supply

- 1.1 Ensuring an adequate housing supply to meet local and sub-regional housing need will be important in making Havering a place where people will want to live and where local people are able to stay and prosper. Appendix 9 of 'We're Housing People' identifies the main anticipated drivers of Havering's housing market to 2020 during consultation on its development.<sup>19</sup> These drivers include economic growth as a result of changes in the job market, improving transport links, house price inflation and social and economic regeneration of lower demand areas.
- 1.2 The London Plan sets Havering the minimum target of building 350 new homes per year from 1997-2016.<sup>20</sup> Between 2001-2004 an average of 375 homes were built in Havering. However, this is based on an annual supply across London of 23,000 homes. The Mayor's preferred target is 30,000 which takes account of economic growth and existing housing need across the capital. The Mayor's draft alterations propose a new London target of

<sup>19</sup> Appendix 9, We're Housing People, London Borough of Havering Housing Strategy 2004-2007, LB Havering 2004

<sup>20</sup> Table 3A.1, London Plan, GLA, February 2004

31,505 homes a year from all sources with a corresponding annual provision target from 2007/08 to 2016/17 of 535 units for Havering.<sup>21</sup> This figure is derived from the London Housing Capacity Study (HCS), and this policy identifies the sources of new supply which were taken into account in arriving at Havering's capacity figure.<sup>22</sup>

- 1.3 Consequently, the sites identified in the Site Specific Allocations and those sites which will emerge through the Romford Area Action Plan<sup>23</sup> will, as required by Planning Policy Guidance 3, Housing, (PPG3) and draft Planning Policy Statement 3, Housing (PPS3), collectively comprise 10 years supply of housing with regard to the revised London Plan target<sup>24</sup>. Nonetheless, as evidenced by the Housing Capacity Study, the Council expects a significant amount of new housing to be from windfall supply which is consistent with the London Plan which expects borough's to maximise housing supply.<sup>25</sup> The total capacity of the Site Specific Allocations and predicted capacity from the Romford Area Action Plan, together with anticipated supply from windfall comprises a 15 year housing supply in line with Draft PPS3.<sup>26</sup> Annex 2 includes a Housing Trajectory which compares past performance on housing supply to future rates of anticipated supply up to 2020. This will be updated annually in the Council's Annual Monitoring Report.
- 1.4 With regard to the Council's Employment Land Review the following changes have been made to Havering's reserve of Primary and Secondary Employment Land which will release land for a significant supply of new housing. The list below excludes sites within Romford Town Centre as these will be brought forward through the Romford Area Action Plan.
- Removal of area north of Fenchurch Street to Southend railway from Rainham Employment Area, but retaining some land for B1(a-c) employment uses.<sup>27</sup> More detail is provided in the Site Specific Allocations Document on constituent sites.
  - De-designation of Chesham Close, Lambs Lane and Spring Gardens Secondary Employment Areas and that part of the Victoria Road Commercial Area outside the Romford Area Action Plan area.

## **FURTHER POLICY AND GUIDANCE**

- 1.5 More detail on the implementation of this policy is provided in the Development Control Policies and supporting guidance.
- London Housing Capacity Study, GLA, 2005
  - Havering Employment Land Review, LB Havering, 2006
  - Romford Area Action Plan Preferred Options Report, LB Havering, 2006

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<sup>21</sup> London Plan Draft Alterations, GLA, July 2005

<sup>22</sup> London Housing Capacity Study 2004, GLA, July 2004

<sup>23</sup> Romford Area Action Plan, Issues and Options Report, April 2005

<sup>24</sup> PPG3 paragraph 34, ODPM, March 2003, and draft PPS3 paragraph 12, ODPM, December 2005

<sup>25</sup> Policy 3A.1, London Plan, GLA, February 2004.

<sup>26</sup> Draft PPS3 paragraph 12, ODPM, December 2005

<sup>27</sup> Use Classes Order 2005

- Site Specific Allocations DPD, LB Havering, 2007

## **MONITORING**

<b>Ref</b>	<b>Indicator</b>	<b>Source</b>
1	Net additional dwellings over the previous five year period or since the start of the relevant development plan document period, whichever is the longer;	Core Output (2)
2	Net additional dwellings for the current year;	Core Output (2)
3	Projected net additional dwellings up to the end of the relevant development plan document period or over a ten year period from its adoption, whichever is the longer;	Core Output (2)
4	The annual net additional dwelling requirement; and	Core Output (2)
5	Annual average number of net additional dwellings needed to meet overall housing requirements, having regard to previous years' performances.	Core Output (2)

## **CP2 - SUSTAINABLE COMMUNITIES**

**Sustainable, attractive, mixed and balanced communities will be created by:**

- **ensuring that the sizes, types and tenures of new housing meets the need of new and existing households at the local and sub-regional level**
- **ensuring that the required sizes and types of new housing are of a density and design that is related to a site's access to public transport and is compatible with the prevailing character of the surrounding area**
- **ensuring that 35% of all new homes are affordable; 70% social rented for those on low incomes and 30% for those on intermediate incomes**
- **safeguarding the existing stock of large homes in Emerson Park and Hall Lane**
- **ensuring that the needs of those households with special needs are met**
- **ensuring that in their design and layout new homes provide for the lifetime needs of households**
- **regenerating and renewing areas of deprivation with low quality housing stock**
- **the social, economic and environmental regeneration of priority housing areas**

- **meeting the needs of gypsies and travellers.**

## **REASONED JUSTIFICATION**

### Housing Mix

- 1.1 The Havering Primary Care Trust's Report on Spatial Inequalities (November 2003) recognises that enabling people to access decent affordable accommodation is a key determinant in a person's quality of life, and in turn can help address other quality of life issues such as health, crime and education. The mismatch between the existing housing stock both in terms of type, size and affordability and that required to meet the needs of new households has contributed to the high rate of price inflation at the lower end of the market, which has knock on impacts on affordability.
- 1.2 Therefore, the Council wants to ensure that the right tenures, sizes and types of new housing are provided to meet the needs of new and existing households. Equally, the Council thinks that it is important that these new homes are integrated with the existing housing stock and make a positive contribution to the character of the borough. This way the plan will achieve mixed, balanced and attractive communities.
- 1.3 Once the precise requirements of PPS3 are clear the Council will in due course prepare a sub-regional housing market assessment and adopt the key implications for the future planning of the borough in the form of Supplementary Planning Document (SPD). The timetable for this will be set out in Havering's Local Development Scheme once a project plan for this work has been developed.
- 1.4 In the meantime, with regard to local and sub-regional housing and the need to provide wider housing opportunity and choice and create mixed communities the Council will have regard to the mix identified in the Greater London Authority's (GLA's) Housing Requirements Study as set out in the GLA's Supplementary Planning Guidance (SPG) Housing.<sup>28</sup>
- 1.5 The housing needs of three groups are particularly pronounced in Havering. Proportionally the numbers of elderly and disabled people in the borough is above the London average and their needs are likely to increase over the plan period. In addition the needs of the young also need addressing, as the price of new homes means that market housing is out of the reach of many first time buyers.

### *Elderly*

- 1.6 Whilst most, if not all, research conducted into the housing preferences of older people points to a resounding desire to stay put in their own homes and a reluctance to move to institutional settings such as residential and nursing

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<sup>28</sup> SPG Housing, GLA, November 2005.

care, there is still a need to plan for sheltered and in particular extra care accommodation. In addition, and in line with the London Plan the Council wants to make sure that new homes are designed so that they meet the needs of households throughout their lives, thereby increasing the independence of people in old age in the form of Lifetime Homes and Wheelchair standard housing.

### *Disability*

- 1.7 In many instances when people become disabled, their existing accommodation needs adapting to enable them to live a normal life. New housing provides the opportunity to design housing which meets the needs of households throughout their lives through changing circumstances.

### Housing Density

- 1.8 In the interests of retaining Havering's green and open character, the majority of housing supply is planned to come from brownfield land sources. It is important that this valuable resource is used efficiently. To ensure this developers will be required to take a design led approach so that residential developments achieve appropriate densities with regard to their accessibility to public transport, the type and sizes of units required to meet local and sub-regional housing need the local context and the principles of high quality design with regard to being compatible with Havering's predominantly suburban character.

### Housing Affordability

- 1.9 Whilst unemployment in Havering is below the national average – 2.2% in August 2003 compared with 3.4% nationally – the gap between earnings and house prices remains a major factor in housing affordability in the borough.<sup>29</sup> In 2006, the estimated gross earned household income in Havering was £27730.<sup>30</sup> In Jan-March 2006 the average dwelling price was £219782, 8 times the average household income.<sup>31</sup> The Havering Housing Needs Survey Update 2006 identifies a need in Havering for 875 additional affordable homes between 2006-2011 years. This is the sum of the backlog of existing need (14 households) and newly arising need 1474 (households) minus the supply of affordable units (613).<sup>32</sup>
- 1.10 Therefore the Core Strategy takes a twin track approach to address housing affordability. It aims to increase the supply of affordable housing and it aims to improve access to quality local jobs for residents by tackling low levels of further education take-up, and supporting employment training and employment access programmes and life long learning.

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<sup>29</sup> Labour Force Survey Annual Local Area Database, 2004

<sup>30</sup> Havering Housing Needs Survey Update, LB Havering, 2006

<sup>31</sup> Land Registry

<sup>32</sup> Havering Housing Needs Survey Update, LB Havering, 2006

- 1.11 Therefore, demand for affordable housing far outstrips supply. Added to this is the wider issue of sub-regional need which must be considered due to the use of a sub-regional allocations system for all affordable housing which is provided with recourse to Housing Corporation grant.
- 1.12 To address this demand, in line with national and regional guidance, the Council has set borough wide and site specific affordable housing targets which are based on an assessment of all housing needs and a realistic assessment of supply. The latter consideration is particularly important in Havering where low land values suppress a development's ability to absorb the cost of providing affordable housing.

Regeneration priority housing areas

- 1.13 Whilst Havering has the highest proportion of owner-occupied housing in East London there are important local concentrations of local authority/housing association stock in Waterloo Road, the Mardyke Estate and Harold Hill. Parts of these fall within the 20% most deprived areas in England. These areas tend to suffer from poor education achievement, poor health and poor housing conditions. The Council is committed to addressing this deprivation. Site Specific Allocation 14 sets out the role of the LDF with regard to the Mardyke Estate. The Council may bring forward LDDs and other strategies, as necessary, as key tools in addressing deprivation and bringing forward regeneration opportunities on the Waterloo Road and Harold Hill Estates.

**FURTHER POLICY AND GUIDANCE**

- 1.14 More detail on the implementation of this policy is provided in the Development Control Policies and supporting guidance.
- SPG Housing, GLA, 2005
  - SPD on Residential Density and Residential Amenity Space
  - Better Places to Live, Companion Guide to PPG3, DCLG, September 2001
  - Places, streets and movement, A companion guide to Design Bulletin 32 Residential roads and foot paths September , DCLG, 1998.
  - SPD Emerson Park and Hall Lane Special Policy Areas
  - SPD Gidea Park Conservation Area
  - SPD Residential Extensions and Alterations
  - SPD Affordable Housing
  - Havering Housing Needs Survey Update, LB Havering, 2006
  - Lifetime Homes, Joseph Rowntree Foundation
  - Havering Gypsy and Traveler Needs Assessment, LB Havering, 2004.

**MONITORING**

<b>Ref</b>	<b>Indicator</b>	<b>Source</b>
6	Percentage of new and converted dwellings on previously developed land	Core Output (2)
7	Percentage of new dwellings completed at less than 30 dwellings per hectare;	Core Output (2)
8	Percentage of new dwellings completed at between 30 and 50 dwellings per hectare; and	Core Output (2)
9	Percentage of new dwellings completed at above 50 dwellings per hectare.	Core Output (2)
10	Affordable housing completions.	Core Output (2)
11	Number of net completions by housing size and type and tenure	Local Output
12	Average density of new housing	Sustainability Appraisal (SEI)
13	Number of extra elderly people cared for at home/1000 population	Sustainability Appraisal (SEI)
14	Need for new affordable homes/annum	Sustainability Appraisal (SEI)
15	New homes built to Lifetime Home standard	Sustainability Appraisal (SEI)
16	New homes built to wheelchair standard or capable of easy conversion	Local Output

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## **PLACES TO WORK**

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## **CP3 – EMPLOYMENT**

**A range of employment sites will be available to meet the needs of business and provide local employment opportunities by:**

- **ensuring sufficient land is allocated within Main and Secondary Employment Areas and protecting this for business, industrial and some warehousing uses**
- **in the Beam Reach Business Park prioritising advanced manufacturing uses and other modern industries in the B1 (b) (c) and B2 use classes which provide a similar quality and intensity of employment**
- **focusing office development within Romford and the district centres**
- **maximising the potential of creative industry in Hornchurch (DC24)**
- **seeking contributions via S106 agreements towards the provision of employment training and support, and local employment access schemes.**

## **REASONED JUSTIFICATION**

- 1.1 This policy aims to create a dynamic prosperous economy driven by a well educated and trained workforce and promote London Riverside as a centre for advanced manufacturing. It is founded on Havering's Employment Land Review which provides a realistic assessment of business needs to ensure that sufficient land is available and readily capable of development and well served by infrastructure.

### **Employment and business profile**

- 1.2 Employment in manufacturing in Havering is in decline, reflecting wider sub-regional trends. The B2 (general) industrial land market is characterised by both low availability of units on the supply side and low take-up on the demand side. General industrial employment in Havering is forecast to decline by 19% between 2005 and 2018. However Havering's Employment Land Review recognises that economic development initiatives might increase the demand in this location further.
- 1.3 Employment in distribution jobs, largely represented by the wholesale sector, increased by 16% in Havering between 1993 and 2003 and is expected to continue to increase up to 2018. However, much of the forecast growth in B8 jobs can be accommodated in the high levels of vacant premises, which currently account for 21% of the overall warehousing stock in Havering. Additional land demand for B8 uses up to 2018 is expected to be minimal. Thurrock to the East of Havering is one of the key distribution hubs in the UK. Existing and proposed port facilities and excellent trunk network in Thurrock give it locational advantages over Havering and the market assessment supports this theory.

- 1.4 The Romford area currently accounts for 79% of B1 accommodation in Havering and is the most important sub-market for this type of land use in the Borough. The office market has experienced limited rental growth since 1998 and relatively little expansion (2 hectares) is expected in the B1 office sub-sector up to 2018.

Employment Land Supply

- 1.5 The London Plan and the draft Supplementary Planning Guidance (SPG) on Industrial Capacity<sup>33</sup> emphasise the importance of identifying and protecting high quality employment sites in appropriate locations to meet the needs of general business, industry and warehousing. The SPG was prepared to deal with a long term reduction in demand for industrial land across London of approximately 30 to 50 ha per annum. Of the 740 ha of industrial land forecast to be released across London between 2001 and 2016, some 500 ha is expected to be released to other uses in East London. The SPG places Havering in the 'Managed Transfer' category, as a Borough which has a greater supply of industrial sites relative to demand and which should generally take a more permissive approach to transfer.
- 1.6 In line with Government guidance<sup>34</sup> in PPG3 local authorities are required to maintain an up to date review of employment land and premises and consider whether some of this land might be better used for housing or mixed-use development.
- 1.7 The Havering Employment Land Review (April 2006) provides an assessment of employment land and demand in the Borough. This followed four steps:
- Determining the extent of existing vacant industrial land;
  - Forecasting a loss of industrial land as a result of employment changes;
  - Factoring in movement of industry from Central London sub-region, the impact of City Fringe and Olympic Park regeneration programmes, and future need for waste management, recycling, utilities and transport infrastructure; and
  - Establishing an appropriate level of vacant land for market efficiency.
- 1.8 The study then undertook a gap analysis to determine the difference between the current supply of employment land and the demand for employment land projected over the planning period.
- 1.9 Based on the current employment land supply of 360 hectares (309 ha built on and 51 ha vacant) and a demand by 2018 for 326 hectares of employment land, the review recommends the release of 34 hectares of land from employment use. To determine which sites needed to be released to meet this global figure each employment area was visited and appraised against a set of agreed economic, planning and property market criteria to assess their fitness for purpose. These criteria were modeled on those in Government's

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<sup>33</sup> Draft Supplementary Planning Guidance: Industrial Capacity, GLA, September 2003

<sup>34</sup> Planning Policy Guidance Note 3, Housing Update, Supporting the Delivery of New Housing, ODPM, January 2005

Employment Land Review Guidance Note and GLA SPG on Industrial Capacity. The study also identified the appropriate uses for the retained employment sites. Paragraphs 1.10 – 1.17 provide detail on how sites have been redefined or released to remedy this surplus and the uses considered appropriate for the remaining Main and Secondary Employment Areas.

Strategic Employment Land / Main Employment Areas

- 1.10 The London Plan states that boroughs should promote and manage Strategic Employment Locations (SELs) as London's strategic reservoir of industrial capacity. The GLA classifies the Rainham Employment Area, Coldharbour Lane and Harold Hill Industrial Estate as SELs. In addition, the Council considers that the King George Close Estate in Romford shares similar qualities to the Rainham and Harold Hill areas and classifies this as a Main Employment Area. To avoid confusion the Council classifies the Secondary Employment Locations as Main Employment Areas. The Council however has de-designated Coldharbour Lane as a Strategic Employment Location for the reasons given below. Therefore, the three Main Employment Areas are:

- Rainham Employment Area

The boundary of the Rainham Employment Area has been revised so that it now excludes those sites north of the London-Tilbury-Southend railway line. This area is now formed by two Site Specific Allocations: Rainham West and Beam Park. In line with the Employment Land Review, the Core Strategy seeks to retain a third of the Rainham West site for B1 (a and b) employment Uses within a mixed use redevelopment.

- Harold Hill Industrial Estate

A slight adjustment has been made to the boundary to exclude the housing development at Percy Close and Harris Close.

- King George Close Estate, Romford

No changes have been made to the King George Close Estate.

- Coldharbour Lane

The Coldharbour Lane area has been de-designated and has been included within the London Riverside Conservation Park Site Specific Allocation. The Coldharbour Lane Commercial Area as previously designated in the Havering UDP comprises a landfill site which has a temporary permission up to 2018, ancillary waste uses including an Autoclave, material recycling facility and composting facility which also have temporary permissions tied to 2018 as residues from these are landfilled. There are also a number of other employment uses in the far south east of the site on the former Freighmaster Estate site. The medium to long term aspirations of the Council and the Development

Corporation is to incorporate the former Coldharbour Lane Commercial Area into the London Riverside Conservation Park in its entirety, once the landfill tipping is complete and the land restored. At this date the other waste uses will also cease and the Council considers that use of this site for waste and other employment uses beyond this date would generate a level of heavy vehicle movements along Coldharbour Lane which would seriously conflict with and jeopardize the enjoyment of and plans for the London Riverside Conservation Park. The related Site Specific Allocation therefore recognizes that the employment uses will be acceptable in their current location in the short term but is focused on incorporating them into the London Riverside Conservation Park in the medium to long term.

- 1.11 The London Plan identifies London Riverside as an Opportunity Area in East London and a suitable location for innovation and high technology manufacturing. The development of the Centre for Engineering and Manufacturing Excellence (CEME)<sup>35</sup> and Beam Park Business Park<sup>36</sup> mean that Havering is well placed to generate and attract higher value advanced manufacturing businesses. The Core Strategy therefore prioritises higher value advanced manufacturing in Beam Reach Business Park, with a mix of light and general manufacturing with some warehousing focused on the Ferry Lane area. Other employment uses will be allowed within the Beam Reach Business Park where they provide a similar quality and level of employment within a high quality development commensurate with the business park location.
- 1.12 The Core Strategy identifies Ferry Lane, Harold Hill and King George Close Estates as acceptable locations for B1 (b) + (c) research and development and light industrial uses, B2 general industrial, and B8 storage and distribution uses. The Council will seek to ensure that the balance between storage and distribution and other business uses in these locations maintains a mix of jobs accessible in terms of quality and quantity.

#### Secondary Employment Areas

- 1.13 The London Plan states that outside of the SELs, local authorities should consider the quality and fitness for purpose of sites and the release of surplus land for other uses in order to achieve efficient use of land in light of strategic and local assessments of industrial land.
- 1.14 One main and a number of secondary employment areas have been lost to other uses since the UDP was adopted in 1993:
  - Eastern Avenue, Romford
  - North Street, Hornchurch

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<sup>35</sup> [www.ceme.co.uk](http://www.ceme.co.uk)

<sup>36</sup> [www.beamreach.co.uk](http://www.beamreach.co.uk)

- Rom Valley Way East (excluding The Seedbed Centre)
- Rom Valley Way West
- Romford Brewery
- Roneo Corner, Romford

1.15 The Havering Employment Land Review recommends that the following secondary employment areas outside Romford Town Centre are released.

- Chesham Close, Romford - 2 hectares
- Lambs Lane, Rainham - 2.5 hectares
- Spring Gardens, Romford - 1.4 hectares
- Part of Victoria Road Commercial Area (outside the Romford Area Action Plan boundary)

Sites within Romford Town Centre will be considered through the process of preparing the Romford Area Action Plan.

1.16 The remaining secondary employment areas in the borough should be retained within employment use and should accommodate all B use class business types (except B1a) other than those that create negative environmental impacts on surrounding uses or those which generate high volumes of traffic on residential roads.

#### Offices

1.17 In line with PPS6 'Planning for Town Centres' the Core Strategy identifies offices as main town centre uses and applies the sequential test to new office proposals.<sup>37</sup>

1.18 Romford is Havering's major centre for office employment. It accounts for 79% of B1 accommodation within the borough. The majority of this is concentrated within the Romford Office Quarter. However, there is a high level of vacancy due to several recent closures. The district centres, particularly Hornchurch and Upminster, also contain office space which provides services and employment opportunities elsewhere in Havering. The GLA London Office Policy Review identifies that supply and demand for offices are low in Havering and this is likely to continue.<sup>38</sup> The review suggests that large scale speculative office development is not viable in Romford and that new offices are only likely to be secured as part of a mixed use residential or retail-led scheme. The review suggests there is no purpose in promoting office development in Hornchurch or Upminster. However whilst the London Plan considers that suburban London office stock is losing its attraction as a location for strategically important office-based activity, Havering's Employment Land Review identifies that there will be demand for a further 2 hectares of office space by 2018 in Romford.

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<sup>37</sup> Planning Policy Statement 6, Planning for Town Centres, ODPM, 2005

<sup>38</sup> London Office Policy Review 2004, GLA, August 2004

- 1.19 The critical mass of office space in Romford provides a high level of employment in a town centre location with good public transport links. Public transport accessibility to Romford from central London and Heathrow will be improved by the development of Crossrail which along with low rent levels will help sustain demand through the plan period. More detailed policy on Romford will be contained in the Romford Area Action Plan.

**Access to Employment**

- 1.20 A key regeneration issue in Havering is tackling the low skills and qualification levels in the Borough. The issue in Havering is not just maximising employment but increasing access to employment opportunities. For regeneration policies to be effective, the local workforce must be suitably qualified and trained to take advantage of new opportunities. A lack of key skills and qualifications means that Havering's workforce is disadvantaged in the competition for employment opportunities both locally and further a field.
- 1.21 Improving access to training programmes and employment support schemes will reduce the jobs-skills mismatch, increase employment opportunities for Havering residents and help alleviate spatial inequalities in the borough. Employment support schemes, such as the Havering Jobnet Programme, deliver a job-brokerage service to unemployed people, offering advice and training sessions, as part of a co-ordinated borough-wide programme.

**FURTHER POLICY AND GUIDANCE**

- 1.22 More detail on the implementation of this policy is provided in the Generic Development Control Policies and supporting guidance.
- Employment Land Review
  - SPD London Riverside

**MONITORING**

Ref	Indicator	Source
17	Amount of land developed for employment by type	Core output (1)
18	Amount of land developed for employment, by type, which is in development and/or regeneration areas defined in the local development framework	Core output (1)
19	Percentage of 1a, by type, which is on previously developed land	Core output (1)
20	Employment land supply by type	Core output (1)

**Cabinet 9 October 2006**

21	Losses of employment land in: (i) development / regeneration areas and (ii) local authority area	Core output (1)
22	Amount of employment land lost to residential development	Core output (1)
23	Amount of completed office development	Core output (4)
24	Percentage of completed office development in town centres	Core output (4)
25	Percentage of employment in knowledge-driven business sectors	Sustainability Appraisal

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## **TOWN CENTRES**

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## **CP4 - TOWN CENTRES**

**Havering's town centre hierarchy consists of:**

- **Metropolitan Centre-Romford**
- **Major District Centres-Hornchurch and Upminster**
- **Minor District Centres-Collier Row, Elm Park, Harold Hill and Rainham.**
- **11 Major Local Centres**
- **68 Minor Local Centres**

**Havering's town centre hierarchy will be promoted and enhanced by:**

- **directing retail, cultural and service development to the borough's town centres through the 'sequential test'**
- **ensuring that the scale and use of new development is consistent with the role and function of the centres and therefore does not harm the vitality and viability of other centres**
- **promoting Romford Town Centre through the Romford Area Action Plan as a leading Metropolitan Centre**
- **consolidating the District Centres of Hornchurch, Upminster, Collier Row, Elm Park, and Harold Hill**
- **expanding Rainham to serve the new communities within London Riverside**
- **securing qualitative improvements to town centres through S106 agreements.**

## **REASONED JUSTIFICATION**

- 1.1 Havering's town, district and local centres, are the focus of community life, offering a diverse mix of uses with a high quality retail offer and convenient local services. They are also important centres of employment not only for retail but also office based employment particularly in Romford and creative industries in Hornchurch, which the policies of the plan seek to maximise.
- 1.2 Havering has undertaken a Retail and Leisure Needs Assessment which was produced in line with PPS6.<sup>39</sup> This assessed the balance of Havering's existing town centre hierarchy which classifies each centre depending on its size, its range of shops and facilities offered and the type of community and catchment area that it serves. This assessment was made with regard to comprehensive town centre healthchecks. It concluded that the hierarchy is functioning well, and that the performance of no one centre has been detrimental to another. Nor did it find that any centres needed reclassifying.
- 1.3 Therefore, Havering's town centre hierarchy consists of one Metropolitan centre (Romford), six district centres (Hornchurch, Upminster, Collier Row, Elm Park, Harold Hill and Rainham) and seventy nine major and minor local

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<sup>39</sup>Havering Retail and Leisure Study, Roger Tym and Partners, April 2005

centres. Whilst Romford serves the sub-region, Havering's district centres tend to serve their local community, offering a range of everyday community, shopping and employment opportunities. The borough's local centres provide day to day shops and services for residents especially the borough's elderly and the less mobile.

- 1.4 To maintain the balance between and role and function of Havering's town centres the Council will apply the sequential to new retail development. The sequential test is detailed in policies DC15 and DC19. It means that retail, cultural and service development should be located on the most central sites in town centres before considering less central sites. The aim is to minimise the need to travel, provide a diverse range of services in the one central location and make facilities accessible to all. This approach is intended to sustain and enhance the vitality and viability of town centres.
- 1.5 Havering's Retail and Leisure Needs Assessment identifies need over the plan period and the appropriate strategy for Romford and each of the borough's district centres. The table below summarises its findings:

<b>Centre</b>	<b>Strategy</b>	<b>Indicative comparison floorspace requirement to 2018 (sqm gross)</b>	<b>Indicative convenience floorspace requirement to 2018 (sqm gross)</b>
Romford	Consolidation/expansion	12000-30000	1000-1400
Hornchurch	Consolidation	800-2000	1500-1900
Upminster	Consolidation	600-1600	300-400
Rainham	Expansion	200-600	600-900
Elm Park	Consolidation	100	1500-1900
Collier Row	Consolidation	100	300-400
Harold Hill	Consolidation	200-400	1000-1400

- 1.6 It found that the district centre boundaries had been successful in helping to achieve compact and focused town centres. The study concludes that the district centres will experience limited growth during the plan period and therefore no change to their boundaries is necessary. The Council does not consider that it is appropriate to identify specific sites to meet this limited growth as there are a number of small-medium size opportunities within the district centres. Therefore, the Council would not wish to prejudice the development of one in favour of another, thereby potentially frustrating the strategy of consolidation in these centres, unless there is a clear cut reason for doing so, as is the case in Elm Park and Rainham. Whilst Romford will experience more substantial growth this can still be met within the town centre boundaries. In summary the approach for each centre is:

**Metropolitan Centre**

***Romford***

- 1.7 The retail strategy for Romford, including sites to meet growth will be set out in the Romford Area Action Plan. The vision for Romford 2020 being taken forward in the Romford Area Action Plan is for Romford Town Centre with the

help of the Romford Town Centre Partnership to continue to be East London's premier town centre. This will include strengthening Romford's historic market as a central feature of Romford's identity and a key part of the local economy.

**Major District Centres**

*Hornchurch*

- 1.8 Hornchurch is the borough's cultural centre and includes a diverse retail, culture and leisure offer, and, therefore, fulfils its role well as a major district centre. With regard to retail it has a localised catchment area. The overall strategy is one of consolidation through the promotion of small to medium scale retail, (particularly convenience), culture, leisure and residential redevelopments. Further detail will be provided in the Hornchurch Town Centre Supplementary Planning Document.

*Upminster*

- 1.9 Upminster performs well as Havering's second retail destination behind Romford as it benefits from both multiple and independent retailers and therefore fulfils its role well as a major district centre serving its local catchment area.
- 1.10 The strategy for Upminster is consolidation with some scope for small and medium scale retail and leisure development within the town centre to maintain its position as one of the two complimentary retail destinations to Romford. The main opportunities for this are largely located towards the edge of the centre's boundary; however no change to this is necessary as extending it would dilute the focus of the centre potentially undermining its vitality and viability.

**Minor District Centres**

*Rainham*

- 1.11 Rainham is within the London Riverside Regeneration Area and is the focus of a number of regeneration initiatives which are included as Site Specific Allocations. These aim to revitalise the area and preserve or enhance its heritage value through significant improvements to public transport and sensitive mixed use development. These initiatives include improvements to the Rainham Station Interchange and traffic management within the village, improvements to Rainham Hall and Grounds, remodelling of Rainham TESCOs and development of land between the railway and the Broadway.
- 1.12 Rainham includes a large TESCOs and a range of individual shops. The former contributes to the classification of Rainham as a minor district centre. There is limited scope for further significant convenience provision. However, given its proximity to the planned population increased in London Riverside and the aforementioned regeneration initiatives focused on the village itself there is potential to increase Rainham's comparison offer. Low floorspace to

plot ratios in Rainham provide an opportunity within the existing town centre boundary to develop new retail floorspace and therefore no change to the town centre boundary is required.

- 1.13 Within the proposed mixed use communities within London Riverside it is considered that there will be inadequate expenditure available to support an additional centre of any significant size in this area, as this would dilute the focus on Rainham. However, there may be a need for small scale retail facilities within these communities and a larger local centre north of the proposed Beam Park station which could act as local top-up shopping functions together with providing other limited services for local residents. In addition improvements to the Roman Close Minor Local Centre will be necessary as part of the Mardyke development.

*Elm Park*

- 1.14 Elm Park is a predominantly convenience based district centre which benefits from a range of small operators, but has a low comparison offer. Its proximity to Romford means that there is unlikely to be little demand for further comparison floorspace but the study has identified a shortfall in convenience floorspace. The strategy for Elm Park is consolidation with potential for some of the poorer quality retail units to be improved, in particular there is scope to improve the convenience retail offer, linkages and quality of the environment south of the railway line. The opportunity for redevelopment of the Station and Tadworth Parades has been identified as a Site Specific Allocation to achieve this.

*Collier Row*

- 1.15 Collier Row is a vibrant district centre with a range of convenience and to a lesser extent comparison shops. The strategy for Collier Row is one of consolidation as it provides limited opportunities to accommodate new retail floorspace. It should therefore continue in its role as a successful centre which serves a largely local catchment area.

*Harold Hill*

- 1.16 Harold Hill is the smallest district centre in the borough but is no less important to its predominantly local catchment area. The strategy here is also one of consolidation.

Environmental and access improvements

- 1.17 This policy seeks to secure funding from developer contributions and other funding sources such as the Borough Spending Plan, Groundwork , London Development Agency and the Council's own capital programme to improve the attractiveness and accessibility of the borough's town centres listed in the hierarchy in order to strengthen and regenerate them. In order to achieve this funding towards improvements such as street schemes, traffic management schemes, landscaping, paving, lighting and the provision of facilities such as

public conveniences and cycle stands to improve conditions for pedestrians and cyclists may be sought where appropriate.

## **FURTHER POLICY AND GUIDANCE**

1.18 More detail on the implementation of this policy is provided in the Development Control Policies and supporting guidance.

- Havering Retail and Leisure Study, LB Havering, 2006
- Hornchurch Urban Strategy SPD
- Romford Area Area Plan Preferred Options Report, LB Havering, 2006

## **MONITORING**

<b>Ref</b>	<b>Indicator</b>	<b>Source</b>
26	Position of town centres in town centre hierarchy	Sustainability Appraisal
27	The amount of completed retail development.	Core output (4)
28	The percentage of completed retail development in town centres	Core output (4)
29	The need for further retail and service use development based on regular need assessments undertaken by the Council	Local Output
30	The vitality and viability of centres based on the performance of the centres against the borough's regular health check.	Local Output
31	Proportion of retail to service uses in primary shopping areas	Local Output
32	Year on year yield trends for Romford, Hornchurch and Harold Hill.	Local Output
33	Number of frontages in primary shopping areas where a group of more than three non-retail shop fronts exist.	Local Output
34	The number of cases where non-retail uses within the primary shopping frontage of Collier Row, Elm Park, Harold Hill and Rainham and Major Local Centres exceed 33% of a frontages total length.	Local Output
35	The number of cases where non-retail uses within the primary shopping frontage of Hornchurch and Upminster exceed 20% of a frontages total length	Local Output

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## **CULTURE**

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## **CP5 - CULTURE**

**To ensure that cultural uses help improve the quality of life of residents and visitors, a strong and well-developed cultural provision will be established by:**

- ensuring that major trip generating cultural uses are located in town centres and sufficient facilities are provided to serve the communities of London Riverside**
- facilitating the development of the Thames Gateway Regional Casino and Entertainment Centre**
- ensuring smaller facilities are easily accessible by walking and cycling**
- promoting Hornchurch as a key cultural centre for the arts serving Havering and the wider sub-region**

- **promoting cultural and arts uses in Romford Town Centre to diversify the evening economy**
- **diversifying the evening and night time entertainment uses in town centres**
- **carefully controlling the impact of food, drink and evening economy uses.**

## **REASONED JUSTIFICATION**

- 1.1 As with the Government publication 'Sustainable Communities: People, Places, Prosperity programme (2005)', the Council recognises the particular role of culture as a pivotal focus for community activity and a sense of shared community and local pride and its contribution to quality of life. The Council regards culture as essential to creating communities in which people want to live, learn and work, both now and in the future. Cultural provision encompasses a wide range of activities from sport and leisure, convenient access to a network of open space, arts and creative activities and industries, and libraries, heritage centres or museums. This policy focuses on town centre cultural uses, other cultural uses such as use of open spaces and less intensive sports and recreation facilities are covered under policy Core Strategy CP7.
- 1.2 In line with Planning Policy Statement 6, the London Plan and the Mayor's Cultural Strategy, the Council regards cultural uses as key components of town centres in order to increase their vitality and viability.<sup>40 41</sup> These uses often remain open beyond shopping hours and therefore aid in extending the economy of town centres. They also add to the diversity of uses in town centres and, aid in promoting consumer activity. The Council supports the diversification of town centre uses and the introduction of complementary day and evening uses such as galleries, museums and restaurants within town centres. The key policy tools for achieving this are the 'sequential test' and the introduction of more flexibility into fringe area retail policy which is covered in DC16 and will be covered in the Romford area Action Plan.

### **Assessing future demand for leisure provision**

- 1.3 Havering's Retail and Leisure Study identifies leisure as covering uses such as cinemas, pubs, restaurants, health and fitness centres, family entertainment, theatres and museums, bingo, and indoor bowling etc, so closely follows the definition of cultural uses covered by this policy. It excludes the less intensive sport and leisure uses to which the 'sequential test' does not apply, for example, open spaces and libraries.
- 1.4 Havering's Retail and Leisure Study notes that there are no industry standard methodologies for modelling and apportioning growth in leisure expenditure. Moreover leisure has only recently been brought into the range of uses covered by the sequential approach.

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<sup>40</sup> Planning Policy Statement 6, Planning for Town Centres, ODPM, 2005

<sup>41</sup> London's Cultural Capital, GLA, April 2004

- 1.5 Growth in leisure expenditure will primarily come from two sources, population growth and increased participation rates. The study anticipates that by 2018 there will be a growth in leisure expenditure in Havering of £139 million, with three fifths of this growth likely to be spent on food and drink establishments.
- 1.6 The study identifies that cinema provision in the borough is above the London average suggesting a slight oversupply and, therefore, considers there is little scope for additional provision in the near future. The representation of food and drink uses in Romford and the district centres was compared with the Great Britain average. Whilst the assessment considers there is good provision, and, indeed, over provision in some cases, the quality of the operators could be improved. It concluded there is a qualitative requirement to increase the number of good quality eating and drinking destinations, rather than take-away units.
- 1.7 The scope is more difficult to quantify with regard to additional facilities such as theatres, ten-pin bowling and health and fitness centres. However, given the likely expenditure growth in leisure pursuits over the life of the plan there is likely to be some scope to expand the offer in sectors such as theatres, ten pin bowling, bingo, and health and fitness centres. For facilities that are intended to serve a wide audience particularly cultural uses the study considers that these should first be directed to Hornchurch as the borough's cultural centre. This is the approach taken by the Core Strategy.
- 1.8 The indicative upper limit for leisure floor space for Romford and the District Centres is set out in DC15. This is taken from Havering's Retail and Leisure Study 2006.
- 1.9 Romford's cultural facilities have been focused on entertainment and leisure. It is known to attract an average of 11,000 people to pubs and nightclubs per night. It also includes a bowling alley and multiplex cinema. The library hosts smaller scale arts events, and there are plans for a Romford Museum in the brewery development. This brings with it economic benefits in terms of the jobs this sustains but also brings problems of anti-social behaviour. The core strategy aims to diversify Romford's evening economy whilst at the same time managing the effects of pubs, clubs and restaurants.
- 1.10 Hornchurch has a greater range and more balanced mix of cultural facilities than Romford which includes the Queens Theatre and Fairkytes Arts Centre as well as a range of pubs and restaurants. Hornchurch is therefore a locally and sub-regionally important cultural quarter. The Core Strategy seeks to continue to protect and promote Hornchurch as Havering's cultural centre not only serving the borough, but the wider Thames Gateway sub-region.
- 1.11 The remaining district centres contain a limited number of cultural facilities mainly focused on restaurant, café and bar uses with a limited number of leisure uses, notable exceptions include the Central Park Leisure Centre in Harold Hill and the Upminster Tithe Barn Museum in Upminster. This indicates that there is the further potential to diversify and enhance arts,

leisure and entertainment uses within district centres such as Rainham, Elm Park, Harold Hill, Collier Row and Upminster which would consequently add complementary day and night uses within these centres effectively enhancing their vitality.

**Thames Gateway Regional Casino and Entertainment Centre**

- 1.12 In principle the location of a regional casino and entertainments centre in Rainham is consistent with regional policy given that the site is located within the London Riverside opportunity area, a priority area for development, regeneration and infrastructure improvement. Collectively, the regeneration benefits and good accessibility of the location by road and public transports, which is planned to improve, make Rainham a suitable area for a regional casino and entertainments complex.
- 1.13 The Casino will dramatically increase leisure opportunities in an area where they are very few and will provide important synergies with the proposed London Riverside Conservation Park. Combined they will not only provide a significant boost to the tourist economy of Rainham but will also help raise the image and profile of this area and help kick start the regeneration of the rest of London Riverside. Regeneration benefits include:
- Delivery of world class leisure, entertainment and tourism facilities, and direct support for the delivery of strategic proposals for Rainham Marshes and the Conservation Park, to create a nationally important tourist destination and environmental asset for the Thames Gateway.
  - Providing the catalyst for regeneration, bringing forward the environmental, economic, and social regeneration of London Riverside much sooner and better than would otherwise be possible.
  - Bringing into the area over three million people annually (Source Sun International) who would not otherwise come to the Thames Gateway or Rainham, showcasing the opportunities to live, work and invest here.
- 1.14 In Rainham itself, the land value uplift and business confidence engendered by the regional casino and entertainment centre will lead to the redevelopment of Ferry Lane and nearby sites such as Beam Reach for good quality employment uses.

**FURTHER POLICY AND GUIDANCE**

- 1.15 More detail on the implementation of this policy is provided in the Development Control Policies and supporting guidance.
- SPD Hornchurch Urban Strategy
  - Romford Area Action Plan Preferred Options Report, LB Havering, 2006
  - Havering Retail and Leisure Needs Assessment, LB Havering, 2005

**MONITORING**

<b>Ref</b>	<b>Indicator</b>	<b>Source</b>
36	Amount of completed leisure development	Core Output (4)
37	Percentage of completed leisure development in town centres	Core Output (4)
26	Position of district centres in GLA town centre hierarchy	Sustainability Appraisal
38	Percentage of population exposed to noise levels above 60Db	Sustainability Appraisal
39	Number of arts and cultural facilities built in town centres and out of centres	Local Output
40	Amount floor area (m2 and percentage) of arts and cultural uses in town centre locations and out of centre locations	Local Output
41	Number of major development schemes and mixed use development schemes that have provided a public art contribution.	Local Output

## **CP6 - ARTS IN HORNCHURCH**

**Hornchurch will be promoted as a key centre for artistic activities that serve the surrounding sub-region by:**

- encouraging arts and other cultural uses to locate in the centre of Hornchurch**
- encouraging the development of creative industry employment to locate in Hornchurch through the development of a limited number of live/work units for artists and creative workers**
- supporting the development of a training centre for artists with links to Havering College and the Queens theatre**
- encouraging the development of A1 uses which specialise in the sale of books, art materials, antiques, photography and artistic and literary creation to locate in the area bounded by and including the High Street to the South, The Queens Theatre to the North, North Street to the east and Billet Lane to the west**

- **supporting improvements to Fairkytes Art Centre including the refurbishment of the façade and landscaping to the front area**
- **supporting proposals that improve the connectivity between The Queens Theatre, Langtons, Fairkytes and High Street**
- **improving the setting of arts and other cultural facilities around Langtons and the Queens Theatre**
- **seeking contributions from development proposals in Hornchurch town centre for improvement works that will aid in implementing the objectives and strategies of this policy.**

## **REASONED JUSTIFICATION**

- 1.1 The arts and cultural attributes of Hornchurch are not only popular with residents in Havering, but also with people from surrounding boroughs. Hornchurch has the advantage of a central location with good transport connections to surrounding areas outside that of Havering. East London is recognised as lacking in cultural facilities such as local theatres and tourist attractions and for this reason the Mayor of London supports the development of new cultural provision in town centres within East London and the Thames Gateway. Hornchurch is already home to the Queens theatre and is complemented by the extensive range of facilities taking place at the nearby Fairkytes Art Centre. Hornchurch is, therefore, considered to be a key centre in East London with regard to arts provision and is well situated to grow in importance to serve the planned new communities within London Riverside and other parts of the Thames Gateway. The opportunity therefore arises to build on these assets and promote Hornchurch as a key centre for arts and other cultural facilities. This is also supported by the GLA publication 'Creativity, London's Core Business' which identifies that Havering has a sizeable growth rate in creative industry jobs, and this highlights an opportunity for growth in creative industries in the borough particularly in Hornchurch which already supports a strong cultural base.<sup>42</sup>
- 1.2 A Supplementary Planning Document will provide more detail on the implementation of this and related policies.

## **FURTHER POLICY AND GUIDANCE**

- 1.3 More detail on the implementation of this policy is provided in the Development Control Policies and supporting guidance.
- Havering Retail and Leisure Needs Assessment, LB Havering, 2006
  - SPD Hornchurch Urban Strategy

## **MONITORING**

- 1.4 The indicators or CP5 will also cover this policy.

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<sup>42</sup> Creativity: London's Core Business, GLA, October 2002

## **CP7 - RECREATION AND LEISURE**

**The Council will take seek to retain and increase access to recreation and leisure opportunities by:**

- **retaining existing facilities where a need exists**
- **addressing quantitative and qualitative deficiencies in open space and recreation facilities**
- **improving opportunities for creative play in parks and open spaces**
- **improving opportunities for informal recreation in the countryside particularly through the implementation of the Thames Chase Plan and London Riverside Conservation Park and also by improving footpaths and bridleways and the links between open spaces, the urban areas, the open countryside and the Thames including a continuous Thames Path**
- **supporting implementation of the following initiatives**
  - **Green Grid**
  - **Green Arc**
  - **London Outer Orbital Loop**
  - **Blue Ribbon Network.**

## **REASONED JUSTIFICATION**

- 1.1 Access to informal and formal recreation and leisure opportunities are important to the quality of life of all age groups. Not only are these sources of enjoyment but also impact on other aspects of quality of life, for example the health benefits of formal and informal recreation and the education benefits to children of creative play.

### **Meeting the need for leisure and recreation activities**

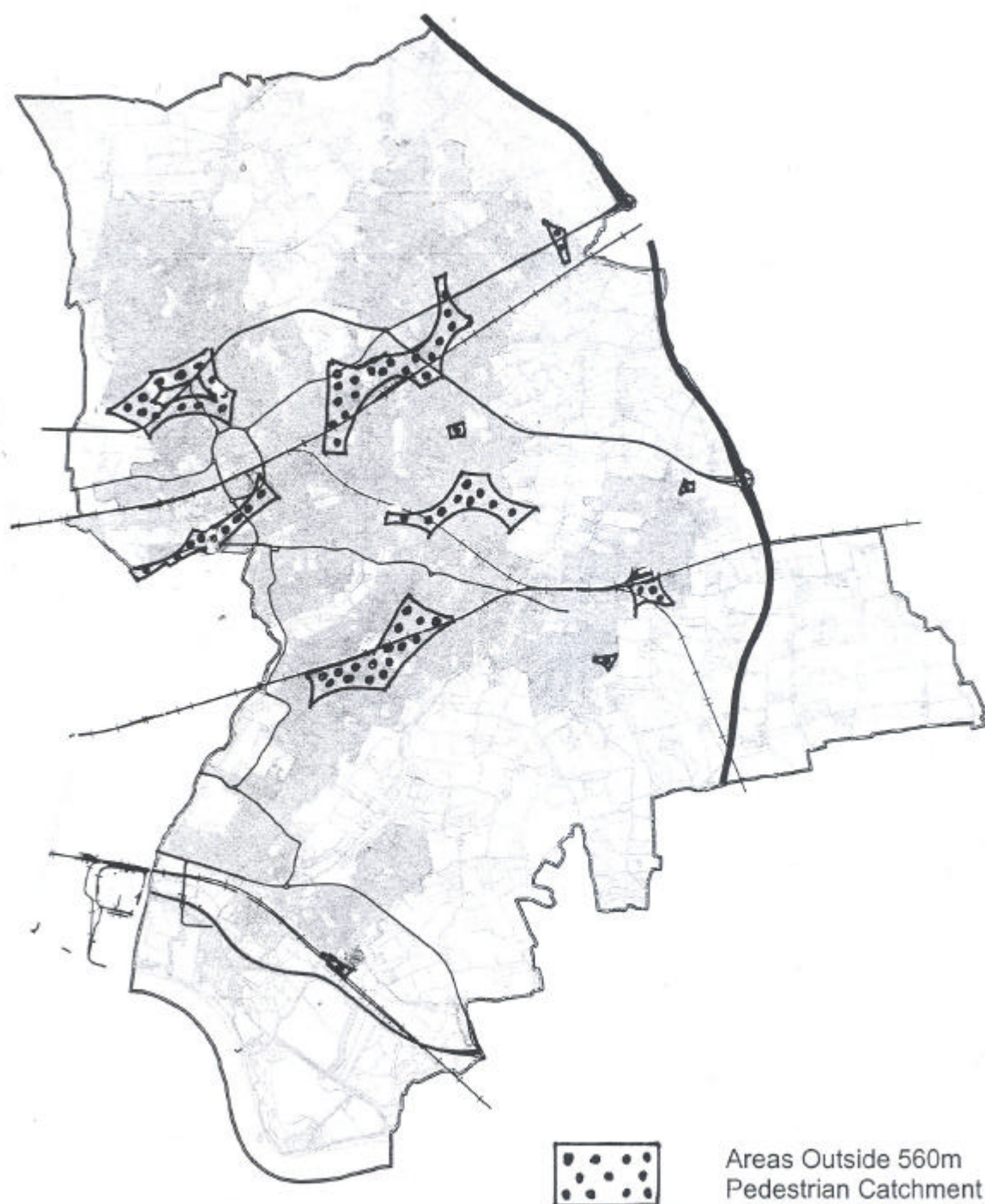
- 1.2 In line with PPG17 the Council has completed an Open Space and Sports Needs Assessment.<sup>43</sup> This shows that Havering has a relatively good quantity of public parks but that there are local pockets of deficiency across the borough, in particular there are significant areas which are deficient in access to dedicated children's play areas. Figure 1 (page 77) shows deficiencies in general terms - a more detailed assessment of deficiency will be undertaken in individual cases where necessary. In terms of sports facilities, the assessment identifies that up to 2016 there will be a need for up to twenty

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<sup>43</sup> Havering Open Space and Sports Needs Assessment, LB Havering, 2005

junior football pitches, two additional artificial turf pitches and three additional sports halls.

**Figure 1 - Indicative Open Space Deficiencies (presentation to be improved)**



- 1.3 In line with PPG17, the Council's aim is to promote equality of access to leisure and recreation facilities by remedying identified deficiencies. It will

seek to achieve this by retaining existing open space, sports and recreation buildings unless a comprehensive assessment shows them to be surplus to requirements. Where a space or facility is surplus to specific requirements the Council will, where necessary, seek to remedy deficiencies in other types of provision. For example where there is an identified surplus in one type of open space or sports and recreational facility but a deficit in another type, planning conditions or obligations may be used to secure part of the development site for the type of open space or sports and recreational facility that is deficient.

- 1.4 In appropriate circumstances the Council will also seek to address deficiencies identified in the assessment through developer contributions, the balance of open space provision and dual use of educational sports facilities.

**Countryside recreation**

- 1.5 The majority of Havering's countryside is within the Green Belt apart from Rainham Marshes. The Green Belt along with the Marshes encircle the built up areas of the borough in the west, north and east. They have helped maintain a valuable recreational resource on the metropolitan edge, through the Country Parks and the Thames Chase Community Forest and the network of public footpaths and bridleways and 'Green Chains' which extend between them and connect them to the urban area.
- 1.6 The Thames Chase covers 70% of the Green Belt in the Borough including 400 hectares of tree cover. The Thames Chase Plan sets out information and policies/proposals concerning the Community Forest. The Council supports the aims of the community forest project which include increasing the amount of woodland and the creation of recreation opportunities including enhancing access to the countryside using the Greenways concept which provide for walking, cycling, and in some instances horse riding, linking built up areas with the countryside and major areas of open space. The Council will look to support the implementation of the Thames Chase Community Forest through the planning system by seeking to ensure that developments located within it make a positive contribution to it. This includes the restoration of minerals extraction sites.
- 1.7 The London Plan identifies that Rainham Marshes and riverside open space should be planned to provide a regionally important environmental and leisure asset for East London.<sup>44</sup> This is called the London Riverside Conservation Park which the Council is supporting the implementation of. It incorporates the Nature Reserve on the Site of Special Scientific Interest and the land south of Coldharbour Lane which is currently being used for waste disposal and employment uses. This is included as a Site Specific Allocation.
- 1.8 The Council will also support the many initiatives which are working towards improving accessibility to and the quality of recreation facilities. These include

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<sup>44</sup> London Plan, paragraph 5.74, GLA, 2004

The Green Grid. The aim of this project is to create a strategic network of interlinked multi-functional high quality open spaces to connect residential areas, major employment areas, town centres, public transport nodes, leisure and recreation uses, the Green Belt and the Thames

The Green Arc. This initiative promotes the positive management and use of the urban fringe to provide a good quality environment for people and wildlife.

London Outer Orbital Loop. This is a 150 mile long path linking the London Boroughs along the city's green edge. It will provide a country walk experience whilst still keeping London facilities close to hand.

Blue Ribbon Network. In Havering this network comprises the Thames, the rivers Rom, Beam and Ingrebourne (including culverted sections), reservoirs and lakes. The London Plan promotes the use of these water-related spaces for a variety of sustainable uses including transport, recreation (including waterside activities), natural habitats and flood storage or protection.

## **FURTHER POLICY AND GUIDANCE**

1.9 More detail on implementation of this policy is provided in the Generic Development Control Policies and supporting guidance

- Havering Open Space Strategy, LB Havering, 2006
- Havering Draft Sports and Physical Activity Strategy, LB Havering, 2006
- Havering Draft Parks and Open Spaces Strategy, LB Havering, 2006
- Havering Cycling Strategy, LB Havering, 2006
- Havering Walking Strategy, LB Havering, 2006
- Havering Local Implementation Plan, LB Havering, 2006
- Thames Chase Plan 2000

## **MONITORING**

<b>Ref</b>	<b>Indicator</b>	<b>Target</b>	<b>Source</b>
AMR42	Number of open spaces with Green Flag Award	Green Flag award for at least 1 open space per annum	Sustainability Appraisal (SEI)

AMR43	Access to local open space: catchment based on maximum walking distance.	Accessibility of local open space catchment coverage in urban areas	Sustainability Appraisal (SEI)
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## **COMMUNITY NEEDS**

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**CP8 - COMMUNITY FACILITIES**

**The Council will work in partnership with other bodies to ensure that a suitable range of community facilities are provided to meet existing and forecast demand by:**

- **ensuring major developments provide facilities to meet new demand, especially in London Riverside and Romford town centre, where significant growth in the number of residents is planned**
- **ensuring all new community facilities are located in places that are accessible by a range of transport, including walking and cycling, and that the development itself is accessible to all groups**
- **retaining or re-providing community facilities where a need exists**
- **allowing the development of essential community facilities necessary to meet the specific needs of the community on non-allocated land and involving the net loss of existing housing.**

## **REASONED JUSTIFICATION**

### **1.1 “Community facilities” include:**

- education facilities;
- health and medical centres;
- residential care and day care facilities;
- childcare facilities (including private nurseries);
- community centres and halls;
- places of worship; and,
- cemeteries and crematoria.

1.2 Community facilities have a major influence on the quality of life for local residents and can help foster community identity and reduce social exclusion. However improving quality of life depends on more than the provision of new facilities. Environmental management and transport policies for example will help improve air quality which is a major contributor to spatial health inequalities. Similarly policies focused on design, culture and heritage will help improve the built and natural environments and will help make walking and cycling more attractive with attendant physical and mental health benefits. Nevertheless the provision of community facilities remains a vital component in improving quality of life and therefore in line with PPS1 and the London Plan, this policy seeks to reduce social inequalities and address accessibility both in terms of location and access for all members of the community to health, education and social facilities.<sup>45 46</sup> To achieve this the Council is committed to working in partnership with the other agencies across the public, private and voluntary sectors which are charged with their delivery.

1.3 Demographic changes in Havering are likely to increase not only the need for community facilities but lead to the need for different types of community facilities than have previously been provided. Whilst demographic changes will be complex and have a number of implications for the delivering of community services and facilities, it is possible to identify three main trends which the Core Strategy will need to plan for in particular:

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<sup>45</sup> Planning Policy Statement 1, Delivering Sustainable Development, ODPM, 2005

<sup>46</sup> Policy 3A.15, London Plan, GLA, 2004

- An aging population and significant forecast increase in the numbers of people over 85 years old
- An increasing birth rate but falling school rolls
- Overall population growth with increasing ethnic diversity and mix of faith groups

Planning for an ageing population

- 1.4 Havering's Supporting People Strategy, Housing Strategy and emerging Strategy for Housing Support and Housing Options for Older People aim to address the challenges faced by Havering's aging population.
- 1.5 Whilst the challenges are complex and varied, in summary their spatial impact is that more older people will be cared for in their own homes with a related greater need for day care facilities and extra care services. However, there may still be a need for sheltered housing, particularly in the private sector, due to the overall increase in the numbers of elderly people and for those older people looking to downsize to a smaller property. This will need to address the fact that many older people prefer 2 rather than 1 bed accommodation.

Planning for an increasing birth rate

- 1.6 There are two trends that need to be planned for regarding young people. Data for the period up to 2021 shows that there will be an increase in the number of 0-4 year olds. This will lead to an increased need for pre-school childcare provision. Havering Council is implementing a number of Children's Centres which are designed to deliver services for families with young children up to the age of five. It plans to delivered eleven across the borough by 2011. Government guidance states that a Children's Centre should be a building 'ideally on or close to a primary school site and within pram-pushing distance of the community it serves'. As well as the need for new build facilities demand may also be met through childminding from home or through the conversion of existing premises as outlined in PPG4.<sup>47</sup> Crèches within the workplace can help remove barriers for parents, especially single parents, to enter employment.
- 1.7 At the same time the number of school age children is forecast to decline with a shift between the population of primary and secondary school aged pupils. Therefore, the cumulative impact of new housing development in the borough is unlikely to have a significant effect on education needs except for in London Riverside.<sup>48</sup> However the way schools are used is changing. The Government is promoting the concept of extended schools which will provide a range of services and activities, often beyond the school day, to help meet the needs of children, their families and the wider community. The Government wants to see strong links between extended schools and Children's Centres.

Planning for an increasing population

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<sup>47</sup> Planning Policy Guidance Note 4, Industrial and Commercial Development and Small Firms, ODPM 1992

<sup>48</sup> Havering School Organisation Plan 2003-2008, LB Havering

- 1.8 Havering's forecast growth in population will impact on the delivery of all types of community services and facilities particularly in the two main growth areas in Havering; Romford Town Centre and London Riverside. Without these growth areas Havering's population would decline through the period of the plan, and exhibit an even more marked aging trend.
- 1.9 The characteristics of Havering's new population are likely to differ from the existing population in a number of ways. Most significantly in terms of service delivery, it will be younger, more ethnically diverse, and households will be smaller.
- 1.10 In planning for the needs of new and existing residents it is important to recognise and remedy deficiencies in current provision. For example, the quality of GP premises locally is an issue as many premises are below the acceptable standard and have long patient lists. There are also significant spatial inequalities in people's health across the borough. The Council is committed to working in partnership with the Havering Primary Care Trust to transform healthcare by improving access to and the quality of GP premises through the NHS Local Improvement Finance Trust Programme. This has already provided new facilities in Harold Hill and Cranham, with new centres planned or proposed in South Hornchurch, Rainham and Romford to meet the needs of existing and new populations.
- 1.11 A comprehensive remodelling of Havering's hospitals is also underway. The new Oldchurch Hospital is scheduled to open in 2007 and will incorporate acute services from Harold Wood which will be redeveloped for intermediate care use.
- 1.12 A different challenge is faced in the education sector. As noted above, whilst population increases are likely to offset falling school rolls, in London Riverside there is likely to be a need for increased education provision and the Council will ensure that adequate provision is made through the planning process. The same is true for pre-school childcare. The low levels of further education take-up also need to be addressed so that more Havering residents in the future participate in further and higher education and lifelong learning, so that Havering residents improve their skills and qualifications, as well as extending their personal development at all stages of life.
- 1.13 The Council recognises that providing new community facilities can be difficult as they can be lost to, or crowded out by, competing higher value land uses. This is particularly true for smaller scale community facilities such as community halls and places of worship. Therefore, the Core Strategy introduces some flexibility to ensure new community facilities can be provided whilst ensuring they are located in accessible places, and seeks to ensure that community facilities continue to serve residents needs.

## **FURTHER POLICY AND GUIDANCE**

1.14 More detail on implementation of this policy is provided in the Development Control Policies and supporting guidance

- Local Implementation Finance Trust, Havering PCT
- Havering School Organisation Plan 2003 - 2008 and Addendum for 2004, LB Havering, 2004
- Educational Needs Generated by New Development SPD

## **MONITORING**

<b>Ref</b>	<b>Indicator</b>	<b>Source</b>
44	Amount of land developed by employment type – social and community facilities	Local output
45	Amount of land developed for social and community facilities on previously developed land	Local output
46	Supply of land for social and community facilities	Local output
47	Amount of land for social and community facilities lost to other development	Local output
48	Percentage of local authority buildings fully accessible for people with disabilities	Sustainability Appraisal
49	Average size of GP patient lists	Sustainability Appraisal
50	Visits to public libraries	Sustainability Appraisal

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# **TRANSPORT**

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## **CP9 - REDUCING THE NEED TO TRAVEL**

**The need to travel will be reduced by:**

- **co-locating major trip generating retail, services, cultural, office, and community uses in places with good public transport accessibility**

- **ensuring that new development reinforces the town centre hierarchy**
- **relating residential densities to public transport access and the character of existing development**
- **ensuring that there is a range of local employment opportunities, that local people are suitably skilled to compete for these and maximising the employment of local people in new development.**

## **REASONED JUSTIFICATION**

- 1.1 Transport for London (TfL) has set statutory transport targets for the implementation of the Mayor of London's Transport Strategy which boroughs are expected to meet in planning transport locally.<sup>49</sup>
- Between 2001 and 2011, an absolute reduction in weekday traffic of 15% in central London, zero growth across the rest of inner London, and a reduction in growth in outer London by a third (6% growth), with the aim of achieving zero growth in outer London town centres
  - A reduction of 40% in number of persons killed and seriously injured
  - Maintain or increase the proportion of personal travel made by means other than car.
  - Achieve an increase of at least 80% in cycling in London between 2001 and 2011.
- 1.2 In line with PPG13 and the London Plan, this policy in unison with Havering's Local Implementation Plan (LIP) seeks to deliver these targets by integrating planning and transport to reduce the need to travel.
- 1.3 Havering's Local Implementation Plan (LIP) is a programme of action to improve transport which is to be taken forward from 2005/06-2010/11. LIP priorities are in line with the Mayor of London's Transport Strategy and are focused on delivering these targets. It is based on the twin principles of seeking to reduce the need to travel and to give people a choice of transport modes that are convenient, sustainable and reliable.<sup>50</sup>
- 1.4 Consequently, Core Strategy policies on retailing, services, culture, and community facilities direct such uses to town centres by introducing more flexibility about the uses which are allowed within the fringe areas of town centres in comparison to the previous Havering UDP, and relating these uses according to where each centre sits within the town centre hierarchy, and the role and function of each.<sup>51</sup> Similarly, the housing policies encourage higher density residential development in town centres in recognition of the greater convenience and public transport accessibility such locations enjoy. The aim is that this will encourage mixed use, multi-functional developments which enhance the vitality and viability of the borough's town centres. It will help

<sup>49</sup> London Transport Strategy, GLA, July 2001

<sup>50</sup> Havering Local Implementation Plan, LB Havering, September 2006. This is a programme of action to improve transport from 2005/06-2010/11, whose priorities are in line with those of the Mayor's of London's Transport Strategy.

<sup>51</sup> Havering Unitary Development Plan, LB Havering, 1993

reduce the need to travel by enabling people to do a number of things in one trip instead of having to make separate journeys, and by providing day to day facilities in convenient and accessible locations to where people live. This will also help increase the attractiveness of walking and cycling and the use of public transport in favour of less sustainable forms of transport.

- 1.5 Whilst the overall aim of this policy is to reduce the need to travel by all forms of motorised transport, the policy in line with the Mayor of London's Transport Strategy and London Plan recognises that many more people will continue to use their cars for travel in the outer London suburbs than in inner London where public transport accessibility and capacity is much higher.
- 1.6 Increasing employment opportunities locally can also help reduce the length of journeys local people make. Around 50% of Havering's residents commute to work outside the borough taking advantage of Havering's good road rail and bus links with surrounding areas. Consequently journey to work times in Havering are longer than the national average and significantly longer than the London average.<sup>52</sup> This indicates a lack of suitable local job opportunities or an inability of local people to access these. At the same time it may also reflect the choice people make when balancing access to employment and the quality of the residential environment they live in.

## **FURTHER POLICY AND GUIDANCE**

- 1.7 More detail on implementation of this policy is provided in the Development Control Policies and supporting guidance
- Havering Local Implementation Plan

## **MONITORING**

<b>Ref</b>	<b>Indicator</b>	<b>Source</b>
51	Annual changes in traffic levels in Borough to/from Romford Town Centre	Sustainability Appraisal

## **CP10 - SUSTAINABLE TRANSPORT**

**A choice of sustainable transport modes where travel is necessary will be promoted by:**

- **achieving integration and convenient interchange between different transport modes**

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<sup>52</sup> <http://neighbourhood.statistics.gov.uk/> Twice as many people in Havering (28%) commute over 20km to work than from any other authority in London (Hillingdon being the next highest at 15%).

- requiring the submission of a travel plan and transport assessment for proposals with significant transport implications
- ensuring that new development does not overload the capacity of the public transport network
- ensuring that new development is designed and laid out with regard to the planned and proposed improvements in public transport which the Council will continue to lobby and seek funding for, in particular:
  - East London Transit
  - Crossrail Line 1
  - Improvements to the C2C railway line from London to Southend via Rainham and Upminster including the new Beam Reach Station
  - General improvements to the local bus network through the London Bus Priority Network and in particular in London Riverside where bus links are vital to the achievement of sustainable communities.
- welcoming facilities which support the use of green fuels for public transport
- where appropriate relating car parking standards to public transport accessibility whilst ensuring sufficient car parking is provided for those who need to travel by car
- ensuring that developments in their design and layout are friendlier to pedestrians and cyclists and minimise the distance to local public transport nodes
- ensuring new development does not have an adverse impact on the road hierarchy
- increasing accessibility to Romford Town Centre by considering the potential to introduce a park and ride facility.
- seeking contributions for improvements to public transport accessibility and capacity and other transport improvements where this is necessary to serve the new development

## **REASONED JUSTIFICATION**

### **Improving public transport**

#### **1.1 Promoting sustainable alternatives to the car helps to:**

- Reduce congestion
- Reduce air pollution and therefore helps meet the objectives of Havering's Air Quality Management Area
- Improve conditions for local business
- Reduce the number of people killed and seriously injured on Havering's roads in line with Havering's Road Safety Plan
- Generally improves quality of life by making it easier for people to get around
- Address social exclusion and ensure equality of opportunity in terms of access to jobs, community facilities and shops.

1.2 Through Havering's Local Implementation Plan (LIP) 2005/6-2010/11 and the associated annual funding and reporting submissions the Council continues to pursue measures to improve public transport accessibility for these reasons.<sup>53</sup>

<sup>54</sup> The Core Strategy can support this approach. New development offers the opportunity to seek contributions towards improvements to public transport especially in poorly provided locations and to help create the conditions for improvements to the public transport infrastructure through the location and form of new development. Attention will be paid to ensuring that new developments do not overload the public transport network, either individually or cumulatively.

1.3 In Havering there are a number of public transport schemes at varying stages of development which this Core Strategy promotes and the Council will work with the relevant statutory authorities to secure the provision of this infrastructure:

- Crossrail. This will connect stations on the existing London Liverpool St line to central London, and beyond to Heathrow and west London.<sup>55</sup>
- East London Transit. Initially a high quality bus with potential to upgrade to tram. First phase from Ilford to Dagenham due to be completed by 2010. Extensions to Rainham and Romford and the route between Romford and Rainham are to be progressed at later stages. Bus priority will need to be designed into new developments once the precise alignment has been agreed.<sup>56</sup> This will help improve links between the north and south of the Borough but also links to the Docklands Light Railway and to the London City Airport and Olympic Park.
- Improvements to London Tilbury Southend Line. Proposed new station at Beam Park and the extension of platforms at Rainham Station to substantially increase peak time frequency and operational capacities
- Bus access improvements in the Ferry Lane/Beam Reach employment area. Important to achieving this is the proposed Rainham Creek Crossing which is an essential prerequisite to enable buses to be routed through the Rainham Employment Area
- Park and Ride. National planning guidance states that local authorities should give favourable treatment to well conceived park and ride schemes. In some circumstances it considers them as acceptable Green Belt uses. Through the LIP Havering has secured funding for a Romford Park and Ride Feasibility Study.
- Thames Gateway Bridge. This will connect Beckton to Thamesmead and will enable the East London Transit to connect to the Greenwich Waterfront Transit.<sup>57</sup>

### Car Parking

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<sup>53</sup> Havering Consultation Draft Local Implementation Plan-LB Havering-July 2005

<sup>54</sup> Havering Borough Spending Plan-LB Havering-2004

<sup>55</sup> <http://www.crossrail.co.uk/>

<sup>56</sup> <http://www.tfl.gov.uk/tfl/initiatives-projects/elt/index.shtml>

<sup>57</sup> [www.tfl.gov.uk/tfl/thames-gateway/tgw-bridge/tgb-intro.shtml](http://www.tfl.gov.uk/tfl/thames-gateway/tgw-bridge/tgb-intro.shtml)

- 1.4 Local evidence for Havering indicates that car ownership levels are related to Public Transport Accessibility Levels.<sup>58</sup> Therefore, improvements to public transport will help reduce the number of car parking spaces which are necessary to serve new development. This in turn increases the viability of public transport by freeing road space for buses, and enabling less developable land to be given over to car parking, thereby making it easier for a development to be designed around the needs of pedestrians and public transport users. This also has the advantage of minimising additional car travel, reducing trip lengths, and encouraging more sustainable forms of travel. However, it is important that the level of car parking is consistent with the level of public transport access a site enjoys, otherwise this may cause on-street parking problems, and increase social exclusion. Equally the Council recognises in line with the London Plan and the Mayor of London's Transport Strategy that many people will continue to use their cars for travel, particularly in the suburbs.<sup>59</sup> Regard also needs to be had to standards in Essex local authorities which may be more generous than Havering standards, this will be particularly important for employment uses to ensure it does not act as a disincentive to inward investment.

#### Design and layout

- 1.5 There are also a number of design considerations which new development can address to increase accessibility to public transport and between different forms of transport. In recognition of the increasing age profile of Havering's population and the significant number of people with a limiting long term illness, this policy promotes seamless integration between forms of transport and ensures that development promotes ease of access to public transport.

#### Walking and cycling

- 1.6 Walking and cycling are important and sustainable forms of transport for the 23% of Havering households who do not have access to a car. Havering's LIP encourages walking and cycling as modes of travel since they help improve health, reduce congestion and help protect the environment.<sup>60 61</sup> Havering's Walking and Cycling Strategies (adopted November 2005) include a number of measures for promoting these most sustainable forms of transport.

#### London Riverside

- 1.7 Existing industry in the area enjoys excellent road links but public transport access is poor. The provision of sustainable communities is dependent in part on the provision of major public transport investment. Public transport is the key to realising the optimal residential capacity of London Riverside for

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<sup>58</sup> <http://neighbourhood.statistics.gov.uk/>

<sup>59</sup> London Plan, paragraph 2O5, GLA, 2004 and Mayor's Transport Strategy, paragraph 4H.3, TfL, 2001

<sup>60</sup> Havering Draft Walking Strategy, LB Havering, July 2005

<sup>61</sup> Havering Draft Cycling Strategy, LB Havering, July 2005

ensuring that jobs created in this area contribute to increasing the Thames Gateway's prosperity and for maximising accessibility to the London Riverside Conservation Park and Thames Gateway Regional Casino and Entertainment Complex. It will be important to improve north to south linkages through the East London Transit and improved bus services to integrate the regeneration opportunities within London Riverside with the rest of the borough.

- 1.8 Funding is being sought for improvements to Rainham Interchange. In addition a new station at Beam Park (which is a Site Specific Allocation) is proposed, in concert with increased frequencies and capacity on the C2C line. The extension of East London Transit from Dagenham through to Rainham is also proposed.<sup>62</sup> <sup>63</sup> It is also proposed to secure a green tram in connection with the Thames Gateway Regional Casino and Entertainments Complex and London Riverside Conservation Park, connecting them with Rainham Station.

## **FURTHER POLICY AND GUIDANCE**

- 1.9 More detail on implementation of this policy is provided in the Development Control Policies and supporting guidance
- Havering Local Implementation Plan 2005/06-2010/11, LB Havering, 2006
  - London Riverside Integrated Transport Strategy, London Riverside Action Group, 2004
  - SPD Car Parking
  - Havering Walking Strategy, LB Havering, 2005
  - Havering Cycling Strategy, LB Havering, 2005
  - Crossrail Safeguarding Direction-Department of Transport- July 2004 and Channel Tunnel Rail Link Safeguarding Directions 1996.
  - Park and Ride Strategic Assessment Framework for London, Transport for London, July 2004

## **MONITORING**

Ref	Indicator	Source
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<sup>62</sup> Achieving through partnership, Havering Strategic Partnership. 2005

<sup>63</sup> London Riverside Integrated Transport Strategy, London Riverside Action Group, 2004

52	Percentage of new residential development within 30 minutes public transport time of a GP, hospital, primary and secondary school, employment and a major health centre.	Core Output (3)
53	Percentage of completed non-residential development complying with car parking standards set out in the local development framework.	Core output (3)
54	Annual modal shift from car use in borough	Sustainability Appraisal
55	Number of organisations with a travel plan pa	Sustainability Appraisal
56	Spatial variations in public transport accessibility levels	Sustainability Appraisal
57	Proportion of journeys made by foot	Sustainability appraisal
58	Proportion of journeys by cycle	Sustainability appraisal

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## **WASTE MANAGEMENT**

**CP11- SUSTAINABLE WASTE MANAGEMENT**

**The Council is committed to minimising the production of waste, increases in recycling and composting and achieving substantial reductions in the use of landfill.**

**New waste management facilities therefore will only be acceptable in Havering where they:**

- **represent the most sustainable location for the management of the waste**
- **ensure that the community or business which generated the waste is taking responsibility for its management**
- **help the waste planning authority or London waste authority where the waste arose to achieve the maximum degree of self sufficiency in managing their waste**
- **help deliver national targets for recycling and composting of waste.**

**Waste management facilities will only be allowed where they manage a proportionate amount of commercial and domestic waste arising in the East London Waste Authority Area, and result in Havering proportionally managing no more of central London's waste than any other non-central London Borough.**

**The Joint Waste Plan which Havering is producing in partnership with the London Boroughs of Barking and Dagenham, Redbridge and Newham will demonstrate the capacity for the area's waste management needs up to at least 2018.**

## **REASONED JUSTIFICATION**

- 1.1 With regard to European Directives, the National Waste Strategy and PPS10, the London Plan encourages an increase in waste minimisation, recycling, composting and the development of new mechanical and biological treatment in preference to any increase in mass burn incineration capacity, and substantial reductions in the use of landfill.<sup>64 65 66</sup>
- 1.2 The London Boroughs of Barking and Dagenham, Havering, Newham and Redbridge have indicated in their Local Development Schemes that they intend to produce a Joint Waste Development Plan Document.
- 1.3 In line with PPS10, the Joint Waste Plan will seek to identify enough sites and areas to provide 10 years capacity to manage the waste management needs for the four boroughs.<sup>67</sup> Following the advice in PPS10 and PPS12 and the accompanying best practice guidance, it will test a number of options for meeting waste capacity requirements through the sustainability appraisal

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<sup>64</sup> Landfill Directive 1993/31/EC

<sup>65</sup> Waste Framework Directive 2000/60/EC

<sup>66</sup> Waste Strategy 2000 for England and Wales, DEFRA, 2000

<sup>67</sup> PPS10 Planning for Sustainable Waste Management, Para 17 and Annex E, ODPM, July 2005

process, based on a robust analysis of available data and information.<sup>68 69</sup>

This policy sets out the broad principles which in advance of the production of the Joint Waste Plan it is possible to identify in line with PPS10 and the London Plan and draft Alterations to it.

- 1.4 One of the key means of minimising the production of waste is to ensure communities take more responsibility for the management of their own waste, rather than dumping it elsewhere, out of sight and out of mind. For this reason draft early alterations to the London Plan identify that two key objectives for the spatial distribution of waste facilities are that:

- Waste should be disposed of in one of the nearest appropriate locations
- Communities should take more responsibility for the management of their own waste

It also clarifies that boroughs within central London must seek to achieve a maximum degree of self-sufficiency.<sup>70</sup> Therefore this policy has been framed around these principles of self-sufficiency and proximity. Havering Council wholeheartedly supports this approach. For too long Havering has been the dumping ground for waste from other London Boroughs. This has left a legacy of environmental degradation in London Riverside. Maintaining this trend would not only be unsustainable but would also run counter to government and London Mayoral objectives for regeneration in London Riverside, deter investment, and undermine the work of the London Thames Gateway Development Corporation. Havering is, therefore, committed in line with draft alterations to the London Plan to achieve the maximum degree of self-sufficiency possible in order to contribute to sub-regional self sufficiency.<sup>71 72</sup> The Council, in partnership with the East London Waste Authority (whose boundaries are coterminous with the sub-region) have made substantial progress in achieving this.

- 1.5 The Draft Early Alterations to the London Plan Alterations recognise that Central London will find it especially difficult to manage all its waste, however it expects boroughs within Central London to achieve a maximum level of self-sufficiency.<sup>73</sup> Havering accepts therefore that some waste from central London may require managing outside it but with regard to the principles set out in this policy the Council considers that the onus should be on all London Boroughs to take their fair share of this excess waste.

## **FURTHER POLICY AND GUIDANCE**

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<sup>68</sup> Planning for Sustainable Waste Management: Companion Guide to PPS10, ODPM, November 2005.

<sup>69</sup> PPS10 Planning for Sustainable Waste Management, Para 4, ODPM, July 2005

<sup>70</sup> Draft Alterations to the London Plan, Paragraph 4.10g, GLA, October 2005

<sup>71</sup> Draft Alterations to the London Plan, Paragraph 4.10h, GLA, October 2005

<sup>72</sup> In line with paragraph 9 of PPS10 'Planning for Sustainable Waste Management' the sub-region comprises the London Borough's of Barking and Dagenham, Havering, Newham and Redbridge

<sup>73</sup> Draft London Plan Alterations, Paragraph 4.10j, GLA, October 2005.

- 1.6 More detail on implementation of this policy is provided in Development Control Policies and the Joint Waste Development Plan Document. Indicators will be included in the Joint Waste Development Plan Document.

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# **MINERALS**

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## **CP12 - USE OF AGGREGATES**

The use of primary won minerals in redevelopments should be minimised by:

- where practicable recycling and re-using aggregates on site
- encouraging the use of acceptable substitute or recycled materials in place of primary minerals
- re-use of aggregates.

### **REASONED JUSTIFICATION**

- 1.1 National guidelines forecast that 23% of aggregates supply will come from recycled sources. To help achieve this the London Plan aims to ensure boroughs meet the strategic target of:

- 80% re-use of construction and demolition waste
- 60% re-use of that waste as aggregates in London by 2011<sup>74</sup>

### **FURTHER POLICY AND GUIDANCE**

- 1.2 More detail on implementation of this policy is provided in the Development Control Policies and supporting guidance

- Controlling the Environmental Effects of Recycled and Secondary Aggregates-ODPM 2000

### **MONITORING**

<b>Ref</b>	<b>Indicator</b>	<b>Source</b>
59	Production of secondary/recycled aggregates.	Core Output

## **CP13 - MINERALS EXTRACTION**

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<sup>74</sup> National and Regional Guidelines for Aggregate's provision in England 2001-2016, ODPM, 2000

**The Council recognises the strategic need to supply the construction industry with aggregates and with regard to the current supply position will make an appropriate contribution to the need to make provision across London for an average output of 1 million tonnes per year.**

**The Council will balance this consideration against the need to ensure that any mineral extraction in Havering does not have an unacceptable impact on human health or the environment.**

**Therefore planning permission will only be granted for mineral workings where:**

- it is demonstrated to the satisfaction of the Council that the site is the most sustainable option in particular with regard to the need and intended use of the won aggregates and current and forecast annual output in Havering and other London Boroughs with regard to the East London and London landbanks**
- suitable measures and controls are sufficient to ensure there is not an unacceptable adverse impact on the environment or human health**
- the mineral workings can be restored to the highest standards using progressive restoration techniques, and secure a beneficial and acceptable after use in line with Green Belt objectives.**

## **REASONED JUSTIFICATION**

- 1.1** It is important that there is an adequate supply of raw materials to provide the infrastructure, buildings and goods that society, industry and the economy needs, and therefore it is a key component in sustaining economic prosperity. Aggregates come from a variety of sources, including marine dredged aggregates and recycling of construction waste. However, an important source of supply will remain from mineral deposits on land.
- 1.2** The Government's National and Regional Guidelines for Aggregate's provision in England 2001-2016 identifies a need for land won sand and gravel for London of 1.2 million tones per annum.<sup>75</sup> In response to this, the London Aggregates Working Party considered the resources available to meet the indicative guideline figure and recommended to the Greater London Authority that a reduced allocation of 1 million tonnes per annum to 2016 could be achieved, divided equally between east and west London. The working party also identified the potential for substantial reserves to be sourced from the Lea Valley Reservoirs, but no figures of the potential resource were available so it was decided not to include it in the apportionment. Alterations to the London Plan published in August 2005, adopted the working party's recommendations. Havering is only one of two East London Boroughs with substantial aggregates reserves, and therefore is

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<sup>75</sup> National and Regional Guidelines for Aggregate's provision in England 2001-2016-ODPM-July 2003

expected to make a significant contribution to meeting the East London apportionment.

- 1.3 Government guidance on the identification of minerals reserves is set out in MPG1 and MPG6. This requires that plans should make adequate provision for the supply of minerals, including aggregates, to make an appropriate contribution to meeting local, regional and national needs. An essential element of the guidance in respect of aggregates extraction is the maintenance of landbanks. Details of how landbanks should be calculated and maintained are set out in MPG6. MPG1 and MPG6 are due to be replaced by MPS1 and annexes later in 2006. Consultation draft Annex 1 to MPS1 on aggregates recommends the Minerals Planning Authorities (MPAs) maintain a landbank of seven years output.<sup>76</sup> Currently it is estimated that there is about 1 million tonnes of permitted reserve in Havering (including dormant sites or currently non-working sites. Given that the draft Alterations to the London Plan do not specify an annual provision target for Havering, it is not possible to calculate exactly what proportion of a seven year landbank this reserve represents. However, across London there is a need to maintain a landbank of 7 million tonnes which presents an output of 1 million tonnes per year. In East London there is a need to maintain a landbank of 3.5 million tonnes which represents an output of 0.5 million tonnes per year. It is estimated that there is currently a permitted reserve of about 2 million tonnes in east London leaving a shortfall of 1.5 million tonnes. Therefore, planning applications for new minerals extraction in Havering will be assessed having regard to the contribution they would make towards achieving this figure taking into account concurrent supply from other London Boroughs, especially those in East London. The Council will be careful to ensure that the release of Havering's minerals resources is carefully controlled to prevent oversupply.
- 1.4 Government guidance (Draft MPS1) states that MPAs should provide a clear guide to minerals operators and the public about the locations where mineral extraction may take place. MPAs are required to show areas of minerals extraction in one of two ways, either as 'preferred areas' or 'areas of search'. It is clear that MPAs that choose to only declare 'areas of search' must fully justify it in their plan, as these provide less certainty of where and when development might take place. Sites at South Hall Farm and Spring Farm Rainham have planning permission and cover the initial years of the plan inline with draft MPS1 which advises that sites with planning permission can be identified as part of the planned provision.
- 1.5 The Council intends to prepare a separate Development Plan Document to identify 'Preferred Areas' and specific sites for Minerals Extraction. In the interim the proposals map identifies the 'Areas of Search' within which applications for minerals extraction will be determined against the criteria set out in this policy and DC42.
- 1.6 The Areas of Search have been defined as the areas mapped by the British Geological Survey as containing aggregate minerals, excluding urban areas

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<sup>76</sup> Consultation paper on Annexes to Minerals Policy Statement 1. Planning and Minerals- supply of aggregates, brick clay, building and roofing stone, and onshore oil and gas, in England, Para 1.3.11 ODPM-July 2005.

and sites already extracted. No assessment has been made of the quantity of mineral present, the economics of extraction and processing or of environmental constraints. Areas of search are broad areas where mineral resources are known to exist and where applications for planning permission area expected to be made. However, there may be other sites containing mineral not falling within the identified areas, but would meet the broad criteria for extraction set out in the plan where extraction could be acceptable. All proposals will be considered against the criteria in this policy and DC42. When more detailed knowledge of resources becomes available 'Preferred Areas' and, where appropriate, specific sites will be identified in a separate Development Plan Document.

## **FURTHER POLICY AND GUIDANCE**

- 1.7 More detail on implementation of this policy is provided in the Development Control Policies.

## **MONITORING**

<b>Ref</b>	<b>Indicator</b>	<b>Source</b>
60	Production of primary land won aggregates.	Core output

# **GREEN BELT**

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## **CP14 - GREEN BELT**

**The boundary of the Green Belt is shown on the proposals map. The revised boundary has taken full account of development needs in the borough over the plan period.**

**Because of the exceptional circumstances which exist in each case, four sites have been removed from the Green Belt.**

- **Mardkye Farm (part)**
- **Whitworth Centre**
- **Part of Lot 7 Hornchurch Airfield**
- **Tay Way**

**The following three Major Developed Sites remaining in the Green Belt have been identified.**

- **St George's Hospital**
- **Cardrome**
- **Quarles Campus**

## **REASONED JUSTIFICATION**

- 1.1 More than 50% of Havering is Green Belt land and it encircles the built up areas of the borough in the west, north and east. It has proved effective in preventing urban sprawl and assisting the recycling of derelict land within the urban area and it also has helped maintain a valuable recreational resource on the metropolitan edge, particularly through the Country Parks and the Thames Chase Community Forest.
- 1.2 The preparation of the Local Development Framework presented the opportunity to review the Green Belt boundary to ensure that for the next 15 years it is defensible.
- 1.3 During the consultation process many sites have been put forward to be considered for removal from the Green Belt. These sites have been assessed against the five purposes of including land in the Green Belt set out in PPG2 and whether exceptional circumstances exist to justify their removal.
- 1.5 This policy puts forward a revised boundary which excludes those sites where the Council considers there are exceptional circumstances justifying their removal. The revised boundary takes full account of housing supply and demand issues and other development pressures, but these do not in themselves justify releasing land from the Green Belt. The four sites which have been excluded from the Green Belt are described below:

### **Mardyke Farm (part)**

- 1.6 Mardyke Farm is a large, poorly restored, and contaminated landfill site in Rainham. The approved restoration scheme is only partly implemented and

there is no provision for its completion, nor for future maintenance or public access to the land. It is adjacent to the Mardyke Estate, a large, high-rise development of 1960s Council-rented flats which is proposed for stock transfer and redevelopment by a housing association.

- 1.7 The Council proposes to remove part of the Mardyke Farm site from the Green Belt and allows its development for housing in order to secure the following exceptional benefits:
- The complete remediation of the Mardyke Farm Landfill Site, to a higher specification than would otherwise be achieved under the approved restoration scheme.
  - The creation of a high quality public open space on the retained Green Belt land, providing a mix of formal and informal parkland, open space and sports facilities, greatly improving the environment and amenity of this part of the 'Dagenham Corridor'.
  - Creation of a sustainable new community by:
    - providing a more mixed and more balanced community than could be achieved via the redevelopment of the Mardyke Estate alone, through the provision of a wider variety of dwelling tenures, sizes and types, particularly houses rather than flats
    - enabling the decanting of residents from the Mardyke Estate during its redevelopment, without recourse to off-site decanting for those residents who wish to continue living in the development .
    - making much better social provision in the form of improved public transport, shops, services and community facilities.
- 1.8 This proposal also has important synergies with the London Riverside developments.
- It will help deliver the Greening the Gateway initiative and Green Grid programme, for the benefit of new and existing communities.
  - It will increase the potential patronage of the proposed East London Transit and Beam Reach station and therefore strengthen their case for early implementation.
  - It will provide a flagship model for social regeneration and sustainable communities to serve as a catalyst for the development of other schemes in the London Riverside Area
- 1.9 The Council considers that these reasons constitute in combination exceptional circumstances justifying the removal of part of the site from the Green Belt. The amount of land removed from the Green Belt has been dictated by:
- the quantum of development necessary to deliver these exceptional benefits
  - the densities that are considered appropriate in this area

- the need for the Green Belt boundary to be defensible with regard to the pattern of existing development and the purpose of including land in it
- 1.10 In line with paragraph 2.9 of PPG2 the new road proposed to serve the new development forms the boundary of the Green Belt. More detail is provided in the related Site Specific Allocations policy.

Whitworth Centre

- 1.11 This site and the Broxhill Centre to the north of Broxhill Road are both former school sites which are currently being used as offices, in council ownership and will both become vacant in the near future. The opportunity therefore exists to deal with the future of these sites in a related and comprehensive manner which will improve the Green Belt and for this reason the Council considers there are exceptional circumstance warranting the removal of the Whitworth Centre from the Green Belt.
- 1.12 To deliver these Green Belt improvements it is proposed to demolish the buildings at the Broxhill Centre, thus forgoing any redevelopment rights that would exist if the site was allocated as a Major Developed Site. The Broxhill Centre would be developed for public open space /playing fields, including the re-provision of the redundant playing fields on the Whitworth Centre site. This would enable the Whitworth Centre to be removed from the Green Belt and developed to its full potential as part of the urban area of Harold Hill (also instead of redevelopment as a Major Developed Site). The new Green Belt boundary on the south side of Noak Hill Road would be well landscaped, and the new development would be lower and less conspicuous than the existing Whitworth Centre buildings.
- 1.13 This approach will result in the overall improvement of the Green Belt in this location by greatly increasing the open nature of the land to the north of Noak Hill Road and providing a defensible and sympathetic Green Belt boundary along Noak Hill Road. More detail is provided in the related Site Specific Allocation policy.

Part of Lot 7 Hornchurch Airfield

- 1.14 The exceptional circumstance in this case is that the site has now been developed for housing as a result of a planning permission given in 1977 and therefore it is no longer serving any Green Belt purpose.

Tay Way

- 1.15 At present the Green Belt boundary runs diagonally through the gardens of the two residential properties at the eastern end of Tay Way so that only parts of the gardens are in the Green Belt. The sites adjoin the Risebridge Golf Course and that boundary makes a more logical and defensible Green Belt boundary and constitutes the exceptional circumstance in this case.

Major Developed Sites

- 1.16 PPG2 allows limited infilling or redevelopment of major existing sites that have been identified in the Local Plan. The Council has identified three Major Developed sites in the Green Belt. The criteria set out in Annex C of PPG2 would apply to these Major Developed Sites.

**FURTHER POLICY AND GUIDANCE**

- 1.17 More detail on the implementation of this policy is provided in the relevant Development Control Policies and Site Specific Allocations.

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# **ENVIRONMENTAL MANAGEMENT**

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## **CP15 - ENVIRONMENTAL MANAGEMENT**

**To reduce their environmental impact and to address the causes and adapt to and mitigate the affects of climate change in their location, construction and use new development should:**

- **minimise their use of natural resources, including the efficient use of land**
- **reduce fluvial, tidal and surface water flood risk and manage residual risks**
- **have a sustainable water supply and drainage infrastructure.**
- **avoid an adverse impact on water quality**
- **ensure that it does not singularly or cumulatively breach air quality targets**
- **take the necessary measures to address contaminated land issues**
- **avoid a noise sensitive use being exposed to excessive noise**
- **minimise the negative impact of lighting.**

**Major new development will be required to adopt high standards of sustainable construction and design and to incorporate on-site renewable energy equipment to reduce predicted CO<sub>2</sub> emissions by at least 10%.**

### **REASONED JUSTIFICATION**

- 1.1 In line with PPS1 this policy seeks to enhance and protect the built and natural environment by taking into account environmental issues such as renewable energy; air quality and pollution; land contamination; the protection of groundwater from contamination; and noise, light pollution and climate change adaptation and mitigation.<sup>77</sup> These are briefly covered under the respective headings below and in more detail in the Development Control Policies.

#### **Sustainable Construction**

- 1.2 In line with London Plan policy 4B.6 this policy promotes a high standard of sustainable design and construction in new development.

#### **Renewable Energy**

- 1.3 In Havering in 2003 over a million tonnes of CO<sub>2</sub> were emitted, approximately 70% from buildings and 30% from transport. The UK Energy Strategy commits the Government to achieve a 20% reduction in CO<sub>2</sub> emissions by 2020. The London Sustainable Development Commission recommends the adoption of a target for the reduction of carbon dioxide emissions in London of 20 per cent from 1990 levels by 2010, as the first stage in a process that

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<sup>77</sup> Planning Policy Statement 1, Delivering Sustainable Development, ODPM 2005

would lead to a minimum target of a 60 per cent reduction in carbon dioxide emissions (relative to 2000) by 2050. In line with the London Plan and PPS22 this policy promotes the use of all forms of renewable energy where appropriate.

#### Flood risk

- 1.4 National guidance in the form of PPG25, 'Development and Flood Risk' states that planning authorities should apply the precautionary principle to the issue of flood risk, using a risk-based search sequence. Consequently the Council will adopt a sequential approach to flood risk which matches the vulnerability of land use and development type to flood risk. In all cases the Council will seek to ensure that the development is located, designed and laid out to ensure that the risk of damage from flooding is minimised, while not increasing the risk of flooding elsewhere and that residual risks are safely managed. The flood risk areas are shown on the Proposals Map and the related Development Control Policy sets out in more detail the approach to determining what types and use of development are acceptable where.

#### Water supply and drainage

- 1.5 Climate change could have fundamental effects on Havering's supply of water due to seasonal changes in rainfall levels and temperature increases. In 2005 average household water consumption in Havering and surrounding areas was around 450 litres per day and rising by 3% pa, an unsustainable trend given the lack of spare water resources capacity in the south-east. The planning by water companies is increasingly based on importing from other regions, but this is likely to have significant effects on river flows elsewhere. Therefore, in line with EC Directive (2000/60/EC), national guidance and advice from the Environment Agency this policy promotes the sustainable use of water resources, and recognises that the supply of water and sewage disposal must be taken into account in drawing up development plans.<sup>78</sup>

#### Water quality

- 1.6 An important objective of the EC Water Framework Directive (2000/60/EC) is to achieve 'good' status for all ground and surface water bodies, by 2015. At a regional level boroughs are expected to seek to protect and improve water quality to ensure that the Blue Ribbon Network<sup>79</sup> is healthy, attractive and offers a valuable series of habitats by directing refusal of proposals that are likely to lead to a reduction in water quality: Therefore it is important that new development does not have an impact on water quality and that where appropriate opportunities are taken to improve water quality, for example, in the lower parts of the Rivers Beam/Rom and Ingrebourne where water quality remains at fair, poor or even bad quality.

#### Air Quality

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<sup>78</sup> Environment Agency Water Resources Strategy

- 1.7 In 2003 the London Borough of Havering assessed air quality throughout the borough with regard to the air quality targets in the National Air Quality Strategy and the Greater London Authority's Air Quality Strategy.<sup>80</sup> These strategies set standards and objectives for eight main pollutants that are known to be harmful to health. This found that monitored and predicted levels of nitrogen dioxide and PM10 exceeded air quality objectives at certain locations, especially in the north of the Borough, and that this was almost entirely attributable to road traffic. The whole of Havering has been designated as an Air Quality Management Area, and in 2007 an Action Plan will be agreed which will set out the measures Havering intends to take to reduce levels of Nitrogen Dioxide and fine particulate matter (PM10) to acceptable levels. This strategy's approach of integrating land use and transport should help tackle air quality issues as it is focused on reducing the need to travel by promoting linked trips, reducing commuting lengths and also promoting more sustainable forms of travel. The strategy's approach to sustainable construction and renewable energy will also help reduce harmful emissions, and the strategy's approach to biodiversity will help moderate air borne pollutants. Havering Council will work with Transport for London and other agencies to ensure that development has a beneficial impact on air quality and where a development is likely to cause a breach of air quality targets the possibility of securing mitigation measures that would allow the proposal to proceed.

#### Contaminated Land

- 1.8 Contaminated land exists in Havering. As well as the industrial areas of South Hornchurch and Rainham, there are extensive current and former mineral workings and landfill sites. Allied with numerous sensitive 'receptor' sites, including sites of nature conservation importance, rivers and residential areas. The Government's objectives for contaminated land are set out in PPS23 and DETR (now DCLG) circular 02/2000,<sup>81</sup> Contaminated Land. PPS23 Planning and Pollution Control states that opportunities should be taken wherever possible to use the development process to assist and encourage the remediation of land already affected by contamination and <sup>82</sup> places the responsibility on owners and developers to establish the extent of any potentially harmful materials on their sites.

#### Noise

- 1.9 In line with PPG24 this policy aims to ensure that noise-sensitive developments are located away from existing sources of significant noise (or programmed development such as new roads) and that potentially noisy developments are located in areas where noise will not be such an important consideration or where its impact can be minimised.<sup>83</sup>

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<sup>80</sup> National Air Quality Strategy, DEFRA, 2000

<sup>81</sup> Circular 02/2000, Contaminated Land, DETR

<sup>82</sup> Planning Policy Statement 23, Planning and Pollution Control, ODPM 2005

<sup>83</sup> Planning Policy Guidance Note 24, Planning and Noise, ODPM

## **FURTHER POLICY AND GUIDANCE**

More detail on the implementation of this policy is provided in the Development Control Policies and supporting guidance

- Thames Gateway Strategic Flood Risk Assessment, ERM, 2006
- Supplementary Planning Document on Sustainable Construction
- London Renewables 'Integrating renewable energy into new developments: a toolkit for planners, developers and consultants', 2004
- LB Havering guide to 'Contamination and the Planning Process'.
- Supplementary Planning Document on Noise and Vibration Standards for Railways
- Lighting in the Countryside: towards good practice, ODPM.

## **MONITORING**

<b>Ref</b>	<b>Indicator</b>	<b>Source</b>
61	Loss of flood plain	Sustainability Appraisal (SEI)
62	Number of planning permissions granted contrary to the advice of the Environment Agency	Core Output (7)
63	CO2 emission levels by 2010	Sustainability Appraisal (SEI)
64	No. of schemes to BREEAM or Eco-Homes standards	Sustainability Appraisal (SEI)
65	% of energy generation from renewable sources	Sustainability Appraisal (SEI)
66	Renewable energy generation capacity installed by type	Core Output (9)
67	%growth in water consumption	Sustainability Appraisal (SEI)
68	% of main rivers of good or fair chemical and biological quality.	Sustainability Appraisal (SEI)
69	Concentration of 2 main air pollutants (NO2, PM10) at monitoring stations	Sustainable Appraisal (SEI)

70	Area of land remediated ready for development	Sustainability Appraisal (SEI)
71	Number of noise complaints	Sustainability Appraisal (SEI)

## **CP16 - BIODIVERSITY AND GEODIVERSITY**

**The Council will seek to protect or enhance the borough's rich biodiversity and geodiversity, in particular priority habitats, species and sites. It will increase public awareness and appreciation of biodiversity and will seek to put in place a strategic framework for the development and delivery of the London Riverside Conservation Park.**

### **REASONED JUSTIFICATION**

- 1.1 Biodiversity is the diversity, or variety, of plants, animals and other living things in a particular area or region and has social and economic value for human society.
- 1.2 In line with Planning Policy Statement 9 "Biodiversity and Geological Conservation" Planning Policy Statement 7 and the London Plan this policy aims to maintain, enhance, restore or add to Havering's rich biodiversity and geological conservation interests, and protect valued rural environmental resources.
- 1.3 The Council has the benefit of the Greater London Authority's audit of sites of nature conservation importance in Havering (March 2003). This identified 93 sites of Nature Conservation Importance in Havering. In addition Havering's Phase 1 Biodiversity Action Plan (April 2003) identifies a range of species and habitats which are either regional or national priorities. Naturally these are not confined to the designated sites, for example private gardens are a regionally priority habitat. This policy therefore not only considers the protection of identified sites of nature conservation importance but looks at enhancing biodiversity in particular priority habitats and species. The concept of wildlife corridors will be important in this as they enable wildlife to spread out from areas of high biodiversity value. The Havering Wildlife Partnership has identified seven such corridors.<sup>84</sup>
- 1.4 Even among the Outer London boroughs Havering's biodiversity is notable. Its historic parks, its river valleys and its Thames-side marshland hold a significant proportion of London's entire resource of some priority habitats. Over half the Borough is covered by protected countryside, parkland and

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84 Sites of Nature Conservation Importance Audit, GLA, March 2003

nature reserves. There are 3 designated Sites of Special Scientific Interest (SSSIs); Rainham and Wennington Marshes, Ingrebourne Marshes and Hornchurch Cutting (which is designated because of its geological importance), and also a large proportion of London's flood plains and hedgerows; at 343, the number of ponds & lakes is the largest for any London Borough. Private gardens are home to a national priority species, the stag beetle, and Havering is also the stronghold in London for two other national priority species - water voles and great crested newts.<sup>85</sup> In implementing the policy the Council will have regard to the UK, GLA and Havering Biodiversity Action Plans

- 1.5 Havering is fortunate in having the most important site for nature conservation in London at Rainham/Wennington Marsh and the Council is committed to working in partnership with the Royal Society for the Protection of Birds to create the London Riverside Conservation Park which will become an important visitor destination.
- 1.6 Havering is also covered by one of the 7 new National Forests - the Thames Chase. The Thames Chase programme has already started to transform the landscape and nature conservation value of countryside within easy reach of many Havering residents.

## **FURTHER POLICY AND GUIDANCE**

- 1.7 More detail on the implementation of this policy is provided in the Development Control Policies and supporting guidance
- SPD Biodiversity
  - Havering Biodiversity Action Plan, LB Havering, 2003

## **MONITORING**

<b>Ref</b>	<b>Indicator</b>	<b>Source</b>
72	Changes in areas designated for their intrinsic environmental value including sites of international, national, regional or sub-regional significance.	Core Output (8)
73	Losses of priority habitats (BAP): Woodland, marsh, floodplain, grassland, hedgerows, and gardens.	Sustainability Appraisal (SEI) and Core Output (8)
74	Losses of priority species (BAP): including Greater Crested Newt, House Martin, Bumble Bees.	Sustainability Appraisal (SEI) and Core Output (8)

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85 Havering Phase1 Action Plan, April 2003

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# **DESIGN**

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## **CP17 - DESIGN**

**The appearance, safety and accessibility of Havering will be maintained and where possible enhanced by requiring new development to:**

- **maintain or improve the character and appearance of the local area in its scale and design**
- **provide a high standard of inclusive design so it is accessible to those who require access to it**
- **be safe and secure in its design and contribute to community safety.**

**The Council may bring forward design codes as Local Development Documents for major development sites to achieve the aims of this policy.**

### **REASONED JUSTIFICATION**

#### Urban Design

- 1.1 Good design is not just about the architecture of individual buildings, but also the functionality and impact of the development on the overall character, beauty, quality and sustainability of an area including resource efficiency. It is pivotal in improving livability and quality of life . Successful, thriving and prosperous communities are characterised by streets, parks and open spaces that are safe, clean and attractive ‘livable’ spaces.’<sup>86</sup> Therefore, in line with PPS1 and the London Plan, this policy promotes high quality, safe and accessible design over the lifetime of a development, and encourages design which improves the character and quality of the borough.<sup>87 88</sup>

#### Accessibility

- 1.2 Access is a major issue in Havering because of the high proportion of older people in the borough, and the relatively high number of households containing someone with a physical disability. Therefore, in line with national and regional policy and the Disability and Discrimination Act this policy seeks to ensure that development meets the needs of all in society and is accessible, usable and easy to understand by them. This applies not only to buildings but the spaces around and between them.<sup>89 90 91</sup> It will be supported in this through schemes promoted in Havering’s Local Implementation Plan 2005/06-2010/11 which aims to create inclusive environments.<sup>92</sup>

#### Crime

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<sup>86</sup> Living Places, Cleaner Safer Greener, ODPM, 2002

<sup>87</sup> Planning Policy Statement 1, Delivering Sustainable Development, ODPM, 2005

<sup>88</sup> The London Plan, GLA, 2004

<sup>89</sup> The London Plan, GLA, 2004

<sup>90</sup> Planning Policy Statement 1, Delivering Sustainable Development, ODPM, 2005

<sup>91</sup> The DDA requires all public buildings to make reasonable adjustments in order to be fully accessible to all people of all ages.

<sup>92</sup> Local Implementation Plan, LB Havering, 2005

- 1.3 Whilst Havering is generally a safe borough it does have localised 'hotspots', in particular crime associated with Romford's evening economy. Therefore, the Havering, Crime, Disorder and Drugs Reduction Strategy aims to create safer environments in order to not only address the causes of actual crime but also to address the fear of crime.<sup>93</sup> To help deliver this and in line with PPS1 and 'Safer Places the Planning System and Crime Prevention', this policy places issues of community safety and crime prevention at the heart of the planning process and aims to create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion.<sup>94 95</sup>

## **FURTHER POLICY AND GUIDANCE**

- 1.4 More detail on the implementation of this policy is provided in the Development Control Policies and supporting guidance.
- Secure by Design SPD
  - By Design-Urban Design in the Planning System, DCLG, 2000
  - SPG Accessible London achieving an inclusive environment, GLA, 2005

## **MONITORING**

<b>Ref</b>	<b>Indicator</b>	<b>Source</b>
48	% of LA buildings fully accessible for people with disabilities	Sustainability Appraisal (SEI)
15	% of new homes built to Lifetime Homes standards.	Local output
75	Street crime, residential burglary and vehicle crime rates	Sustainability Appraisal (SEI)
76	Disorder call rates	Local Output

<sup>93</sup> Havering Crime and Disorder Strategy 2005-2008, LB Havering, 2005

<sup>94</sup> Planning Policy Statement 1-Delivering Sustainable Development, ODPM, 2005

<sup>95</sup> Safer Places, the Planning System and Crime Prevention, ODPM, 2005

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# **HERITAGE**

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## **CP18 - HERITAGE**

**All new development affecting sites, buildings, townscapes and landscapes of special architectural, historical or archaeological importance must preserve or enhance their character and appearance. Contributions may be sought towards the preservation or enhancement of historic assets where appropriate.**

### **REASONED JUSTIFICATION**

- 1.1 The historic environment can help foster the attainment of key social objectives, most particularly economic development, but also public health, community safety, better educational attainment, and community cohesion.
- 1.2 Havering has a wealth of heritage sites the value of which has to be taken into account when development proposals are being considered. These include 200 statutory, over 200 buildings of local historical and/or architectural interest, and 3 Scheduled Ancient Monuments. Around half of the Borough comprises Areas of Archaeological Potential. Nine Conservation Areas have been designated (3.5% of Borough) as well as an Area of Distinctive Character & other design policy areas.
- 1.3 The Council also has the benefit of some 4 decades of archaeological information. Details of statutory buildings of historical and/or architectural interest, ancient monuments, conservation areas, parks and gardens of historic interest and areas of archaeological potential are all set out in the Heritage Strategy Supplementary Planning Document. In line with Planning Policy Guidance note 16 the Council recognises that archaeological remains are irreplaceable and seeks the protection, enhancement and preservation of sites of archaeological interest and their settings.

### **FURTHER GUIDANCE**

- 1.4 More detail on the implementation of this policy is provided in the Development Control Policies and supporting guidance
  - Heritage Strategy SPD

### **MONITORING**

<b>Ref</b>	<b>Indicator</b>	<b>Source</b>
77	Number of historic buildings at risk per annum	Sustainability Appraisal (SEI)
78	Number of Conservation Areas with Appraisals and Management Plans	BVPI 219
79	Review need for Conservation Areas Borough wide	Planning(Listed Buildings and Conservation) Act 1990

# 10 Implementation and Monitoring

- 10.1 Implementing the Vision, objectives and policies of the Core Strategy will be achieved in a number of ways. Many factors are outside the direct control of those involved in the delivery of the Core Strategy for example the global economy, the climate, the threat of pandemics, and so on, but by working in partnership and by using assets, tools and funding creatively and by gathering intelligence on economic, social and environmental issues, a real and lasting impact can be made in achieving the vision and objectives of the Core Strategy. The key ways the Core Strategy will be implemented are as follows:

Working in partnership with other agents in the development planning process including at the national regional and local level

- 10.2 Key partners include:

- Havering Strategic Partnership and its constituent members:
  - Learning and Skills Council
  - Aon Group
  - Havering Association of Voluntary and Community Organisations
  - Havering Trades Council
  - Ford Motor Company
  - Metropolitan Police
  - Havering Chamber of Commerce
  - Age Concern
  - Havering Primary Care Trust
  - Barking, Havering and Redbridge Hospitals
- Greater London Authority
- Transport for London
- London Development Agency who also own significant amount of land in London Riverside.
- Thames Chase
- Havering Wildlife Partnership
- Housing Corporation
- London Thames Gateway Development Corporation (see separate sheet on page **to be inserted**)

- 10.3 The implementation of the Core Strategy will also depend on securing the involvement of the community especially those who live, work or visit the area. Havering was the first London Borough to adopt its Statement of Community Involvement and it will honour the commitments set out in this document to involving the community in the preparation of Local Development Documents and in making decisions on applications for major developments.

Policy tools

10.4 Examples of policy tools include:

- Residential Density Matrix
- Sequential Test
- Open Space Hierarchy

Planning standards

10.5 Examples of planning standards include

- BREEAM including EcoHomes
- Housing Corporation Development Scheme Standards
- Lifetimes Homes
- Secure by Design

Protection or safeguarding land or features

10.6 Examples of land or features protected in the Core Strategy include:

- Open space
- Green Belt
- Listed Buildings
- Conservation Areas
- Wharves
- Trees
- Sites of Nature Conservation Importance

Designation of land for particular uses

10.7 Examples of land designated for particular uses include:

- Main and secondary employment areas
- Core and fringe shopping areas

Other Local Development Framework documents

10.8 Other Development Plan Documents and Supplementary Planning Documents will be prepared to help achieve the vision and objectives of the Core Strategy. These are set out in Havering's Local Development Scheme. Committed DPDs including the Romford Area Action Plan, Joint Waste Plan and Site Specific Allocations Document. Local Development Documents may also include masterplans for major development sites to enable the wider involvement of the community in major schemes which effect them.

Best practice advice

10.9 Core Strategy policy signposts applicants where appropriate to best practice guides which provide more detailed advice on the implementation of policies examples include:

- The London Renewables Toolkit 2004
- By Design, Urban Design in the Planning System Towards Better Practice 2000
- Better Places to live 2001
- Safer Places the Planning System and Crime Prevention 2004
- SPD produced by Havering Council and Supplementary and Best Practice Guidance produced by the GLA

Conditions and planning agreements

10.10 Core Strategy policy may apply conditions or failing that seek to enter into planning agreements to ensure that new development is sustainable and to mitigate against adverse impacts for example:

- Affordable housing
- Community facilities
- Public transport improvements
- Education contributions
- Environmental and other qualitative improvements to town centres

Planning statements and assessments

10.11 Core Strategy where appropriate requires the submission of planning statements and assessments with planning applications to ensure the applicants have addressed certain issues set out in the Core Strategy, for example to mitigate against adverse impacts or to demonstrate that specific requirements have been met. Examples include:

- Design and access
- Transport
- Travel Plans
- Energy
- Flood Risk

Funding

10.12 Funding will be important in implementing the Core Strategy asides from funding secured through planning agreements other sources include:

- Housing Corporation Funding
- Transport for London Funding
- Community Infrastructure Fund
- London Development Agency Funding
- London Thames Gateway Development Corporation Funding
- Cleanaway Landfill Trust Funding
- European Union funding

Compulsory Purchase

10.13 Havering Council and the London Thames Gateway Development Corporation have compulsory purchase powers. Compulsory Purchase Powers (CPOs) are an important tool to use as a means of acquiring land needed to help deliver social and economic change. CPOs can help bring about urban regeneration, the revitalisation of communities and the promotion of business leading to improvements in quality of life. Examples of this include:

- Where there is a need for a comprehensive redevelopment of an area where there are a number of separate landowners
- Where a property has fallen into disrepair and it seems unlikely that the owner intends to refurbish it.

Monitoring

10.14 Monitoring is a vital tool in ensuring the Core Strategy is being implemented as intended. Havering Council produces an Annual Monitoring Report which includes a framework of over 50 indicators and targets against which the effectiveness of Core Strategy policies can be measured against. These indicators and targets come from a number of sources including Core Output Indicators set by the Government, Local Output Indicators and Significant Effects Indicators (SEI) set by the Council. The SEI are drawn from the Sustainability Appraisal Framework which is set out in the Core Strategy Sustainability Appraisal Scoping Report. The SEIs enable the sustainability impacts of the Core Strategy to be assessed. The Local Output Indicators are locally defined indicators focused on monitoring those aspects of the Core Strategy which impact on spatial planning and expressed in local strategies for example the Housing Strategy, Supporting People Strategy, Local Implementation Finance Trust, Havering Biodiversity Action Plan, Thames Chase Plan and Local Implementation Plan. These indicators and targets are provided against the relevant Core Policies in chapter 11. Where the Annual Monitoring Report reveals a policy is not being implemented as intended, it can be reviewed and amended as appropriate through revisions to the Core Strategy.

10.15 Underpinning this monitoring framework is a robust evidence base including:

- Havering Employment Land Study 2006
- Havering Retail and Leisure Study 2006
- Havering Open Space and Sports Study 2005
- London Housing Capacity Study 2005
- Havering Housing Needs Survey Update 2006

10.16 These will be reviewed on average every five years and these detailed assessments will augment the data in the Annual Monitoring Report.

10.17 Internal working groups will also help the implementation and monitoring of Core Strategy policy. These enable core strategy policy to be communicated widely, and the impact of policy and related obligations to be assessed on individual schemes and regeneration areas. Examples include:

- S106 Working Party
- Corporate Housing and Planning Group
- Major Development Group
- Regeneration Group

**London Thames Gateway Development Corporation**

1. London Thames Gateway Development Corporation has been established as a special purpose vehicle to deliver jobs and housing as part of the Government's Sustainable Communities Plan. Its boundary is shown on the next page. The statutory objective and powers of the Development Corporation are set out in s.134 and 135 of the Local Government Planning & Land Act 1980.
2. It is a public body, funded by the Department for Communities and Local Governments ("DCLG") and governed by an independent board of directors, appointed by the Secretary of State.

**Statutory Purpose**

3. The purpose of the Development Corporation is to secure the regeneration of its area by:
  - bringing land and buildings into effective use;
  - encouraging the development of existing new industry and commerce;
  - creating an attractive environment;
  - ensuring that housing and social facilities are available to encourage people to live and work in the area.

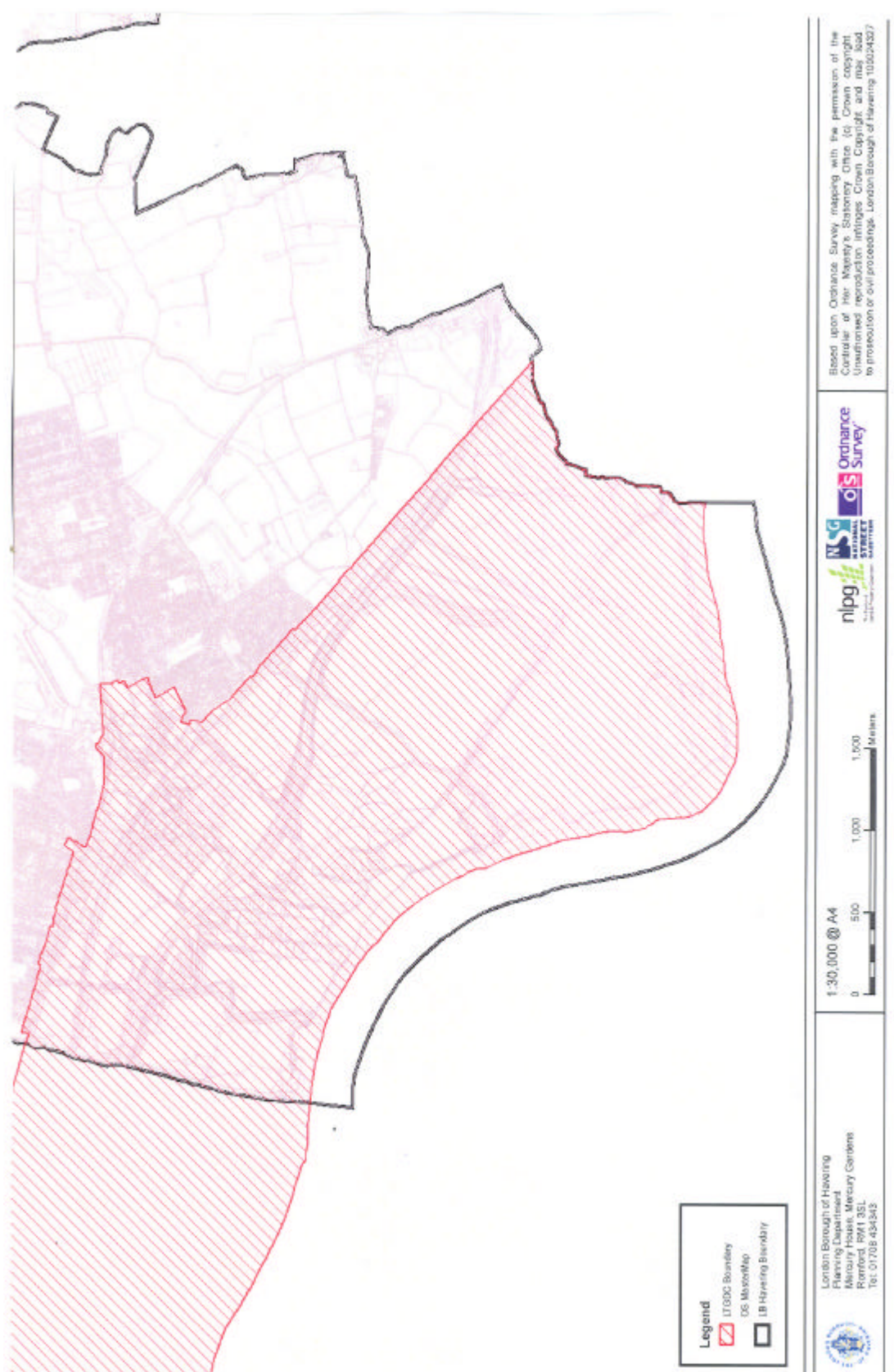
**Powers**

4. For the purpose of achieving regeneration of its area, the Development Corporation can:
  - acquire, hold, manage, reclaim and dispose of land and other property;
  - carry out building and other operations;
  - seek to ensure the provision of water, electricity, gas, sewerage and other services;
  - provide funding to organisations whose activities meet our operational objectives, and,
  - undertake any appropriate activity which may underpin the regeneration of the London Thames Gateway area.

**Planning Powers**

5. An Order giving the Corporation substantial development control powers within its territory (with the exception of Stratford City and the Olympic zone), has been in effect since 31/10/05.
6. It establishes the Corporation as the local planning authority for key strategic applications relevant to its purpose (householder and minor applications remain with the relevant Boroughs).
7. Plan making powers remain with the local authorities but the Development Corporation will produce its own Regeneration Frameworks which will take into account Local Development Frameworks and the Mayor's London Plan.

**Figure 2 - Boundary of Development Corporation**



# 11 Development Control Policies

- 11.1 These development control policies provide detailed guidance on the criteria against which planning applications will be determined. All applications for planning permission must satisfy all the relevant policies of the Core Strategy and therefore applicants are advised to consult the list of policies provided in Section 12 to identify which development control policies are of relevance to their application. This includes development control policy DC72 which sets out the items the Council may seek in connection with a planning application with regard to the tests set out in Circular 05/05. Where necessary the development control policies include information on how they will be implemented. Please note that a number of development control policies will simply be implemented through the application of that policy.

## **PLACES TO LIVE**

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### **DC1 - LOSS OF HOUSING**

**Planning permission resulting in the net loss of existing housing will only be granted where:**

- **it involves the provision of essential community facilities for example, health and education, which are necessary to meet the specific needs of the community**
- **the proposal is necessary to deliver mixed and balanced communities.**

### **REASONED JUSTIFICATION**

- 1.1 Due to the high levels of housing need and demand for new housing it is important that existing housing is retained. Otherwise more new homes may need to be built to compensate for this which is clearly unsustainable. However loss of existing housing may be justified in the circumstances set out in the policy. With regard to the provision of community facilities proposals must also satisfy policy DC26.

### **DC2 - HOUSING MIX AND DENSITY**

**Planning permission will only be granted for new housing if a design led approach is adopted in determining the type, size, and form of new development with regard to:**

1. **The type and size of new housing required to meet local and sub-regional housing needs with regard to creating mixed and balanced communities. The indicative mix for market housing is provided below; policy DC6 provides details of the indicative affordable housing mix.**

<b>Market Housing Mix</b>				
<b>Bedrooms<sup>96</sup></b>				
<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5+</b>
<b>24%</b>	<b>41%</b>	<b>34%</b>	<b>0</b>	<b>1%</b>

2. **The densities set out in the density matrix**

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96 Figure 90: Net 10-year Housing Requirement by Property Type and Size, GLA Housing Requirements Study, 2004

				Car parking provision	high 2-1.5 spaces per unit	moderate 1.5-1 space per unit	low less than 1 space per unit
				Predominant existing housing type	Detached Semi and Terraced houses	Terraced houses and flats	Mostly flats
LOCATION	PLAN	PTAL	PTAI	SETTING	UNITS PER HECTARE		
Romford pedshed	1 (1a-1c)	5-6	20.01>	Central (Area within Solid line)			240-435
				Urban (Area between dotted line and solid line)		55-175	165-275
				Suburban		50-110	80-120
Upminster Hornchurch Upminster Bridge	2 3 (3a-3b) 3 (3c)	3-4	10.01-20	Urban (Area within solid line)	30-65	50-110	80-150
Gidea Park Harold Wood Elm Park	4 5 6			Suburban (Area between dotted line and solid line)		50-80	
Rest of Borough	All areas not covered by maps 1-6			Urban (Harold Hill and Collier Row District Centres)		50-80	
		1-2	0-10	Suburban (All areas outside the PTAL Zones and Harold Hill and Collier Row District Centres)	30-50		

In the following circumstances, densities of higher than 30-50 units per hectare outside the Public Transport Accessibility Zones (PTAL) in the rest of the borough may be acceptable:

- on large development sites, development briefs may be prepared which encourage higher densities
- where the existing use is non-conforming or bad neighbour
- on sites which are adjacent to the PTAL Zones, their PTAL value will be calculated on a case by case basis, and the appropriate density range set accordingly
- for new 'special-purpose' residential development intended for permanent occupation by the elderly.

Residential developments will only be permitted with less than one car parking space per unit where on-street car parking can be controlled through a Controlled Parking Zone. In these circumstances, residents of new flatted development will be ineligible for residents parking permits, unless they are a holder of a Disabled Persons Badge. This will be achieved through the use of a S106 agreement, and include successors in the property title and apply to all residents living in the property.

Within the Emerson Park or Hall Lane Special Policy Areas the density matrix does not apply. These areas have special policies formulated to ensure that their existing special character of large units in generous

**landscaped plots is retained and to ensure that an adequate stock of this type of housing is maintained to attract high earning private and public sector professionals in the borough. For similar reasons neither does it apply to the Gidea Park Conservation Area or Gidea Park Special Character Area.**

**As existing PTALs are low, residential densities in London Riverside will be determined with regard to future PTAL which are expected to rise due to planned and proposed public transport improvements.**

**As London Plan policy in estate renewals requires at least the equivalent reprovision of affordable housing floorspace the matrix would not be applied in estate renewal schemes.**

**Residential amenity space standards are set out in the Supplementary Planning Document on Residential Density and Amenity.**

## **REASONED JUSTIFICATION**

### Housing mix

- 1.1 The design and layout of new housing should be determined first and foremost by the range of housing types and tenures needed to meet local and sub-regional housing need. New developments should widen housing opportunity and choice and create mixed and balanced communities, in particular family accommodation. The Council intends to prepare and adopt a Housing Market Assessment Supplementary Planning Document. Until this study is adopted the Council will have regard to Havering's Housing Need Survey Update 2006 and the GLA Housing Requirements Study in implementing this policy. Policy DC6 covers the required mix for affordable housing.

### Housing density

- 1.2 It is important that the type and size of new housing needed to meet housing need makes efficient use of brownfield land. Therefore developers should take a design led approach to determining densities so that residential developments achieve densities appropriate to their accessibility to public transport, and the local context with regard to the principles of good design. To enable this, applicants should follow the density matrix set out in the policy which identifies the density ranges which apply across the borough within and outside the Public Transport Accessibility Level (PTAL) zones shown on the proposals map. The design led approach will determine within the density ranges what the appropriate density should be. The Council accepts that high density town centre developments may not always be appropriate locations for family units, however in those parts of the borough where the matrix identifies a maximum density of 80 units per hectare family accommodation can be provided as contemporary town housing can be provided at this density.

- 1.3 Within the density ranges set for the PTAL Zones and in the district centres of Harold Hill and Collier Row the amenity standards should still be met. However where this is not possible any deficits in provision must be offset by for example more generous private balconies and private roof terraces. S106 payments towards improvements to the local public realm and open space may also be sought. In this regard the Council will expect any district/town centre developments to enhance the public realm particularly the provision of green space.

### **IMPLEMENTATION**

- 1.4 Developers should refer to the SPDs on Residential Density and Amenity Space and the SPDs covering the Emerson Park and Hall Lane Special Policy Areas.
- 1.5 In the London Riverside area the main housing sites are included as Site Specific Allocations. The Site Specific Allocations document and London Riverside SPD provide details of the approach to density for these sites which is based on future public transport accessibility levels.

### **DC3 - HOUSING DESIGN AND LAYOUT**

**Planning permission will only be granted if in their design and access statements developers demonstrate how they have addressed the policies in this plan which impact on the design and layout of new developments, including where appropriate:**

- **DC2 Housing Mix and Density**
- **DC7 Lifetime Homes**
- **DC34 Walking**
- **DC35 Cycling**
- **DC40 Waste Recycling**
- **DC50 Sustainable Design and Construction**
- **DC61 Urban Design**
- **DC62 Access**
- **DC63 Crime**

### **REASONED JUSTIFICATION**

- 1.1 Recently a number of urban design good practice guides have been published including:
- By Design, Urban design in the planning system: towards better practice 18 May 2000-Department of Transport Local Government and the Regions (DTLR)
  - Better places to live 11 September 2001-Companion guide to PPG3-DTLR

- Places, Streets & Movement. A companion guide to Design Bulletin 32 Residential roads and footpaths September 1998-DTLR
- 1.2 In line with PPG 3 Housing, and with regard to these guides, the Council requires good design in new housing developments in order to create, attractive, safe and secure, high-quality living environments which are sustainable and where people will choose to live. It will, therefore, encourage developers to embody the good practice guidance in these guides in new residential developments, and address the criteria within the policies it refers to. In addition the Council will wish to ensure that new housing intended to be rented out is low maintenance and built from durable materials.

### **IMPLEMENTATION**

- 1.3 New developments must provide adequate sitting out/private amenity space with regard to Housing Density and Residential Amenity Space SPD.
- 1.4 The Residential Extensions and Alterations SPD includes the detailed criteria for residential extensions and alterations
- 1.5 SPDs on the Gidea Park Special Character Area and Hall Lane and Emerson Park Special Policy Areas, include specific guidance on maintaining and enhancing the character of these areas.
- 1.6 The Council may prepare development briefs/masterplans for housing sites over 500 units and will publish the timetable for these through amendments to its Local Development Scheme.

### **DC4 – CONVERSIONS TO RESIDENTIAL AND SUBDIVISION OF RESIDENTIAL USES**

**Planning permission will only be granted for proposals involving conversions to residential and subdivision of existing residential dwellings provided the following criteria are satisfied:**

- residents/visitors are able to park without detriment to highway safety taking into account the availability of on and off street parking with regard to the standards set out in DC33
- there is no conflict with surrounding uses
- the proposal should not result in an unacceptable loss of privacy enjoyed by the occupants of adjoining properties by reason of overlooking, and should by its layout provide a suitable degree of privacy and private sitting out/amenity space
- the living rooms of new units do not abut the bedrooms of adjoining dwellings

**Where the conversion or subdivision involves the provision of self contained residential accommodation that:**

- **each flat has a reasonable outlook and aspect**
- **at least one, one bed self contained flat is provided with separate sleeping area. Studio flats will not be permitted**
- **the property has safe and secure access from the street.**

**Where the conversion/demolition/subdivision involves the provision of residential communal uses (including bedsits, Houses in Multiple Occupation and Nursing Homes):**

- **The original property is detached and well separated from neighbouring dwellings**
- **The nature of the new use is not out of character with the locality and will not be likely to give rise to significantly greater levels of noise and disturbance to occupiers of nearby residential properties than would an ordinary single family dwelling**
- **Satisfies policy DC5.**

## **REASONED JUSTIFICATION**

### **Self contained dwellings**

- 1.1 Conversions can provide an important source of additional housing for smaller households particularly in town centres. Conversions can come from many sources including offices and retail as well as the subdivision of existing residential units. Indeed the conversion of space above retail units is encouraged as this can help bring activity to town and district centres and increase their vitality and viability. However, policy must be careful to ensure that the standard of the resultant new dwellings is satisfactory both in terms of the standard of accommodation provided and its impact on the surrounding environment. The latter consideration will be particularly important outside the PTAL areas within the suburban heartlands of the borough. The Council's density matrix directs pressure for flatted development to those parts of the borough best served by public transport and where the existing character is urban rather than suburban.
- 1.2 Intensification of the suburban areas of Havering could have a detrimental impact on the residential character of Havering and the supply of family housing if not carefully controlled. Therefore, this policy whilst recognising the needs of smaller households balances this with the equally important objective of ensuring that Havering remains an attractive borough where people choose to live.

### **Communal residential uses**

- 1.3 The Council has a positive attitude towards care in the community however the conversion and loss of dwellings for communal uses such as Houses in

Multiple Occupation, bedsits and older persons homes can materially alter the character of the streetscape they are set within. In particular to change the use of bedrooms to living rooms can lead to overlooking of nearby gardens and the more intensive use may bring noise disturbance and parking problems. It is, therefore, necessary to ensure that whilst seeking to support the modernisation of existing stock, the buildings are suitable for the intensity of use proposed and that adequate parking and amenity space are provided.

## **DC5 – SPECIALIST ACCOMMODATION**

**Planning permission will only be granted for all health and non health social service residential projects provided they satisfy the following criteria:**

- **the proposal is located within a residential area unless the scale and nature of the facility is such that it would be inappropriate in a residential setting**
- **the site has reasonable pedestrian and cyclist access to shops and services**
- **the site is well served by public transport**
- **where the proposal involves the conversion of an existing residential property that policy DC4 is satisfied**
- **with regard to policy DC61 the proposal is of a high standard of urban design and does not result in overshadowing, loss of sunlight, unreasonable noise and disturbance, overlooking or loss of privacy to existing and new properties and responds to distinctive local building forms and patterns of development and respects the scale, massing and height of adjoining buildings**
- **residents/visitors are able to park without detriment to highway safety taking account of the availability of on and off street parking with regard to the standards set out in policy DC33.**

## **REASONED JUSTIFICATION**

- 1.1 This policy covers such forms of residential accommodation as extra care accommodation, HMOs, bedsits, hostels, foyers and residential mental health units. Hostels and bedsits can provide valuable temporary housing for those who may not have access to permanent housing in the borough, particularly the non-priority homeless students and low-paid workers. The needs of these groups are set out in Havering's Supporting People Strategy and other strategic policy documents. Policy needs to establish criteria for such forms of specialist accommodation to ensure that substandard accommodation is not provided and that they are provided in areas accessible by public transport, near to shops and open spaces, but at the same time that the new use is not out of character with the locality and will not be likely to give rise to unacceptable levels of noise and disturbance to occupiers of nearby residential properties.

## **DC6 - AFFORDABLE HOUSING**

**Affordable housing is housing designed to meet the needs of households whose incomes are not sufficient to allow them access to decent and appropriate housing. Affordable housing comprises social housing and intermediate housing.**

**The Council will aim to achieve a minimum of 35% of all new homes built in the borough as affordable from the following sources:**

- **100% affordable schemes by residential social landlords**
- **provision from vacant accommodation brought back into use**
- **provision from non-self contained accommodation**
- **affordable housing secured through the use of planning agreements or conditions.**

**In determining planning applications for private residential schemes, including sheltered housing, the Council will seek 35% of dwellings as affordable, split 70:30 between social housing and intermediate forms. This will apply on sites of 15 or more dwellings and on residential sites of 0.5 hectares or more irrespective of the number of dwellings.**

**In applying this indicative target the Council will through negotiation and agreement with the applicant assess the suitability of a site for affordable housing and the subsequent percentage that is sought with regard to:**

- **local and sub-regional housing need**
- **site, size suitability and the economics of provision**
- **the need to achieve and deliver a successful housing development.**

**In determining the mix of affordable housing the Council will have regard to the indicative mixes set out in the Havering Housing Needs Survey Update 2006 (HHNS) and the East London Affordable Housing Investment Framework (ELAHIF).**

	<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>	<b>4 bed</b>	<b>5 bed</b>
<b>HHNS</b>	<b>19%</b>	<b>25%</b>	<b>47%</b>	<b>10%</b>	
<b>ELAHIF</b>	<b>20%</b>	<b>40%</b>	<b>20%</b>	<b>15%</b>	<b>5%</b>

**Where schemes are brought forward for 14 or less dwellings the developer will need to satisfy the Council that:**

- **the proposal does not represent an underdevelopment of the site with regard to the Council's policy on Housing Density (DC2)**
- **a large site is not being brought forward in phases in order to avoid the threshold at each stage.**

**Where this proves to be the case the Council will apply the affordable housing target to subsequent phases based on the capacity of all phases, including those already built or permitted.**

**All forms of affordable housing secured through this policy must be governed by a mechanism to ensure the housing is affordable in perpetuity or owned and managed by a housing association or other Registered Social Landlord (RSL).**

## **REASONED JUSTIFICATION**

- 1.1 The Havering Housing Needs Survey Update 2006 identifies a need in Havering for 875 additional affordable units per annum over the period 2006-2011. Balanced against this low land values (relative to other London boroughs) in Havering suppress a development's ability to absorb the cost of providing affordable housing. Therefore, this policy sets a target and threshold which take into account these two factors.
- 1.2 The London Plan Technical Report Number 1 examines the viability of the affordable housing targets put forward by the Draft London Plan and considers the 50% target financially unviable in Havering. This research conducted by Three Dragons and Nottingham Trent University (3DNTU) considers that the maximum a developer will be prepared to pay for land is equal to expected revenue minus all costs including normal profit. Using as this policy does a 70:30 split between social housing and intermediate housing it recommends an indicative target of 35% for Havering based on its economic modelling.
- 1.3 Reflecting draft PPS3, the Council considers that the overall affordable housing target needs to reflect the likely supply from the single greatest contributing source which is affordable housing secured from market housing sites.<sup>97</sup> For the reasons given this is unlikely to be greater than 35%, moreover affordable housing from other sources will do no more than compensate for those market housing sites below 15 units from which no affordable housing will be sought. Therefore based on an assessment of all housing needs and a realistic assessment of supply the Council considers that an overall affordable housing target of 35% is achievable.
- 1.4 The Council will endeavour to ensure that all affordable housing is governed by a mechanism or owned and managed by a housing association or other RSL which will ensure that it remains affordable in perpetuity. Consequently it will generally encourage the involvement of a registered social landlord such as a housing association in development proposals and in particular one of the Council's Preferred RSL Partners. The Council will be happy to provide developers with the details of its Preferred RSL Partners.
- 1.5 Applicants are recommended to contact the Council at the earliest possible stage in making their application. This will enable the Council's housing, legal

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<sup>97</sup> Draft PPS3 Housing, Paragraph 27, ODPM, December 2005

and planning officers to guide the applicant as to how the policy impacts on their site, and if it does apply to provide in more detail, information regarding the affordable housing which it would look to secure on the site, and details of RSLs who are active in the borough and willing to work in partnership with developers to provide affordable housing.

### **IMPLEMENTATION**

- 1.15 The Council will seek to achieve the objectives of this policy by placing appropriate planning conditions on planning permissions or through Section 106 agreements.
- 1.16 Affordable Housing SPD provides more detail on the implementation of this policy.

## **DC7 – LIFETIME HOMES AND MOBILITY HOUSING**

**The Council will seek all new homes to be built to Lifetime Homes standards**

**10% of all new homes on sites of 15 or more dwellings and on residential sites of 0.5 hectares or more irrespective of the number of dwellings must be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.**

### **REASONED JUSTIFICATION**

- 1.1 Havering has a relatively high proportion of households containing someone with a physical disability, and an ageing population. New housing provides the opportunity to design housing which meets the needs of households throughout their lives through changing circumstances. Implementation Point 12 of the GLA's SPG on Accessible London clarifies that Lifetime Homes should apply to all forms of housing and gives examples of successful case studies for both houses and flats.

## **DC8 - GYPSIES AND TRAVELLERS**

**Planning permission will only be granted for gypsy/traveller sites provided all the following criteria are satisfied:**

- **the proposal meets identified need with regard to the traveller needs assessment/local housing needs assessment**
- **it is suitable for mixed residential and business uses and has no adverse impact on the safety and amenity of the occupants and their children and neighbouring residents.**
- **it has safe and convenient access to the road network**
- **it is located within reasonable distance of services and community facilities in particular schools and essential health services**
- **it does not have an access point where vehicle movements would cause a significant hazard to other users.**
- **it has provision for parking, turning, service and emergency vehicles and servicing of vehicles**
- **it is capable of accommodating the number of caravans/mobile homes proposed with any equipment for business activities**
- **the site will be supplied with essential services such as water sewerage and drainage, and waste disposal.**

**Sites within the Green Belt will only be acceptable in exceptional circumstances where through their design, layout and landscaping they maintain its openness, do not prejudice the purposes of including land in the Green Belt, and do not reduce its recreational usage or involve the loss of high grade agricultural land.**

### **REASONED JUSTIFICATION**

- 1.1 The Council carried out a gypsy/traveller needs assessment during 2004. The survey identified 33 gypsy and traveller families dispersed across the borough. Of these:
  - 19 live on privately owned but green belt land unauthorised for traveller occupation
  - Only 7 families live on private authorised traveller sites
  - 7 families are housed in public sector housing
- 1.2 The criteria presented in the this policy have been defined with regard to best practice criteria from Annex C of Circular 1/2006 'Planning for Gypsy and Traveller Caravan Sites', and the Council considers that these are fair, reasonable, realistic and effective. The Circular makes clear that applications cannot be refused because provision in the area is adequate.

## **PLACES TO WORK**

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### **DC9 - MAIN EMPLOYMENT AREAS**

**Planning permission will only be granted for B1 (b+c), B2 and B8 uses in the Rainham Employment Area, Harold Hill Industrial Estate and King George Close Estate Main Employment Areas.**

**Advanced manufacturing uses (B1 (b) (c) and B2) will be prioritised within the Beam Reach Business Park together with other (B1 (b) (c) and B2) uses which provide a similar quality and intensity of employment and a high standard of design.**

**The site north of the A13 to the west of Ferry Lane is allocated in the Site Specific Allocations DPD, for a Regional Casino and Entertainment Centre, which is proposed to include employment uses including, hotel, leisure and entertainment uses (including casino) with remaining employment uses B1, B2 and B8.**

**Waste uses will be considered acceptable within Main Employment Areas except the Beam Reach Business Park provided they are consistent with the policies set out in the Joint Waste Development Plan Document and Core Policy CP11.**

**Police Patrol Bases are considered acceptable uses within Main Employment Areas due to employment density levels and the nature of the use.**

### **REASONED JUSTIFICATION**

- 1.1 The Rainham Employment Area provides for the needs of all industrial businesses by offering a choice of small, medium and large premises and is considered to be a strategically and locally important area. Given its high environmental quality and location next to the Centre for Engineering and Manufacturing Excellence (CEME), Beam Reach Business Park is prioritised for advanced manufacturing and other modern industries. Other uses will be allowed within the Beam Reach Business Park where they provide a similar quality and intensity of employment within a high quality development commensurate with the business park environment.
- 1.2 Both the Harold Hill Industrial Estate and King George Close Estate are well suited for employment uses and offer a range of accommodation to suit the needs of all types of businesses. Both provide accessible employment in the north of the Borough, particularly the Harold Hill Estate which is within that part of the borough with the highest levels of unemployment. Both sites are well served by the trunk road network and have relatively good environmental settings.

- 1.3 Whilst in land use terms waste management uses are considered acceptable uses within Main Employment Areas, any sites that come forward will need to satisfy the policies within the Joint Waste Development Planning Document and Core Policy CP11.

## **DC10 - SECONDARY EMPLOYMENT AREAS**

**Planning permission for B1 (b) (c), B2 and B8 uses will be granted within Secondary Employment Areas provided that they do not adversely affect the amenity of adjoining residential areas.**

**Planning permission for other uses will only be granted in exceptional circumstances. In these cases the applicant will need to demonstrate that:**

- **the site is not needed to meet future business needs with regard to the difference between the current supply of employment land and the demand for employment land over the planning period**
- **the site is not considered fit for purpose when assessed against the economic, planning and property market criteria provided in Appendix A of Havering's Employment Land Review 2006**
- **the site has proved very difficult to dispose of for B1 (b) (c), B2 and B8 uses.**

## **REASONED JUSTIFICATION**

- 1.1 Secondary employment areas are well established locations which make an important contribution to the range and number of job opportunities in Havering. This policy seeks to retain the commercial nature of these areas in so far as this is compatible with maintaining a good environment in the surrounding areas.
- 1.2 The Havering Employment Land Review identified a limited number of Secondary Employment Sites for release to ensure that a sufficient reservoir of employment land remained to meet future business needs over the planning period. For this reason it is important that the remaining Secondary Employment Areas are retained for B1, B2 and B8 uses, as their loss to other uses would be detrimental to the local economy, and cause an imbalance between supply and demand. The policy, therefore, will only allow non-employment uses in exceptional circumstances. These circumstances require the applicant to demonstrate that their site is suitable for release following the same methodology employed in the Havering Employment Land Review.
- 1.3 The following areas have been designated as Secondary Employment Areas and are defined on the Proposals Map:

- Crow Lane, Romford (three sites)
- Harold Wood Industrial Estate
- Hillman Close (Stafford Industrial Estate)
- Lyon Road, Romford
- The Seedbed Centre, Romford

## **DC11 - NON-DESIGNATED SITES**

**Outside the Green Belt, the designated employment areas, Romford town centre and the district and local centres the Council will:**

- **generally resist changes of use to industrial and business uses where these would conflict with housing or environmental policies**
- **generally require the redevelopment for housing of commercial sites which become available for development. If this is not feasible the Council's main concern will be to encourage environmental improvements in conjunction with a commercial redevelopment of the site.**

## **REASONED JUSTIFICATION**

- 1.1 Employment sites outside the designated employment areas will often be unsuitable in environmental terms for employment uses and will be more suitable for housing, especially on those sites which are close to, or within, residential areas.
- 1.2 However, where an urban site which has a longstanding use of an industrial or commercial nature becomes vacant, it may not be feasible to achieve a residential redevelopment of the site. There may also be instances where there is some scope for limited expansion of employment uses which are already established outside the employment and commercial areas. In both cases the Council's primary aim will be to safeguard the amenities of nearby housing, and such developments will be expected to conform to the environmental policies set out in the relevant chapter.
- 1.3 Proposals brought forward for sites in the Green Belt will need to comply with the relevant Green Belt policies.

## **DC12 - OFFICES**

**Planning permission will only be granted for offices provided the sequential test is satisfied. In this regard office development is encouraged within Romford Town Centre and the district centres.**

**Within the district centres but outside the retail cores and fringes redevelopment for offices will be acceptable at ground floor and above provided it maintains an active frontage. However, within the retail cores and the fringes, office uses within Use Class B1 will be restricted to first floors and above.**

**Where office development involves the loss of existing residential accommodation, the Council will wish to secure replacement housing within the scheme to ensure there is no net loss of housing.**

### **REASONED JUSTIFICATION**

- 1.1.1 Proposals for new office development in the borough are directed to Romford and the district centres to ensure that they sustain and create accessible employment opportunities close to public transport nodes. Offices add to the vitality and viability of town centres but the policy is careful to ensure that they do not conflict with the primary retail and service function of the centre nor result in a loss of housing.

### **IMPLEMENTATION**

- 1.2 Policy relating to offices within Romford Town Centre will be covered by the Romford Area Action Plan.

## **DC13 - ACCESS TO EMPLOYMENT OPPORTUNITIES**

**To ensure that Havering's workforce is suitably skilled so that local people can compete for high quality jobs both locally and further afield the Council will, where appropriate, seek to enter into agreements with developers to contribute towards training programmes and employment support and employment access schemes, including the provision of premises in appropriate locations.**

### **REASONED JUSTIFICATION**

- 1.1 Improving access to employment through training programmes and employment support and access schemes, such as the Havering Jobnet Programme, will increase opportunities for Havering residents by reducing the mismatch between available skills and the skills needed to fill jobs both locally and further a field, and will also help them access these jobs. Increasing skills

locally may also help attract inward investment and address spatial inequalities in the borough.

## **DC14 - HOTELS**

**Planning permission will only be granted for hotels if the sequential test is satisfied. In this regard:**

- **Romford is the preferred location for large scale hotel development**
- **smaller hotels will be appropriate in locations within or close to district centres, depending on the scale of the proposals and whether the sites are well served by public transport**
- **within the London Riverside Opportunity Area proposals for new hotel development will be encouraged provided they have, or will have, convenient access to public transport and do not harm the vitality or viability of Rainham District Centre.**

## **REASONED JUSTIFICATION**

- 1.1 Hotels strengthen the wider role of town centres and provide a range of employment opportunities. The present trend of increasing numbers of tourists visiting London is expected to continue. The GLA Hotel Demand Study (2006)<sup>98</sup> estimates the hotel stock in Havering to be 335 bedrooms (0.3% of the total London supply). Between 2001 and 2005, 60 new hotel bedrooms were completed and a further 78 are identified as being in the pipeline between 2006 and 2010. The study estimates that between 2007 and 2026 a gross figure of 300 (new) hotel rooms will be required in Havering. There may be additional demand for hotel accommodation in the borough with the 2012 Olympic Games which will be less than ten minutes from Romford by rail and with improved rail access to central London following the development of Crossrail. Continued demand for accommodation around key transport hubs and providing transport linkages will be one of the key issues for determining the location of new hotel growth in the future.

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<sup>98</sup> Hotel Demand Study, GLA, June 2006

## **TOWN CENTRES**

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### **DC15 - LOCATING RETAIL AND SERVICE DEVELOPMENT**

Planning permission for retail and service development, and extensions to or the redevelopment of existing edge of centre and out of centre retail stores over 200 square metres, including mezzanines will only be granted where the sequential test is satisfied, unless it is ancillary to the use of an existing development or a new development to which the sequential test does not apply. Therefore applicants should first thoroughly assess the availability of sites within the retail core (or in the case of service uses the boundary of the centre as shown on the proposals map). Where no such sites are available developers must then consider edge of centre sites. Developers should take into account the following indicative upper limits for the scale of development likely to be permissible in each of the centre.

<b>Centre</b>	<b>Indicative upper limit for additional retail floorspace (sqm gross)</b>
<b>Romford</b>	<b>45000</b>
<b>Hornchurch</b>	<b>5000</b>
<b>Upminster</b>	<b>5000</b>
<b>Rainham</b>	<b>3000</b>
<b>Elm Park</b>	<b>1000</b>
<b>Collier Row</b>	<b>1000</b>
<b>Harold Hill</b>	<b>1000</b>

The Council recognises that larger proposals may be appropriate in the event of comprehensive redevelopment schemes coming forward.

For all development not located on a central site, including edge of centre sites, or identified as a Site Specific Allocation the applicant must provide the following information to justify the location of their development:

- the need for the development, including both quantitative and qualitative need
- whether there were any more sequentially preferable sites available
- whether more innovative layouts, different configurations, a smaller scale of development or reduced car parking would allow the development to fit on sequentially preferable sites
- whether there are elements of the development which could be reasonably located on separate sequentially preferable sites
- the impact of the development on the vitality and viability of the centre and nearby town centres

- **the accessibility of the site in terms of public transport, cyclist and pedestrian access and how car borne traffic will be minimised**
- **the contribution and effect the development may have on economic growth including investment in the area and improvements in productivity**
- **the affect of the development on local employment and whether the development will create higher skill opportunities or opportunities that will benefit the local labour market**
- **how the development contributes to social inclusion.**

**Planning permission for new retail uses within the proposed new communities from Dovers Corner to the boundary of Barking and Dagenham will only be granted where:**

- **they are contained within a local parade of new local centre north of the proposed Beam Park station**
- **they do not harm the viability and vitality of Rainham District Centre.**

## **REASONED JUSTIFICATION**

- 1.1 This policy sets out the tests new development not located on a central town centre site must satisfy to gain approval, and is therefore based on the sequential test criteria set out in PPS6. It therefore aims to ensure the widest access to shopping activities to the greatest number of people. Locating retail and services in town centres is a key way in which to achieve this. When considering a retail use a central site is one that is located within the retail core, for service uses a central site is one that is within the boundary of Romford or the District/Local Centres shown on the proposals map. Havering's Retail and Leisure Needs Assessment demonstrates that all identified growth within the plan period can be provided within the boundaries of Romford and the district centres, and, therefore, makes no allowance for any out of centre retail provision. Therefore applicants will need to demonstrate with regard to the criteria set out in the policy why their proposal cannot be located in a central site.
- 1.2 In applying this policy applicants should have regard to the indicative comparison and convenience floor space requirements for each site set out in policy CP4.
- 1.3 If the applicant can demonstrate that there are no appropriate sites within existing centres or on the edge of centres then preference will be given to existing out of centre sites as designated on the proposals map.

### Indicative upper limits

- 1.4 Romford is the highest order centre within East London and therefore the issue of scale is less important here than in the district centre as it is the focus of all major trip generating uses. The indicative upper limits for the district

centres are based on a consideration of the role of each centre within the hierarchy and its future strategy as set out in policy CP4. Developments will not be refused just because they breach the upper limit, neither does it mean that a development within the upper limit is appropriate in scale terms.

Edge of centre

- 1.5 Havering's town centres are rather contained, and have limited transition between where town centre uses end and residential uses commence, some 'edge of centre', sites as defined by the definitions in PPS6, would mean retail and service uses would technically be looking towards residential areas where there were no central sites available.<sup>99</sup>
- 1.6 Therefore the definition of edge of centre will be judged on a case by case basis, taking into account local topography; the nature of uses in the surrounding area; perceived and actual walking distance from the centre (primary frontages for retail uses, boundaries of centres for service uses); barriers to accessing the town centre such as roads, railways and car parks; the attractiveness and perceived safety of the route; the strength of the main centre and the developments compliance with policy (on design). Sites that are located in predominantly residential areas and are poorly connected with the town centre will not be considered favourably.

Ancillary

- 1.7 In assessing the definition of ancillary development the following factors will be assessed; the use of the main development, the use of the proposed development, the scale of the development, the range of goods sold and the turnover of goods sold which are not related to the main use. Where development is not considered ancillary, it must satisfy the sequential test set out in this policy.

To ensure ancillary uses do remain genuinely ancillary to the main development, conditions may be imposed on planning permission to limit the range of goods sold and the area in which ancillary uses can operate.

Out of centre developments

- 1.8 Under the Government's favoured 'class of goods' approach to the sequential test as opposed to the 'format driven' approach, the convention is not to make a distinction between bulky and non-bulky goods. Therefore Havering's Retail and Leisure Study divides identified quantitative need in accordance with the sequential approach amongst Romford and the district centres, within their existing boundaries. Where an out of centre retail development meets the tests set out in the policy including considering edge of centre sites, then the policy directs such uses to within the existing out of centre retail locations as identified on the proposals map.

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<sup>99</sup> Planning Policy Statement 6, Planning for Town Centres, Table 2, ODPM, 2005

## **IMPLEMENTATION**

1.6 Depending on the location of the development planning conditions may be applied to:

- Control the proportion of convenience and comparison goods sold in a development
- Apply restrictions to the maximum amount of floorspace allowed
- Limit the range of goods sold
- Limit internal alterations to increase the amount of floorspace
- Apply restrictions to the maximum amount of floorspace allowed
- Ensure that any retail and service use that is ancillary to the main development remains so.
- Prevent developments from being subdivided.

## **DC16 - CORE AND FRINGE FRONTAGES IN DISTRICT AND LOCAL CENTRES**

**In the district centres and major local centres:**

- **planning permission for A1 retail uses will be granted throughout the primary shopping area at ground floor level**
- **planning permission for service uses (A2, A3, A4, A5) will only be granted within District and Neighbourhood Centres throughout the retail core at ground floor level where:**
  - **the use provides a service appropriate to a shopping area**
  - **the proposal will not result in the grouping of 3 or more adjoining A2-A5 uses**
  - **within the retail core of Hornchurch and Upminster the proposal will not result in the proportion of non-retail uses within the relevant frontage exceeding 20% of its total length. Within the retail cores of Collier Row, Elm Park, Harold Hill and Rainham and the Major Local Centres a 33% figure will apply.**
- **planning permission for non retail uses in fringe shopping areas will be granted at ground level provided that the use:**
  - **has an active frontage**
  - **is open during shopping hours**
  - **would not significantly harm the character, function and vitality and viability of the centre.**

**Planning permission for retail uses (A1) and other uses appropriate to a shopping area (A2, A3, A4, A5) in the borough's Minor Local Centres will be granted at ground floor level. Exceptions may be made where the applicant can demonstrate to the Council's satisfaction that the premises have proved difficult to dispose of for any such use.**

**Police premises in shop units will be considered an A2 use provided they maintain an active frontage and open during core retail hours.**

**All shop fronts in primary and fringe shopping areas must be active and maintain the impression of a visual and functional continuity to aid in enhancing the vitality of the town centre. Shop fronts located in Conservation Areas will be required to meet the guidelines within the Havering Conservation Areas Shopfront Design Guide Supplementary Planning Document.**

**The extent of District, Major Local, and Minor Local Centres is provided in Annex 4.**

## **REASONED JUSTIFICATION**

- 1.1 Achieving the right balance of retail and non-retail uses in a town centre is critical to ensuring its vitality and viability. For this reason it is important that a critical mass of retailing uses are maintained within the core areas of the borough's town centres. Outside of these core areas, and in line with PPS6, there is more scope to introduce non-retailing, in the interests of providing greater opportunities for flexibility and a diversity of uses in the interests of maintaining and enhancing a centre's vitality and viability, and to promote linked trips. This is in line with PPS6 which considers uses such as fitness centres, bowling, bingo, theatres, museums, and galleries as town centre uses.<sup>100</sup> The frontage will be measured in metres along continuous built development between significant breaks such as a road or footpath.

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<sup>100</sup> Planning Policy Statement 6, Planning for Town Centres, paragraph 1.8 and paragraph 2.17, ODPM, 2005

## **CULTURE**

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### **DC17 – PROTECTING EXISTING ARTS, AND ENTERTAINMENT FACILITIES**

**Planning permission which involves the loss of arts and entertainment facilities to other uses will only be granted where the applicant can demonstrate no need exists for the use or its loss was necessary to achieve other planning objectives.**

#### **REASONED JUSTIFICATION**

- 1.1 Arts uses in particular help enrich the local community and a persons quality of life, and provide a sense of identity and civic pride and therefore it is important that their loss is resisted. Entertainment uses are also important not least in their contribution to the evening economy and the vitality and viability of town centres.

### **DC18 - PROTECTION OF PUBLIC OPEN SPACE, RECREATION, SPORTS AND LEISURE FACILITIES**

**The Council will seek the retention and enhancement of all public open space and recreation, sports and leisure facilities that are in private and public ownership.**

**Where it is shown that public open space or other land /building is surplus to requirements because other facilities exist in the locality to meet the standards set out in Policy DC20 alternative uses will be allowed.**

**Priority will be given to other recreation/leisure uses such as allotments or sports pitches where there is an identified need for such a use. Where no such needs exists then other uses may be approved provided that there is no conflict with other Core and Development Control policies and there is no unacceptable impact on the local environment or amenities of local residents.**

**Any loss of open space to a non recreation/leisure use must be accompanied by an improvement to the quality of open space in the vicinity or to remedying qualitative and quantitative deficiencies in open space elsewhere in the Borough.**

## **REASONED JUSTIFICATION**

- 1.1 The Council's Open Space and Sports Assessment (2005) considered the quality and value (in terms of recreation) of the borough's open spaces. It suggests that where open spaces have a high value they should be protected and the quality enhanced if appropriate. Although this policy applies to all open spaces, only spaces greater than 1 hectare are defined on the proposals map.
- 1.2 On the other hand where sites have both a low quality and low value either because of poor facilities or poor location it may be possible to consider the facility surplus to requirements. In such cases, the policy suggests that the redevelopment of such sites can make a contribution to improving the quality and quantity of open space where an identified deficiency exists in the area or improving the quality of the remainder of the open space. The Assessment also looked at the need for and provision of a range of different recreation, sports and leisure facilities. Decisions about the retention of these facilities will be based on the findings of the Assessment as required by PPG17

## **IMPLEMENTATION**

- 1.3 The Open Space and Sports Assessment will form that basis of making decisions as to whether an open space is "surplus to requirements". S106 agreements that comply with Circular 05/05 will be employed where appropriate

## **DC19 – LOCATING CULTURAL FACILITIES**

**Planning permission will be granted for new cultural development where the sequential test is satisfied. In this regard opportunities within the boundaries of Romford Town Centre and the district centres must first be tested before less central sites are considered. Where no central sites are available the applicant must then assess the availability of edge of centre sites.**

**Developers should take into account the following indicative upper limits for the scale of cultural developments likely to be permissible in each centre.**

<b>Centre</b>	<b>Indicative upper limit for additional cultural floorspace (sqm gross)</b>
<b>Romford</b>	<b>45000</b>
<b>Hornchurch</b>	<b>5000</b>
<b>Upminster</b>	<b>5000</b>
<b>Rainham</b>	<b>3000</b>
<b>Elm Park</b>	<b>1000</b>

<b>Collier Row</b>	<b>1000</b>
<b>Harold Hill</b>	<b>1000</b>

**For all development not located on a town centre site or identified as a Site Specific Allocation the applicant must provide the following information to justify the location of their development:**

- **the need for the development, including both quantitative and qualitative need where necessary**
- **whether there were any more central sites available.**
- **whether the scale and use of the development relates to the scale and role of the centre and its catchment**
- **whether more innovative layouts, different configurations, a smaller scale of development or reduced car parking would allow the development to fit on sequentially preferable sites**
- **whether there are elements of the development which could be reasonably located on separate sequentially preferable sites**
- **the impact of the development on the vitality and viability of the centre and nearby town centres**
- **the accessibility of the site in terms of public transport, cyclist and pedestrian access and how car borne traffic will be minimised.**

**In considering the location of arts uses, applicants must first thoroughly assess the availability of sites in Hornchurch District Centre, before considering sites within Romford and the remaining District Centres. Where arts uses are proposed in centres other than Hornchurch the applicant must demonstrate that this will not adversely impact on the vitality and viability of Hornchurch as the borough's cultural centre. Similarly edge of Hornchurch centre sites will be considered sequentially preferable to edge of other centre sites.**

**In considering proposals for cultural facilities within London Riverside any new development should:**

- **add to, or not harm the vitality and viability of Rainham District Centre**
- **be accessible by public transport**
- **be well linked by pedestrian and cyclist routes to planned and existing communities.**

## **REASONED JUSTIFICATION**

**1.1 Cultural uses are all the uses covered in paragraph 9 of PPS6 apart from retail and office uses. Therefore cultural uses are:**

- **leisure, entertainment facilities, and the more intensive sport and recreation uses, (including cinemas, drive-through restaurants, night-**

- clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls);
- arts, culture and tourism (theatres, museums, galleries and concert halls, and conference facilities).

Pubs, bars and restaurants are covered by DC policies 15 and 16 as they are classified as service uses as they fall within use class A2-A5. Hotels are covered by DC14.

- 1.2 Cultural uses are key components of town centres in order to increase their vitality and viability. Cultural uses often remain open beyond shopping hours and therefore aid in extending the economy of town centres. Cultural uses also add to the diversity of uses in town centres and therefore aid in promoting consumer activity. In line with PPS6 this policy takes forward the sequential approach to the location of facilities, seeks to ensure that the scale of development is appropriate to the centre and in conjunction with DC16 promotes greater opportunities for a diversity of uses in fringe shopping areas in town centres. This will also help ensure that access to cultural facilities is maximised as town centres tend to be well served by public transport.
- 1.3 The policy recognises that Hornchurch is the borough's centre for arts, and therefore applies the sequential test accordingly to ensure that proposals for new arts developments in other borough centres do not adversely affect Hornchurch's status. At the same time the lack of arts facilities in the Thames Gateway means that Havering needs to plan for arts facilities in accessible locations that meet the needs of the new communities within London Riverside. Arts uses will also be important for Romford Town Centre where asides from the retail offer, the day and evening economy is focused towards the pub, club and entertainment culture, and will help broaden the centres appeal. This will complement the Romford Urban Strategy which aims to use the historic Market Square for civic events and encourage a better restaurant offer to broaden the centre's appeal.
- 1.4 In the interests of creating sustainable communities in London Riverside the policy recognises that applying the sequential test to proposals in the south of the borough may result in out of town centre cultural developments. In some cases the nature of the uses means it would not be appropriate to locate the use within the Rainham District Centre. This is especially the case for the Thames Gateway Regional Casino and Entertainment Centre and facilities ancillary to the London Riverside Conservation Park. The location of and full justification for these two sites is provided in the Site Specific Allocations Development Plan Document.

#### Thames Gateway Regional Casino and Entertainment Centre

- 1.5 The Thames Gateway Regional Casino and Entertainment Centre is proposed south of Rainham District Centre. This comprises a number of cultural uses clustered around a Regional Casino. The Council considers there are no sequentially preferable sites within the Borough or this part of the Thames Gateway, to the one identified. Moreover in order to maximise the

centre's regeneration impacts in line with the Government's policy statement on gambling and reduce the risk of ambient gambling the Council does not consider in Havering's case that such a complex is best suited to a town centre location. At the same time it is still important that the complex is sustainably located and therefore access to public transport and by walking and cycling remain important criteria.

**London Riverside Conservation Park**

- 1.6 It is proposed to develop visitor facilities and other ancillary uses as part of the development of the London Riverside Conservation Park. Evidently these uses must be located within the park, and therefore the emphasis will be on ensuring they are accessible by public transport and walking and cycling.

**DC20 - ACCESS TO RECREATION AND LEISURE  
INCLUDING OPEN SPACE**

**The Council will seek to ensure that there is adequate provision of a varied range of accessible leisure and recreation facilities throughout the Borough.**

**The Council will have regard to the following walking distances in order to improve the distribution of open space:**

- |                                    |                    |
|------------------------------------|--------------------|
| • <b>Regional Park (400 ha)</b>    | <b>3.2 to 8 km</b> |
| • <b>Metropolitan Park (60 ha)</b> | <b>3.2km</b>       |
| • <b>District Park (20ha)</b>      | <b>1.2km</b>       |
| • <b>Local Park (2ha)</b>          | <b>800m</b>        |

**The Council will also seek to achieve the following standard of provision**

- |                                |   |
|--------------------------------|---|
| • <b>Children's Play Space</b> | <b>0.8 hectares per 1,000 population<br/>with access to formal/informal<br/>play provision within 400 m of<br/>home</b> |
| • <b>Allotments</b>            | <b>0.18 hectares per 1,000 population<br/>with access within 800 m of home</b>  |
| • <b>Sports pitches</b>        | <b>0.75 hectares per 1,000 population<br/>with access within 1200 m of home</b>   |

**In order to make the best use of facilities the Council will promote the dual use of education sports and recreation facilities by the public.**

## **REASONED JUSTIFICATION**

- 1.1 Access to informal and formal recreation and leisure opportunities is important to residents quality of life, not only are these sources of enjoyment but also bring related health benefits.
- 1.2 Informal open spaces such as urban and country parks tend to provide the setting for informal recreation such as walking and cycling. Formal recreation is usually practiced on sports pitches and within sports centres.
- 1.3 Besides their recreational function open spaces can also help increase biodiversity and manage flood risk as well as provide a valuable role in increasing general environmental quality and amenity.
- 1.4 The Council has undertaken an Open Space and Sports Assessment which covers all aspects of recreation and sport based leisure pursuits in line with the advice in PPG17 and its accompanying guidance. The policies of the Core Strategy are based on that Assessment and the standards set out above are those recommended in the Assessment. Figure 1 (page 77) shows deficiencies in general terms; a more detailed assessment of deficiency will be undertaken in individual cases where necessary when implementing this policy. The assessment of sports pitches was carried out using the Sport England Playing Pitch Model in line with the advice set out in the companion guide to PPG17. The Council intends to prepare a Parks and Open Spaces Strategy and this will be a major tool in implementing the findings of the Assessment.

## **IMPLEMENTATION**

- 1.5 The Open Space Assessment and Open Space Strategy will be used when dealing with applications in accordance with PPG17 and will also be used to identify deficiencies.

## **DC21 - MAJOR DEVELOPMENTS AND OPEN SPACE, RECREATION AND LEISURE FACILITIES**

**The Council will require major new developments to include provision for adequate open space, recreation and leisure facilities. The Council will require open space provision at the rate of 1.84 hectares per thousand population. Where it is not possible to include such facilities within the development site the Council will require the facilities to be provided nearby. In some cases improving the quality of existing facilities may be appropriate. Financial contributions to enable the provision of new facilities or improvement to the quality of existing facilities may also be sought. The Council may also seek an agreement with the developer for the long term maintenance of any new open space provided in connection with their development.**

**Developments in areas which are deficient in open space may be required not only to provide for the demand generated by the new development but may also be expected to help address the current deficiencies.**

## **REASONED JUSTIFICATION**

- 1.1 PPG17 explains that where planning permission is granted for new developments (especially housing) local authorities should seek to ensure that provision is made for local sports and recreational facilities either by increasing the number of facilities or improving existing facilities. Planning obligations should be used where appropriate to achieve this.
- 1.2 At paragraph 33 the guidance continues to say planning obligations should be used as a means to remedy local deficiencies in the quantity or quality of open space. Local authorities will be justified in seeking planning obligations where the quantity or quality of provision is inadequate or under threat, or where new development increases local needs. Havering's Open Space and Sports Assessment recommended that new development should be accompanied by 1.84 hectares of open space per 1000 population based upon established levels of provision in areas considered to be well served.

## **DC22 – COUNTRYSIDE RECREATION**

**Opportunities for informal recreation in the countryside will be increased by:**

- **the improvement of the public right of way network including links to the urban area**
- **allowing equestrian and horsekeeping facilities in the Green Belt subject to no adverse effect on the amenity of residents or the countryside**
- **ensuring that all developments located within the Thames Chase Forest area make a positive contribution to the implementation of the Thames Chase Plan by improving, for example, access, recreation opportunities, the landscape and nature conservation**
- **encouraging the provision for recreational water activities and sport subject to no adverse effect on the amenity of residents or the countryside**
- **where appropriate seeking developer contributions towards implementation of the Green Chain network, the London Outer Orbital Loop, the Green Arc, the Thames Chase Forest , and the Green Grid.**

## **REASONED JUSTIFICATION**

- 1.1 Forming important components of the 'Greening the Gateway Initiative' the Council is working with partners to implement the Thames Chase Plan, the London Outer Orbital Loop the Green Arc, and the Green Grid to create quality opportunities for informal recreation in Havering's countryside.

## **IMPLEMENTATION**

- 1.2 The Council will continue to bid for Local Implementation Plan funding towards the implementation of walking and cycling initiatives within the Green Belt.

## **DC23 - FOOD, DRINK AND THE EVENING ECONOMY**

**The impacts of food, drink and evening entertainment facilities in Havering's town centres will be carefully controlled by:**

- **encouraging a diverse range of complementary day and evening uses in town centres that meet the needs of different social groups in the community**
- **promoting the objectives of the Licensing Act 2003 by carefully considering later opening times of licensed premises, with the focus on preventing crime and disorder, maintaining public safety, preventing public nuisance and protecting children from harm**
- **discouraging proposals that will result in a concentration of similar evening uses in the one area or uses that will have a singular or cumulative impact on the area as a result of disturbance, amenity and type of facility.**

## **REASONED JUSTIFICATION**

- 1.1 Food, drink and evening economy uses including restaurants, cafes, pubs, nightclubs, wine bars, cinemas and galleries can contribute to the vitality and viability of shopping centres. However a concentration of these uses in a particular location or street can detract from the amenity and character of an area. Excessive noise, litter, smells, crime and anti social behaviour are potential impacts such uses can have if not carefully controlled.
- 1.2 Therefore in line with PPS6 this policy seeks to manage the evening and night time economy by considering with regard to new development its disturbance and cumulative impact on the character and function of a centre, related anti-social behaviour, and impacts on crime and the amenities of nearby residents. It also seeks to take account of licensing objectives under the Licensing Act 2003.<sup>101</sup>

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<sup>101</sup> Licensing Act, DCMS, 2003

1.3 Any application submitted for food, drink or evening entertainment facilities must be accompanied by a planning statement that addresses the following factors.

- The nature and characteristics of the proposal and possible disturbances and impacts on the surrounding area.
- The scale of the development in terms of the number of patrons it attracts and the catchment area.
- The methods to address potential disturbances including smells, litter, refuse, noise, anti-social behaviour and other general impacts on the amenity of the surrounding area.
- The concentration of food, drink and evening entertainment facilities in the surrounding area and possible cumulative effects that may result from the development of the facility.
- The proximity to residential uses.
- Estimates of the likely numbers of customers (supported by a business plan) and their likely nature.
- The proposed hours of operation and their relationship to the hours of operation of surrounding facilities.
- Traffic implications associated with the facility and servicing arrangements.
- The use of outdoor areas.

#### **IMPLEMENTATION**

- 1.4 The Metropolitan Police would be directly consulted on major planning applications to enable them to provide advice relating to crime and anti-social behaviour issues that may be associated with a proposal.
- 1.5 Conditions may be imposed relating to the need to control times of performances on the premises, operating hours, noise insulation, the erection of notices at exits requesting the public to respect local residents and the need to provide a refuse and litter management plans to minimise disturbance to nearby properties.
- 1.6 This policy will be implemented in conjunction with policies contained in the Romford Area Action Plan for sites in the area within that plan.

## **DC24 – LIVE-WORK IN HORNCHURCH**

**To maximise the potential of creative industry employment in Hornchurch live-work units will be allowed within Hornchurch Town Centre provided that:**

- **they are specifically designed for the purposes of artists and creative workers**
- **they are safeguarded from a change to purely residential use**
- **the floorspace is split into 60% work and 40% residential and no more than two bedrooms are provided**
- **the type of artist or creative industry sought will not have an adverse impact on the quality, character or amenity of the surrounding environment.**

### **REASONED JUSTIFICATION**

- 1.1 The GLA publication 'Creativity, London's Core Business' identifies that Havering has a sizeable growth rate in creative industry jobs, and this highlights an opportunity for growth in creative industries in the borough particularly in Hornchurch which already supports a strong cultural base.<sup>102</sup> To maximise this potential and in line with the adopted Hornchurch Urban Strategy the Council will encourage a limited number of live/work units for artists and creative workers in certain parts of designated mixed use areas. This will be determined within the Hornchurch SPD and may include consolidating the spare land within the rear of the plots which front the High Street and gain access from Fentiman Way and Appleton Way. There is also potential for these uses within the area bounded by High Street to the South, The Queens Theatre to the North, North Street to the east and Billet Lane to the west.

### **IMPLEMENTATION**

- 1.2 More detailed guidance will be provided within the Hornchurch SPD.
- 1.3 Planning conditions may be applied to prevent live/work units of creative industries and artists studios from being converted to purely residential use.

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<sup>102</sup> Creativity, London's Core Business, GLA, October 2002

## **DC25 - PUBLIC ART**

**Where appropriate the use of public art in all major and mixed use development schemes including redevelopment and refurbishment proposals is encouraged.**

**Where it is not appropriate for public art to be provided and incorporated into a development on site, a S106 contribution may be sought to assist in the improvement and inclusion of art in public spaces in the vicinity.**

## **REASONED JUSTIFICATION**

- 1.1 The provision of public art in developments and in the public realm aids in enhancing the appearance of buildings and their setting, the quality of the environment and aids in promoting culture, fosters local identity and promotes civic pride. Public art may take many forms including art installations, sculptures, involving the community, lighting, local art projects, metal work, floor and window designs. Artistic elements can also be incorporated into a development in other ways including the employment of an artist as a member of a design team, the commissioning of temporary work for performance activities and school and community education programs.

## **COMMUNITY NEEDS**

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### **DC26 – LOCATION OF COMMUNITY FACILITIES**

**Planning permission for new community facilities will only be granted where they:**

- **are accessible by a range of transport including have pedestrians and cyclists and to those groups who rely on public transport**
- **do not have a significant adverse effect on residential character and amenity**
- **ensure that any on-street parking which is likely to be generated by the use can be accommodated without detriment to pedestrian and highway safety, and**
- **are provided in buildings which, are practicable, multi-use, flexible and adaptable.**

**The preferred locations for new community facilities will be Romford or the District and Local Centres.**

**To enable this, community facilities will be allowed within these centres:**

- **above ground floor level within core retail areas**
- **at ground floor level outside core areas provided policy DC17 is satisfied.**

**In addition, community facilities essential to meet the specific needs of the community, either as part of a mixed use scheme or sole use depending on the scale of land available, will be allowed on sites considered suitable for housing or involving the loss of housing.**

**For any site outside a town, district or local centre, the applicant must demonstrate that a suitable site was not available within a centre accessible to the client group. This test would not apply within London Riverside where the facilities are designed to serve new residential developments.**

### **REASONED JUSTIFICATION**

- 1.1 Opportunities for the development of new community facilities can be limited because they cannot compete financially on equal terms for land against uses such as residential and retail which attract higher land values. Planning policy can help address this by seeking opportunities for the provision of new community facilities in major mixed use developments, including the re-use of

existing buildings, and through the use of planning obligations, to ensure that new facilities are provided in accessible locations.

- 1.2 Within London Riverside, community facilities will need to be provided to serve the planned new housing. The location of these facilities will be addressed in SPD, and therefore this policy is flexible to enable community facilities in this area to be located in convenient locations for the planned new community whilst also being accessible to the existing communities.

### **IMPLEMENTATION**

- 1.3 The Council will continue to liaise with the relevant agencies to monitor the land and building requirements for education, health and social services and bring forward new sites through amendments to the Site Specific Allocations DPD to meet identified requirements.
- 1.4 The Council may impose conditions restricting the use of community facilities due to the large range of uses the current use classes permit. At the same time, this will need to be balanced against the encouragement for multi-use facilities.

### **DC27 – PROVISION OF COMMUNITY FACILITIES**

**Planning permission which involves the redevelopment of a community facility will be granted:**

- **where it can be demonstrated that there is no longer a need for the facility affected, either in its current use or any alternative use, or**
- **where suitable alternative provision is made in the locality**

### **REASONED JUSTIFICATION**

- 1.1 Community buildings provide important facilities in which people can meet and interact. They need to be close to places where people live to serve local communities. The high cost of land and buildings in Havering means that community facilities may come under pressure from more profitable uses and the local community may lose an accessible facility. Once these sites are redeveloped for commercial uses it is often difficult to find alternative sites with good accessibility because these uses find it difficult to compete with higher value land uses. Therefore, it is important to ensure that community facilities continue to serve residents' needs'.

## **IMPLEMENTATION**

- 1.2 Conditions may be attached to the application to ensure that the replacement facility was re-provided before 50% of the development was completed to ensure that the facility was not out of use for any significant amount of time.

## **DC28 - DUAL USE OF SCHOOL FACILITIES**

**Opportunities to make existing schools and their facilities (including playing fields) available to wider community use will be encouraged where such use results in no unacceptable amenity, environmental, safety or traffic problems.**

**Conditions may be imposed to minimise disturbance including time restrictions.**

## **REASONED JUSTIFICATION**

- 1.1 Dual use of school facilities is a sensible use of scarce resources which represent a major capital investment. By allowing community and other groups to use education facilities and playing fields outside school hours it is possible to use land more efficiently and to make new or improved local facilities available in easily accessible locations. This fits in with the Government's 'Extended School' model. The Council, will therefore, encourage schools to manage their facilities to provide opportunities for community use, particularly in areas where an unmet need exists.

## **DC29 - EDUCATIONAL PREMISES**

**The Council will ensure that the provision of primary and secondary education facilities is sufficient in quantity and quality to meet the needs of residents by:**

- **supporting the implementation of the Havering School Organisation Plan and by taking into account future demands as a result of population changes**
- **normally seeking to meet the need for increased school places within existing sites**
- **in addition to the criteria in DC26, ensuring that proposals to locate new schools meet the following criteria:**
  - **the sites and buildings are appropriate to the needs of the users and the community in general, including the dual use of premises for community purposes (see DC28)**
  - **they are accompanied by a School Travel Plan.**

- **seeking payments from residential developers for the capital infrastructure of schools required to meet the demands of new housing in Havering. Detailed guidance is provided in the related SPD.**

### **REASONED JUSTIFICATION**

- 1.1 The Council will continue to closely the monitor the land needs of schools and ensure the most efficient use of land and buildings in the education service in order that a full range of education opportunities can be maintained.
- 1.2 Generally the cumulative impact of housing development in the borough is unlikely to have a significant effect on education needs. However, in the longer term, large-scale development of housing in the south of the borough, as part of the London Riverside development is likely to have an impact on the need for additional school places in the southern part of the borough.
- 1.3 Where an education site is found to be surplus to the needs of the education service as a whole they will be used in accordance with the priorities of the plan. In doing so account will be also be taken of existing open space and sports facilities ancillary to the school, with regard to demand for these in line with PPG17 and the Havering Open Space and Sports Assessment.
- 1.4 Financial contributions from residential developers towards educational facilities will be sought in line with SPD on Educational Needs Generated by New Development.

### **DC30 – CONTRIBUTION OF COMMUNITY FACILITIES**

**Where appropriate in major new development, the Council will seek contributions towards the provision of essential new community facilities.**

**A major development is one of 10 dwellings or more or 1,000 m<sup>2</sup> and above.**

### **REASONED JUSTIFICATION**

- 1.1 Planning obligations are used to lessen any adverse impact a development may cause and contribute towards local facilities. For example, new housing development may create additional demand for GP premises, or a major new employment use may generate demand for childcare facilities. In such cases, an agreement may be sought with the developer to provide (or contribute towards providing) such facilities.

## **DC31 – CEMETERIES AND CREMATORIA**

**The Council will ensure that sufficient land is retained to meet demand for burial space and cremated remains.**

### **REASONED JUSTIFICATION**

- 1.1 From 2006 burial space needs in Havering are forecast to increase by more than four acres every five years. The Core Strategy will, therefore, need to plan for future burial space. Land at Romford Cemetery cannot be used due to waterlogging and attendant groundwater pollution concerns. However, there is the potential to extend Upminster Cemetery to meet burial space need. There is also a need for extra land to bury cremated remains at the South Essex Crematorium. This is covered in the Site Allocations Development Plan Document.

# **TRANSPORT**

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## **DC32 – THE ROAD NETWORK**

**New development which has an adverse impact on the functioning of the road hierarchy will not be allowed.**

**Planning permission for new road schemes will only be allowed where they:**

- **are consistent with the Council's road hierarchy**
- **improve conditions for pedestrians and cyclists and disabled people by providing safe and convenient facilities**
- **improve public transport accessibility**
- **have net environmental benefits**
- **improve safety for all users**
- **contribute to regeneration objectives**
- **are consistent with the Council's Local Implementation Plan and the Mayor of London's Transport Strategy**
- **allocate street space in accordance with London Plan policy 3C.17.**

**Contributions may be sought from developers towards new road schemes or road improvements.**

## **REASONED JUSTIFICATION**

- 1.1 The Government in its document 'Managing Our Roads' recognises that there is only limited scope for tackling urban congestion by increasing road capacity. Similarly, the key challenge in Havering is improving the management and efficiency of the road network for all modes of transport, and encouraging modal shifts. The Council will therefore take care to ensure that new development does not have an adverse functioning of the road hierarchy and for major developments will require the submission of a transport assessment to ensure this. At the same time there may be cases in Havering where new roads are needed to support regeneration especially in London Riverside, or to improve the environment and increase safety, (for example the Ferry Lane Link Road). In planning new roads the overall objective of the Core Strategy of reducing the need to travel and promoting sustainable forms of transport where travel is necessary, needs to be met. Therefore new roads should deliver improvements to public transport accessibility and improve conditions for walking and cycling. The Ferry Lane link road is a good example of this which enables a circular route to be formed through London Riverside thereby providing a viable bus route where previously there was not one.

- 1.2 New roads will also need to be consistent with the Council's road hierarchy. This categorises the different types of road needed in order to serve the wide range of vehicle types and the different journeys for which they are used.
- 1.3 Primary roads are the long distance links forming part of the national road network. They cater particularly for through traffic and heavy vehicles. Secondary roads are the other important roads where considerations of traffic flow predominate. They provide the links from local roads to the Primary Road Network, access to strategic centres, and the main bus routes.
- 1.4 Local distributor roads collect traffic from local access roads and convey it to the Secondary and Primary Road Networks and thus also have a traffic function. They are also used for the less important bus routes. Local access roads (i.e. all road types below local distributors) give direct access to buildings and land. Their use by traffic having no need for access in the locality should be restricted. The Council also applies a hierarchy of standards for these roads depending on the use to which they are put and the number of dwellings they serve.

#### **IMPLEMENTATION**

- 1.5 The Council intends to revise its guide to the layout of roads in new development to reflect 'Places, Streets and Movement, A Companion Guide to Design Bulletin 32-Residential Roads and Footpaths'-DTLR 1998, and 'Better Places to Live, A Companion Guide to PPG3'. The Council, therefore, encourages more flexible highway and footpath standards which consider streets as open spaces promoting for example smaller radii shared surfaces, and using the layouts of roads, planting and parking rather than dedicated physical obstacles to traffic calming. This will be published as a separate technical supporting document to Havering's Local Development Framework.
- 1.6 The Council will work closely with Transport for London on issues affecting management of the Transport for London Road Network and Strategic Road Network.

## **DC33 – CAR PARKING**

**Planning permission will only be granted if new developments provide car parking spaces to the standards provided in Annex 5 which are based on those provided in the London Plan. They should also provide Motor-cycle Parking and Disabled Parking to the standards provided in Annex 5.**

**In applying these standards developers need to satisfy the following criteria in addition to those set out in Annex 5:**

- for major commercial developments within town centres demonstrate that the level of car parking would not adversely affect that centre or a neighbouring centre's vitality and viability**
- for public off street car parking; achieve Park Mark Safer Parking status**
- for private off-street car parking; achieve secure by design standard**
- demonstrate with regard to existing or planned CPZs and the need for additional parking controls that there is no adverse impact on the amenity of residents and the interests of the users of adjacent facilities**
- for development with significant transport implications require a submission of a Transport Assessment with the Planning Application in line with the guidance in PPG13**
- for public off street parking show it meets an essential need and enter into an agreement for a management scheme and pricing structure including annual reviews to deter commuter parking or alternatively contribute to off-site public parking provision.**

**The Council will support appropriate development proposals to convert to alternative (non-parking) uses where:**

- private non-residential parking space is not required by genuine operational business users**
- parking at residential development is in excess of current standards and is not required to meet the parking needs of residents**
- the Council has identified public off-street parking as being surplus to requirements**

## **REASONED JUSTIFICATION**

- 1.1 This policy uses a combination of Transport Assessments and a measure called Public Transport Accessibility Level (PTAL) to determine parking standards for different uses.**
- 1.2 Transport Assessments should give details of proposed measures to improve access by public transport, walking and cycling, to reduce associated parking and mitigate adverse transport impacts. Transport Assessments will be a key factor in assisting in the assessment of**

development proposals and ensuring that **parking** levels sought for new developments are neither excessive nor inadequate and that sufficient capacity exists or can be provided on the significantly affected parts of the transport network. Equally they will help to ensure that the level of car parking does not give rise to on-street car parking problems which may impact on the safety and quality of the environment. In doing so consideration will need to be given to ensuring that car parking standards are integrated with on-street parking controls. Where a new development particularly major residential and employment uses are proposed in areas of poor public transport provision the Council may seek contributions for public transport improvements, which in turn may enable the level of car parking to be reduced.

- 1.3 In setting parking standards the Council has been careful that there is no incentive for uses to locate away from town centres, or that this will impact on the viability and vitality of town centres. For example, Romford competes with Lakeside and Bluewater which offer free parking. There is also competition between and within town centres in Havering that has to be addressed as part of a strategy.
- 1.4 Car parking standards for new dwellings are set out in policy DC2 Housing Mix and Density. Standards vary from car free developments to two spaces per dwelling in less accessible suburban areas. Overall the aim is to not provide on average more than 1.5 spaces per dwelling in line with PPG3. Romford, and the 'urban' areas of Hornchurch, Upminster and Elm Park are identified as suitable for car free housing in terms of accessibility. However, in the interests of controlling on-street parking, the absence of a CPZ in Hornchurch and Elm Park means that car free housing is only acceptable in Romford and Upminster where permits can be withheld from residents of new flatted development.
- 1.5 The Council through its Local Implementation Plan and Parking and Enforcement Strategy will continue to monitor the usage of public car parks and identify surplus provision and the need for increased provision as appropriate. Within town centres it is often not practicable for new developments to accommodate additional parking demand on site, and a contribution towards public-off street parking may be acceptable.

## **DC34 - WALKING**

**In the design and location of access and circulation arrangements within and between development and local pedestrian destinations developers will be required to:**

- **take account of the needs of pedestrians**
- **address desire lines to local shops, services and schools, including safer routes to school, and public transport nodes, lighting, rest facilities, safety and security, and barriers to local movement.**

**Where appropriate contributions may be sought towards initiatives either planned or underway to promote walking in the borough as included in Havering's Local Implementation Plan, and the strategic walking routes set out in the Transport for London Walking Plan including the Greenways. This includes the implementation of a continuous Thames Path across the Borough which increases access to the Thames frontage.**

**Where relevant contributions may also be sought towards increasing pedestrian accessibility between the development and important local facilities including shops and services and local public transport nodes, for example crossings, drop kerbs, tactile paving, lighting and so on. This would include contributions toward improving the pedestrian environment at transport interchanges including stations and bus stops.**

**In major new developments used by the public the provision of public conveniences may be sought on site or contributions to off-site Universal Super Loos in line with the Council's Street Environment Maintenance and Management Plan.**

## **REASONED JUSTIFICATION**

- 1.1 Havering's Walking Strategy reflects the policies and objectives set by the London Plan and PPG13 and Havering's Local Implementation Plan.
- 1.2 Havering's Walking Strategy seeks to promote walking because it is;
  - good for the environment as it has the least adverse environmental impacts of all forms of travel and has no negative impacts upon air quality, congestion and noise.
  - good for the community as it is a socially inclusive form of transport which helps reduce social isolation and has positive impacts on community safety
  - good for the individual because it has proven health benefits.
  - good for the economy as town centres which are planned around the needs of pedestrians tend to have more vibrant day and evening economies
- 1.3 Therefore in line with Havering's LIP it sets a number of objectives the most relevant of which to the Core Strategy are;

- to maintain a high quality walking environment
- to improve the pedestrian environment
- to promote safety, security and interaction
- to promote walking for leisure

- 1.4 This policy takes forward the measures within the strategy in so far as they can be implemented through new development.

## **DC35 - CYCLING**

**The design and layout of developments will be encouraged to take account of the needs of cyclists by:**

- **encouraging safe and secure cycle parking and change and shower facilities to be provided appropriate to the nature and scale and location of the development**
- **encouraging the design and location of access and circulation arrangement of the development to take account of the needs of cyclists**
- **in major new development encouraging cycle priority measures which link with existing routes and networks.**
- **where appropriate seeking contributions towards off-site improvements to the cycle network and cycle facilities including facilities at key public transport nodes and destinations and contributions towards the London Cycle Network Plus and Thames Chase Forest Circle.**

**Applicants will be required to provide cycle parking to the standards provided in Annex 6 from Transport for London.**

**In applying this policy regard will be had to the London Cycling Action Plan 'Creating a chain reaction', and the London Cycle Design standards.**

## **REASONED JUSTIFICATION**

- 1.1 Havering's Cycling Strategy reflects the policies and objectives set by the London Plan, PPG13 and Havering's Local Implementation Plan.
- 1.2 Havering's Cycling Strategy seeks to promote cycling because it is;
- good for the environment as it does not pollute or rely on finite fossil fuels, and has positive effects on noise levels and air quality
  - good for the community as it is an inclusive form of transport which is accessible to many groups irrespective of age, background or income
  - good for the individual because it has proven health benefits.

- 1.3 Therefore in line with Havering's LIP it sets a number of objectives the most relevant of which to the Core Strategy are;
- to improve and increase the length of cycle routes
  - to improve and increase cycle parking
  - to improve the cycling environment through engineering and planning measures
- 1.4 This policy takes forward the measures within the strategy in so far as they can be implemented through new development. The cycle standards are from Transport for London proposed guidelines on Cycle Parking Standards.

## **DC36 - SERVICING**

**Planning permission for new industrial, housing, shopping and commercial developments will only be granted where adequate servicing arrangements are provided. As far as possible these will be required within the curtilage of the development, and be designed and laid out so that vehicles can leave in forward gear.**

**Town centre developments may be serviced from the highway at the front of the premises. However planning permission will only be granted where the applicant can demonstrate that:**

- **this will not have an adverse effect on the functioning of the road hierarchy**
- **does not adversely effect the efficient functioning of the public transport network**
- **cause unacceptable levels of congestion or road hazard**
- **does not have an adverse effect on pedestrian safety or the amenity of residential properties**
- **there is no provision of a rear service road as part of the servicing of the wider area.**

## **REASONED JUSTIFICATION**

- 1.1 It is important that in the planning and design of new developments that servicing arrangements are considered from the outset. Outside town centre servicing off the main highway will generally be the best and safest approach. However within town centres service roads can take up valuable town centre land and can impede pedestrian access. The alternative is to service developments from the highway. This can help deliver high density mixed use development but if not carefully controlled by for example conditioning hours of servicing, can have an adverse impact on congestion highway safety, and residential amenity.

- 1.2 The implementation of the Clear Zone remains an option for Havering to consider for Romford Town Centre should it be required for pedestrian safety and convenience. Clear Zones remove all vehicular traffic from the centre, and only allow servicing during strictly defined times which are fully enforced. Effectively this means that pedestrianised areas remain just that during the times of peak pedestrian flows.

### **IMPLEMENTATION**

- 1.3 On street servicing hours will be conditioned.

## **DC37 - SAFEGUARDING**

**Land for the Channel Tunnel Rail Link and Crossrail has been safeguarded in accordance with the safeguarding directions from the Secretary of State.**

**Planning permission will only be granted for the change of use of land from transport and transport support functions where:**

- **it is not required and is unlikely to be required in the future for this purpose**
- **or an equally good alternative is provided either within the borough or in neighbouring boroughs.**

**The Council will seek to ensure that new development is designed and laid out with regard to the planned and proposed improvements to public transport set out in Core Policy 10, including Crossrail, the East London Transit and Beam Park Station.**

### **REASONED JUSTIFICATION**

- 1.1 PPG13 states that identifying and protecting existing and potential routes is critical in widening choices for passengers.<sup>103</sup> The London Plan advises that boroughs should only identify approved schemes in their plans.<sup>104</sup> Directions have been made by the Secretary of State for Transport to Havering to safeguard land for the Crossrail scheme and for CTRL (Channel Tunnel Rail Link Act 1996). However East London Transit is still a proposal and therefore as the precise safeguarding requirements are not known an indicative route is shown on page 174 to enable new development to be designed with regard to its future implementation. The proposed Beam Park Station is included within the Beam Park Site Specific Allocation.

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<sup>103</sup> PPG13 Transport, paragraph 48, ODPM, March 2001.

<sup>104</sup> London Plan, policy 3C.13, GLA, February 2004

- 1.2 The London Plan recommends that changes of use from transport and transport support functions should only be approved if it is no longer required and is unlikely to be required in the future for this purpose, or if equally good alternatives are provided.<sup>105</sup>

**Figure 3 – Indicative route of East London Transit (presentation to be improved)**

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<sup>105</sup> London Plan policy 3C.4, GLA, February 2004



Indicative route of East London Transit 

## **DC38 – PARK AND RIDE**

**Park and ride schemes serving Romford Town Centre which meet the guidance provided in PPG13 and the TfL publication “Park and Ride Strategic Assessment Framework for London” (Nov 2004) will be looked upon favourably.**

### **REASONED JUSTIFICATION**

- 1.1 PPG13 states that local authorities should give favourable treatment to well conceived Park and Ride schemes and in certain circumstances considers them as acceptable Green Belt uses.<sup>106</sup> Park and ride offers the opportunity to reduce road congestion in and around Romford Town Centre and to reduce car dependency and encourage modal shift.
- 1.2 Romford suffers considerable traffic congestion issues which are especially acute at weekends. The introduction of a regular Park and Ride serving Romford town centre would help improve residents accessibility to services and shops, and help bolster the local economy. If successful it may also enable town centre parking to be reduced.

### **IMPLEMENTATION**

- 1.3 Transport for London funding has been secured for a feasibility study into a permanent high quality park and ride facility for Romford.

### **DC39 - FREIGHT**

**Improvement to the integration of rail, river and road freight will be encouraged. Planning permission will only be granted for new developments which generate high levels of freight, provided that the applicant demonstrates through a transport assessment how freight movements to and from their site will be managed with regard to:**

- **maximizing the use of river and rail freight facilities within and outside the borough where this represents the most sustainable option**
- **minimising impact on the efficient functioning of the public transport network**
- **minimising inconvenience to residents and other businesses, and minimising the impact on the environment.**

**Encouragement will be given where practicable to using**

**The use of the River Thames by freight is supported and therefore the Tilda and Phoenix Wharves are safeguarded from redevelopment for other purposes which would prejudice their use for freight related**

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<sup>106</sup> PPG13 Transport, paragraph 59, ODPM, March 2001

**purposes. Their development will not be allowed unless applicants can prove that they will never be capable of being made viable for cargo-handling. In implementing this policy the criteria in paragraph 4.105 of the London Plan will be applied.**

**Development which generates high levels of freight must be located close to major transport routes and away from town centres and residential areas.**

## **REASONED JUSTIFICATION**

- 1.1 Havering's economy and that of the surrounding area relies on an efficient system for the distribution of goods and services. Within Havering the primary freight network is the road network. The borough's main employment areas enjoy excellent access to the A13 and A12 and M25. In line with the Road Traffic Act 2004 the Council will seek to ensure that the traffic management of Havering's roads is properly managed to enable freight deliveries to be made whilst minimising the impact on Havering's residents.
- 1.2 The river Thames provides an alternative to road freight in the south. Currently, there are two safeguarded wharves, Frog Island and Tilda Rice and another operational river terminal at Cleanaway.
- 1.3 Rail freight is active through the borough but not in it. There are now no rail freight terminals within Havering, and Havering's LIP confirms that the Council considers that a case cannot be put forward for a rail terminal that could be cost effectively developed. However, a freight terminal is proposed in Barking and Dagenham which would access the Channel Tunnel Rail link (CTRL) and give access to high gauge wagons to and from mainland Europe. Havering's LIP identifies that access to freight deliveries by rail for origins and destinations within Havering should be through this terminal.

## **IMPLEMENTATION**

- 1.4 As part of their transport assessment major freight generating uses would be required to assess the sustainability of freight movements to and from their site as detailed in the policy.
- 1.5 The Council intends to carry out a feasibility study, subject to receiving LIP funding, to determine how the level of waste transfer by rail/water can be increased.

## **WASTE MANAGEMENT**

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## **DC40 – WASTE RECYCLING**

**Planning permission will only be granted for developments where suitable waste and recycling storage facilities are provided.**

**In large residential or commercial developments neighbourhood recycling centres should be provided where a need exists and where an accessible facility for local residents by all forms of transport can be provided which does not impact adversely on the amenity of neighbouring properties.**

**Where it is not practical or feasible to service each household individually the developer should provide on-site or convenient and accessible off-site communal recycling facilities. The Council will assess the best approach in negotiation with applicants on a site by site basis, having regards to factors such as the overall number of units and the implications for residential amenity and access. Where off-site facilities are considered the best approach the Council will seek a Section 106 agreement commensurate with the scale of the development proposed.**

**Developers are required to provide home composting units with all new homes with gardens.**

### **REASONED JUSTIFICATION**

- 1.1 Havering provides a weekly kerbside collection of paper, card, tins, cans, plastic bottles, plastic bags and aluminium foil to 90,000 households using orange survival sacks. The borough also has a network of 28 neighbourhood recycling centres where residents can bring textiles, cans, glass bottles & jars and paper for recycling. Havering also has a weekly collection service for 'green' garden waste. Alternatively, the borough encourages home composting or residents can take their 'green' waste to the facility at Gerpins Lane from where it is sent for composting.
- 1.2 In 2003-04, a total of 81,235 tonnes of household waste was produced in Havering and 7.5% of this was recycled and 2.1% was composted, 9.6% in total.
- 1.3 The focus of this policy is on ensuring the design of new developments enables significantly increased levels of recycling to be undertaken to help achieve National Recycling targets.

### **IMPLEMENTATION**

- 1.4 The Council may condition applications to ensure that before the new development is operational that the terms of this policy have been met

## **MINERALS**

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## **DC41 – RE-USE AND RECYCLING OF AGGREGATES**

**All new developments are encouraged to:**

- **recycle and re-use as aggregate, construction and demolition waste on development sites**
- **where it is not possible to process and subsequently re-use the material within the site to process it on-site before re-use at another site or for local land restoration**
- **use substitute or recycled materials in new development in place of primary minerals.**

**Subject to policy DC44 planning permission for aggregates recycling will be granted within minerals extraction sites and existing landfill sites where the site is in reasonable proximity to the source of the waste and is in reasonable proximity to the Strategic Route Network. All plant must be removed once the primary operation of the site has ceased.**

**Only where the applicant can prove that there are no suitable and available minerals extraction or landfill sites for aggregates recycling, and the processed material cannot be transported directly by rail or river will planning permission for aggregate recycling facilities be granted within Main Employment Areas.**

**For all aggregates recycling sites there must not be an unacceptable impact on the environment or human health and noise. Dust and visual intrusion must also be kept to a minimum. Applicants are advised to consult the Government guide ‘Controlling the Environmental Effects of Recycled and Secondary Aggregates’.**

### **REASONED JUSTIFICATION**

- 1.1 This policy is focused on meeting London Plan targets for the re-use of construction and demolition waste. The recycling of aggregates involves the sorting, crushing and grading of construction and demolition waste. Ideally this process should be done on site and as much of the recycled waste re-used in the construction process. This helps reduce the need for primary minerals and also reduces the need to transport minerals from, and too, the site. However, where this is not possible there will be a need for off-site recycling facilities. These tend to be best located in mineral extraction and landfill sites. However, in exceptional circumstances, these may be allowed within Main Employment Areas.

## **DC42 – MINERALS EXTRACTION**

**Planning permission for minerals extraction will only be granted within the areas of search shown on the proposals map and provided the criteria in CP13 are satisfied and provided:**

***Environmental Impact***

- **That the proposed extraction will not result singularly or cumulatively in significant adverse impacts on the environment or human health by ensuring:**
  - **minimisation of environmental disturbance for the period of the operation by means of, for example, tree planting and land grading schemes, visual screens, acoustic baffles, siting of plant and buildings, limitation of working hours, direction of working and by relating excavation to progressive restoration to minimise the extent of the area open at any one time**
  - **particle emissions meet EC and UK standards**
  - **there are no adverse noise and dust impacts with regard to Annexes 1 and 2 of MPS2. 'Controlling and Mitigating the Environmental Effects of Minerals Extraction in England- Noise'. Applicants will be required to prepare and implement a Dust Action Plan to control dust to acceptable levels**
  - **there is no significant adverse effect on safety and amenity from vehicular traffic. When considering the traffic implications the Council will not only consider the effect on roads and the amenity of residents in the vicinity of the site but also along routes leading to the site through built-up areas and through the countryside**
  - **there are no significant long term adverse effects on the landscape**
  - **it does not create land instability**
  - **adequate separation distances are maintained with regard to guidance in Draft MPS1**
  - **subject to part 19 of the General Development Plan Order 1995, ensure ancillary buildings, structure, plant or equipment in the Green Belt are essential to the operation and preserve the open nature of the Green Belt, and that their materials are sympathetic to the landscape and their impact is minimised by appropriate siting and screening where necessary.**
  - **there is no significant adverse effect on sites of protected or priority species or habitats in line with Havering's Biodiversity Action Plan, sites of historical, geological or archaeological importance**
  - **there is no significant adverse effect on ground or surface waters, flooding, and air quality.**

***Restoration***

- **the site workings are restored to the highest standards and secure a beneficial and acceptable after use in line Green Belt objectives**
- **sites within the Thames Chase Community Forest are provided to a high quality after-use in liaison with the Thames Chase Forest and the Council which increased the recreational and biodiversity quality of the land in line with the targets in Havering's Biodiversity Action Plan, as appropriate**
- **where extraction involves grade 1, 2 or 3A agricultural land that it is restored to its former physical characteristics, and that extraction is phased to ensure the maximum amount of land is retained in agricultural use.**

**Applicants will be required to include a detailed scheme for the progressive restoration of the land and the after-use of the site in line with Minerals Planning Guidance 7: Reclamation of Mineral Workings. Where the proposed restoration is to agriculture, forestry or amenity, a scheme for the management of the land for at least 5 years following restoration will be required. In evaluating after-use and restoration the Council will take into account the applicant's past record of working and restoring sites. It will seek to secure the improvement of poorly restored land within the applicant's control by imposing planning conditions or through legal agreements where appropriate.**

## **REASONED JUSTIFICATION**

- 1.1 MPG1 states that sustainable minerals development should ensure that the environmental impacts caused by mineral operations and the transport of minerals are kept, as far as possible, to an acceptable minimum. This is further amplified in draft MPS1, which states that factors such as a site's impact on the environment including air and water quality, impact on existing urban areas especially sensitive uses such as housing, and the quality of land for example its nature conservation value, the character of the landscape, its historic interest and its agricultural quality need to be taken into account in identifying sustainable locations for minerals extraction.
- 1.2 Consequently this policy seeks to ensure that planning permission for new minerals extraction sites is only granted to those applications within the 'areas of search' shown on the proposals map (or exceptionally outside of these areas) which are sustainable and ensure the high quality restoration of minerals extraction sites.
- 1.3 It is important to note that minerals extraction need not be inappropriate development or conflict with the purposes of designating Green Belts. However, in permitting mineral winning developments in the Green Belt, the Council will need to ensure that high environmental standards are maintained during operation, and that the site is well restored to an after use consistent with Green Belt objectives.

- 1.4 The policy also seeks to ensure the high quality restoration of mineral extraction sites, which may in appropriate circumstances, help to provide leisure and recreation opportunities in the Green Belt and, where relevant, help deliver the Thames Chase Plan.
- 1.5 Applicants will be encouraged to:
- Carry out environmental audits to ensure they comply with relevant legislation, regulation and conditions contained in pollution control authorisations, discharge approvals and planning permissions
  - Adopt voluntary site transport plans in consultation with the local community

## **IMPLEMENTATION**

The production of primary land won aggregates will be monitored in the Annual Monitoring Report which will help inform the need for applications for minerals extraction.

## **DC43 – MINERALS SAFEGUARDING**

**Wherever possible, potentially workable mineral deposits will be safeguarded from surface development which would prevent the deposits being worked in the future. Where development is permitted which would sterilise the mineral resources, the Council will normally allow the prior extraction of the minerals provided that this conforms with Core and Development Control. However, prior extraction will not be allowed where it would render a site unsuitable for the proposed surface development.**

## **REASONED JUSTIFICATION**

- 1.1 Draft Minerals Planning Statement 1 states that the planning system has an important role to play in the safeguarding from unnecessary sterilisation by surface development of deposits of minerals which are or may become within the foreseeable future of economic importance.<sup>107</sup> Most of the minerals reserves in Havering are within the Green Belt which provides protection from inappropriate development and therefore by default helps protect reserves from sterilisation. However the Green Belt designation does not guarantee that all minerals reserves are protected from potentially sterilising development and therefore a policy is required to address this.

## **DC44 - READY MIXED AND PROCESSING PLANT**

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<sup>107</sup> Draft Minerals Planning Statement 1, Planning and Minerals, Paragraph 7, ODPM, November 2004

**Within the Green Belt planning permission will only be granted for ready mix concrete plant and other secondary aggregate processing plants at current mineral working sites. However, unless proposed as part of the application for extraction, the Council may seek Article 4 Directions to restrict the rights to erect such plant where, unless carefully controlled, this would be likely to conflict with other policies of the Plan. All secondary plant at mineral sites will be tied to the life of mineral extraction at the site and all plant will be required to be removed upon the completion of mineral working.**

## **REASONED JUSTIFICATION**

- 1.1 Draft Minerals Planning Statement 1 states that local authorities should indicate the types of site where recycled or secondary aggregates production could take place. If this is not possible, clear criteria should be included to assist the identification of an appropriate number of sites.<sup>108</sup>
- 1.2 The erection of processing plant which is ancillary to mineral working is generally permitted by the General Development Order (GDPO), although the detail may be subject to approval. The location of ready mixed concrete and other secondary aggregate processing plant on operational mineral sites will help to reduce traffic movements by minimising the number of traffic movements required.

## **DC45 - TRANSPORT OF AGGREGATE BY RAIL OR RIVER**

**Planning permission for the establishment of facilities for the importation and distribution of aggregate by rail or river will be granted where both of the following criteria are met:**

- **the site has good connections to the primary road network which are adequate to cope with the expected traffic**
- **there is no conflict with green belt, environment or employment policies.**

## **REASONED JUSTIFICATION**

- 1.1 The establishment of bulk handling and distribution facilities for imported aggregates would help to reduce the need to rely on long distance lorry traffic. The retention of existing aggregate depots is encouraged by the London Plan. However, there are already aggregate wharves and depots in Barking and Dagenham and in Thurrock which currently serve the north eastern part of London and now that Frog Island has been developed for waste uses it is very unlikely that such sites can be found in Havering.

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<sup>108</sup> Draft Minerals Planning Statement 1, Planning and Minerals, ODPM, November 2004

## **GREEN BELT**

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## **DC46 - APPROPRIATE DEVELOPMENT IN THE GREEN BELT**

**The Council will promote uses in the Green Belt that have a positive role in fulfilling Green Belt objectives. Planning permission for development in the Green Belt will only be granted if it is for the following purposes:**

- **agriculture and forestry, outdoor recreation, nature conservation, cemeteries**
- **mineral extraction provided Core and Development Control minerals policies are complied with**
- **park and ride facilities provided that the criteria in Annex E of PPG13 are met.**

**Planning permission for new buildings will only be granted for the following purposes:**

- **they are essential for the uses listed above**
- **they involve limited infilling or redevelopment on a site designated as a Major Developed Site.**

**Extensions, alterations and replacement of existing dwellings will be allowed provided that the cubic capacity of the resultant building is not more than 50% greater than that of the original dwelling.**

**Planning permission for the reuse of existing buildings will only be granted if the criteria set out in PPG2 are satisfied. Particular care will be taken to ensure that the proposed use (including the use of any adjoining land) does not have a greater impact on the openness of the Green Belt.**

**Subject to the Departure procedure, planning permission for the redevelopment of authorised commercial/industrial sites will be granted provided there is a substantial decrease in the amount of building on the site and improvements to the local Green Belt environment.**

## **REASONED JUSTIFICATION**

- 1.1 This policy is based on the guidance set out in PPG2. PPG2 makes it clear that there is a general presumption against inappropriate development which is harmful to the Green Belt except in very special circumstances. It says that policies in development plans should ensure that any planning applications for inappropriate development accord with the plan. In addition PPG13 Transport amends PPG2 by saying that park and ride schemes may be appropriate subject to non Green Belt sites being investigated first and a number of other criteria set out in Annex E of the guidance.

- 1.2 The Council considers that in order to achieve improvement to both the open nature and Green Belt environment at existing authorised commercial/industrial sites it may be justifiable to grant permission for a use which would not normally be acceptable in terms of Green Belt policy. Any such proposal will need to be treated as a Departure and will be subject to the appropriate procedures.

## **DC47 - MAJOR DEVELOPED SITES**

**The following sites have been defined as Major Developed Sites in the Green Belt.**

- **St George's Hospital**
- **Cardrome**
- **Quarles Campus**

**The criteria set out in Annex C of PPG2 will be applied when determining planning applications on these sites.**

**Proposals for alternative uses to the existing use must comply with CP1 and DC26.**

## **REASONED JUSTIFICATION**

- 1.1 PPG2 allows limited infilling or redevelopment of major existing sites that have been identified in the Local Plan. The Council has identified the following sites as major developed sites as they all have a substantial amount of existing buildings and may become available for other uses in the future.
- 1.2 St. Georges Hospital - This site lies between residential areas to the north and Hornchurch Country Park to the south and adjoins the ecologically sensitive Ingrebourne Valley to the east. Any redevelopment of the site will need to relate satisfactorily to the surrounding uses.
- 1.3 The Cardrome – The majority of this site is laid out with a system of roads that is used by persons learning to drive off the public highway. Other parts of the site are occupied by car sales, a filling station and a variety of buildings used in connection with the other uses on the site.
- 1.4 Quarles Campus – This former school site is still in education use and is currently one of three sites in the Borough occupied by Havering College. The western part of the site is occupied by a range of buildings and hardstanding whilst the eastern part of the site is largely open and provides some sport /recreation facilities. Planning permission has recently been granted for a community football project including a full size grass pitch, an artificial training pitch, changing facilities and car parking.

## **DC48 - AGRICULTURE**

### **The Council will**

- **not grant planning permission where the proposal would result in the loss of high quality agricultural land (Grades 1, 2 & 3a) unless it can be shown that the development is unavoidable and no lesser quality land is available**
- **seek to ensure that new agricultural buildings are necessary for a bona fide agricultural enterprise and that other suitable buildings on the agricultural unit previously used for agricultural purposes within the last four years are not being used for a non agricultural use**
- **apply the criteria set out in PPS7 when dealing with applications for farm diversification including farm shops and applications for permanent and temporary agricultural/forestry dwellings**
- **ensure that the amenities of local residents are protected when permission is granted for diversification or a new agricultural building.**

### **REASONED JUSTIFICATION**

- 1.1 National planning policy in PPS7 recognises the importance and varied roles of agriculture including the maintenance and management of the countryside and valued landscape. The guidance says that the presence of the best and most versatile agricultural land (grades 1, 2 and 3a of the Agricultural Land Classification) should be taken into account when determining planning applications. If development of agricultural land is unavoidable local planning authorities should seek to use areas of poorer quality (grade 3b or lower).
- 1.2 The guidance says that favourable consideration should be given to proposals for diversification in the Green Belt where the development preserves the openness of the Green Belt and does not conflict with the purposes of including land in the Green Belt. When determining such applications the Council will apply the criteria set out in PPS7.
- 1.3 This policy seeks to ensure that agricultural buildings are genuinely needed and their adverse effect on the Green Belt and the environment are minimised in order to protect the open nature of the Green Belt and the amenities of residents.
- 1.4 Dwellings are often required for farm workers especially where livestock is involved on the holding. This is a sensitive issue in the open countryside and even more so in the Green Belt. The Council will therefore need to be convinced that the new dwelling is essential and will use the criteria set out in

Annex A of PPS7. Similarly when new farming activities are started the criteria for temporary dwellings set out in PPS7 will be applied.

## **ENVIRONMENTAL MANAGEMENT**

## **DC49 – FLOOD RISK**

**Planning permission will only be granted for development where it can be demonstrated that:**

- it is in the lowest appropriate flood risk zone with regard to table 1 of Planning Policy Guidance Note 25. Proposals in high risk zones must demonstrate that there are no other suitable sites in areas with a lower probability of flooding and that measures are put in place to safely manage any residual flood risks for the lifetime of the development**
- it would not constrain the natural function of the flood plain, either by impeding flood flow or reducing storage capacity**
- surface water is controlled as near to its source as possible and does not add to flood risk elsewhere**
- the use of Sustainable Urban Drainage Systems (SUDS) has been considered. Where SUDS have not been used, the applicant should justify these reasons.**

**A Flood Risk Assessment must be submitted with planning applications for proposals in flood risk zones 2 & 3, appropriate to the nature and scale of the development. This must identify and assess the risks of all forms of flooding to and from the development and demonstrate how the flood risks will be managed over the lifetime of the development.**

**A Surface Water Flood Risk Assessment must be submitted with planning applications for developments over 1 hectare in size.**

### **REASONED JUSTIFICATION**

- 1.1 It is important that flood risk is properly addressed in the planning of new developments otherwise this can result in property damage during periods of flooding, put residents in the floodplain at risk, and increase risk to those outside the floodplain.
- 1.2 To ensure this developers must adopt the sequential approach in determining the location of their development with regard to its land use and type and the flood risk zones shown on the proposals map.
- 1.3 In permitting sites for development the Council will give priority in descending order to the flood zones set out in Table 1 of PPG25, including the sub-divisions in Zone 3.
- 1.4 Where appropriate the use of Sustainable Urban Drainage Systems (SUDS) must be considered. These aim to control surface water run-off as near to its source as possible and ensure that drainage from the site is consistent with

that of a greenfield site. Sustainable Urban Drainage Systems (SUDS) can be applied to all new development and those in flood risk areas to control the quantity of surface water drainage. Such systems include conventional attenuation storage (tanks or excavated areas), permeable pavements, infiltration trenches and ponds. The Environment Agency should be contacted for more detail on SUDS. Planning obligations to secure flood attenuation measures may be required to make the development acceptable.

## **IMPLEMENTATION**

- 1.5 More detail on FRAs can be obtained in PPG25 or from the Environment Agency.
- 1.6 The Council will have regard to PPS25, in operating this policy.

## **DC50 - SUSTAINABLE DESIGN AND CONSTRUCTION**

**Planning permission for major new developments will only be granted where they are built to a high standard of sustainable construction.**

**Applicants for major developments will be required to produce documentation from the Building Research Establishment to confirm that the development is predicted to achieve a rating under the Eco-Homes or BREEAM schemes (or equivalent methodology) of at least Very Good.**<sup>109 110</sup>

**“Major Developments” are those with 10 or more dwellings or in mixed developments and other cases buildings of 1000 square metres or more.**

**More detailed advice to support this policy is included in the Supplementary Planning Document on Sustainable Construction.**

## **REASONED JUSTIFICATION**

- 1.1 This policy focuses on the application of the Building Research Establishments, BREEAM standards which address these issues through an assessment of the sustainability of the design of a number of uses including offices, homes (Eco-Homes), industrial units, retail units and schools. However, the Council recognises that this assessment may change in the future and will use the appropriate replacement standard.
- 1.2 The BREEAM standard is a widely accepted benchmark for measuring the environmental performance of buildings. It offers an independent assessment of a proposal using a range of criteria for which credits attained are interpreted

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<sup>109</sup> British Research Establishment Environmental Assessment (BREEAM), British Research Establishment, 1990

<sup>110</sup> Eco-Homes is the homes version of BREEAM

in the form of an overall rating of Excellent, Very Good, Good and Fair. BREEAM assesses the performance of buildings in the following areas: management: overall management policy, commissioning site management and procedural issues, energy use: operational energy and carbon dioxide (CO<sub>2</sub>) issues, health and well-being: indoor and external issues affecting health and well-being, pollution: air and water pollution issues, transport: transport-related CO<sub>2</sub> and location-related factors, land use: greenfield and brownfield sites, ecology: ecological value conservation and enhancement of the site materials: environmental implication of building materials, including life-cycle impacts, water: consumption and water efficiency.

## **DC51 – RENEWABLE ENERGY**

**Planning permission for major developments will only be granted where the application:**

- **includes a formal energy assessment showing how the development has sought to ensure that energy consumption and carbon dioxide emissions are minimised.**
- **incorporates on-site renewable energy equipment to reduce predicted CO<sub>2</sub> emissions by at least 10%.**

**“Major Developments” are those with 10 or more dwellings or in mixed developments and other cases buildings of 1000 square metres or more.**

**Proposals for the development of renewable energy facilities will be acceptable, provided that their design is not detrimental to the character of the surrounding area, there is no demonstrable harm to visual or residential amenities or gives rise to unacceptable levels of pollution generation. In assessing schemes the benefits of achieving diverse and sustainable energy supplies and reducing greenhouse effects will be balanced against any harm arising from the development. Consideration will also be given to the viability of installing renewable energy generation equipment with regard to the type of development proposed and its location, and design.**

**More detailed advice to support this policy is included in Supplementary Planning Document on Sustainable Construction.**

## **REASONED JUSTIFICATION**

- 1.1 In line with the London Energy Strategy and PPS22 ‘Renewable Energy’, this policy requires major new development to incorporate on-site renewable energy equipment to reduce predicted CO<sub>2</sub> emissions by at least 10%.<sup>111</sup>. On-site renewable technologies that can be used to meet the 10% target and

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<sup>111</sup> London Energy Strategy, GLA, 2004

which are promoted by PPS22 include small scale renewable energy schemes utilising technologies such as solar panels, biomass heating, small scale wind turbines, and photovoltaic cells.

- 1.2 However, a major investment in decentralised smaller-scale renewable energy regeneration will also be needed across the Borough to help achieve London's potential, identified in the London Renewable Energy Assessment<sup>112</sup> 2001 (DTI).
- 1.3 As far as standalone developments are concerned, Havering already has a number of wind turbines. National guidance makes it clear that specific sites can only be allocated for renewable energy in plans where a developer has already indicated an interest in the site, has confirmed that the site is viable, and that it will be brought forward during the plan period.

### **IMPLEMENTATION**

- 1.4 More detailed advice to support this policy is included in Supplementary Planning Document on Sustainable Construction.
- 1.5 Applicants are recommended to consult The London Renewables Toolkit 'Integrating renewable energy into new developments: A toolkit for planners developers and consultants'<sup>113</sup> (2004).

## **DC52 - WATER SUPPLY, DRAINAGE AND QUALITY**

**Planning permission will only be granted for development which has no significant adverse impact on water quality, water courses, groundwater, surface water or drainage systems unless suitable mitigation measures can be secured through conditions attached to the planning permission, or a legal agreement. Where a development affects the lower reaches of the Rivers Beam and Rom and River Ingrebourne contributions may be sought towards measures to improve the poor water quality in these areas.**

**Applicants are required as a minimum to incorporate a high standard of water efficiency which can include greywater and rainwater recycling to help reduce water consumption.**

**New development must be co-ordinated and phased inline with the provision of the appropriate utility infrastructure including adequate water, foul drainage and sewerage treatment capacity to serve all developments.**

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<sup>112</sup> London Renewable Energy Assessment, Department of Trade and Industry, 2001

<sup>113</sup> The London Renewables Toolkit 'Integrating renewable energy into new developments: A toolkit for planners developers and consultants, GLA, 2004

**Developers must demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to problems for existing users.**

**Development or expansion of water supply or waste water facilities necessary to serve existing or planned future development will need to ensure that there is no adverse impact on other land uses or the environment.**

## **REASONED JUSTIFICATION**

### *Water supply and drainage*

- 1.1 The Environment Agency estimates that rainwater and grey water recycling (water butts or more complex collection and treatment systems) can reduce household water use by up to 30%, with even greater savings for commercial and public premises. This is an important issue because climate change could have fundamental effects on water supply due to seasonal changes in rainfall levels and temperature increases.
- 1.2 Sewerage and water supply to the proposed new homes in London Riverside may need to be phased, and developer contributions sought to ensure that new development is properly serviced.

### *Water quality*

- 1.3 The London Plan expects boroughs to seek to protect and improve water quality to ensure that the Blue Ribbon Network<sup>114</sup> is healthy, attractive and offers a valuable series of habitats by directing refusal of proposals that are likely to lead to a reduction in water quality. In 2004 river water quality remains at fair, poor or even bad for the lower parts of the Rivers Beam/Rom and Ingrebourne.

## **IMPLEMENTATION**

- 1.4 More detailed advice to support this policy is included in the Sustainable Construction SPD.

## **DC53 – AIR QUALITY**

**Planning permission will only be granted where new development both singularly or cumulatively does not cause significant harm to air quality,**

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<sup>114</sup> The London Plan, Policy 4C.1 the Strategic Importance of the Blue Ribbon Network, GLA, 2004

**and does not cause a breach of the targets set in Havering's Air Quality Management Area Action Plan (HAQMAAP).**

**A formal assessment will be required where it is suspected that a development is likely to cause a breach of emission levels for prescribed pollutants. Where the assessment confirms a breach, planning permission will only be granted if suitable mitigation measures are put in place through conditions or legal agreement.**

## **REASONED JUSTIFICATION**

- 1.1 The whole of Havering has been designated as an Air Quality Management Area, and by 2007 an Action Plan will have been agreed which will set out the measures Havering intends to take to reduce levels of Nitrogen Dioxide and fine particulate matter (PM10) to acceptable levels.

## **IMPLEMENTATION**

- 1.2 The Supplementary Planning Document on Sustainable Construction includes measures which may help mitigate airborne emissions from development proposals. The Havering Air Quality Management Area Action Plan (AQMAAP) also provides details on the boundary of the AQMAAP and the objectives of this plan for the borough.

## **DC54 - CONTAMINATED LAND**

**Planning permission for development will only be granted where both of the following criteria are met:**

- **where the development is on or near a site where contamination is known, or expected to exist, a full technical assessment of the site's physical stability, contamination and/or production of landfill gas must be undertaken. Where the assessment identifies an unacceptable risk to human health, flora or fauna or the water environment, the applicant will be required to agree acceptable long term remediation measures before any planning permission is granted to ensure there is no future harm with regard to the future use of the site. Where feasible on-site remediation, especially bio-remediation is encouraged**
- **the development does not lead to future contamination of the land in and around the site.**

## **REASONED JUSTIFICATION**

- 1.1 Havering Council is receiving an increasing number of planning applications for development on previously used land. In many cases, these sites are

affected by the presence of contamination due to historic industrial or waste disposal processes. Contamination can affect the health of people, flora and fauna as well as affecting the development potential of the site, however, development presents an opportunity to remediate this.

## **IMPLEMENTATION**

- 1.2 The Havering Council leaflet titled 'Contamination and the Planning Process' provides information on what the Council requires in order to assess if a development is suitable for the proposed use on land which is potentially affected by contamination.
- 1.3 Where there is a proposal to develop land which may be contaminated, it is advisable to contact the Environmental Health Service (EHS) to discuss potential land contamination issues before submitting a planning application. This will determine whether a Phase I Preliminary Risk Assessment Report and Checklist is required as part of the planning application. The document also provides contact details for the Council's EHS.
- 1.4 For details on Bioremediation applicants should refer to the Environment Agency's Remedial Action Datasheets which are available on their website. Applicants should also consider the Model Procedures for the Management of Land Contamination, CLR 11 from the Environment Agency, which have been developed to provide the technical framework for applying a risk management process when dealing with land affected by contamination.

## **DC55 - NOISE**

**Planning permission will not be granted if it will result in exposure to noise or vibrations above acceptable levels affecting a noise sensitive development such as all forms of residential accommodation, schools and hospitals. Where the proposal would lead to a noise sensitive development being located near to a noise generating activity a formal assessment will be required to ensure compliance with the noise exposure categories in PPG24. Planning conditions may be imposed to this effect.**

## **REASONED JUSTIFICATION**

- 1.1 Noise pollution can have a significant effect on someone's quality of life, whether a householder, hospital patient, school pupil or employee. Therefore noise sensitive developments should be located away from existing sources of significant noise, and potentially noisy developments located in areas where noise will not be such an important consideration or where its impact can be minimised.

## **IMPLEMENTATION**

- 1.2 A Supplementary Planning Document provides advice on Noise and Vibration Standards for Railways
- 1.3 When completed Havering's Ambient Noise Strategy will provide useful evidence for the application of this policy.

## **DC56 - LIGHT**

**In order to minimise the intrusion of artificial lighting planning permission will only be granted for development including artificial lighting where it does not have a negative impact on the amenity of residents or public safety.**

**Planning conditions may be used to control the level of luminance, glare, spillage, angle, type of lighting and hours of operation.**

**Applicants are encouraged to use low energy lighting to limit the disturbance to wildlife.**

### **REASONED JUSTIFICATION**

- 1.1 Whilst artificial lighting is an effective measure in creating safe and secure environments, and is also necessary for nighttime sporting activity, it can have adverse impacts, on wildlife, residential amenity, safety and energy conservation. It is only where the provision of lighting involves development or is part of a larger development scheme for which a planning application is required that the Council can impose planning controls.
- 1.2 PPG17 'Planning for Open Space, Sport and Recreation', provides guidance on floodlighting, it states that in considering applications for floodlighting, local authorities should ensure that local amenity is protected. It also states that the impact on the openness of the Green Belt or on the character of the countryside, of floodlight towers should be a key factor in determining whether planning permission should be granted

### **IMPLEMENTATION**

- 1.3 The Government has produced guidance 'Lighting in the Countryside: towards good practice.' The advice is applicable in towns as well as the countryside and will be used as part of assessing planning applications.

## **DC57 - RIVER RESTORATION POLICY**

Parts of the rivers Beam and Ingrebourne have been identified by the “Bringing Your Rivers Back to Life” strategy, as rivers which could benefit from restoration. However, other Havering rivers could also benefit from restoration, including the Rom, the Ravensbourne, the Warley, the Weald Bank and Paines Brook.

Where sites are located in close proximity to a river the Council will in appropriate circumstances seek river restoration and/or financial contributions towards the restoration of rivers. In particular the Council will seek where appropriate:

- improvements to the River Ingrebourne, including full river restoration, the restoration of banks and in-channel habitat enhancement
- improvements to the River Beam, including full river restoration, in channel habitat enhancement the restoration of river banks, the removal of structures (e.g. weirs), deculverting and river channel restoration
- improvements to the River Rom, including in-channel habitat enhancement
- improvements to the Weald Bank and the Ravensbourne in the form of full river restoration.

## **REASONED JUSTIFICATION**

- 1.1 The ‘Bringing Your Rivers Back to Life’ strategy promotes river restoration in Havering and other boroughs. River restoration can improve the quality of a river and its surrounding area environmentally, socially and economically by attracting visitors, biodiversity and businesses to the area and helps enhance the Blue Ribbon Network as set out in the London Plan.<sup>115</sup>

## **DC58 - BIODIVERSITY AND GEODIVERSITY**

**Biodiversity and geodiversity will be protected and enhanced throughout the borough by:**

- protecting and enhancing all sites of Metropolitan, Borough or Local Importance for Nature Conservation as identified in SPD and shown on the proposals map. Planning permission for development that adversely affects any of these sites will not be granted unless the economic or social benefits of the proposals clearly outweigh the nature conservation importance of the site and only then if adequate mitigation can be provided
- not granting planning permissions which would adversely affect priority species/habitats identified in either the GLA or Havering

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<sup>115</sup> Bringing Your Rivers Back to Life: a Strategy for Restoring Rivers in North London, Environment Agency, February 2006

**Biodiversity Action Plans unless the economic or social benefits of the proposals clearly outweigh the nature conservation importance of the site and only then if adequate mitigation measures to secure the protection of the species/habitat can be provided**

- **protecting and promoting the linking of habitats via the wildlife corridors shown in figure 4**
- **protecting the individual quality and character of, and promoting access to, each Countryside Conservation Area shown on the proposals map**
- **protecting and enhancing the biodiversity of the Blue Ribbon Network including rivers and their associated corridors.**

## **REASONED JUSTIFICATION**

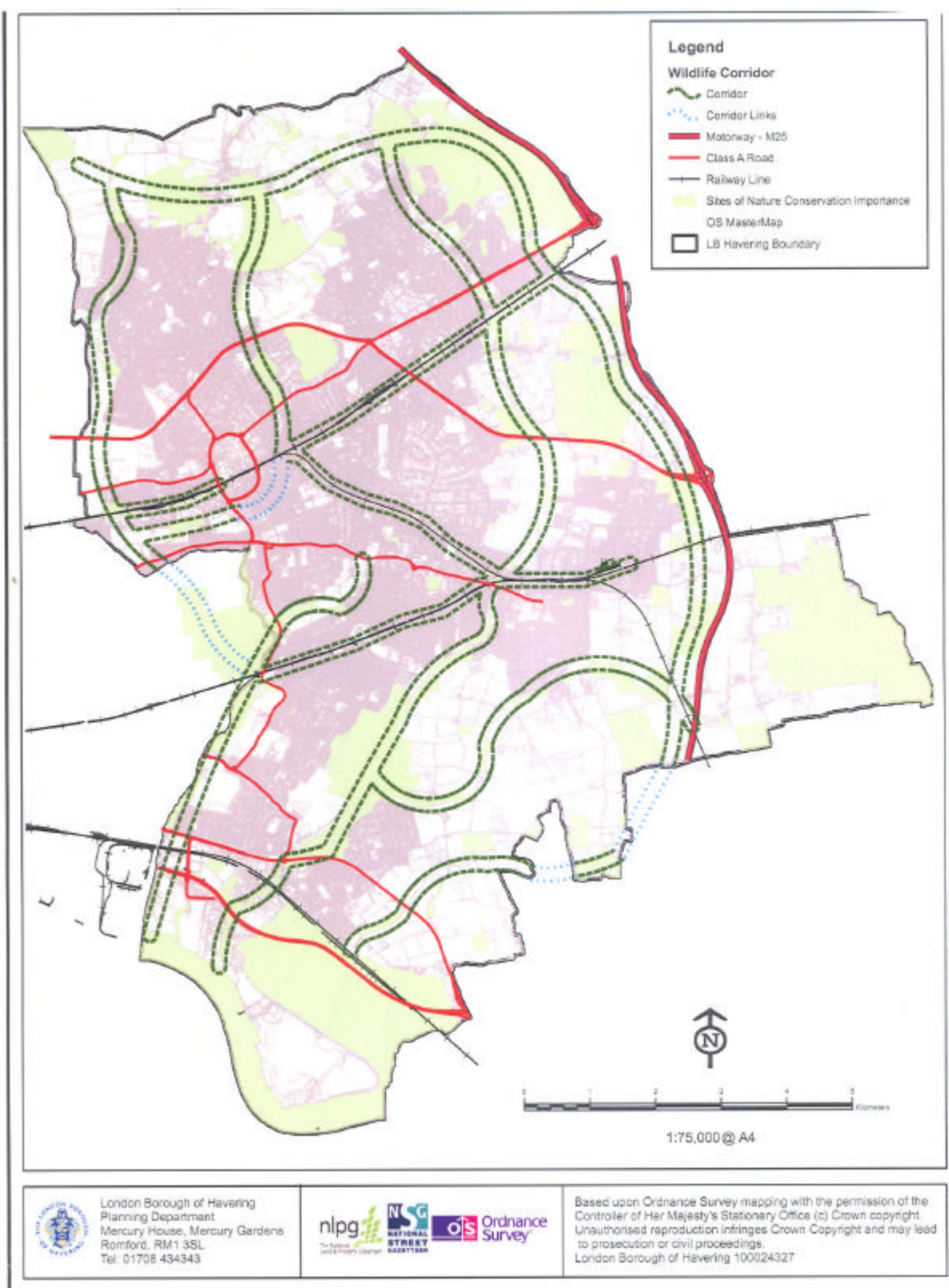
- 1.1 Biodiversity consists of the rich diversity of flora and fauna which form a critical part of the earth's ecosystem which humans are a part of and depend on. Biodiversity brings other benefits too. It can be important in flood protection, help ameliorate pollution, and can also be important to the local economy. It is important that biodiversity is protected and enhanced. The London Biodiversity Action Plan, Havering's Biodiversity Action Plan and the GLA's Sites of Importance for Nature Conservation in Havering provide a wealth of information on biodiversity which is particularly rich within Havering.
- 1.2 The London Riverside Conservation Park which is included as a Site Specific Allocation and part of which is already designated as a nature reserve is forecast to attract over half a million visitors a year when complete. Similarly the Thames Chase Forest is rich in biodiversity and provides an important asset in Havering's urban fringe and opportunities for enhancement are included in the Thames Chase Action Plan. As part of the survey of the Borough the GLA identified three Countryside Conservation Areas which are broad tracts of land where more traditional landscape predominates and there is a high wildlife interest.
- 1.3 When implementing the policy in respect of species/habitats reference will be made to the UK, London, and Havering Biodiversity Action Plans
- 1.4 The rivers in the borough and their associated corridors are, in the most part, included either in wildlife corridors, SSSIs, Local Nature Reserves or other sites of nature conservation interest. The London Plan stresses the importance of a valuable series of habitats known as the Blue Ribbon Network. The Council will seek to protect and enhance the biodiversity of this network by implementing policy 4C.3 of the London Plan.
- 1.5 However, biodiversity is not confined to major sites and the countryside it is also present in private gardens and street trees provide important habitats. Previously developed land or "brownfield land" may also have biodiversity interest. Therefore, policy should not just be concerned about ensuring new

development does not harm biodiversity it can actually represent an opportunity to add to it.

**IMPLEMENTATION**

- 1.6 SPD on Biodiversity provides more detailed guidance on:
- Countryside Conservation Areas
  - wildlife corridors
  - priority habitats and species
- 1.7 The success of this policy will be monitored with the help of the Havering Wildlife Partnership with regard to the Havering Biodiversity Action Plan.

**Figure 4 – Wildlife Corridors in Havering**



## **DC59 - BIODIVERSITY IN NEW DEVELOPMENTS**

**Enhancements to biodiversity and geodiversity will be sought, in line with Havering Biodiversity Action Plan targets, as an integral part of new development.**

#### **REASONED JUSTIFICATION**

- 1.1 National Policy in PPS9 has as a key principle, the promotion of opportunities for the incorporation of beneficial biodiversity and geological features within the design of development.
- 1.2 Even small scale developments can increase habitat and benefit biodiversity, for example, by the planting of a single tree or the provision of bird/bat boxes. The opportunities are much greater on larger sites and include, for example, buffer zones to watercourses, planting of native species trees and shrubs, sustainable urban drainage schemes and green roofs.
- 1.3 The Havering Biodiversity Action Plan identifies action plans for various species and habitats in the Borough. This will be a useful guide in deciding how new developments can best contribute to enhancing biodiversity.

#### **IMPLEMENTATION**

- 1.4 SPD on Biodiversity provides more detailed guidance on: measures to enhance biodiversity in development schemes.

#### **DC60 - TREES**

**The amenity and biodiversity value afforded by trees and woodland will be protected and improved by:**

- **retaining trees where practical and making tree preservation orders where appropriate**
- **ensuring that adequate measures are put in place when granting planning permission to protect trees during construction works**
- **supporting the implementation of the Thames Chase Plan and ensuring that, where appropriate, development within the area makes a positive contribution towards its implementation**
- **not granting planning permission for development that would adversely affect ancient woodland.**

#### **REASONED JUSTIFICATION**

- 1.1 Havering is fortunate in having not only a large number of woodlands but also a large number of trees or small groups of trees interspersed within the built environment. This is particularly so in Harold Hill, Gidea Park and Emerson

Park. Woodlands and trees make an important contribution to visual amenity, biodiversity and in some cases provide recreation opportunities. Many copses in particular ancient woodland are protected as either sites of Special Scientific Interest or of Metropolitan or Local Importance.

- 1.2 Part of the Borough is in the Thames Chase Community Forest area and this has resulted in the creation of new woodlands as well as other new planting including hedgerows. Thames Chase will continue to add to the tree cover of the Borough in future years.

### **IMPLEMENTATION**

- 1.3 SPD on the Protection of Trees during Development provides more detail on the implementation of this policy.
- 1.4 Where appropriate planning conditions will be imposed on planning permissions to ensure the protection of trees of amenity value while development takes place.
- 1.5 Tree preservation orders may be made on individual trees, groups of trees, areas of trees, hedges or woodlands which contribute to the character of the area and are of public amenity value.

## **DESIGN**

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## **DC61 - URBAN DESIGN**

**Planning permission will only be granted for development which maintains, enhances or improves the character and appearance of the local area. Development must therefore:**

- **harness the topographical and ecological character of the site, including the retention of existing trees and landscape features while providing appropriate landscaping**
- **respond to distinctive local building forms and patterns of development and respect the scale, massing and height of the surrounding physical context**
- **complement or improve the amenity and character of the area through its appearance, materials used, layout and integration with surrounding land and buildings**
- **provide structure by utilising and protecting existing views, vistas, panoramas and landmarks and creating new ones;**
- **reinforce, define and embrace the street and create natural surveillance by ensuring streets and open spaces are overlooked**
- **create or enhance and clearly define the public and private realms and ensure these are free of clutter and easily accessible**
- **meet the needs of all people of all ages**
- **be designed and oriented around the needs of pedestrians, cyclists and connectivity to the public transport network**
- **be durable, flexible and adaptable.**

**Where Statutory Instrument 2006 No. 1062 applies, applications for planning permission must be accompanied by a design and access statement which addresses the guidance in Circular 1/2006.<sup>116</sup>**

**Planning permission will not be granted where the proposal:**

- **results in unacceptable overshadowing, loss of sunlight/daylight, overlooking or loss of privacy to existing and new properties and has unreasonable adverse effects on the environment by reason of noise impact, hours of operation, vibration and fumes between and within developments or**
- **prejudices the satisfactory development of adjoining land and/or the development of the surrounding area as a whole.**

## **REASONED JUSTIFICATION**

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<sup>116</sup> Statutory Instrument 2006 No. 1062, The Town and Country Planning (General Development Procedure) (Amendment) (England) Order 2006

- 1.1 Havering is an attractive borough, with a diverse urban, suburban and rural character. For example, Romford Town Centre is a bustling centre with big buildings and a variety of different uses. The sort of development which would work in the heart of Romford Town Centre would not be appropriate for example in the heart of Havering-atte-Bower which is a loose collection of one and two storey houses around a traditional village green in a rural setting. Therefore the need for new developments to be responsive to the circumstances of their site and the surrounding environment is very important in Havering. New development represents an opportunity to improve the quality of the environment and this policy is focused on ensuring this. In line with 'By Design'<sup>117</sup> this policy includes performance criteria rather than standards which encourage creative solutions to what are often complex brownfield urban development sites.

## **IMPLEMENTATION**

- 1.2 Further detail is provided in Residential Density and Amenity Space SPD which provides guidance on amenity space standards, sunlight/daylight criteria and privacy/overlooking.
- 1.3 Residential Extensions and Alterations SPD sets out guidance for householders planning to extend or alter their home.

## **DC62 - ACCESS**

**Planning permission for public buildings and toilets or places which provide a service including places of work, places of education, shops, restaurants, community buildings, health, education, culture, the arts, leisure including tourist, sport play and youth facilities will not be granted unless a high standard of inclusive access for employees and visiting members of the public is provided.**

**Where Statutory Instrument 2006 No. 1062 applies, applications for planning permission will not be entertained unless accompanied by a design and access statement.<sup>118</sup> This should include how the specific needs of disabled people, have been integrated into the proposed development, and how inclusion will be maintained and managed.**

## **REASONED JUSTIFICATION**

- 1.1 Access is a major issue in Havering because of the high proportion of older people in the borough, the relatively high number of households containing someone with a physical disability and the forecast increase in the numbers of very young and very old. Inclusive design is based on the social model of

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<sup>117</sup> By Design, Urban Design in the Planning System, ODPM, 2000

<sup>118</sup> Statutory Instrument 2006 No. 1062 The Town and Country Planning (General Development Procedure) (Amendment) (England) Order 2006

disability, as it focuses on the design of the environment not on an individual's impairment. An inclusive environment is one that can be used by everyone, regardless of age, gender or disability. To achieve this the needs of all user groups need to be considered at the beginning of the design process.

- 1.2 The Disability Discrimination Act<sup>119</sup> (DDA) places a statutory duty on the providers of goods and services, to ensure equality of access for persons with disabilities. As a consequence, all new public buildings must be designed to be accessible to all members of the community. These requirements are enforced through the Building Regulations<sup>120</sup> (part M). In line with the Mayor of London's SPG on Accessible Environments<sup>121</sup> this policy aims to achieve inclusive design and encourage developments that can be used easily by as many people as possible without undue separation or special treatment, offer the freedom to choose and the ability to participate equally in the development's mainstream activities.

## **IMPLEMENTATION**

- 1.3 Applicants when preparing Access Statements should consider the contents of the Mayor of London's SPG to the London Plan on Accessible Environments and the Disability Rights Commission guide to Access Statements.<sup>122</sup>

## **DC63 - CRIME**

**Planning permission will only be granted for proposals which:**

- **ensure that footway frontages, bus stops, publicly accessible spaces, open space or other transport interchanges are overlooked**
- **be designed with management and maintenance in mind, to discourage crime in the present and in the future**
- **have well defined routes, spaces and entrances that provide convenient movement without compromising security**
- **be structured so that different uses do not cause conflict**
- **promote a sense of ownership, respect, territorial responsibility and community**
- **where necessary include well-designed security features**
- **generate a level of human activity that is appropriate to the location and creates a reduced risk of crime and sense of safety at all times.**

**In addressing these criteria applicants are expected to adopt the principles and practices of the 'Secured by Design'<sup>123</sup> Award Scheme.**

<sup>119</sup> Disability Discrimination Act (DDA), 1995 and new provisions to the act

<sup>120</sup> The Building Regulations 1999, Approved Document M Access and Facilities for Disabled People

<sup>121</sup> Accessible London: Achieving an Inclusive Environment Supplementary Planning Document, GLA, 2004

<sup>122</sup> Disability Rights Commission <http://www.drc.org.uk/businessandservices/bizdetails.asp?print=true&id=97&title=bs>

<sup>123</sup> Secured By Design, Police Initiative, 2004 <http://www.securedbydesign.com/>

**Where appropriate the Council will consider imposing community safety conditions or seek contributions via legal agreements for crime prevention through environmental design or community safety initiatives i.e. CCTV, improved street lighting, alley gating, taxi marshalling schemes, provision of CCTV, or late-night bus services.**

**More detail on the implementation of this policy is provided in Supplementary Planning Document on Designing for Safer Places.**

## **REASONED JUSTIFICATION**

- 1.1 Sustainable communities are communities which succeed economically, socially and environmentally, and respect the needs of future generations. They are well-designed places where people feel safe and secure; where crime and disorder, or the fear of crime, does not undermine the quality of life or community cohesion. Crime is a very important issue locally, when surveyed in 2004 82% of residents said low levels of crime is one of the most important things in making an area a good place to live.
- 1.2 'Safer Places' promotes the importance of safety and security in design, which is essential to successful sustainable communities.<sup>124</sup> Seven attributes of sustainable communities that are particularly relevant to crime prevention are central to the guide. These are not intended to be prescriptive or a set of rules to be applied to all situations, but should be considered as prompts to the application of crime prevention through environmental design and promoting community safety.
- 1.3 This policy is in line with national and regional planning guidance which places design at the centre of the planning process; these include PPS1<sup>125</sup>, PPG3<sup>126</sup>, PPS6<sup>127</sup>, PPG13<sup>128</sup> and PPG17<sup>129</sup>. The Crime and Disorder Act<sup>130</sup> also places a duty on the local authority to do all that it can reasonable, to prevent crime and disorder in the area. Planning applications should demonstrate how crime prevention measures have been considered. This should be part of the applicant's design and access statement.
- 1.4 Developers, designers and those seeking planning permission should enter into discussions with a range of interested parties before the application is submitted, including the Havering Police Borough Crime Prevention Design Advisor (CPDA).

## **IMPLEMENTATION**

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<sup>124</sup> Safer Places, ODPM, 2004

<sup>125</sup> Planning Policy Statement 1, Delivering Sustainable Development, ODPM - 2005

<sup>126</sup> Planning Policy Guidance 3 Housing, ODPM 2000 updates 2005

<sup>127</sup> Planning Policy Guidance 6 Planning for Town Centres, ODPM, 2005

<sup>128</sup> Planning Policy Guidance 13 Transport, ODPM, 2001

<sup>129</sup> Planning Policy Guidance 17 Planning for Open Space, Sport and Recreation, ODPM , 2002

<sup>130</sup> The Crime and Disorder Act , Section 17, HMSO , 1998

- 1.5 The Havering CPDA is available for free advice on how applicants can achieve the 'Secured by Design' standard. The Borough CPDA is currently seconded to the local Council on a full time basis.
- 1.6 The Metropolitan Police Property Service will be directly consulted on major planning applications to enable them to identify scope for meeting their property requirements.
- 1.7 Where crime prevention or the fear of crime is material to a proposed development, the local planning authority will seek community safety conditions to secure measures which will help to reduce the possibility of crime. In cases where it is either inappropriate or simply not possible to impose a valid condition, informatives on planning permissions drawing the applicant's attention to particular guidance on crime prevention or to technical publications that deal with security measures will be used. Where appropriate the CPDA will be consulted with in the discharging of conditions.

## **DC64 - TELECOMMUNICATIONS**

**Planning permission for telecommunications development will only be granted where:**

- **it does not have an unacceptable effect on the character and appearance of the surrounding area or in other respects**
- **unacceptably harm the amenity of occupiers of neighbouring sites**
- **the proposal is sufficiently screened, it has no undue effect on the skyline, the height of the proposal is acceptable in relation to the existing topography and it does not cause an adverse effect on local conservation value**
- **the applicant has demonstrated the significance of, and need for the proposal as part of a national network**
- **the applicant has demonstrated that the proposal is the least environmentally intrusive option of all technically feasible alternatives, including those of sharing a mast or site, using an alternative location or using an existing building or structure**
- **a statement is provided with mobile phone base station applications stating compliance with the ICNIRP<sup>131</sup> (International Commission on Non-Ionizing Radiation Protection) guidelines for public exposure**
- **evidence is provided confirming that there will be no significant and irremediable interference with other electrical equipment in the locality**
- **the installation is removed as soon as it becomes obsolete.**

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<sup>131</sup> Guidelines for Limiting Exposure to Time-Varying Electric, Magnetic, and Electromagnetic Fields (up to 300 GHz)  
International Commission on Non-Ionizing Radiation Protection (ICNIRP) Guidelines

**The policy will be applied particularly strictly in relation to the Green Belt, Conservation Areas and Listed Buildings where the architectural quality of buildings and townscapes may be particularly sensitive to the intrusion of badly sited and designed telecommunications equipment.**

## **REASONED JUSTIFICATION**

- 1.1 The Council recognises the need for telecommunications equipment to support, business and domestic needs. At the same time it also needs to ensure its environmental impact and impact on the character of an area/or building is minimised. Planning Policy Guidance Note 8 <sup>132</sup> (PPG8) Telecommunications seeks to balance these needs. The purpose of this policy would therefore be to reconcile these two competing factors.
- 1.2 It should be noted that most smaller satellite dishes and other minor telecommunications development are permitted under the Town and Country Planning General Permitted Development Order <sup>133</sup> (GPDO) 1995 (as amended) and so do not require planning permission. However, planning permission for such developments may be required in Conservation Areas and areas that are subject to Article 4 directions.

## **IMPLEMENTATION**

- 1.3 Applicants should refer to PPG8 Telecommunications and Government guidance in Mobile Phone Network Development: Code of Best Practice.
- 1.4 For the siting of satellite television antennas applicants should refer to "A Householder's Planning Guide for the Installation of Antennas including Satellite Television Dishes <sup>134</sup>".

## **DC65 - ADVERTISEMENTS**

**Express consent for advertisements will only be granted if:**

- they complement the scale, form and architectural composition of individual buildings**
- they are by size, design, siting and degree of illumination in character with the surrounding area and the buildings they are on**
- when displayed on a paved forecourt, or in a pedestrianised area, their dimensions are in scale with other street furniture and should not be overwhelming upon pedestrians in the area**

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<sup>132</sup> Planning Policy Guidance 8, Telecommunications, ODPM, 2001

<sup>133</sup> Statutory Instrument 2001 No. 2718, The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2001

<sup>134</sup> A Householder's Planning Guide for the Installation of Antennas including Satellite Dishes, 2005, ODPM

- when they are displayed on buildings, or as free-standing units alongside the highway, they should be related to the scale of surrounding buildings and have regard to the symmetry or architectural features of their location
- they do not materially harm the visual amenity in the area
- they do not unduly compromise public safety or pose a hazard to traffic.

**Advertisements above fascia level are unlikely to be acceptable since they tend to form an excessively prominent and incongruous feature in the street scene.**

**Illuminated advertisements within predominantly residential areas will only be granted where they comply with all of the following criteria:**

- the letters only are internally illuminated or alternatively the advertisement is externally spot lit
- the hours of illumination are limited to 7.00am to 9.00pm or the hours during which the business premises are open for trading, whichever are the longer
- projecting box signs are positioned at or below existing fascia height, subject to a minimum clearance of 2.1m (7ft), a maximum projection of 0.9m (3ft) and are not deeper than the existing fascia and in any case no deeper than 0.9m (3ft)
- do not materially affect the amenities of neighbouring residential properties.

**All of the borough's Conservation Areas and the Green Belt are defined as Areas of Special Control for Advertisements.**

**Applications for poster sites will be determined with regard to the criteria contained in Annex A of PPG19.<sup>135</sup>**

## **REASONED JUSTIFICATION**

- 1.1 This policy covers fascia signs and projecting signs, large advertising hoardings, freestanding illuminated adverts and smaller poster panels.
- 1.2 It is accepted that there is a need for advertising on commercial premises. However, such material must be limited if adverts are not to dominate buildings or detract from the appearance of the location. This can be particularly detrimental to the character of Conservation Areas and the Green Belt and for this reason all of the borough's Conservation Areas and the Green Belt are defined as Areas of Special Control for Advertisements. Within Areas of Special Control there are further restrictions on the type, height and size of signs that can be displayed without express consent from the Council.

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<sup>135</sup> Planning Policy Guidance 19, Outdoor Advertisement Control, ODPM, 1992

- 1.3 For illuminated advertisements the Council will have regard to standards recommended by the Institute of Lighting Engineers.
- 1.4 Excessive number of advertisements and signs in close proximity can lead to visual chaos and clutter in the street scene. The Council wishes to avoid this by restricting the number of advertisements and signs to a level appropriate to the character of the area.

### **IMPLEMENTATION**

- 1.5 Applicants should consult the Government guide titled, 'Outdoor advertisements and signs: a guide for advertisers' <sup>136</sup>, to find out if their application requires advertisement consent.
- 1.6 Applicants should refer to the Havering Conservation Areas: Shopfront Design Guide SPD which encourages high standards of shop front design within all Conservation Areas in Havering where shop fronts exist.
- 1.7 Applicants should also refer to the Institute of Lighting Engineers Technical Report No5 on Brightness of Illuminated Advertisements <sup>137</sup>, which will be used by the Council to assess and condition the extent of illumination; this is to ensure that the illumination is of a level which will not materially affect the amenities of neighbouring residential properties.

## **DC66 - TALL BUILDINGS AND STRUCTURES**

**Buildings or structures of 6 storeys or greater or above 18 metres in height above ground level will normally only be granted planning permission in Romford Town Centre.**

**Policy on tall buildings will be contained in the Romford Town Centre Area Action Plan. Exceptionally tall buildings may be granted planning permission outside of Romford Town Centre provided that they:**

- **create an attractive landmark building which would clearly improve the legibility of the area for example at key gateway locations or are clustered with other buildings of a similar scale and massing and raise the cluster's quality or coherence**
- **preserve or enhance the natural environment, the historic environment, local amenity and the local character of the area**
- **act as a catalyst for regeneration**
- **preserve or enhance views from Havering Ridge**
- **do not mar the skyline**

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<sup>136</sup> Department for Transport, Local Government and the Regions and the Welsh Assembly for Wales, Outdoor Advertisements and Signs: A Guide for Advertisers

<sup>137</sup> Institute of Lighting Engineers, Technical Report No5 on Brightness of Illuminated Advertisements, 2001

- do not have a significant adverse impact on the amenity of nearby occupiers.
- are appropriate to the local transport infrastructure and capacity in the area.

**All tall buildings should be of exemplary high quality and inclusive design and in particular they must:**

- ensure that the proposed density is suited to the site and to the wider context in terms of proportion, composition, relationship to other buildings, streets, public and private open spaces, the waterways or other townscape elements
- be attractive city elements as viewed from all angles and where appropriate contribute to an interesting skyline
- create a well-defined public realm with a human scale, with continuity of frontage and accessible entrances from street level
- be sensitive to their impact on micro-climates in terms of wind, sun, reflection and overshadowing
- contain internal spaces, which do not become redundant over time and can easily adapt to changing social, technological and economic conditions
- be oriented and profiled taking into account the potential negative impact on aircraft, navigation and telecommunications networks.

**Tall buildings are not necessary to achieve high density development; a tall building will therefore only be acceptable where there is a clear reason to have one.**

## **REASONED JUSTIFICATION**

- 1.1 The Mayor of London defines a tall building as a building which is significantly taller than its surroundings and/or has a significant impact on the skyline and is larger than the threshold sizes set for the referral of planning applications to the Mayor, which is 30 metres. However, the Mayor allows Boroughs to set locally based thresholds for tall buildings. The London Borough of Havering is typically characterised by 2-3 storey suburban development even within the Major district centres, and a scattering of 10 storey and above buildings or structures. There is very little development in between these heights. Consequently the tall buildings there are in Havering tend to feature prominently on the skyline and there is little or no gradation of scale.
- 1.2 The biggest concentration of tall buildings is in Romford Town Centre, which includes The Axis, Romford Brewery Chimney, St Andrew's Church, Thomas England House and William Park House, South Street Telephone Exchange, Mercury House and North House. Even here, for example along South Street and Victoria Road, much development is two or three storeys high. Outside of Romford Town Centre tall buildings tend to either be residential tower blocks or churches. Examples include Highfield Tower (Collier Row), Perry, Templar, Mardyke, Roman, Chantry House (Mardyke), St Andrew's Church Hornchurch, Dryden and Kipling Towers (Harold Hill) and Haynes Park Courts

(Hornchurch). These demonstrate the importance of having a clear policy on where tall buildings should be located and how they should be designed.

- 1.3 The Council considers that in Havering a tall building or structure is one which is 6 storeys or 18 metres or more above ground level. Buildings or structures of this height are likely only to be acceptable in Romford Town Centre. Romford Town Centre is that area covered by the Romford Area Action Plan. Where exceptionally a tall building is considered acceptable outside Romford Town Centre the criteria in this policy must be satisfied. The criteria within the policy are modeled on those set out in the London Plan. Policy 4B.8 promotes the development of tall buildings where they create attractive landmarks, are of high quality and inclusive design, enhance London's character, and help to create economic clusters or act as a catalyst for regeneration.<sup>138</sup> The criteria also have regard to criteria for evaluation within the Joint CABE/English Heritage publication 'Design Guidance for Tall Buildings'.<sup>139</sup>
- 1.4 Tall buildings can be a method of achieving high densities; however, as recognised by the Urban Task Force Report it is equally clear that tall buildings are not necessary to provide high density accommodation. There are significant advantages in adopting a low or medium rise approach to achieving the same level of density. A medium rise perimeter block has several distinct advantages over a single block standing in the middle of an open space. A tall building is therefore only acceptable where there is a clear reason for having one, which the applicant should highlight.

## **HERITAGE**

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<sup>138</sup> Policy 4B.8, Tall Buildings Location, The London Plan, 2004

<sup>139</sup> Guidance for Tall Buildings, Para 4.6, CABE/English Heritage 2003

## **DC67 – BUILDINGS OF HERITAGE INTEREST**

**Planning permission for applications affecting Listed Buildings will only be allowed where:**

- **it does not involve the demolition of a Listed Building**
- **it does not adversely affect a Listed Building or its setting**

**A change of use which is contrary to other Development Control policies may be considered more favourably if it is in the interests of conserving a Listed Building.**

**When dealing with planning applications the Council will also take into account the contribution that other buildings of historical and/or architectural interest make to heritage.**

### **REASONED JUSTIFICATION**

- 1.1 The Council has a statutory duty to protect buildings and structures of special architectural or historic interest. These buildings are important for the positive contribution they make to the character of an area. They are appreciated and valued by the public as established and tangible evidence of the past, providing a sense of permanence and belonging and a historic perspective with which to approach today's development opportunities. The retention and conservation of these buildings is therefore very important and a wide range of suitable and viable uses should be considered to secure their future. There are also over 200 buildings of local historical and/or architectural interest in the Borough and account will be taken of their contribution to the heritage when dealing with planning applications

### **IMPLEMENTATION**

- 1.2 The Heritage Strategy SPD will identify all of the buildings to which this policy will apply.

## **DC68 – CONSERVATION AREAS**

**The character of Conservation Areas will be preserved or enhanced. Planning permission for development within a Conservation Area will only be granted where:**

- **it does not involve the demolition of a building that makes a positive contribution to the character or appearance of the area**
- **it preserves or enhances the character of the Conservation Area and that it is well designed**
- **it does not involve the loss of trees which contribute towards the character of the Conservation Area**
- **in the case of the Gidea Park Conservation Area it ensures that all subdivision of plots particularly within the 1911 Exhibition and Competition housing areas result in plot sizes similar to those of surrounding properties.**

**The revision of the boundaries of existing Conservation Areas and the designation of additional Conservation Areas will be based on the Heritage Strategy SPD.**

## **REASONED JUSTIFICATION**

- 1.1 Planning Policy Guidance Note 15 says that plans should set out an authority's broad criteria for the designation of new conservation areas and for the review of existing conservation area boundaries; and, where possible, which particular areas are in mind for both. However, the detailed definition or revision of boundaries, and formulation of proposals for individual conservation areas should be pursued separately from the local plan process itself. Nonetheless the core strategy should provide a policy framework, making clear to the public how detailed assessment documents and statements of proposals for individual conservation areas relate to the plan, and what weight will be given to them in decisions on applications for planning permission and conservation area consent.
- 1.2 Currently there are 9 Conservation Areas in Havering which cover 3.5% of the Borough's area. The Council is currently carrying out appraisals of the nine existing Conservation Areas. These appraisals will reconsider the boundaries as well as setting out approaches to dealing with planning applications. This work will be fed into the Heritage Strategy SPD which will include criteria for reviewing existing Conservation Area boundaries and for identifying additional Conservation Areas. Any changes will need to be subject to further investigation and public consultation before any designations can be made under the relevant sections of the Planning Acts.

## **IMPLEMENTATION**

- 1.3 The Heritage Strategy Supplementary Planning Document will build on the work of the Conservation Area appraisals and set the criteria for designating Conservation Areas and will identify possible new Conservation Areas and amendments to the boundaries of existing designated areas.

- 1.4 Criteria for judging applications in the Gidea Park Conservation Area are included in the Gidea Park SPD. More detailed advice criteria for judging applications in other specific Conservation Areas will either be included in the Heritage Strategy SPD or in separate SPDs. Applicants should also consult the Havering Conservation Area Shop front Design Guide SPD.

## **DC69 - OTHER AREAS OF SPECIAL TOWNSCAPE OR LANDSCAPE CHARACTER**

**Planning permission will only be granted if it maintains or enhances the special character of:**

- **the Emerson Park Policy Area which is typified by large and varied dwellings set in spacious mature, well landscaped grounds**
- **the Hall Lane Policy Area which is typified by large detached and semi detached dwellings set in large gardens with considerable tree and shrub planting**
- **the Gidea Park Special Character Area which is derived from the quality of its urban design and architectural detailing and also its locally important heritage and historical associations.**

**Detailed criteria for dealing with planning applications in these areas will be contained within three separate SPDs.**

**The Council will also seek to preserve the special character of Havering Ridge including protecting views to and from the area.**

## **REASONED JUSTIFICATION**

- 1.1 There are certain parts of the Borough which, whilst not Conservation Areas, have special and unique characters which add to the townscape and landscape quality of the Borough.
- 1.2 The Council has operated policies aimed at preserving the spacious character of the Emerson Park and Hall Lane, Upminster residential areas for around thirty years. This has helped to maintain the special character of these areas. In addition these areas contain a critical stock of large family and "executive homes" which have helped promote the Borough as a good business location.
- 1.3 The Gidea Park Special Character Area has been designated because of the quality of its urban design, architectural detailing and locally important heritage associations.
- 1.4 Havering Ridge in the north of the Borough was recognised by the former London Planning Advisory Committee as an Area of Special Character because of its skyline character and the panoramic views it affords of Central

London. It has also been identified by English Heritage as an Area of Heritage Land for its combined intrinsic value for landscape, historic and nature conservation interest. Even if a development is generally acceptable in terms of Green Belt policy the Council will ensure that any development has regard to the special character of the area.

## **IMPLEMENTATION**

- 1.5 Detailed criteria for dealing with applications in the Emerson Park and Hall Lane Special Policy Areas and Gidea Park Special Character Area will be contained in separate SPDs.

## **DC70 – ARCHAEOLOGY AND ANCIENT MONUMENTS**

**The Council will ensure that the archaeological significance of sites is taken into account when making planning decisions and will take appropriate measures to safeguard that interest. Planning permission will only be granted where satisfactory provision is made in appropriate cases for preservation and recording of archaeological remains in situ or through excavation. Where nationally important archaeological remains exist there will be a presumption in favour of their physical preservation. Particular care will need to be taken when dealing with applications in archaeological 'hotspots' where there is a greater likelihood of finding remains.**

**Planning permission will not be granted for development which adversely affects the three Ancient Monuments in the Borough or their settings.**

## **REASONED JUSTIFICATION**

- 1.1 Archaeological sites of interest and their settings and Ancient Monuments are irreplaceable and therefore it is important that policy seeks their protection, enhancement and preservation for the benefit of current and future generations. There are three scheduled Ancient Monuments in Havering, the 14<sup>th</sup> Century Upminster Hall Barn or Tithe Barn in Hall Lane Upminster, the moated site at Dagnam Park and the Roman Road across Romford golf course.
- 1.2 The archaeological "hotspots", which are areas that have a greater potential for containing remains, will be shown in the Heritage Strategy SPD. They are divided into Archaeological Priority Areas where important archaeology can be expected and Archaeological Priority Zones where there is a potential need for archaeological consideration and consultation with English Heritage. The identification of these areas is as a guide to the existence of or potential for archaeological remains being present and each particular application should be dealt with on a case by case basis.

## **IMPLEMENTATION**

- 1.3 Archaeological hotspots will be defined in Heritage Strategy SPD.

## **DC71 - OTHER HISTORIC LANDSCAPES**

**The character of historic parks and common land will be protected or enhanced giving particular attention to the protection of views to and from common land and other historic landscapes.**

## **REASONED JUSTIFICATION**

- 1.1 National policy in PPS9 says that registered parks and gardens should be protected whilst there are laws which protect Common Land.
- 1.2 There are over 50 historic parks and gardens in the Borough and the garden at Upminster Court is included in English Heritage's Register of Parks and Gardens of Special Historic Interest.
- 1.3 The largest area of Common Land in Havering is Upminster/Tylers Common (which also includes land on the highway verges of nearby roads). One of the features of Upminster/Tylers Common is the pleasant views from it over the surrounding countryside. Views from the surrounding area including the footpath and bridleway system are also important. The Village Green at Havering-Atte-Bower is also Common Land and is a focus of the village and Conservation Area and provides a fine setting for the Church and other listed buildings.

## **IMPLEMENTATION**

- 1.4 The historic parks and gardens will be identified in the Heritage Strategy SPD. This will also contain criteria aimed at keeping to a minimum the number of accesses over Common Land in Tomkyns Lane, Nags Head Lane and Warley Road and ensuring that any new access has the minimum adverse impact on the character of the Common Land.

## **DC72 - PLANNING OBLIGATIONS**

In order to ensure that new development is in line with the principles of sustainable development as set out in the Core Policies and Development Control Policies one or more of the following, or other items, may be sought in connection with a planning application approval where they satisfy the tests set out in Circular 05/05.

**Places to Live**

Affordable housing (DC6)

**Places to Work**

Training programmes and employment support, and access to employment schemes including the provision of premises in appropriate locations (DC13)

**Town Centres**

Environmental and other qualitative improvements to town centres (CP4)

**Culture**

Qualitative improvements in Hornchurch Town Centre (CP6)  
Improvements to the quality and quantity of open space, recreation and leisure facilities. (DC18)

Implementation of the Green Chain network, London Outer Orbital Loop, the Green Arc, Thames Chase Forest and Green Grid. (DC22)

Public art (DC25)

**Community Needs**

Education facilities (DC29)

Community facilities (DC30)

**Transport**

Improvements to public transport accessibility and capacity and other transport infrastructure (CP10)

Improvements to conditions for walking (DC34)

Improvements to conditions for cycling (DC35)

Road improvements

**Waste Management**

Waste recycling facilities (DC40)

**Environment Management**

Provision of on-site renewable energy equipment (DC51)

**Mitigating the impact of development on air quality. (DC53)**  
**Mitigating the impact of development on water quality, water courses, groundwater, surface water and/or drainage system. (DC52)**  
**Enhancements to biodiversity and geodiversity (DC59)**

**Heritage**

**Preservation or enhancement of historic assets (CP18)**

**Design**

**Measures to achieve safer environments (DC63)**

**REASONED JUSTIFICATION**

- 1.1 "Planning obligations (or "s106 agreements") are private agreements negotiated, usually in the context of planning applications, between local planning authorities and persons with an interest in a piece of land (or "developers"), and intended to make acceptable development which would otherwise be unacceptable in planning terms" (Circular 05/05<sup>140</sup>, Para B3).
- 1.2 PPS 1 Delivering Sustainable Communities<sup>141</sup>, advocates the integration of sustainable development in Development Plans. Circular 05/05 states that planning obligations may be used to ensure a development is in line with the objectives of sustainable development. This policy lists the areas where the Council, or other bodies may enter into an agreement to ensure the principles of sustainable development as set out in the Core Strategy and Development Control policies are met. The policy provides the policy reference to where the obligation that may be sought is covered in more detail. In some cases the agreement only applies to particular uses, sizes or locations of development. Additional obligations are where appropriate included for individual sites within the Site Specific Allocations Development Plan Document and may also be included within other DPDs including the Romford Area Action Plan and Joint Waste Plan. The list of obligations in this policy therefore is not exclusive, and other obligations may be sought where they are necessary to achieve sustainable development.
- 1.3 In line with Circular 05/05, paragraph B5 agreements will only be entered into where the following tests are met:
  - Relevant to planning
  - Necessary to make the proposed development acceptable in planning terms
  - Directly related to the proposed development
  - Fairly and reasonably related in scale and kind to the proposed development
  - Reasonable in all other respects

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<sup>140</sup> Circular 05/05: Planning Obligations, Department of the Environment Circular, 2005.

<sup>141</sup> Planning Policy Statement 1, Delivering Sustainable Development, ODPM, 2005

**IMPLEMENTATION**

- 1.4 Supplementary Planning guidance on Educational Needs Generated by New Development, London Riverside, Hornchurch Centre, Heritage, Affordable Housing, Protecting the Borough's Biodiversity and Havering Conservation Areas: Shopfront Design Guide, all provide additional guidance on planning obligations.

## 12 List of Policies

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	<b>Transport</b>	
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	<b>Waste Management</b>	
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<b>CP13</b>	MINERALS EXTRACTION	<b>100</b>
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**Places to Live**

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<b>DC2</b>	<b>HOUSING MIX AND DENSITY</b>	<b>128</b>
<b>DC3</b>	<b>HOUSING DESIGN AND LAYOUT</b>	<b>131</b>
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<b>DC12</b>	<b>OFFICES</b>	<b>142</b>
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## 13 Glossary

**Design and access** A statement that is submitted with a planning application

<b>statement</b>	which demonstrates how the guidance set out in Circular 1/2006 has been met.
<b>Annual Monitoring Report</b>	An annual report for the previous financial year, which updates progress on producing the Local Development Framework, and assesses the performance of Local Development Framework policies.
<b>Area Action Plan</b>	A development plan document that establishes a planning framework for areas of change or conservation.
<b>Affordable Housing</b>	Housing for people whose incomes are insufficient to allow them to afford decent local housing on the open market.
<b>Air Quality Management Area (AQMA)</b>	An area where an Action Plan is prepared to ensure that emission levels for prescribed pollutants are not exceeded.
<b>Ambient Noise</b>	Ongoing sounds in the environment like that from industry and transport.
<b>Article 4 Direction</b>	A direction that can remove all or part of the permitted development rights set out in the Town & Country Planning General Development Order 1988 (as amended). An Article 4 Direction requires the owner/occupier to obtain planning permission before undertaking certain works to their dwellinghouse, for which the permitted development rights have been removed.
<b>Best Practicable Environmental Solution (BPEO)</b>	A solution that provides the most benefits or the least damage to the environment and human health as a whole, at acceptable cost, in the long term as well as in the short term.
<b>Biodiversity</b>	The variety of all life forms (animals, plants and living things), the genes they contain and the ecosystems they form part of.
<b>Blue Ribbon Network</b>	A spatial policy that covers London's waterways, water spaces and the land alongside them.
<b>BREEAM standards</b>	An assessment tool that aims to review and improve the environmental performance of a building.
<b>Brownfield Land</b>	Land and premises that have previously been used or developed and are not currently in full use. The land may also may be vacant, derelict or contaminated.
<b>Community Strategy</b>	A document produced by a local strategic partnership to promote or improve the economic, social and

	environmental wellbeing of the area under jurisdiction of a local authority.
<b>Comparison Goods</b>	Goods which people buy from the store offering the best value for money rather than the one closest to them. They comprise household appliances, furniture, clothing and footwear.
<b>Convenience Goods</b>	Goods which are commonly purchased everyday. They comprise food, drink, tobacco and newspapers.
<b>Core Strategy</b>	A development plan document that sets out a long term spatial vision and spatial objectives and core policies to deliver the vision. Also includes detailed development control policies.
<b>Creative Industries</b>	The creative industries sector includes those who work in a creative industry and those who work in a creative occupation. This may, for example include people who work in an art centre and artists.
<b>Crossrail</b>	Cross rail is a proposed new rail link that will enable rail travel from Romford across London.
<b>Cultural Quarters</b>	An area containing a mass of cultural activities and related uses such as theatres, art centres and affordable workspace for creative industries.
<b>DCLG (Department for Communities and Local Government)</b>	A government department responsible for planning, local government, housing and regional development.
<b>Development Control Policies</b>	Policies that contain criteria against which planning applications are assessed. Development Control Policies ensure that all development meets the vision and objectives of the core strategy.
<b>Development Plan</b>	Havering's Development Plan comprises the London Plan and all the Development Plan Documents contained within the Local Development Framework.
<b>Secure by design</b>	Designs and layouts which take into account public health, crime prevention and community safety to produce attractive and well managed environments that help discourage crime and vandalism.
<b>EcoHomes</b>	A widely accepted benchmark for measuring the environmental performance of new homes. Includes issues such as energy use, air and water pollution and ecology.

<b>Environmental Impact Assessment</b>	An assessment to review the environmental effects of a project to determine whether the project should go ahead.
<b>Green Belt</b>	The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the most important attribute of Green Belts is their openness.
<b>Green Chains / Greenways</b>	Areas of undeveloped open land that are linked to other areas of open land by footpaths for walking, cycling or wildlife corridors.
<b>Havering Strategic Partnership / Local Strategic Partnership</b>	A partnership which is focused and committed to improving the quality of life and governance in a particular locality. The partnership consists of people representing public services, local business, residents and community and voluntary groups.
<b>Inclusive design</b>	Seeks to create an environment which can be easily used by as many people as possible without undue effort, separation or special treatment and enables everyone the ability to participate equally in the development's mainstream activities.
<b>Independent Examination</b>	A hearing chaired by an Independent Inspector to assess the soundness of development plan documents.
<b>Lifetime Homes</b>	Homes that are built to be accessible, adaptable and convenient to reflect the changing needs of the population from young children to older people.
<b>Locally Listed Building</b>	A building or structure which, whilst not listed by the Secretary of State, the Council feels to be an important part of Havering's heritage due to its architectural, historic or archaeological significance.
<b>Livability</b>	Refers to the environmental and social quality of an area as perceived by residents, employees and visitors.
<b>Local Development Framework (LDF)</b>	The LDF forms part of Havering's Development Plan along with the London Plan. The LDF comprises Development Plan Documents, Supplementary Planning Documents, a Statement of Community Involvement and Annual Monitoring Report.
<b>Local Development Documents</b>	A collective term referred to in the Act for Development Plan Documents, Supplementary Planning Documents and the Statement of Community Involvement.

<b>Local Development Scheme</b>	Sets out the detail, time scales and arrangements for producing all local development documents.
<b>Local Implementation Plans</b>	A statutory transport plan produced by each London borough which sets out how they will implement the Mayor's Transport Strategy in their area.
<b>London Riverside</b>	An area extending across six square kilometres on the north bank of the Thames from Barking Creek to the eastern edge of Greater London. London Riverside has been designated as a priority area for regeneration by The Mayor of London and is at the heart of the Thames Gateway Growth Area.
<b>Managed Transfer</b>	A term applied to the transfer of Employment Land to other uses. Boroughs identified for managed transfer have a greater supply of vacant industrial sites relative to demand and should generally take a more flexible approach to transfer.
<b>Mixed use development</b>	Development containing a variety of activities and uses on single sites or across wider areas such as town centres.
<b>National Planning Guidance</b>	Sets out the Governments national policies and principles on planning which local planning policy must be consistent with. These take the form of Planning Policy Guidance Notes and Planning Policy Statements.
<b>Opportunity Areas</b>	An area designated by the London Plan which has the potential to accommodate large scale development to provide substantial numbers of new employment and housing.
<b>Precautionary Principle</b>	This principle is based on a 'better safe than sorry attitude' in relation to the environment. It takes the view that where there are threats of serious or irreversible damage, and science has not yet determined whether a product or process is safe or unsafe, policy should restrict or prohibit its use until it is safe.
<b>Proposals Map</b>	A map that shows the boundaries of all policy areas as set out in Development Plan Documents.
<b>Proximity Principle</b>	Seeks to minimise the negative impacts of waste by dealing with waste as near as practical to its place of production.
<b>Public Realm</b>	The space between and within buildings that are publicly accessible.

<b>Renewable Energy</b>	<p>Renewable energy technologies include:</p> <ul style="list-style-type: none"><li>• Solar heating, using solar energy to heat water.</li><li>• Solar power, using light energy such as daylight to generate electricity.</li><li>• Wind, using wind energy to generate electricity.</li><li>• Biomass heating, stoves or boilers running on wood or other biomass</li><li>• Biomass Combined Heat and Power plant, simultaneously generating electricity and heat, using biomass as fuel.</li><li>• Ground sourced heat pumps, transferring and 'concentrating' heat from the ground to provide space and hot water heating.</li><li>• Ground sourced, or borehole, cooling, using the ground or groundwater for cooling of offices and other non-domestic buildings.</li></ul> <p>Though not strictly a renewable form of energy the capture of any form of energy from a process that would normally result in that energy being wasted will be deemed as a suitable technology.</p>
<b>Regional Spatial Strategies</b>	<p>Sets out a region's policies in relation to the use and development of land which policies in the Local Development Framework should be in general conformity with. The London Plan is London's Regional Spatial Strategy.</p>
<b>Road Hierarchy</b>	<p>Categorises roads depending on the function they perform.</p>
<b>Saved Policies</b>	<p>Unitary Development Plan policies that have been saved for a period of three years from September 2004. During the three year period, the saved policies will progressively be replaced by policies in local development documents.</p>
<b>Section 106 Agreements</b>	<p>Legally binding agreements between a local planning authority and land developers to secure planning objectives for the area and for the community. Agreements can be used for a variety of uses such as the requirement for the developer to provide affordable housing or undertake environmental improvements to a town centre.</p>
<b>Sequential Approach</b>	<p>An approach which ensures that the scope for locating major leisure and retail uses in town centres is properly assessed before their location elsewhere is considered.</p>
<b>Sites of Special Scientific Interest (SSSI)</b>	<p>An area defined as being of particular conservation interest because of the wildlife it supports or the geographical features that are found there. A SSSI is classified under the Wildlife and Countryside Act (1981 as amended).</p>

<b>Site Specific Allocations.</b>	A document which sets out sites for specific uses and development such as housing, jobs and community facilities which are necessary to deliver the Core Strategy of the LDF.
<b>Social exclusion / inclusion</b>	Social exclusion refers to people or areas that suffer from a combination of related problems including unemployment, poor skills, low incomes, poor housing, high crime environments, bad health and family breakdown. Social Inclusion is about removing the barriers and factors which lead to exclusion so people can participate and access a full range of opportunities.
<b>Social infrastructure</b>	Includes health, education, childcare, facilities for older people and disabled people, as well as libraries, community halls, meeting rooms and places of worships.
<b>Spatial Planning</b>	This considers not only the physical aspects of location and land use but also takes into account economic, social and environmental matters. These factors may include access, movement, health, education, employment and crime prevention and demands that the plans of other organisations responsible for these areas are considered.
<b>Stakeholders</b>	Any person, group, or organisation affected by or having an interest in the development of planning policy.
<b>Strategic Employment Locations</b>	The best located and highest quality employment land across London.
<b>Strategic Environmental Assessment (SEA)</b>	A method to assess and predict the effects that a proposal, plan or programme is likely to have on the environment. SEA is a requirement of European Union Directive 2001/42/EC and has since been incorporated into English law by virtue of the Strategic Environmental Assessment Regulations 2004.
<b>Statement of Community Involvement</b>	A document that sets out how a local planning authority intend to involve communities and stakeholders in the process of preparing local development documents and development control decisions.
<b>Submission</b>	This is the stage in preparing development plan documents when they are submitted to the Secretary of State for Independent Examination.
<b>Supplementary Planning Documents (SPD's)</b>	A document which further expands on information contained in policies in Development Plan Documents. The document may explain through text, illustrations and

practical examples of how policies can be taken forward.

**Sustainability Appraisal.**

A tool for assessing policies to ensure that they reflect sustainable development objectives, including environmental, social and economic factors. The Planning and Compulsory Purchase Act requires local planning authorities to undertake a sustainability appraisal of all local development documents.

**Sustainable Development**

Development that aims to ensure a better quality of life for everyone, now and in the future through the protection of the environment, social progress, the prudent use of natural resources and the maintenance of economic growth.

**Thames Gateway**

An area identified by National Government for growth on either side of the River Thames extending from east London through to North Kent and South Essex.

**Town Centre Hierarchy**

Categorises town centres depending on their function and the area they serve. Town centres may be defined as International, Metropolitan, Major, District and Local.

**Urban Renaissance**

The (re)creation of a practical, attractive, safe and efficient urban area which offers a vibrant and desirable quality of life.

**Use Classes Order**

The Use Classes Order is a town planning tool which categorises everything from shops, services, industrial uses, hotels, dwellings, institutions and leisure uses into several classes. The Use Class Order effectively controls what buildings can be used as and what the use of buildings can be changed to.

**Waste hierarchy**

The waste hierarchy acts as a guide when determining the most sustainable waste management options from the ideal of prevention and reduction to the last resort of disposal.

**Annex 1 – Relationship to Havering Unitary Development Plan**

RAAP = Romford Area Action Plan

JWP = Joint Waste Plan

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<b>Part 1</b>	<b>Subject Policy</b>	<b>Name of Policy</b>
STR1	Overall approach to future development of Havering	All Core Policies
STR2	Protecting and improving the environment	Core Policy CP17: Design
STR3	Maintaining the character of established residential areas	Core Policy CP17: Design
STR4	Environmental improvements	Removed
STR5	Land, air and water quality	Core Policy CP15: Environmental Management
STR6	Special needs and disabilities	Core Policy CP17: Design
STR7	Conservation Areas, Listed Buildings, trees and woodland	Core Policy CP16: Biodiversity and Geodiversity
STR8	Nature conservation	Core Policy CP18: Heritage
STR9	Thames Area of Special Character	Core Policy CP18: Biodiversity and Geodiversity
STR10	Protection of Green Belt	Removed
STR11	Recreation in Green Belt	Core Policy CP14: Green Belt
STR12	Agricultural land	Core Policy CP14: Green Belt
STR13	Agricultural activities	Removed
STR14	Ingrebourne Valley and Dagenham Corridor	Removed
STR15	Development of Rainham Marsh	Removed
STR16	Romford and District Centres	Core Policy CP4: Town Centres
STR17	Employment Areas	Core Policy CP3: Employment
STR18	Hotels	Core Policy CP3: Employment
STR19	Romford shopping centre	Core Policy CP4: Town Centres
STR20	Existing shopping centres	RAAP
STR21	Town Centre retailing	Core Policy CP4: Town Centres
STR22	Regional shopping centres and food superstores	Core Policy CP4: Town Centres
STR23	Supply of housing	Core Policy CP4: Town Centres
STR24	Housing opportunities	Core Policy CP1: Housing Supply
STR25	Communities	Core Policy CP2: Sustainable
STR26	Trunk network	Removed
STR27	Road hierarchy	Core Policy CP10: Sustainable
STR28	Transport	Core Policy CP10: Sustainable
STR29	Public transport network	Core Policy CP10: Sustainable
STR30	Pedestrians and cyclists	Core Policy CP10: Sustainable
STR31	Transport	Core Policy CP9: Reducing the need to travel
STR32	Traffic management measures	Core Policy CP10: Sustainable
STR33	Off street parking	Removed
STR34	Transport	Core Policy CP5: Culture
STR35	Freight use of Thames	Core Policy CP6: Arts in Hornchurch
STR36	Leisure and entertainment in Romford and District Centres	Core Policy CP7: Leisure and Recreation
STR37	Parks, playing fields and open spaces	Core Policy CP7: Leisure and Recreation
STR38	Outdoor recreation in the Green Belt	Core Policy CP7: Leisure and Recreation
STR39	Recreation	Core Policy CP7: Leisure and Recreation
STR40	Access to Countryside	Core Policy CP13: Minerals Extraction
STR41	Supply and demand of aggregates	Core Policy CP13: Minerals Extraction

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STR37 Mineral extraction	Core Policy CP13: Minerals Extraction
STR38 Mineral extraction sites	Core Policy CP13: Minerals Extraction
STR39 Restoration of mineral and waste sites	Core Policy CP12: Use of Aggregates Core Policy CP13: Minerals Extraction Aggregates recycling (new policy)
STR40 Waste disposal facilities	Core Policy CP11: Sustainable Waste Management JWP
STR41 Rainham landfill	JWP
STR42 Waste management proposals	JWP
STR43 Land and building requirements for education	Core Policy CP8: Community health and social services facilities
STR44 Improvement and development of Romford Town Centre	RAAP
STR45 Development opportunities in Romford Town Centre	RAAP
<b>Part 2 Subject Policy</b>	<b>Name of Policy</b>
ENV1 Environmental Criteria for New Developments	DC40: Waste recycling DC49: Flood Risk DC50: Sustainable Design and Construction DC51: Renewable Energy DC52: Water supply, drainage and quality DC53: Air Quality DC55: Noise DC56: Light DC61: Urban Design DC62: Access DC63: Crime Removed
ENV2 Environmental Improvement Schemes	DC68: Conservation Areas
ENV3 Conservation Areas	DC69: Other Areas of Special Townscape or Landscape Character
ENV4 Listed Buildings	DC67: Buildings of Heritage Interest
ENV5 Trees and Woodland	DC60: Trees
ENV6 High Buildings	DC66: Tall Buildings and Structures RAAP
ENV7 Nature Conservation	DC58: Biodiversity and Geodiversity DC59: Biodiversity in new developments
ENV8 Contaminated Sites	DC54: Contaminated Land
ENV9 Damaged Land	DC54: Contaminated Land
ENV10 "Bad Neighbour" Uses	Removed
ENV11 Street Furniture	Removed
ENV12 Telecommunications	DC64: Telecommunications
ENV13 Vacant Land	Removed
ENV14 Archaeology	DC70: Archaeology and Ancient Monuments
ENV15 Ancient Monuments	DC70: Archaeology and Ancient Monuments
ENV16 Development Abutting the Green Belt	Removed
ENV17 Advertisement Consent	DC65: Advertisements

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ENV18	Illuminated Advertisements	DC65: Advertisements
ENV19	Advertisement Hoardings	DC65: Advertisements
ENV20	Public Art	DC25: Public Art
ENV21	Emerson Park Area Townscape	DC69: Other Areas of Special or Landscape Character
ENV22	Hall Lane, Upminster Area Townscape	DC69: Other Areas of Special or Landscape Character
ENV23	Gidea Park Conservation Area	DC68: Conservation Areas
ENV24	Thames Policy Area and Rainham Marsh	Removed
ENV25	River Thames Area of Special Character	Removed
ENV26	Havering Ridge Area of Special Character Townscape	DC69: Other Areas of Special or Landscape Character
ENV27	Common Land	DC71: Other Historic Landscapes
ENV28	Thames Chase Community Forest Leisure	DC20: Access to Recreation and
GRB1	Green Belt Boundary	Core Policy CP14: Green Belt
GRB2	New Development	DC46: Appropriate Development in the Green Belt
GRB3	Institutional Uses	Removed
GRB4	M25 (No Justification for Development)	Removed
GRB5	Infilling/"Rounding Off"	DC46: Appropriate Development in the Green Belt
GRB6	Unused/Underused Land	Removed
GRB7	Agricultural Land	DC48: Agriculture
GRB8	Wildlife Habitats, Landscape Quality and Historic Character	Removed
GRB9	New Agricultural Buildings	DC48: Agriculture
GRB10	Redundant Agricultural Buildings	DC48: Agriculture
GRB11	Retail Use on Agricultural Units	DC48: Agriculture
GRB12	Garden Centres	DC48: Agriculture
GRB13	New Residential Units	DC48: Agriculture
GRB14	Rebuilding or Extensions to Residential Property	DC46: Appropriate Development in the Green Belt
GRB15	Residential Gardens/Curtilages	Removed
GRB16	Existing Authorised Commercial and Industrial Sites	DC46: Appropriate Development in the Green Belt
GRB17	Cumulative Effect of Development	Removed
GRB18	Maintenance and Improvement Works	Removed
GRB19	Ingrebourne Valley	Removed
GRB20	Land South of Scott & Albyns Farm	Removed
GRB21	St George's Hospital	DC46: Appropriate Development in the Green Belt
GRB22	Dagenham Corridor	Removed
GRB23	Land South of Dagenham Road	Removed
GRB24	Willoughby Drive	Removed
GRB25	Crow Lane	Removed
EMP1	Rainham Employment Area	DC9: Main Employment Areas
EMP2	Rainham Marsh	Removed
EMP3	Thames Policy Area	Removed
EMP4	Coldharbour Lane Commercial Area	Removed
EMP5	Main Employment Areas	DC9: Main Employment Areas
EMP6	Secondary Employment Areas	DC10: Secondary Employment Areas
EMP7	New Road Employment Area	Removed
EMP8	Small Businesses	Removed
EMP9	Other Industrial/Commercial Premises	DC11: Non-designated sites
EMP10	Special Industries/Hazardous Installations	JWP
EMP11	District Centres	DC12: Offices
EMP12	Hotels	DC14: Hotels
EMP13	Hotel at Eastern Road, Romford	Removed

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EMP14	Victoria Road Commercial Area	RAAP
SHP1	Expansion/Improvement of Retail Facilities	Core Policy CP4: Town Centres
SHP2	Non-Retail Uses in Hornchurch and Upminster District Centres	DC16: Core and fringe frontages in district and local centres
SHP3	Non-Retail Uses in Collier Row, Elm Park, Harold Hill and Rainham District Centres	DC16: Core and fringe frontages in district and local centres
SHP4	Non-Retail Uses in Major Local Centres	DC16: Core and fringe frontages in district and local centres
SHP5	Non-Retail Uses in Minor Local Centres	DC16: Core and fringe frontages in district and local centres
SHP6	Improvements to Rainham District Centre	Removed
SHP7	Bryant Avenue Commercial Area	Removed
SHP8	Food Superstores	DC15: Locating Retail and Service Development
SHP9	Retail Warehouses	DC15: Locating Retail and Service Development
HSG1	Housing Priority	Core Policy CP1: Housing Supply
HSG2	Sites for Residential Development	Core Policy CP1: Housing Supply
HSG3	Retention of Housing	DC1: Loss of Housing
HSG4	Housing in Large Commercial Schemes	Core Policy CP1: Housing Supply
HSG5	Range and Availability of Housing	DC2: Housing Mix and Density
		DC3: Housing Design and Layout
		DC4: Conversions to residential and subdivision of residential
		DC6: Affordable Housing
HSG6	Specialised Housing Needs	DC5: Specialist Accommodation
		DC7: Lifetime Homes and Mobility Housing
HSG7	Sub-division of Houses	DC4: Conversions to residential and subdivision of residential
HSG8	Conversion or Redevelopment for Communal Use	DC4: Conversions to residential and subdivision of residential
HSG9	Site for Travellers' Caravans	DC8: Gypsy and Travellers
TRN1	Road Hierarchy	DC32: The Road Network
TRN2	Effect of Development on Public Transport and Roads	Removed
TRN3	Public Transport for New Developments	Core Policy CP10: Sustainable Transport
TRN4	Trunk Roads	Removed
TRN5	A13 – Re-routing	Removed
TRN6	Secondary and Local Distributor Roads	DC32: The Road Network
TRN7	Highway Improvements/Traffic Management	Removed
TRN8	Service Roads in Shopping Centres	DC36: Servicing
TRN9	Rear Access Road 42-60 Station Lane, Hornchurch	Removed
TRN10	Environmental Areas	Removed
TRN11	Public Transport	Core Policy CP10: Sustainable Transport
TRN12	Bus Facilities	Removed
TRN13	Interchange Facilities	Core Policy CP10: Sustainable Transport
TRN14	Upminster to Romford Railway	Removed
TRN15	Cycle Facilities	DC35: Cycling
TRN16	Pedestrian Facilities	DC34: Walking
TRN17	Facilities for Transport Handicapped Groups	Removed
TRN18	Car Parking	DC33: Car Parking
TRN19	Car Parking in Shopping Centres	DC33: Car Parking
TRN20	Appleton Way, Hornchurch, Car Park Extension	Removed
TRN21	"Park and Ride" Facilities for Romford Town Centre	DC38: Park and Ride

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TRN22	On Street/Off Street Parking	DC33: Car Parking
TRN23	Parking at Railway Stations	DC33: Car Parking
TRN24	Lorry Parking	Removed
TRN25	Heavy Commercial Vehicles	Removed
TRN26	Waterborne Traffic on the Thames	DC39: Freight
TRN27	Ferry Lane, Rainham	Removed
TRN28	Bridge Road/Ferry Lane Link Road	Removed
LAR1	Existing Leisure & Recreation Facilities	DC18: Protection of public open space, recreation, sports and leisure facilities
		DC20: Access to recreation and leisure
		DC26: Location of community facilities
		DC27: Protecting existing community facilities
LAR2	Existing Arts, Cultural & Entertainment Facilities	DC17: Protecting existing arts and entertainment facilities
		DC19: Locating cultural facilities
LAR3	Dual Use of School Facilities	DC28: Dual use of school facilities
LAR4	Langtons and Queen's Theatre	Removed
LAR5	Existing Parks, Playing Fields and Open Spaces CS	DC18: Protection of public open space, recreation, sports and leisure facilities
		DC20: Access to recreation and leisure
		DC20: Access to recreation and leisure
LAR6	Distribution of Public Open Space leisure	
		DC21: Major developments and developer contributions
LAR7	Allotments	DC20: Access to recreation and leisure
		Removed
LAR8	Extension of Hornchurch Country Park	DC22: Countryside Recreation
LAR9	Green Chains	DC22: Countryside Recreation
LAR10	Informal Recreation in the Countryside	DC22: Countryside Recreation
LAR11	Public Access in the Countryside	Removed
LAR12	Potential Footpath Improvement Areas	Removed
LAR13	Potential Bridleway Improvement Areas	Removed
LAR14	Open Air Recreation Facilities in the Green Belt	Removed
LAR15	Water Recreation and Sports	Removed
LAR16	Equestrian Facilities and Horse-keeping	DC22: Countryside Recreation
LAR17	Gerpins Lane	Removed
MWD1	Environmental and Public Safety Criteria	DC42: Minerals extraction
MWD2	Other Considerations for Mineral Workings Applications	DC42: Minerals extraction
MWD3	Other Considerations for Landfill Applications	JWP
MWD4	Mineral Extraction from Agricultural Land	DC42: Minerals extraction
MWD5	Deposit of Waste on Agricultural Land	Removed
MWD6	Traffic Implications	DC42: Minerals extraction
MWD7	Over-concentration of Mineral Workings	DC42: Minerals extraction
MWD8	Safeguarding of Mineral Deposits	DC43: Minerals safeguarding
MWD9	Planned After-use and Aftercare	DC42: Minerals extraction
MWD10	Ancillary Buildings, Plant etc	DC42: Minerals extraction
MWD11	Ready Mixed and Processing Plant	DC41: Re-use and recycling of aggregates
		DC44: Ready mixed and processing plant
		DC45: Transport of aggregate by rail or river
MWD12	Import of Aggregate by Rail or River	JWP
MWD13	Waste Recovery and Recycling	

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MWD14 Waste Disposal in Thames Policy Area	JWP
MWD15 Mineral Extraction Sites	Removed
MWD16 Waste Disposal Sites	JWP
PSU1 Land and Buildings for Public Services and Utilities	Removed
PSU2 Educational Land and Buildings	DC29: Educational premises
PSU3 Post-16 College at Dury Falls	Removed
PSU4 Stubbers Outdoor Pursuits Centre	Removed
PSU5 Health and Social Services Residential Projects	DC5: Specialist Accommodation
PSU6 Occupational Centre for Physically Handicapped	Removed
PSU7 Short Term Accommodation for Handicapped Children & Adolescents	Removed
PSU8 Area Social Services Office at Upper Bedfords Park School	Removed
PSU9 20-26 Park End Road, Romford	Removed
PSU10 Expansion of Harold Wood Hospital	Removed
ROM1 Additional Retail Floorspace	RAAP
ROM2 Retail Development Sites	Removed
ROM3 Non-Retail Uses in Romford Town Centre	RAAP
ROM4 Refurbishment of the Liberty Shopping Centre	RAAP
ROM5 Pedestrianisation South Street/High Street	Removed
ROM6 Repaving/Planting/Landscaping in South Street/Western Road	Removed
ROM7 Repaving/Planting/Landscaping in the Market Place	Removed
ROM8 Office Development	RAAP
ROM9 Eastern/Western Road Office Area	RAAP
ROM10 Leisure Uses	RAAP
ROM11 Sites for Town Centre Development	RAAP
ROM12 Retention of Housing	RAAP
ROM13 Restraint of Peak Hour Traffic Flows	Removed
ROM14 Increase of Public Off-street Parking	Removed
ROM15 Car Park Between Eastern and Western Road	RAAP
ROM16 Improved Public Transport Facilities	RAAP
ROM17 Licensed Taxi Facilities	Removed
ROM18 Cycle Facilities	RAAP

### **Other new policies**

P01: Planning obligations  
DC13: Access to employment opportunities  
DC23: Food, drink and the night time economy  
DC24: Live-Work in Hornchurch  
DC30: Planning Gain  
DC31: Cemeteries and Crematoria  
DC37: Safeguarding  
DC47: Major developed sites  
DC57: River restoration policy

## **Annex 2 - selected list of strategies and programmes at the national, regional and local level which have been taken into account in preparing the Core Strategy**

Government Strategies

1. The Government has a variety of national strategies which set out Government policy in key areas. Some of these strategies are relevant to the Core Strategy. They are too numerous to mention but key examples include:
  - Sustainable Communities Plan
  - Homes for All
  - Sustainable Development Strategy-Securing the Future
  - Waste Strategy
  - Air Quality Strategy
  - Strategy for Sport
  - Supporting People Strategy
  - Energy Strategy
2. These are either addressed directly in the Core Strategy or are translated into the local strategies listed below.

Thames Gateway Strategies

3. The Sustainable Communities Plan identifies the Thames Gateway as one of four national growth areas. The London Riverside Regeneration Area is at the heart of the Thames Gateway growth area. Whilst a number of strategies exist for the Thames Gateway growth area the four most important and the ones to which the Core Strategy has had most regard are:
  - Growth and regeneration in the Thames Gateway - Interregional planning statement 2004
  - The London Thames Gateway Development and Investment Framework 2004
  - London Riverside Urban Strategy 2003
  - Draft London Thames Gateway Development Corporation Regeneration Strategy 2006

Regional and local strategies and evidence base

4. These are just some of the local strategies and evidence base documents that the Core Strategy has had regard to:
  - Capital Homes: London Housing Strategy 2005-16,
  - Barker Review of Housing Supply
  - Havering Fit for Purpose Housing Strategy 2004-2007
  - GLA Housing capacity study 2006/7-2016/17
  - Havering Housing Needs Survey Update 2006
  - East London Affordable Housing Investment Framework 2004/05.
  - Havering Five Year Supporting People Strategy, 2005-2010
  - Havering Employment Land Study 2006
  - Draft East London Industrial Land Survey 2006
  - London Office Policy Review, 2004
  - Industrial and Warehousing Demand in London 2004

- Hotel Demand Study 2006
- London Economic Development Strategy 2005
- Romford Urban Strategy 2006
- Hornchurch Urban Strategy 2006
- Havering Retail and Leisure study 2006
- Upminster, Collier Row and Elm Park, Town Centre Framework, Groundwork 2003
- Havering Draft Open Space Strategy 2006
- Havering Open Space and Sports Assessment 2005
- Thames Chase Plan 2000
- Havering Crime and Disorder Strategy-2005-2008
- Greening the Gateway 2005
- Creativity London's Core Business 2002
- Spending Time: London's Leisure Economy 2003
- NHS Local Improvement Finance Trust Programme
- Health Inequalities in Havering 2003
- Havering School Organisation Plan 2003-2008
- London Transport Strategy 2001
- Havering's Local Implementation Plan 2006
- London Riverside Integrated Transport Strategy 2003
- Havering Cycling Strategy 2006
- Havering Walking Strategy 2006
- East London Joint Waste Plan, Building the Evidence Base, Identifying Issues and Options, Final Report, 2006
- National and regional guidelines for Aggregates Provision 2001-2016
- Quarry Products Association Assessment of Remaining Unsterilised Sand and Gravel Resources in Greater London 2004
- London Aggregates Monitoring Report 2000-2004
- The Mayor's Biodiversity Strategy 2002
- Havering's Phase 1 Biodiversity Action Plan 2003
- The Mayor's Air Quality Strategy 2002
- Sounder City: the Mayor's Ambient Noise Strategy 2004
- Thames Gateway Strategic Flood Risk Assessment 2006
- Environment Agency Water resources strategy 2001-2026
- London Emissions Inventory 2003
- Green light to clean power: the Mayor's Energy Strategy March 2004
- Urban Task Force Report 1999
- By Design, Urban Design in the Planning System Towards Better Practice 2000
- Better Places to Live 2001
- Safer Places the Planning System and Crime Prevention 2004
- Havering Community Safety Strategy 2002-2005
- Romford Heritage Strategy 2000
- Hornchurch Heritage Strategy 2000
- Conservation Areas in Havering 1990
- English Heritage National register of parks and gardens 2003
- DCMS List of Buildings of Special Architectural or Historic Interest

**Annex 3 - Housing Trajectory**

**Havering Housing Trajectory 1993/04-2019/20**

## **Introduction**

- 1.1 The main purpose of a housing trajectory is to support the forward planning process by providing a progress report comparing past progress on housing supply to future rates of supply as anticipated by the Council against strategic housing targets.
- 1.2 Havering's current UDP was adopted in March 1993 and this Core Strategy is focused on planning the future of Havering up to 2020. Therefore in line with Regulation 48 of The Town and Country Planning (Local Development) (England) Regulations 2004, this housing trajectory covers the period 1993/94 to 2019/20.

## **Housing provision targets**

- 1.3 The regional planning body for London is responsible for, in partnership with the London Local Planning Authorities, preparing a housing capacity study. This study forms the basis of the housing targets set by the regional planning body. Housing Capacity Studies were published in 1994, 2000 and 2005 and formed the basis for the housing provision targets set out in RPG3 'Strategic Planning Guidance for London Planning Authorities' 1996, the London Plan 2004, and Draft Alterations to the London Plan 2005.

### Housing provision targets 1993-2020

<b>Regional Planning Body</b>	<b>Source</b>	<b>Period</b>	<b>Overall target</b>	<b>Annual target</b>
London Planning Advisory Committee	RPG3 - 1996	1992-2006	5550 dwellings	370/annum
Greater London Authority	London Plan 2004	1997-2016	6400 dwellings	350/annum
Greater London Authority	draft alterations to the London Plan 2006	2007-2016	5350 dwellings	535/annum

- 1.4 Therefore from 1993/4-1996/7 the strategic housing target was 370/annum, and from 1997/8-2006/7 350/annum. From 2007/8-2016 it will be 535/annum. There is no target for 2017 onwards. A figure of 535/annum has been used for this period.
- 1.5 This housing trajectory will compare **actual** and **forecast** completions against these targets to determine previous and future performance against the respective targets.

## **Actual completions**

- 1.6 Actual completions, are the number of net new houses built in the respective financial year. The Council maintains a accurate record of these with regard to Council and NHBC Building Certificates from 1993-2006. This shows on average 347 net new dwellings per annum where built in this period. On average 10 units per year less than the targets which applied in this period, resulting in an overall shortfall over 13 years of 137 units.

### **Forecast completions**

- 1.7 To forecast completions over the remaining period the Council has had regard to the data provided for the London Housing Capacity Study 2004. This calculated housing capacity as follows:

Known housing capacity from sites over 0.5h with planning permission
+
Estimated housing yield from sites over 0.5 hectares without planning permission
+
Housing from other agreed sources ( <i>additional capacity</i> )
+
Projected housing yields from all sites below 0.5 hectares
+
Non self-contained household spaces
+
Long term vacants returning to permanent use
=
Total housing capacity

### **Large sites over 0.5 hectares**

- 1.8 The 2004 Housing Capacity Study sets out the methodology for calculating capacity of large sites over 0.5 hectares:
- All large sites with potential for housing are individually identified, with no large site windfall allowance.
  - Default value potential housing yields on large sites are based on generalised assumptions selected automatically by a computerised system according to characteristics of sites and their locations.
  - Alternative potential housing yields on large sites are estimated by varying input assumptions including default values.
  - Large sites are allocated different degrees of probability of being developed for housing rather than being either included in or excluded from the estimated housing capacity.
  - Different total housing capacity outputs are generated according to variations in input assumptions and infrastructure scenarios.
- 1.9 The study calculated 3429 units would be completed on large sites between 2007/08 and 2016/17. 2963 (86%) of these between 2007/08 and 2011/12.

However the GLA reduced this to 3200 to ensure only the mid point of the London Plan Density Matrix was used in calculating the capacity of qualifying sites. The Council agreed that an additional 500 units may come forward in Romford Town Centre. These are units on small sites (below 0.5 hectares) which represent capacity over and over the small site allowance. Therefore the capacity was increased to 3700 units. However this was reduced to 3500 units as it was considered the 3700 made an unrealistic assumption about the amount of employment land which could be released.

- 1.10 The methodology employed for the Housing Capacity Study (HCS) means that there is no windfall element to the overall capacity figure. However neither does the study include a definitive list of housing sites which the Council can be 100% certain will come forward during the life of the Core Strategy. This is because the study assesses the probability of capacity being delivered across all qualifying sites. Therefore whilst the capacity is meaningful when aggregated, it is not possible to say with any certainty that capacity on all individual sites will come forward. At the same time the Council is able to identify those **existing sites with planning permission** which it is certain will come forward between 2007/08 and 2011/12, and those **sites without planning permission** it expects to come forward between 2007/08 and 2019/20. These two sources of supply are detailed in paragraphs 1.13 and 1.14.

- Existing sites with planning permission forecast to be completed 2007/08 and 2011/12 = **1592**
- Sites without planning permission it expects to come forward between 2007/08 and 2019/20 = **6800**

- 1.11 The Council therefore anticipates that 8392 new homes will be built on large sites over 0.5 hectares between 2007/8 and 2019/20. This compares with the HCS which calculated 3500, albeit for the shorter period 2007/08-2016/17. This increase is due to additional sources of supply which were not included within the Housing Capacity Study.

- Mardyke Development – 1500 units
- London Riverside (excluding Rainham Village) – 3500 units

- 1.12 Excluding these two sites gives a total of 3392 units, which compares to the 3500 forecast by the HCS for the same period. The shortfall of 108 units will be met by those identified sites included in the HCS without permission which cannot be identified individually at the site level with any certainty at this point in time.

*Large sites over 0.5 hectares with planning permission*

- 1.13 The bulk of capacity on large sites with planning permission is forecast to come forward between 2007-2012. The following are the principle sites (over

50 units) with planning permission which have not yet been delivered but are expected to be built out between 2007-2012.

- (P0849.00) North side of Market Place = 91
- (P1635.04) Oldchurch Hospital = 703
- (P0704.01) Harold Wood Hospital = 480
- (P1478.03) Gobions School = 162
- (P1478.03) Ahearns-Crow Lane = 96
- (P2106.05) 10-14 Western Road = 60

Total **1592**

*Large sites over 0.5 hectares without planning permission*

- 1.14 There are a number of planning applications expected on large sites with significant housing capacity within this period. These include:

Mardyke Development = 1500

This is dependent on a Green Belt boundary alteration proposed within the Core Strategy and is programmed to come on stream 2008/09 onwards.

London Riverside = 4000

- Rainham West
- Beam Park
- Rainham Central
- Rainham Land Between Railway and Broadway

A significant proportion of this capacity is predicated on the provision of East London Transit and/or Beam Reach Station. It is therefore not forecast to be delivered until 2013/14 onwards.

Romford Town Centre = 700

- Bridge Close
- Como Street Car Park
- 25- 55 North Street
- Angel Way (Secrets)
- Angel Way (Decathlon)

These are either sites currently the subject of planning applications, or sites included in the Romford Area Action Plan Preferred Options Report.

Others = 600

- Roneo Corner
- Romford Ice Rink
- Lambs Lane
- Spring Gardens

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- North Street (remaining)
- The Whitworth Centre

Lambs Lane, Spring Gardens and North Street are Secondary Employment Areas that the Core Strategy proposes to de-designate.

Roneo Corner and Romford Ice Rink are both Council owned sites. The Whitworth Centre is also Council owned and depends on a Green Belt boundary alteration proposed within Core Strategy.

Total **6800**

### **Small sites**

- 1.15 The small sites component (sites under 0.5 Ha) is based on net housing completions including new-build developments and gains from conversions for the last five years of reliable data (1998-2002) which is assumed to continue at a constant rate over the capacity study period. This rate for Havering was calculated at 124 units per year. This was then subject to a level of uplift based on policy changes since the end of 2002. In Havering's case the main factors were new guidance on density and residential car parking and a more permissive approach to housing within town centres (excluding Romford Town Centre for which a separate addition was made). These factors all contributed to deriving a level of potential increase in small site capacity of 33%, giving a revised total of 165. This was then reduced to 160 to take account of a reduced amount of employment land being reduced. From 2016/17 onwards a 10% reduction applies, reducing the annual small site allowance to 146.

### **Vacancies**

- 1.16 An allowance of 250 units from 2007/08 – 2016/17 has been made for vacancies (25 per annum), it has been assumed that this will continue to 2019/20.

Table 1 shows on a year by year basis the housing targets which apply for the period 1993/04-2019/20. It then compares this to actual completions (1993/04-2005/06) and anticipated completions (2006/07-2019/20). It separately identifies those sources of capacity not included within the Housing Capacity Study, (London Riverside excluding Rainham Village, and Mardyke Development). The shaded area shows the supply which was identified through the Housing Capacity Study and comprises the 5350 supply target from 2007/08-2016/17. Chart 1 graphically represents this data and shows the trend (log) lines for the housing target and completions. Chart 2 shows the cumulative impact of the actual and forecast completions when compared to the housing provision target.

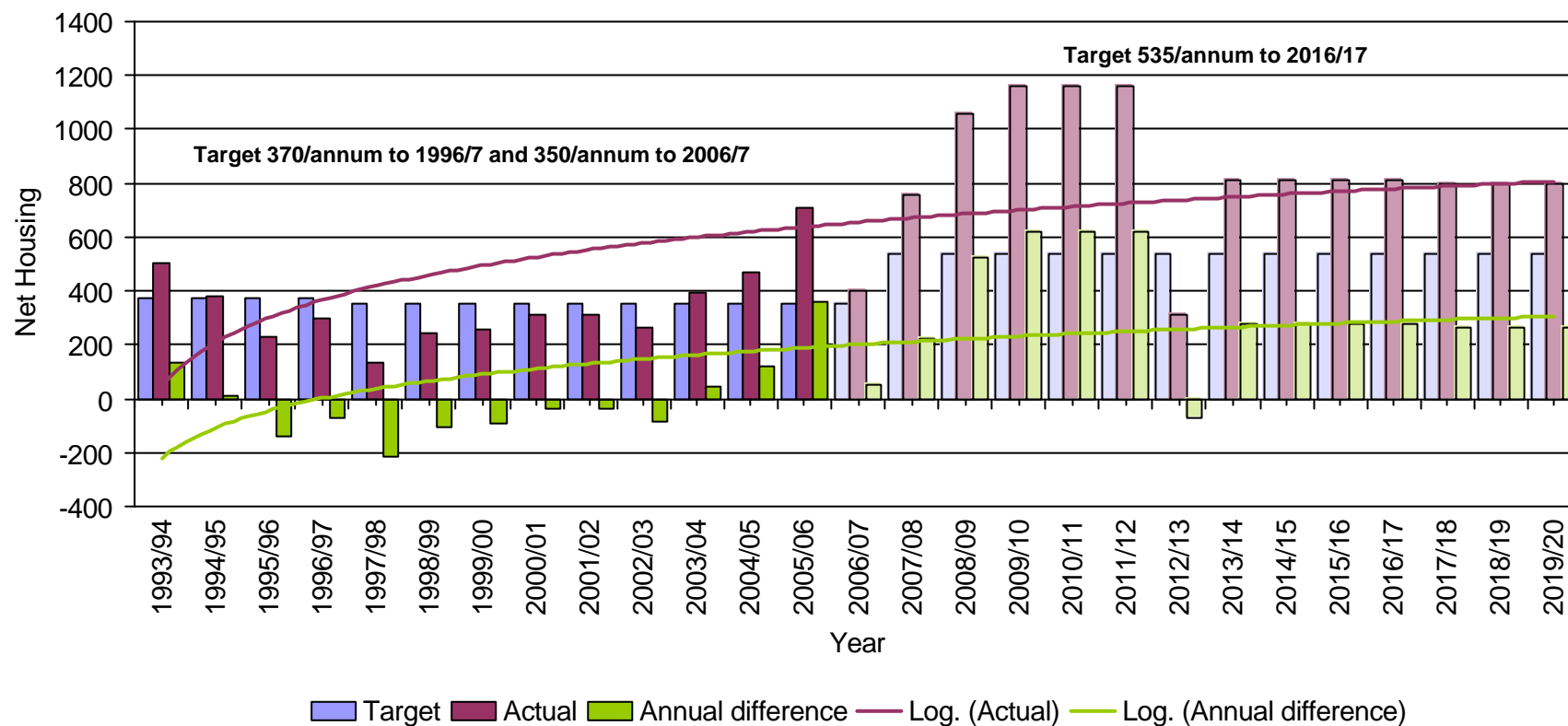
## **Conclusion**

- 1.17 This housing trajectory demonstrates that from 1993/4-2005/06, Havering was within 3% of meeting the housing targets that applied in this period. Significantly completions data for 2004/05 and 2005/06 shows that supply is increasing in line with the increased housing target which will apply from 2007/08 - 2016/17. 711 units were completed in 2005/06. From 2006/7-2011/12 it shows that the target will have been surpassed by a net surplus of 2540 dwellings. By 2017 this increases to 3575 and by 2020, 4358 net new homes. If the additional sources of supply not included in the London Housing Capacity Study 2004 are excluded, the 535 new homes per year figure will be surpassed due to the size of the pipeline of unimplemented permission and sites the Council is aware of and planning for, which are expected to come forward between 2007/8-2016/17.

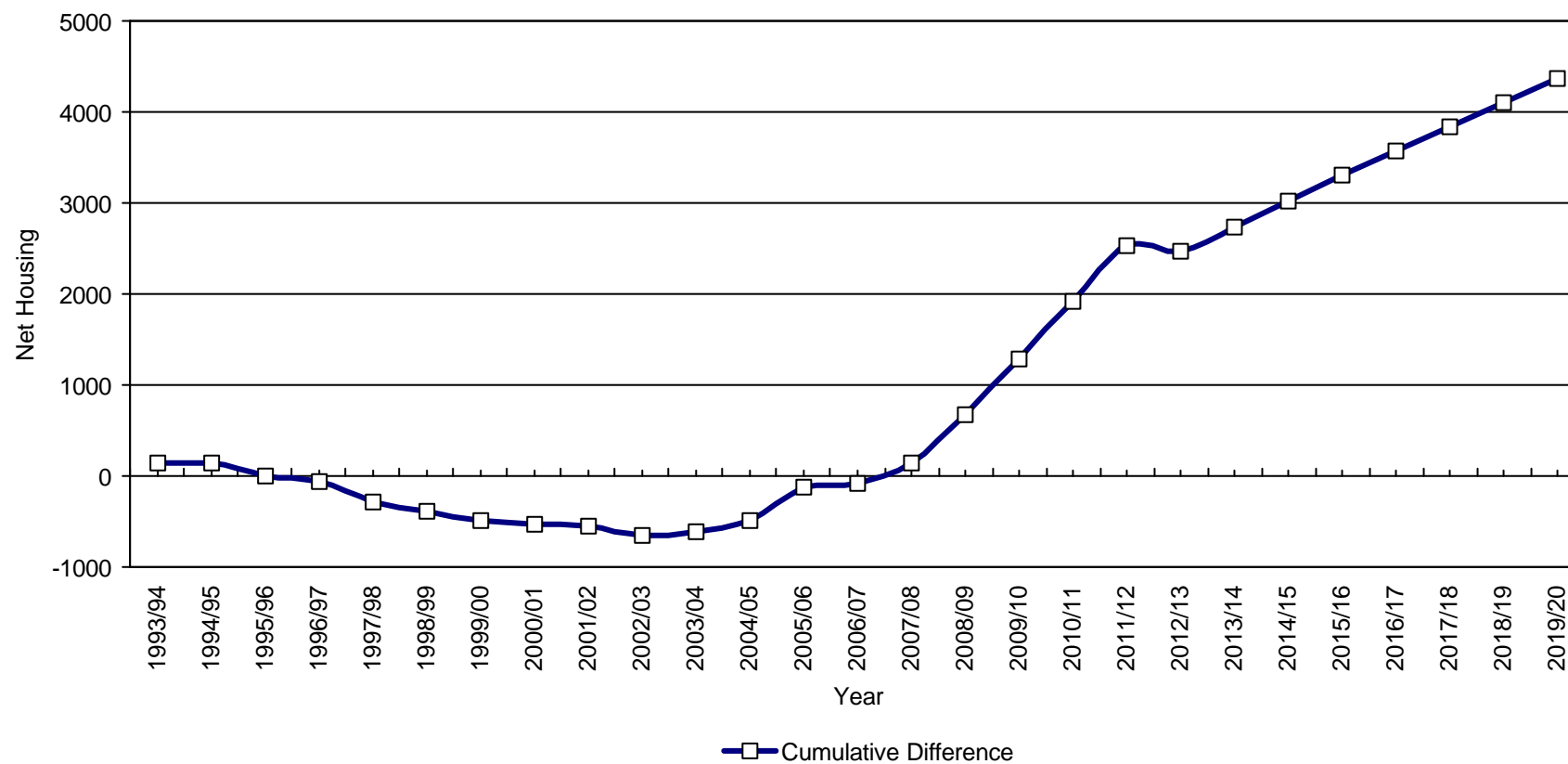
**Table 1 - Housing provision target and actual and forecast completions 1993/94 – 2019/20**

Year	Housing provision target	ACTUAL/FORECAST COMPLETIONS						Annual difference between target and completions	Cumulative Difference between target and completions
		Large	Small	Vacant	Mardyke Development	London Riverside (excluding Rainham Village)	Total		
1993/94	370						505	135	135
1994/95	370						382	12	147
1995/96	370						227	-143	4
1996/97	370						298	-72	-68
1997/98	350						136	-214	-282
1998/99	350						242	-108	-390
1999/00	350						256	-94	-484
2000/01	350						310	-40	-524
2001/02	350						314	-36	-560
2002/03	350						264	-86	-646
2003/04	350						393	43	-603
2004/05	350						468	118	-485
2005/06	350						711	361	-124
2006/07	350	307	92				399	49	-75
2007/08	535	573	160	25			758	223	148
2008/09	535	573	160	25	300		1058	523	671
2009/10	535	573	160	25	400		1158	623	1294
2010/11	535	573	160	25	400		1158	623	1917
2011/12	535	573	160	25	400		1158	623	2540
2012/13	535	127	160	25			312	-73	2467
2013/14	535	127	160	25		500	812	277	2744
2014/15	535	127	160	25		500	812	277	3021
2015/16	535	127	160	25		500	812	277	3298
2016/17	535	127	160	25		500	812	277	3575
2017/18	535	127	144	25		500	796	261	3836
2018/19	535	127	144	25		500	796	261	4097
2019/20	535	127	144	25		500	796	261	4358

Chart 1 - Housing Trajectory 1993/94 – 2019/20



**Chart 2 - Cumulative difference between housing provision target and forecast and actual completions 1993/94 – 2019/20**



**Annex 4 - Properties included with District, Major Local and Minor Local Centres.**

<b>CENTRE</b>	<b>PROPERTIES/LAND INCLUDED</b>
<b>MAJOR DISTRICT CENTRES</b>	
<b>HORNCHURCH</b>	
<b>Retail Core comprising:</b>	<b>High Street, 70-162 (evens), 63-187 (odds); North Street, 4-14 (evens), 1-23 (odds); Station Lane 43-2 (evens).</b>
<b>Fringe Area comprising:</b>	<b>North Street, 16-22 (evens); Billet Lane, 1-31 (odds); High Street, 5-29, 35-61 and 189-199 (odds), 44-64 and 172-212 (evens); Station Lane, 36-62 (evens), 1-41 (odds).</b>
<b>Remaining land/properties within the District Centre boundary:</b>	<b>As shown on the Proposals Map.</b>
<b>UPMINSTER</b>	
<b>Retail Core comprising:</b>	<b>Station Road, 1-65 (odds), 2-70 (evens); St Mary's Lane, 119-133 and 141-149 (odds); Corbets Tey Road, 1-63 (odds) and 16 Bell Corner.</b>
<b>Fringe Area comprising:</b>	<b>St Mary's Lane, 151-209 (odds), 160-218 (evens); Corbets Tey Road, 28-52 (evens) and 69-127 (odds).</b>
<b>Remaining land/properties within the District Centre boundary:</b>	<b>As shown on the Proposals Map.</b>

<b>CENTRE</b>	<b>PROPERTIES/LAND INCLUDED</b>
<b>MINOR DISTRICT CENTRES</b>	
<b>COLLIER ROW</b>	
<b>Retail Core comprising:</b>	<b>Collier Row Road, 2-62 (evens), 1-43 (odds); Chase Cross Road, 2-14 (evens); Collier Row Lane 316-322 (evens); Clockhouse Lane, 1-23 (odds).</b>
<b>Fringe Area comprising:</b>	<b>Chase Cross Road, 1-11 (odds); Collier Row Lane, 303-313 (odds).</b>
	<b>Remaining land/properties within the District Centre boundary as shown on the Proposals Map.</b>
<b>ELM PARK</b>	
<b>Retail Core comprising:</b>	<b>Station Parade, 1-27 (all nos.); Tadworth Parade, 1-20 (all nos.); Broadway Parade, 7-42 (all nos.); Elm Parade, 1-26 (all nos.); Elm Park Avenue, 186-202 (evens).</b>
<b>Fringe Area comprising:</b>	<b>Broadway Parade, 1-6 (all nos.).</b>
<b>Remaining land/properties within the District Centre boundary:</b>	<b>As shown on the Proposals Map.</b>
<b>HAROLD HILL</b>	
<b>Retail Core comprising:</b>	<b>Farnham Road, 2-16 and 42-48 (evens), 1-19 and 65-73 (odds); Hilldene Avenue, 94-120 and 170-198 (evens); Chippenham Road, 65 and 83 (odds).</b>
<b>Fringe Area comprising:</b>	<b>Chippenham Road, 59-63 and 85-89 (odds); The Arcade 1-11 and 13-23 (odds), 2-12 and 14-24 (evens).</b>
<b>Remaining land/properties within the District Centre boundary:</b>	<b>As shown on the Proposals Map.</b>

<b>CENTRE</b>	<b>PROPERTIES/LAND INCLUDED</b>
<b>RAINHAM</b>	
<b>Retail Core comprising:</b>	<b>Upminster Road South, 9-53 (odds), 2-26 (evens).</b>
<b>Fringe Area comprising:</b>	<b>Broadway, 12-28 (evens); Upminster Road South, 1-7 (odds).</b>
<b>Remaining land/properties within the District Centre boundary:</b>	<b>As shown on the Proposals Map.</b>

<b>REF</b>	<b>LOCATION</b>	<b>PROPERTIES/LAND INCLUDED</b>
<b>MAJOR LOCAL CENTRES</b>		
<b>1</b>	<b>Petersfield Avenue, Harold Hill</b>	<b>Petersfield Avenue, 90-132 (evens).</b>
<b>2</b>	<b>Station Road, Harold Wood</b>	<b>Station Road, 1-29 (odds), 33-49 (odds) and King Harold PH.</b>
<b>3</b>	<b>Main Road, Gidea Park</b>	<b>Core Area comprises: Main Road, 168-210 (evens), 77-89 (odds); Balgores Lane, 1-9 (odds).</b>
	<b>Fringe Area</b>	<b>Fringe Area comprises: Main Road, 212-248 (evens), 73-75 (odds), 91-101 (odds) and Unicorn Hotel PH.</b>
<b>4</b>	<b>Ardleigh Green Road, Squirrels Heath</b>	<b>Ardleigh Green Road, 187-207 (odds), 88-122 (evens) and land to rear of 122 and Spencers Arms PH; Squirrels Heath Lane, 177-179 (odds).</b>
<b>5</b>	<b>Balgores Lane, Gidea Park</b>	<b>Balgores Lane, 97-105 (odds), 81-85 (odds), 142- 168 (evens); Station Road, 2-8 (evens).</b>
<b>6</b>	<b>Avon Road, Cranham</b>	<b>Avon Road, 119-151 (odds).</b>
<b>7</b>	<b>Rush Green Road, Rush Green</b>	<b>Rush Green Road, 162-180 (evens), 197-205 (odds); Dagenham Road, 68-80 (evens), 82-96 (evens)</b>
<b>8</b>	<b>Front Lane, Cranham</b>	<b>Core Area comprises: Front Lane, 69-81 (odds), 85-103 (odds) and The Plough PH; Willow Parade, Front Lane 1-12 (all nos.); Broadway, Front Lane, 1, 2; Moor Lane, 2-12 (evens).</b>
		<b>Fringe Area comprises: Front Lane, 38-46 (evens).</b>
<b>9</b>	<b>Station Lane, Hornchurch</b>	<b>Station Lane, 171-213 (odds); Suttons Lane, 1-25 (odds); Station Lane, 142-144 (evens).</b>

<b>REF</b>	<b>LOCATION</b>	<b>PROPERTIES/LAND INCLUDED</b>
<b>10</b>	<b>Cherry Tree Corner, South Hornchurch</b>	<b>Rainham Road, 70-90 (evens), 109-115 (odds) and Cherry Tree PH; South End Road, 2-12 (evens); Cherry Tree Lane, 205-211 (odds).</b>
<b>11</b>	<b>Crown Parade, Upminster Road South, Rainham</b>	<b>Upminster Road South, 193, 215-223 (odds), 188-200 (evens); Crown Parade, 1-8</b>

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**MINOR LOCAL CENTRES**

<b>12</b>	<b>Whitchurch Road, Harold Hill</b>	<b>Whitchurch Road, 145-167 (odds).</b>
<b>13</b>	<b>Boxmoor Road, Collier Row</b>	<b>Boxmoor Road, 37 and 15-27 (odds).</b>
<b>14</b>	<b>Highfield Link, Collier Row</b>	<b>Highfield Link, 1-7 (odds).</b>
<b>15</b>	<b>Chase Cross Road, Collier Row</b>	<b>Chase Cross Road, 257-263 (odds).</b>
<b>16</b>	<b>Grange Road, Harold Hill</b>	<b>Grange Road, 1-7 (odds).</b>
<b>17</b>	<b>Harold Park</b>	<b>The Parade, Colchester Road, 1-8 (all nos.); Colchester Road, 15-21 (odds); Tudor Court, Harold Court Road, 1-5 (all nos.); Harold Court Road.</b>
<b>18</b>	<b>Chase Cross Road, Collier Row</b>	<b>Chase Cross Road, 87-93 (odds).</b>
<b>19</b>	<b>Gobions Avenue, Rise Park</b>	<b>Gobions Avenue, 25, 27, 33, 39, 43, 45, 47, 53, 55.</b>
<b>20</b>	<b>Briar Road, Harold Hill</b>	<b>Briar Road, 9-21 (odds).</b>
<b>21</b>	<b>Camborne Avenue, Harold Hill</b>	<b>Camborne Avenue, 1-15 (odds).</b>
<b>22</b>	<b>Collier Row Road, Collier Row</b>	<b>Collier Row Road, 164-178 (evens).</b>
<b>23</b>	<b>Collier Row Road, Collier Row</b>	<b>Collier Row Road, 98-120 (evens).</b>
<b>24</b>	<b>Moray Way, Rise Park</b>	<b>Moray Way, 2-16 (evens).</b>
<b>25</b>	<b>Tennyson Road, Harold Hill</b>	<b>Tennyson Road, 39-45 (odds).</b>
<b>26</b>	<b>Masefield Crescent, Harold Hill</b>	<b>Masefield Crescent, 61-67 (odds), 66-72 (evens).</b>

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<b>27</b>	<b>Oak Road, Harold Hill</b>	<b>Oak Road, 1-17 (odds).</b>
<b>28</b>	<b>Fitzilian Avenue, Harold Wood</b>	<b>Fitzilian Avenue, 2-8 (evens), 5-7 (odds).</b>
<b>29</b>	<b>White Hart Lane, Collier Row</b>	<b>White Hart Lane, 37-59 (odds).</b>
<b>30</b>	<b>Collier Row Lane, Collier Row</b>	<b>Collier Row Lane, 134-142 (evens).</b>
<b>31</b>	<b>Collier Row Lane, Collier Row</b>	<b>Collier Row Lane, 162-174 (evens)</b>
<b>32</b>	<b>Pettits Lane North, Rise Park</b>	<b>Rise Park Parade, Pettits Lane North, 169-179 (odds), 211-223 (odds).</b>
<b>33</b>	<b>Upper Brentwood Road, Gidea Park</b>	<b>Upper Brentwood Road, 622-630 (evens).</b>
<b>34</b>	<b>Collier Row Lane, Collier Row</b>	<b>Collier Row Lane, 52-62 (evens), 37-55 (odds).</b>
<b>35</b>	<b>Belgrave Avenue, Harold Wood</b>	<b>Belgrave Road, 117-127 (odds).</b>
<b>36</b>	<b>Mawney Road North, Collier Row</b>	<b>Mawney Road, 170-178 (evens); Denbar Parade, 1-6 (all nos.); Marlborough Road, 6-8 (evens).</b>
<b>37</b>	<b>Mawney Road South, Romford</b>	<b>Mawney Road, 121-123 (odds), 126-128 (evens).</b>
<b>38</b>	<b>Hare Hall Lane, Gidea Park</b>	<b>Hare Hall Lane, 4-9 (all nos.)</b>
<b>39</b>	<b>Balgores Square, Gidea Park</b>	<b>Balgores Square, 1-4 (all nos.).</b>
<b>40</b>	<b>Station Road, Gidea Park</b>	<b>Station Road, 84-94 (evens).</b>
<b>41</b>	<b>Carlton Road, Romford</b>	<b>Carlton Road, 2-16 (evens).</b>
<b>42</b>	<b>Drill Corner, Squirrels Heath</b>	<b>Heath Park Road, 143-155 (odds), 160-168 (evens);</b>

		<b>Balgores Lane, 236-238 (evens); Brentwood Road, 364-392 (evens), 395-405 (odds); The Drill Public House.</b>
<b>43</b>	<b>Essex Gardens, Emerson Park</b>	<b>Essex Gardens, 2-8 (evens).</b>
<b>44</b>	<b>London Road West, Romford</b>	<b>London Road, 257-277 (odds).</b>
<b>45</b>	<b>London Road East, Romford</b>	<b>London Road, 53-65 (odds), 30-60 (evens).</b>
<b>46</b>	<b>Brentwood Road, Romford</b>	<b>Brentwood Road, 284-290 (evens), 317-319 (odds).</b>
<b>47</b>	<b>Brentwood Road, Romford</b>	<b>Brentwood Road, 46-92 (evens); Albert Road, 89-93 (odds); Park Lane, 1-9 (odds).</b>
<b>48</b>	<b>Hillview Avenue, Heath Park</b>	<b>Hillview Avenue, 136-144 (evens).</b>
<b>49</b>	<b>Butts Green Road, Emerson Park</b>	<b>Butts Green Road, 43-79 (odds).</b>
<b>50</b>	<b>Lyndhurst Drive, Hornchurch</b>	<b>Lyndhurst Drive, 202-210 (evens).</b>
<b>51</b>	<b>Park Lane, Romford</b>	<b>Park Lane, 65-93 (odds), 134-140 (evens).</b>
<b>52</b>	<b>Butts Green Road, Emerson Park</b>	<b>Butts Green Road, 1-9, 23 (odds); Berther Road, 2 (evens).</b>
<b>53</b>	<b>North Street, Hornchurch</b>	<b>North Street, 88-112, 118-124, 128-142 (evens); Billet Lane, 153-163 (odds); The Chequers Public House</b>
<b>54</b>	<b>Rush Green Road, Romford</b>	<b>Rush Green Road, 138-146 (evens).</b>
<b>55</b>	<b>Roneo Corner, Romford</b>	<b>Hornchurch Road, 307-323 (odds); Roneo Corner, 2-32 (evens);</b>
<b>56</b>	<b>Hornchurch Road, Hornchurch</b>	<b>Hornchurch Road, 134-194 (evens), 202-228 (evens), 121-137 (odds).</b>
<b>57</b>	<b>Wingletye Lane,</b>	<b>Wingletye Lane, 65a-81 (odds).</b>

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	<b>Emerson Park</b>	
<b>58</b>	<b>Upminster Road Upminster</b>	<b>Upminster Road, 25-33 (odds).</b>
<b>59</b>	<b>Upminster Bridge, Upminster</b>	<b>Upminster Road, 97-107 (odds), 122-164A (evens).  Entrance to Upminster Bridge (District Line) Station also included.</b>
<b>60</b>	<b>St Mary's Lane, Upminster</b>	<b>St Mary's Lane, 302-314 (evens).</b>
<b>61</b>	<b>Lichfield Terrace St Mary's Lane, Cranham</b>	<b>Lichfield Terrace, 41-46 (all nos.).</b>
<b>62</b>	<b>Abbs Cross Lane, Hornchurch</b>	<b>Abbs Cross Lane, 115-119 (odds).</b>
<b>63</b>	<b>Abbs Cross Lane, Hornchurch</b>	<b>Abbs Cross Lane, 224-228 (evens).</b>
<b>64</b>	<b>Bevan Way, Hornchurch</b>	<b>Hacton Parade, Bevan Way/Central Drive, 1-8 (all nos.).</b>
<b>65</b>	<b>Gaynes Park Road, Upminster</b>	<b>Gaynes Park Road, 49-57 (odds).</b>
<b>66</b>	<b>Northolt Way, South Hornchurch</b>	<b>Blenheim Court 1-7 (all nos.).</b>
<b>67</b>	<b>Mungo Park Road, South Hornchurch</b>	<b>Mungo Park Road, 105-131 (odds).</b>
<b>68</b>	<b>Elmer Gardens, South Hornchurch</b>	<b>Elmer Gardens, 2-8 (evens).</b>
<b>69</b>	<b>South End Road, South Hornchurch</b>	<b>South End Road, 166-174 (evens).</b>
<b>70</b>	<b>Ongar Way, South Hornchurch</b>	<b>Writtle Walk, Ongar Way, 1-5 (all nos.).</b>
<b>71</b>	<b>Rainham Road, South Hornchurch</b>	<b>Rainham Road, 145-149 (odds).</b>
<b>72</b>	<b>Cherry Tree Lane, South Hornchurch</b>	<b>Cherry Tree Lane, 179-185 (odds).</b>

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<b>73</b>	<b>Roman Close, South Hornchurch</b>	<b>Roman Close, 145-153 (odds).</b>
<b>74</b>	<b>Southview Parade, New Road, Rainham</b>	<b>Southview Parade, 1-6 (all nos.).</b>
<b>75</b>	<b>Upminster Road South, Rainham</b>	<b>Upminster Road South, 107-119 (odds), 76-84 (evens).</b>
<b>76</b>	<b>Wennington Road, Rainham</b>	<b>Wennington Road, 113-139A (odds).</b>
<b>77</b>	<b>Wennington Road, Rainham</b>	<b>Wennington Road, 194-200 (evens) No. 205B</b>

**Annex 5 – Car, Motor-cycle and Disabled Parking Standards**

Type of development (1)	Use class (2)	Parking requirement				Further information
		Romford Town Centre (3)	District Centres (4)	Local centres (5)	Rest of Borough (6)	
Food stores upto 500 m <sup>2</sup> (7)	A1	1/75m <sup>2</sup>	50-35 m <sup>2</sup>	30 m <sup>2</sup>		
Food supermarket upto 2500 rfa/c4000 m <sup>2</sup> gfa (7)	A1	1/40-30 m <sup>2</sup>	1/30 m <sup>2</sup>	1/18 m <sup>2</sup>		
Non-Food store upto 2500 rfa/c4000 m <sup>2</sup> gfa (7)		1/75-50 m <sup>2</sup>	1/50-35 m <sup>2</sup>	1/30 m <sup>2</sup>		
Food superstore over 2500 rfa/c4000 m <sup>2</sup> gfa (7)	A1	1/38-25 m <sup>2</sup>	1/25-18 m <sup>2</sup>	1/15 m <sup>2</sup>		
Non-food warehouse over 2500 rfa/c4000 m <sup>2</sup> gfa (7)	A1	1/60-40 m <sup>2</sup>	1/50-30 m <sup>2</sup>	1/30 m <sup>2</sup>		
Garden centre	A1	1/65-45 m <sup>2</sup>	1/45-30 m <sup>2</sup>	1/25 m <sup>2</sup>		
Town centre/shopping mall (7)	A1	1/75-50 m <sup>2</sup>	1/50-35 m <sup>2</sup>	1/30 m <sup>2</sup>		This standard applies to all non-food stores below 2500 m <sup>2</sup> .
Financial and professional services	A2	1/75-50 m <sup>2</sup>	1/50-35 m <sup>2</sup>	1/30 m <sup>2</sup>		Headquarter style buildings of financial institutions will be treated as B1 No site specific parking should be provided for branches of banks, building societies etc.
Restaurants, cafes and drinking	A3-5	1/50 m <sup>2</sup>	1/10 m <sup>2</sup>			Within the Core and Fringe Retail areas of Romford Town Centre customer parking may not

<b>establishments. Hot Food Takeaways</b>				<p>be necessary. Generally provided "on-street" parking is not considered likely to result in a serious road safety hazard or a significant increase in traffic congestion and the amenity of neighbouring residents is not Significantly affected, a relaxation in standards may be considered. Takeaway food stores with no facilities for consumption on the premises will be considered as food shops and the appropriate standard should be used.</p>
<b>Offices Research and development Light industry</b>	<b>B1 (a) (b) (c)</b>	<b>1/100 m<sup>2</sup></b>		<p>In determining appropriate parking for B2 and B8 employment uses applicants should have regard to B1 standards although a degree of flexibility may be required to reflect different trip generating characteristics. In applying this standard regard will be had to standards in adjoining areas in Essex. Provision will be calculated and made for each individual unit within a development rather than the aggregate floorspace of the total scheme.</p>
<b>Storage and distribution</b>	<b>B8</b>	<b>1 lorry space per 200 m<sup>2</sup> (minimum 1 lorry space), to 1 lorry space minimum plus 1 lorry space per 500 m<sup>2</sup>.</b>		<p>Any associated office accommodation should be treated as offices for parking purposes.  In applying this standard regard will be had to standards in adjoining areas in Essex.</p>
<b>Hotel Boarding house Guest house</b>	<b>C1</b>	<b>Operational requirements</b>	<b>1 space per bedroom (staff and guests)</b>	<b>Outside Romford Town Centre lower provision may be acceptable where there is good public transport.</b>
<b>Hospitals/Residenti</b>	<b>C2</b>	<b>To be assessed on an individual basis using</b>		

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<b>al Schools and Colleges</b>		<b>a transport assessment.</b>	
<b>Nursing home</b>	<b>C2</b>	<b>1 space per 4 resident bedspaces</b>	<b>This standard covers residents and staff</b>
<b>Sheltered housing</b>	<b>C3</b>	<b>1 space per resident warden plus 1 space per 4 units (where 1 bed) and 1 space per 2 units (where 2 bed) (minimum 2 spaces) plus 1 per 20 non resident staff</b>	
<b>Dwelling houses</b>	<b>C3</b>	<b>See density matrix in DC2</b>	<b>Disabled parking guidance provided at the end of this table.</b>
<b>Hostels</b>	<b>SG</b>	<b>1 space per 2 resident spaces</b>	<b>The level of parking provision required will depend on the type of hostel proposed owing to the wide variation in parking demand generated by different types of hostels.</b>
<b>HMOs</b>	<b>SG</b>	<b>1 space per 2 habitable rooms</b>	
<b>Day nurseries and creches</b>	<b>D1</b>	<b>1 space for each member of staff</b>	<b>Dropping off area will also need to be provided</b>
<b>Surgeries, health centres and clinics</b>	<b>D1</b>	<b>1 per practitioner plus 1 per 2 additional staff plus 2 per consulting room</b>	<b>In the case of primary health care facilities only, the benefits of providing a convenient local surgery will be taken into account. Provided the site is well served by public transport, "on street" parking is not considered likely to result in a serious road safety hazard or a significant increase in traffic congestion and the amenity of neighbouring residents is not significantly affected, a relaxation in standards may be considered.</b>
<b>Colleges of further education</b>	<b>D1</b>	<b>1 space per staff plus 1 space per 15 students</b>	
<b>Primary and secondary schools</b>	<b>D1</b>	<b>1 space per teaching staff</b>	<b>Safe and convenient dropping off/collection areas should be provided for parents cars and coaches/school buses</b>
<b>Church halls,</b>	<b>D1</b>	<b>1 space per 4 m<sup>2</sup></b>	

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<b>village halls and community centres</b>			
<b>Assembly and leisure including cinema, theatre (sui generis), bingo, ice rinks etc.</b>	<b>D2</b>	<b>1 space per six seats</b>	<b>The variety and scale of leisure developments means that larger developments may be assessed on an individual basis. For outdoor recreation the assessment would be based on the total number of players (including substitutes, referee etc) able to play at any one time and, if appropriate, an allowance for paying spectators. Where Clubhouse facilities are provided, additional parking provision at licensed premises standard will be required.</b>
<b>Stadia</b>	<b>D2</b>	<b>1 space per 15 seats</b>	

- (1) All floorspace is gross floor area except for retail where retail floor area (rfa) is also used.**
- (2) The use classes referred to at those defined by the Town and Country Planning Act 1990, as amended by the Use Classes (Amendment) Order 2005, and General Permitted Development (Amendment) Order 2005.**
- (3) \* Romford PTAL Zone**
- (4) \* Hornchurch, Upminster, Elm Park, Harold Wood, Elm Park, Rainham PTAL Zones, Collier Row and Harold Hill District Centres as defined on the proposals map**
- (5) \* Local centres as defined on the proposals map**
- (6) All areas of the borough outside the PTAL Zones, Collier Row and Harold Hill District Centres and Local Centres**
- (7) The Council would prefer that the majority of spaces generated by shopping developments with Romford Town Centre should be provided at the developer's expense in public car parks by means of negotiated commuted payment.**
- (8) For an application for a change of use it will only be necessary to provide additional spaces to meet the difference in requirement between the proposed use and existing use. However where the proposed use will remove parking spaces for an existing development which will remain, replacement provision will have to be made.**
- (9) For mixed used development, the gross floorspace given over to each use should be used to calculate the overall total maximum parking figure. Only when there is clear evidence that peaks will occur at different times and communal parking space is provided will consideration be given to relaxing this requirement**
- (10) All large developments should provide for appropriate taxi ranks and coach/bus parking/standards. Consideration of these should form part of the developments' transport assessment.**
- (11) A standard car parking space should measure 4.8m x 2.4m and each space should be capable of use independently of any other space. Access lanes should be at least 6m wide. Disabled parking bays should measure 4.8m x 3.6m. Parking for nursing homes and sheltered housing should be 2.6 metres wide.**

### **Motor-cycle Parking**

**Depending on the nature of the development, motorcycle parking spaces should be provided for staff and visitors. As a guideline, 1 motorcycle parking space should be provided per 20 car parking spaces, subject to all developments with more than 10 car spaces having a minimum of 1 space. A minimum area of 2m x 1m should be provided, and, as with pedal cycle parking, every effort should be made to provide spaces in a secure, and attractive position. They should be located closer to the building they serve than car parking spaces, and should be provided with adequate protection from the weather.**

**Disabled parking**

The following standards are taken from Traffic Advisory Leaflet 05/95:

Car Park Used For	Car Park Size	
	5-200 Bays	Over 200 Bays
Employees and visitors to business premises	Individual bays for each disabled employee plus 2 bays or 5% of total capacity whichever is greater	6 bays plus 2% of total capacity
Shopping, recreation and leisure and other public uses	3 bays or 6% of total capacity whichever is greater	4 bays plus 4% of total capacity

Where no off street parking is proposed applicants must demonstrate where disabled drivers can park in order to easily use the development. All disabled spaces should be sized in accordance with BS 8300 2001. In off-street public car parks, spaces for Blue Badge holders should be provided as close as possible, preferably within 50 metres of the facilities served by the car park with level or ramped (preferred gradient 5 per cent) access, and under cover if possible, and on firm and level ground. They should be clearly marked with the British Standard “disabled” symbol and clearly signposted from the car park entrance. Access to the buildings should not be hampered by the presence of kerbs or steps. In open parking areas, designated parking spaces should be located on firm and level ground. The surface of designated parking spaces should be even and stable, with any variation of surface profile not exceeding  $\pm 5\text{mm}$  (e.g. between paving, surface features or different surfaces). In multi-storey car parks the spaces should be on the level or levels at which there is pedestrian access or, if this is not possible, near to a lift usable by wheelchair users.

Where the provision of designated parking spaces close to the building is not possible, a setting-down point for disabled passengers should be provided on firm and level ground, close to the principal entrance to the building. The surface of the pavement or footpath alongside a setting-down point should be level with the carriageway at this point. Tactile indication of this type of setting-down point is necessary to enable people with impaired vision to determine whether they are on the pavement or the carriageway.

For residential development, the design of parking bays should be in accordance with Lifetime Homes standards. Parking bays associated with Wheelchair Housing should be designed in accordance with the Wheelchair Housing Design Guide. Any proposal to create car-free developments should demonstrate where Blue Badge Holders can park in order to easily use the development.

**Please see Traffic Advice Leaflet 5/95, Parking for Disabled People for further advice.**

**Annex 6 - Cycle Parking Standards**

<b>Land Use</b>	<b>Category</b>		<b>Cycle Parking Standard * Minimum 2 spaces</b>
<b>A1</b>	<b>Shops</b>	<b>Food retail</b>	<b>Out of town 1/350m<sup>2</sup>*</b>
			<b>Town centre/Local shopping centre 1/125m<sup>2</sup>*</b>
		<b>Non-food retail</b>	<b>Out of town 1/500m<sup>2</sup>*</b>
			<b>Town centre/Local shopping centre 1/300m<sup>2</sup>*</b>
		<b>Garden centre</b>	<b>1/300m<sup>2</sup>*</b>
<b>A2</b>	<b>Financial and professional services</b>	<b>Offices, business and professional</b>	<b>1/125m<sup>2</sup>*</b>
<b>A3</b>	<b>Food and drink</b>	<b>Pubs, wine bars</b>	<b>1/100m<sup>2</sup>*</b>
		<b>Fast food takeaway</b>	<b>1/50m<sup>2</sup>*</b>
		<b>Restaurants, cafes</b>	<b>1/20 staff for staff + 1/20 seats for visitors</b>
<b>B1a</b>	<b>Business</b>	<b>Business offices</b>	<b>1/250m<sup>2</sup>*</b>
<b>B1b</b>		<b>Light industry</b>	<b>1/250m<sup>2</sup>*</b>
<b>B1c</b>		<b>R&amp;D</b>	<b>1/250m<sup>2</sup>*</b>
<b>B2</b>	<b>General industrial</b>		<b>1/500m<sup>2</sup>*</b>
<b>B8</b>	<b>Storage and distribution</b>	<b>Warehouses</b>	<b>1/500m<sup>2</sup>*</b>
<b>C1</b>	<b>Hotels</b>	<b>Hotels</b>	<b>1/10 staff</b>
		<b>Sui generis hostels</b>	<b>1/4 beds</b>
<b>C2</b>	<b>Residential institutions</b>	<b>Hospitals</b>	<b>1/5 staff + 1/10 staff for visitors</b>
		<b>Student accommodation</b>	<b>1/2 students</b>
		<b>Children's homes, nursing homes, elderly people's homes</b>	<b>1/3 staff</b>
<b>C3</b>	<b>Dwelling house</b>	<b>Flats</b>	<b>1/unit</b>
		<b>Dwelling houses</b>	<b>1/1 or 2 bed dwelling, 2/3+ bed dwelling</b>
		<b>Sheltered accommodation</b>	<b>1/450m<sup>2</sup></b>
<b>D1</b>	<b>Non-residential institutions</b>	<b>Primary schools</b>	<b>1/10 staff or students</b>
		<b>Secondary schools</b>	<b>1/10 staff or students</b>
		<b>Universities, colleges</b>	<b>1/8 staff or students</b>
		<b>Libraries</b>	<b>1/10 staff + 1/10 staff for</b>

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			<b>visitors</b>
		<b>Doctor, dentist, health centres, clinics</b>	<b>1/50 staff + 1/5 staff for visitors</b>
<b>D2</b>	<b>Assembly and leisure</b>	<b>Theatres, cinema</b>	<b>1/20 staff for staff + 1/50 seats for visitors</b>
		<b>Leisure, sports centres,</b>	<b>1/10 staff + 1/20 peak period visitors</b>
		<b>swimming pools</b>	

# **Havering Council**

## **Site Specific Allocations**

### **Submission**

### **Development Plan**

### **Document**

**October 2006**



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As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents.

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# 1 Introduction

- 1.1 Havering's Local Development Framework (LDF) is a portfolio of different documents which are concerned with the future planning of the borough. The Core Strategy document is the first document the Council has prepared in its LDF and it sets the Council's approach to the planning of the whole borough up to 2020 and sets the framework for this document, the Romford Area Action Plan and Joint Waste Plan and other Local Development Documents (LDDs). This is complementary to the Site Specific Allocations Development Plan Document. This sets out the specific allocations for individual sites across the borough except for sites in Romford Town Centre which will be identified in the Romford Area Action Plan and sites for waste management which will be identified in the Joint Waste Plan. The sites identified in this document are considered necessary to deliver the vision, objectives and policies of the Core Strategy.

## 2 How to use this document

- 2.1 This documents starts by, in **Section 3**, providing the background to the selection of sites included in this document. It clarifies which sites this Development Plan Document is concerned with, how they have been identified and the relationship with national and regional planning policy guidance. The section concludes with an explanation of how the implementation of the sites will be monitored. The sites included in this document are necessary to deliver the Vision, objectives and policies of the Core Strategy. **Section 4** therefore sets out the relationship between the sites and the Core Strategy, looking first at the Vision and Objectives for the future planning of the borough and then identifying which Core Policies each site will help deliver. **Section 5** then presents the Site Specific Allocation policies which where necessary include specific guidance over and above that provided in Development Control policies. Each Site Specific Allocation policy is supported by a reasoned justification which provides the rationale for each allocation.

## **3 The Sites**

### **Which sites are included?**

- 3.1 Despite over 50% of the borough being within the Green Belt and the urban area being well developed there are a number of significant development opportunities in Havering which can help deliver the vision, objectives and policy of the Core Strategy.

Most of the major sites fall into two key strategic areas.

1. London Riverside which is designated as an Opportunity Area within the London Plan due to the development opportunities it presents at the Heart of the Thames Gateway for new jobs, sustainable communities and leisure and recreation.
2. Romford Town Centre which is the Thames Gateway's and East London's premier town centre for retailing and entertainment, but which also has potential for significant increase in housing capacity

Sites within Romford Town Centre will be identified within the separate Romford Town Centre Area Action Plan.

In addition a major development has been identified on land north of the Mardyke Estate together with redevelopment of the Estate itself, which will help deliver economic, social and environmental regeneration benefits in this deprived part of Havering. This is immediately adjacent to the Development Corporation's designated area of London Riverside, and has been included within the London Riverside sites.

- 3.2 This document also excludes waste management sites which will be covered in the Joint Waste Plan.

### **What is the source of the sites?**

- 3.3 The sites identified in this document come from a number of sources including:
- Sites submitted by landowners in response to a Council request for details of sites sent in December 2004
  - Sites identified through the London Housing Capacity Study
  - Sites identified through the multi agency regeneration of London Riverside
  - Sites identified in the Government publication "Greening the Gateway" as part of the Government's Sustainable Community Plan.

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As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents.

- Sites put forward by the London Borough of Havering itself.
- 3.4 None of the sites within the 1993 Havering Unitary Development Plan have been carried forward.

**Relationship of this document to national and regional planning guidance**

- 3.5 In line with Planning Policy Statement 1 'Sustainable Communities' and the London Plan the focus has been on identifying sites and proposals which can contribute to the delivery of sustainable communities. However, regard has also been had to the need to satisfy other national and regional government guidance where it makes specific reference to land allocations. What follows is a summary of the relevant national and regional government guidance with regard to the identification of site specific allocations.

Places to live

- 3.6 Planning Policy Guidance Note 3 states that sufficient sites should be shown on the plan's proposals map to accommodate at least the first five years (or the first two phases) of housing development proposed in the plan.<sup>1</sup> Policy 3A.2 of the London Plan sets a housing target for Havering of 350 units per annum from 1997-2016 with regard to the London Housing Capacity Study. Draft alterations to the London Plan propose to increase this to 535 new homes per year from 2007/08 to 2016/17. Core Strategy Core Policy CP3 'Housing Supply' identifies the sources of new supply which will deliver these targets as appropriate through the life of the plan. The Site Specific Allocations will make a significant contribution to meeting this target. However it is important to note that the Whitworth Centre and Mardyke Development schemes were not included in calculating the borough's housing capacity from which the revised housing target was derived. This is because they are sites removed from the Green Belt. Therefore they are not necessary to deliver the 535 new homes per year target but will help maximise supply and meet local and sub-regional housing need.

Town Centres

*Retail*

- 3.7 Planning Policy Statement 6 states that in planning for growth in their town centres, local planning authorities should allocate sufficient sites to meet the identified need for at least for first five years from the adoption of their development plan documents.<sup>2</sup> This applies to town centre uses especially retail, leisure and office uses.

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<sup>1</sup> PPG3 Housing paragraph 34-ODPM-2000

<sup>2</sup> Planning Policy Statement 6, Town Centres, paragraph 2.52, ODPM, 2005

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As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents.

- 3.8 Havering's Retail and Leisure Needs Assessment 2006, identifies future comparison and convenience floorspace requirements up to 2018 for Romford and each of the district centres. The study concludes that the district centres will experience limited growth during the plan period and therefore no change to their boundaries is necessary. It found that the centre boundaries had been successful in helping to achieve compact and focused town centres. The Council does not consider that is necessary to identify specific sites within the district centres to meet the modest additional convenience and comparison floorspace requirements identified up to 2018 as the Council is confident that sufficient sites are available and will be brought forward by the private sector, unless there is a clear cut reason for doing so, as is the case in Elm Park and Rainham.
- 3.9 The most significant shortfall identified by the study was for comparison floorspace in Romford Town Centre. This will be addressed through the Romford Area Action Plan.

Culture

- 3.10 Cultural provision encompasses a wide range of activities from sport and leisure, convenient access to a network of open space, arts and creative activities and industries, and libraries, heritage centres or museums.
- 3.11 Planning Policy Statement 6 states that local planning authorities should allocate sufficient sites to meet the identified need for at least five years from the adoption of their development plan documents for town centre uses including leisure uses. The Havering Retail and Leisure Needs Assessment recognised that identifying future need for non-retail town centre uses is very difficult, but does identify a significant growth in leisure expenditure in the borough which will need to be satisfied.
- 3.12 A site has been identified in Rainham for a Thames Gateway Regional Casino and Entertainment Centre and more detail has been provided in SSA18 regarding its 'fit' with PPS6. In addition, as the borough's primary centre for leisure the Romford Area Action Plan will consider options for meeting this growth in expenditure.
- 3.13 PPG17 states that assessments and audits will allow local authorities to identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in their areas.<sup>3</sup> The Havering Open Space and Sports Needs Assessment 2005, shows that Havering has a relatively good quantity of public

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<sup>3</sup> Planning Policy Statement 17: Planning for Open Space Sport and Recreation-Paragraph 4-ODPM-2002

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As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents.

parks but that there are local pockets of deficiency across the borough, in particular there are significant areas which are deficient in access to dedicated children's play areas. In terms of sports facilities the assessment identifies that up to 2016 there will be a need for up to twenty junior football pitches, two additional artificial turf pitches and three, four court additional sports halls. The Council will also seek to address deficiencies identified in the assessment through where appropriate developer contributions, the balance of open space provision and dual use of educational sports facilities and therefore does not consider it necessary to identify specific sites.

- 3.14 However in line with the Havering Open Space and Sports Assessment a site has been identified within the north west of the Borough where current access to swimming pools is poorest.
- 3.15 In addition a number of sites have been identified to help realise the vision of the Core Strategy to increase the opportunities for recreation within Havering's countryside and to implement the ODPM's Greening the Gateway Strategy.

#### Employment

- 3.16 Planning Policy Guidance Note 4 states that in allocating land for industry and commerce planning authorities should be realistic in their assessment of the needs of business. They should aim to ensure that there is sufficient land available which is readily capable for development and well served by infrastructure, and ensure there is a variety of sites available to meet differing needs. In line with the findings of Havering's Employment Land Study, the Core Strategy has rationalised the extent of Main and Secondary Employment Areas in the borough. In accordance with Core Strategy Core Policy CP1 the first priority for de-designated areas will be housing. Due to their scale the de-designated parts of the Rainham Employment Area have been identified as site allocations to ensure that sustainable communities are realised in this key part of the Thames Gateway.
- 3.17 The future strategy for employment areas within Romford Town Centre will be resolved within the Romford Area Action Plan.

#### Minerals

- 3.18 Minerals Planning Statement 1 states that the minimum length of the (minerals) landbank should reflect the time needed to obtain planning permission and bring a site into full production. This should be taken as 7 years. A landbank less than 7 years is an indication that additional resources may need to be permitted. Draft Early Alterations to the London Plan published in July 2005 set out an East London apportionment of 0.5 million tones, and require a minimum seven

years' output to be maintained in London (7 million tonnes). The Core Strategy identifies areas of search within which minerals extraction may be acceptable where it meets the criteria of policy DC42. The Council intends to bring forward a separate development plan document to identify preferred areas.

### Waste

- 3.19 Planning Policy Statement 10 states that Waste Planning Authorities should be able to demonstrate how capacity equivalent to at least ten years of the annual rates set out in the Regional Spatial Strategy could be provided, and identify the types of waste management facilities that would be appropriately located on the allocated site or in the allocated area, taking care to avoid stifling innovation in line with the waste hierarchy.<sup>4</sup> Draft Early Alterations to the London Plan published in July 2005 set out these annual sub-regional rates.
- 3.20 Havering has agreed to produce a Joint Waste Development Plan Document with other East London Waste Authority (ELWA) boroughs. The East London Waste Authority is a statutory waste authority responsible for waste disposal in its area, which covers the four London boroughs of Barking & Dagenham, Havering, Newham and Redbridge. Whilst ELWA is only responsible for municipal waste, the Joint Waste Plan will cover all sources of waste domestic and commercial. This includes facilities for the management of waste with specific requirements, such as hazardous waste. These sites will be added to the Site Specific Allocations document when it is reviewed, once the Joint Waste Plan has been adopted.

### Monitoring

- 3.21 As the Site Specific Allocations are focused on delivering Core Strategy objectives and policies their impact will be monitored through the relevant core strategy indicators and targets set out in the Annual Monitoring Report.
- 3.22 The Annual Monitoring Report will also provide a yearly update on the delivery of each of the Site Specific Allocations, including what, if any, difficulties have arisen and the planned approach for overcoming these. The SSA will be reviewed as necessary to include additional

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<sup>4</sup> PPS10 paragraph 17 Planning for Sustainable Waste Management

As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 10

sites in response to forecast development pressures, and adoption of other Development Plan Documents where they include sites.

## 4 Relationship to the Core Strategy

- 4.1 The sites identified in this document are considered necessary to help deliver the Vision, objectives and policies of the Core Strategy. The vision and objectives of the Core Strategy are presented below followed by a matrix in table 1 which shows which Core Policies each site allocation will help deliver.

### **Vision for the planning of the borough up to 2020**

- 4.2 In 2005, Havering Strategic Partnership updated the Havering Community Strategy, taking account of the issues and opportunities identified in the previous section, and after wide consultation with the community.

The Vision for Havering in the 2005 Community Strategy is:

- To create a safe, welcoming, healthier and more prosperous place where people choose to live, work and visit.

To realise the vision, the Partnership has adopted this mission:

- Make Havering an inclusive place in which to live, work and visit;
- Create a dynamic, prosperous economy driven by a well-educated and trained workforce;
- Create a thriving, successful and healthy community for all;
- Create a good quality of life in Havering for now and the future, through actions that contribute locally, nationally and internationally to sustainable development.

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As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 11

This will be delivered through a Community Strategy with six themes:

- A More Prosperous Community
- Improved Lifelong Learning
- Better Health and Welfare
- Increased Community Participation
- Protect and Improve the Environment
- A Safer Community

4.3 Achieving the vision will involve securing and managing positive changes in the towns, suburbs, and countryside areas which make Havering the place that it is. Therefore the aim of Havering's Local Development Framework, and especially the Core Strategy, is to protect and strengthen what is best about Havering, to create places of real quality which are enjoyable and fulfilling to live in, and to improve social, economic, and environmental opportunities for the whole community.

4.4 This leads to the following vision for how Havering will change and develop by 2020.

### **Places to live**

1. Through partnership working with the Development Corporation and other agencies. London Riverside will have become a major mixed urban centre on the River Thames. Sustainable expansion of the communities of Rainham and South Hornchurch will have taken place within London Riverside, which will be home to 12,000 more people. Over 3000 people will be living in Romford Town Centre. Collectively, these developments will help address housing need in the borough. Elsewhere mixed use developments will be encouraged within Havering's town centres, promoting linked trips and helping sustain the local economy.
2. Outside the town centres the borough's suburban character will be maintained and enhanced by sympathetic residential development which respects and makes a positive contribution to the existing context. All groups within the community will have good, affordable access to the housing they need, including those needing larger, family-sized accommodation.

### **Places to work**

3. Havering will have a dynamic, prosperous economy founded on a strong skills base, a quality environment and a hierarchy of strategic and local employment sites. In particular London Riverside will be a centre for advanced manufacturing and a wide range of modern industries clustered around the Centre for Engineering and Manufacturing Excellence, with tourism and leisure destination centred on the London Riverside Conservation Park and Thames Gateway Regional Casino and Entertainment Centre. Environmental and 'green' industries will provide further new opportunities for economic growth and jobs. There will be a range of e-enabled knowledge-based industries within new mixed used developments in and around the borough's town centres. Havering residents will be equipped to get good quality, well-paid, jobs locally and in the Thames Gateway.

### **Town centres**

4. Romford Town Centre, with the help of the Romford Town Centre Partnership, will continue to be East London's Premier Town Centre thriving on the competition offered by Stratford to the west and Lakeside and Bluewater to the east. It will have built upon its traditional character, and have a safe, diverse, culturally rich and well managed evening economy offering a range of activities for people of all ages.
5. Upminster and Hornchurch will continue to be thriving town centres, providing a diverse mix of uses with a high quality retail offer and convenient local services. Hornchurch will be a sub-regionally important cultural centre anchored by the Queens Theatre and Fairkytes Arts Centre in attractive settings which complement their role.
6. Havering's town, district and local centres will be the focus of community life, offering a diverse mix of shops, services, housing, cultural and community facilities which meet the needs of the communities they serve. They will enjoy good public transport access and will be places to and in which more people choose to walk and cycle.

### **Culture**

7. In recognition of its importance to its residents and visitors' quality of life, Havering will have a strong and well-developed cultural provision, including opportunities for sport and leisure

activities, indoor and outdoor, convenient access to a network of open space, arts and creative activities and industries, and libraries, heritage centres or museums. Voluntary and community groups, including faith groups, will be able to find suitable premises and will be encouraged and supported.

8. Havering's countryside will offer an array of recreation and leisure opportunities through the continuing development of the Thames Chase Community Forest, the extension of Havering Country Park and Dagnam Park and the provision of the London Riverside Conservation Park.

### **Community Needs**

9. Spatial inequalities in Havering's health system will be reduced through the provision of additional, accessible facilities. Havering's cultural and leisure provision will enable people to pursue a healthier lifestyle through personal well-being and fitness from activities such as walking and cycling. Older people will be supported to live healthily and safely at home whenever possible. The new Oldchurch Hospital will be up and running in conjunction with a network of Primary Care Trust Centres. Improved availability of services and facilities in Havering's health care system will be achieved through the provision of additional accessible facilities.
10. Havering schools and colleges will maintain and build upon their reputation for excellence. More Havering residents will participate in further and higher education (including at universities, colleges and CEME), and lifelong learning, so that Havering residents improve their skills and qualifications, as well as extending their personal development at all stages of life.

### **Transport**

11. Havering will enjoy a first class, integrated system for getting people and goods around the Borough, that will provide choice, reduce the need to travel and promote healthier lifestyles and improve the quality of life for all sections of the community, including those who are less mobile and people with impairments. This will provide a competitive advantage for local businesses and will be a major attraction for people moving into the borough. New development will be focused on those parts of the borough most accessible to public transport.

12. Havering's transport system will consist of a comprehensive clean fuel bus network, rail links across London that provide convenient access to the Stratford EuroStar station, the Crossrail service through Romford, a new station on the Fenchurch Street line serving the new residents and employees of London Riverside, and East London Transit which will run from Barking to Rainham, then onto Elm Park, Romford, Harold Hill and Collier Row. Provision will continue to be made for cars in recognition that many people will continue to use them for travel, particularly in the suburbs but overall traffic growth will be falling and many more people will choose to walk and cycle. The borough will continue to have excellent road links due to the A12, A13, A127 and M25.

### **Waste management**

13. Havering will be dealing with a proportionate amount of domestic and commercial waste arising in the East London Waste Authority Area and Central London. Municipal and domestic recycling rates will be over 33% and the borough's landfill sites will no longer be used.

### **Minerals**

14. The mineral industry in Havering will be sustainably managed, balancing the needs of society and the economy with the protection of the environment and the people who live, work and visit in Havering.

### **Green Belt**

15. Development pressures will continue to be directed to brownfield land due to the continuing strong protection of the Green Belt which will cover over 50% of the borough.

### **Environmental management**

16. Havering will be helping to address climate change by encouraging the highest standards of sustainable construction and design and ensuring development is protected from its effects.
17. The London Riverside Conservation Park will be London's premier environmental attraction. Generally wildlife in Havering

will flourish in all habitats, particularly in priority habitats, through the implementation of Havering's Biodiversity Action Plan.

## **Design**

18. Havering will continue to be a safe place for residents, users of public open space, commercial enterprises and those employed within the borough as new developments will be designed to increase the safety of the borough's public and private realms.
19. Overall, Havering will continue to be an attractive, liveable, safe and fully accessible borough where developments are required to be high quality and design-led, contributing positively to the character of the borough, respecting the local heritage and creating an environment in which people want to live, stay and prosper.

## **Heritage**

20. Havering's heritage will be maintained and enhanced and will provide a rich context for new development. Therefore creative and sensitive responses will be demanded which recognise that the buildings and environments created in the future will be tomorrow's heritage.

## **Strategic objectives for the planning of the borough up to 2020**

These strategic objectives are focused on delivering the Vision of the Core Strategy and are therefore organised under the same twelve key themes.

## **Places to Live**

- LV (A) Make Havering a place where people will want to live and where local people are able to stay and prosper, by ensuring that local and sub-regional housing need is addressed whilst maintaining and enhancing the character of Havering's residential environment which makes the borough such an attractive place to live.
- LV (B) Ensure the housing needs of the borough's more vulnerable people are met.

- LV (C) Achieve sustainable new communities in London Riverside and support the continuing urban renaissance of Romford Town Centre.

### **Places to Work**

- WK (A) Create a dynamic prosperous economy driven by a well educated and trained workforce by addressing current land surpluses and skills shortages.
- WK (B) Promote London Riverside as a centre for advanced manufacturing and a wide range of modern industries including environmental and 'green' industries, supported by a tourist and leisure economy focused on the London Riverside Conservation Park and Thames Gateway Regional Casino and Entertainment Centre.

### **Town Centres**

- TC (A) Promote and enhance the centres, including local centres, within the town centre hierarchy, ensuring their future vitality and viability by enabling a diverse range of shops, services, housing, cultural and community facilities to be provided in convenient and accessible locations, and securing environmental improvements with recourse to external funding wherever possible.
- TC (B) Promote Romford as a leading Metropolitan Centre serving Essex, East London and the Thames Gateway.

### **Culture**

- CU (A) Improve the provision for culture within the borough, including sport and leisure, parks and open spaces, arts and creative activities and industries, and libraries, and promote equality of access.
- CU (B) Promote Hornchurch as the borough's key cultural centre.
- CU (C) Promote the diversification of the borough's evening economy for the safe enjoyment of all sections of the community, particularly in Romford Town Centre.

### **Community Needs**

- CM (A) Address spatial inequalities in health in Havering, maintain and build upon Havering's reputation as centre of excellence for education and ensure that other essential social infrastructure is planned for to meet the demands of existing and new communities.

### **Transport**

- TR (A) Integrate planning and transport to reduce the need to travel, by concentrating major trip generating development in the borough's main centres and other places with good public transport access, and supporting the important role and function of the borough's local centres whilst recognising that many people will continue to use their cars for travel, particularly in the suburbs.
- TR (B) Ensure that where travel is necessary that there is a choice of accessible modes of transport for people to take through improved public transport particularly in the borough's most deprived areas and London Riverside, and creating the conditions for people to walk and cycle.

### **Waste Management**

- WM (A) Promote minimisation of waste and re-use of waste in line with the waste hierarchy and strive for sub-regional (ELWA) self-sufficiency in managing commercial and domestic waste arisings in line with the proximity principle.

### **Minerals**

- MN (A) Promote re-use of minerals and only extract minerals within Havering provided strict sustainability criteria are met.

### **Green Belt**

- GB (A) Provide strong protection to the Green Belt and ensure recreational value is maintained and enhanced.

### **Environmental Management**

- EN (A) Ensure Havering reduces its impact on the environment (land, air quality, water and flooding) and minimises its impact on the causes of climate change, whilst planning for adaptation and mitigation of its effects.
- EN (B) Maintain and enhance the Borough's biodiversity and geodiversity, in particular the priority species and habitats identified in the London, UK and Havering Biodiversity Action Plans and the sites identified by the GLA Ecological Survey.

### **Design**

- DE (A) Create safe, liveable, accessible environments with distinct characters through high quality design-led development.

### **Heritage**

- HE (A) Preserve and enhance sites, buildings, areas and landscapes of special architectural or historic importance.

**Table 1**  
**The Core Policies the sites will help deliver**

The Site Specific Allocations are defined in the list at the start of Section 5

	CP1	CP2	CP3	CP4	CP5	CP6	CP7	CP8	CP9	C10	CP11	C12	CP13	CP14	CP15	CP16	CP17	CP18
SSA1	✓	✓							✓					✓	✓	✓	✓	
SSA2	✓	✓		✓					✓	✓				✓	✓		✓	
SSA3							✓							✓		✓		
SSA4							✓							✓		✓		
SSA5							✓							✓		✓		
SSA6	✓	✓					✓		✓	✓				✓	✓	✓	✓	
SSA7								✓						✓				
SSA8										✓								
SSA9										✓								
SSA10	✓	✓	✓				✓	✓	✓	✓				✓	✓	✓	✓	
SSA11	✓	✓	✓				✓	✓	✓	✓				✓	✓	✓	✓	
SSA12	✓	✓		✓					✓	✓				✓				✓
SSA13	✓	✓	✓	✓			✓	✓	✓	✓							✓	
SSA14	✓	✓		✓			✓	✓		✓				✓	✓	✓	✓	
SSA15				✓						✓							✓	✓
SSA16	✓	✓	✓	✓			✓	✓	✓	✓					✓		✓	✓
SSA17	✓	✓		✓			✓		✓	✓				✓		✓	✓	✓
SSA18			✓	✓	✓		✓	✓		✓				✓	✓	✓	✓	
SSA19							✓			✓	✓					✓	✓	
SSA20				✓			✓									✓		✓
SSA21	✓	✓		✓	✓												✓	✓

CP1	Housing Supply
CP2	Employment
CP3	Sustainable Communities
CP4	Town Centres
CP5	Culture
CP6	Arts in Hornchurch
CP7	Recreation and Leisure
CP8	Community Facilities
CP9	Reducing the Need to Travel
CP10	Sustainable Transport
CP11	Sustainable Waste Management
CP12	Use of Aggregates
CP13	Minerals extraction
CP14	Green Belt
CP15	Environmental Management
CP16	Biodiversity and Geodiversity
CP17	Design
CP18	Heritage

# 5 The sites included in this document

- 5.1 The Site Specific Allocations are split into two groups, non-London Riverside allocations, and London Riverside allocations. Within these two groups the allocations are then ordered under the Core Strategy themes. For each site there is a policy which includes specific guidance over and above that provided in the Core Strategy Core and Development Control policies about the nature of development which will be allowed. This is supported by a reasoned justification which provides the rationale for each allocation.
- 5.2 The Site Specific Allocation policies are the product of the Sustainability Appraisal process and take account of the feedback received from the community and other stakeholders during the various consultation initiatives undertaken in preparing the Core Strategy, at the issues and options, and preferred options stages. The Site Specific Allocations Sustainability Appraisal Report and Statement of Compliance should be consulted for more information on this.
- 5.3 The list of identified sites are as follows:

## **Non-London Riverside sites**

### **Places to live**

SSA1	Harold Wood Hospital	22
SSA2	Whitworth and Broxhill Centres	24

### **Town centres**

SSA3	Elm Park parades	27
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### **Culture**

SSA4	Arnold's Field Community Woodland	30
SSA5	Rainham Quarry Community Woodland	31
SSA6	Warwick Lane Community Woodland	32
SSA7	Romford Ice Rink	33

### **Community Needs**

SSA8	Upminster Cemetery and South Essex Crematorium	35
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### **Transport**

SSA9	Channel Tunnel Rail Link	38
SSA10	Crossrail	38

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As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 20

**London Riverside sites**

Places to live

SSA11	Beam Park	42
SSA12	Rainham West	46
SSA13	Rainham-Land Between Railway and Broadway	51
SSA14	Mardyke Development	53

Transport

SSA15	Rainham Traffic Management System	62
SSA16	Rainham Station Transport Interchange and Civic Square	63

Town Centres

SSA17	Rainham Central	66
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Culture

SSA18	Thames Gateway Regional Casino and Entertainment Centre	69
SSA19	London Riverside Conservation Park	74
SSA20	Ingrebourne Creek	77

Heritage

SSA21	Rainham Hall and Grounds	79
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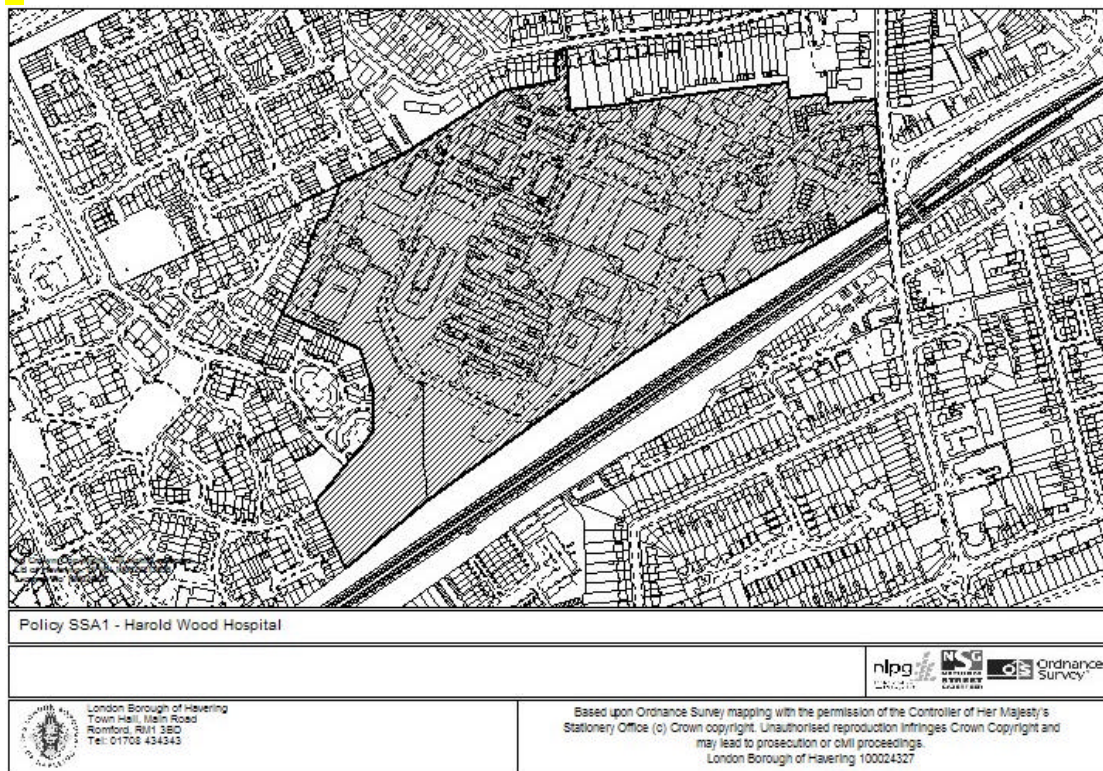
# Places to live

## POLICY SSA 1 – HAROLD WOOD HOSPITAL

<b>Map ref</b>	TQ540912
<b>Location &amp; Site Description</b>	Located on the western side of Gubbins Lane approximately ¼ of a mile south of the junction with Colchester Road and opposite Station Road and Harold Wood mainline railway station
<b>Area (ha)</b>	15.5
<b>PTAL</b>	2-4
<b>Implementation</b>	The existing acute healthcare facilities at Harold Wood Hospital are to be decommissioned by the end of 2006 when they will be transferred to the new Oldchurch Hospital in Romford. This will free 8.5 hectares of land for alternative use.
<b>Applicable Core Strategy policies</b>	DC2, DC3, DC6, DC7, DC20, DC21, DC27, DC29, DC30, DC33, DC34, DC40, DC49, DC50, DC51, DC52, DC53, DC54, DC55, DC56, DC59, DC61, DC62, DC63, DC67, DC72.
<p><b>Residential development will be allowed on the former Harold Wood hospital site provided that:</b></p> <ul style="list-style-type: none"><li>• In line with policy DC2 residential densities are in the range of 30-80 units per hectare with 1-1.5 car parking spaces per unit provided.</li><li>• 10% of the site is provided as open space to serve the development.</li><li>• A bus route which meets Transport for London's approval is provided east-west through the site. An agreement will be sought with the developer to seek a contribution of £200,000/annum for the first 3 years to pump prime the cost of this service.</li><li>• Pedestrian and cyclist links are provided through the site to Gubbins Lane and the station</li><li>• Proof is provided that the remaining healthcare facilities adequately cater for the existing area and the needs arising from the new development</li></ul> <p><b>The Council will seek to enter into an agreement with the developer to secure contributions for the review of the Harold Wood Controlled Parking Zone and to fund the implementation of any traffic orders, road signs and road markings within the site to prevent commuter</b></p>	

As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 22

**parking.**



## **Reasoned Justification / Explanation**

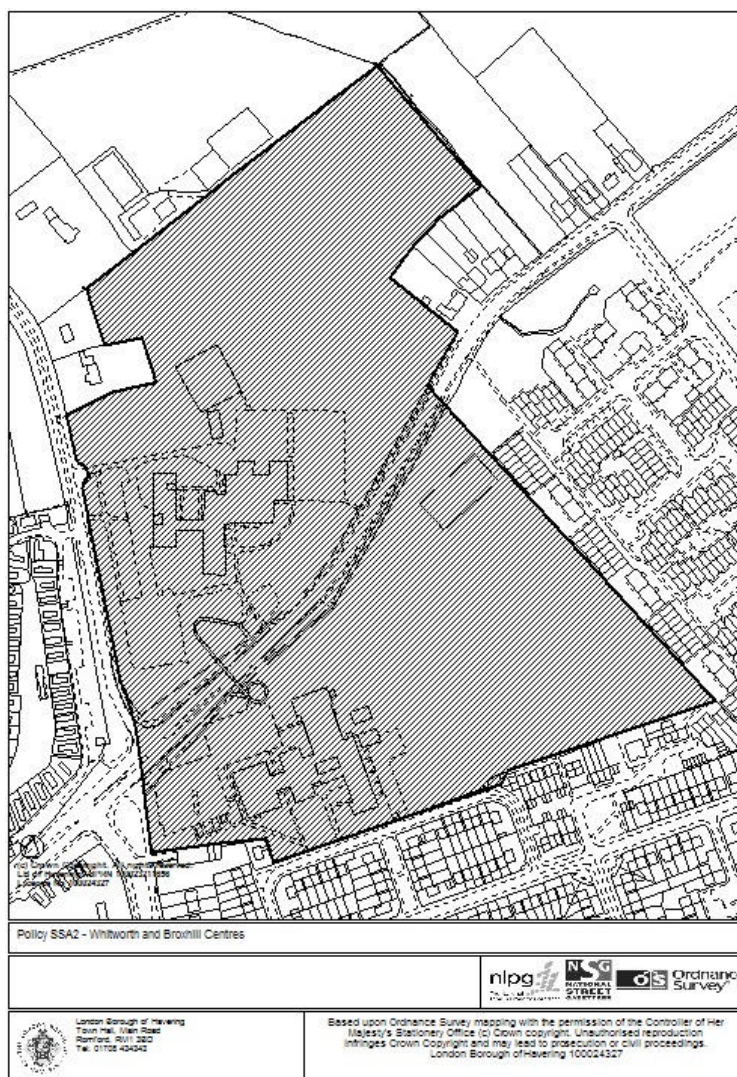
- 1.1 The Harold Wood hospital site contains a mixture of operational health facilities including a maternity block, wards and other medical and ancillary accommodation. There are also a number of blocks of staff accommodation and "The Grange" a Grade II listed building that currently functions as the Primary Care Trust's Headquarters. The site also includes a number of buildings which are separately leased and occupied by The McKesson Centre, DSC and South Bank University Buildings. The existing acute healthcare facilities at Harold Wood hospital are due to be decommissioned by the end of 2006 when they will be transferred to the new Oldchurch Park Hospital in Romford which is due to open in January 2007. More recent parts of the hospital and parking areas may be transferred to the Havering Primary Care Trust for use in providing intermediate and primary care. Any proposals for the redevelopment of the existing health facilities will need to satisfy Core Strategy policy DC27 – 'Provision of Community Facilities'. In addition the Council will need to be satisfied that the remaining healthcare provision meet the needs of the existing and planned new populations in the area. However it is likely that a significant portion of the site will become surplus to requirements and therefore offers the potential for the provision of new housing.

As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 23

- 1.2 Part of the eastern end of the site is within the Harold Wood PTAL Zone where Core Strategy policy DC2 identifies a density range of 30-80 units per hectare. The policy stipulates the provision of a new bus service through the site to help improve access to local services which will raise PTAL levels across the site particularly those parts within 960 metres of the station. In determining densities across the site, in line with Core Strategy policy DC2 developers should take a design led approach to the design of their developments and in line with DC61 respond to distinctive local building forms and patterns of development and respect the scale, massing and height of the surrounding physical context. Policy DC2 sets out the indicative housing mix that developers should have regard to.

## **POLICY SSA 2 – WHITWORTH AND BROXHILL CENTRES**

<b>Map ref</b>	TQ 532926
<b>Location &amp; Site Description</b>	Former Council offices either side of Noak Hill Road, to the east of its junction with Straight Road
<b>Area (ha)</b>	12.1
<b>PTAL</b>	1-2
<b>Implementation</b>	Both sites are presently Council owned and will be vacated as part of the Council's agreed property strategy,
<b>Applicable Core Strategy policies</b>	DC2, DC3, DC6, DC7, DC18, DC20, DC21, DC29, DC33, DC34, DC35, DC40, DC49, DC50, DC51, DC52, DC53, DC54, DC55, DC56, DC59, DC61, DC62, DC63, DC72
<b>Residential development will be allowed on the Whitworth Centre site provided that:</b> <ul style="list-style-type: none"><li>• The Broxhill Centre buildings are demolished and a new public open space provided which re-provides the existing playing fields at the Whitworth Centre along with a high quality landscaped accessible public park, enhancing the openness of the Green Belt.</li><li>• In its design, layout and boundary treatment it minimizes its impact on the Green Belt to the north by using lower buildings profile and achieves a more sympathetic boundary treatment than currently exists.</li><li>• In line with policy DC2 residential densities are in the range of 30-50 units per hectare with 1-1.5 car parking spaces per unit provided.</li><li>• Pedestrian and cyclist links are provided through to Appleby Drive to enable convenient access to Harold Hill District Centre</li></ul>	



### **Reasoned Justification / Explanation**

- 1.1 The Whitworth and Broxhill Centres are both former schools which the Council has recently used as offices.
- 1.2 Havering Council's Corporate Office Strategy was approved by Cabinet in 2005. This seeks to consolidate office staff in Romford Town centre, with properties elsewhere in the borough vacated by this process declared surplus to requirements and sold or re-used for other purposes. As part of this strategy the Broxhill and Whitworth Centres are scheduled by 2007, and 2008 respectively to become surplus to requirements with no alternative use of these buildings proposed.
- 1.3 Both sites are within the Green Belt which is a legacy of the previous PPG2 which considered institutional buildings as acceptable Green Belt uses. In relation to PPG2 the Council considers that both sites clearly meets the criteria for designation as Major Developed Sites in the Green Belt. However the Council is concerned that any

As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 25

redevelopment of these two centres does not compromise the purpose of including land in the Green Belt and helps to fulfill the objectives of the use of Green Belt land.

- 1.4 Having regard to the criteria governing the redevelopment of existing buildings in the Green Belt set out in Annex C of PPG2, the Council does not consider that this would represent the best approach to maintaining the openness of the Green Belt in this area nor to the purposes of including land within it. This is because the existing buildings have a detrimental impact on the openness of the Green Belt and any proposal which replaces the existing quantum of development on both sites may reduce this impact to a degree, but would still result in a significant quantum of development within the Green Belt on both sides of Noak Hill Road which the Council considers would be contrary to two of the purposes of including land in the Green Belt:

- to check the unrestricted sprawl of large built-up areas;
- to assist in safeguarding the countryside from encroachment

- 1.5 To avoid this impact and with regard to these purposes the Council considers that the Green Belt boundary should be drawn along Noak Hill Road therefore excluding the Whitworth Centre site. This would enable the existing quantum of development north of Noak Hill Road, to be transferred to south of Noak Hill Road. Likewise this would enable the re-provision of the playing field on the Whitworth Centre site north of Noak Hill Road, as part of a new and improved public open space on the Broxhill Centre site which meets the purposes of including land in the Green Belt and radically improves the openness of it. This solution would remove any notion of urban sprawl and by using a new robust and defensible boundary along Noak Hill Road assist in safeguarding the countryside from encroachment. The redevelopment of the Whitworth also offers the opportunity to achieve a more appropriate scale and massing of development and a more sympathetic green edge to the urban area than currently exists.

- 1.6 The Broxhill Centre and Whitworth Centres sites are therefore treated as one SSA, as the public open space and park facilities on the Broxhill Centre cannot be delivered without cross subsidy from the redevelopment of the Whitworth Centre and playing fields. The policy also seeks to ensure that the redevelopment of the Whitworth Centre respects its proximity to the Green Belt and therefore minimizes its impact on it, and in this regard seeks a lower building profile and more sympathetic boundary treatment.

- 1.7 With regard to Core Development Control policy DC2 this site is outside the PTAL zones and therefore is classified as 'rest of the borough' where a density range of 30-50 units per hectare applies. The nearest centre to the site is Harold Hill District Centre. To ensure

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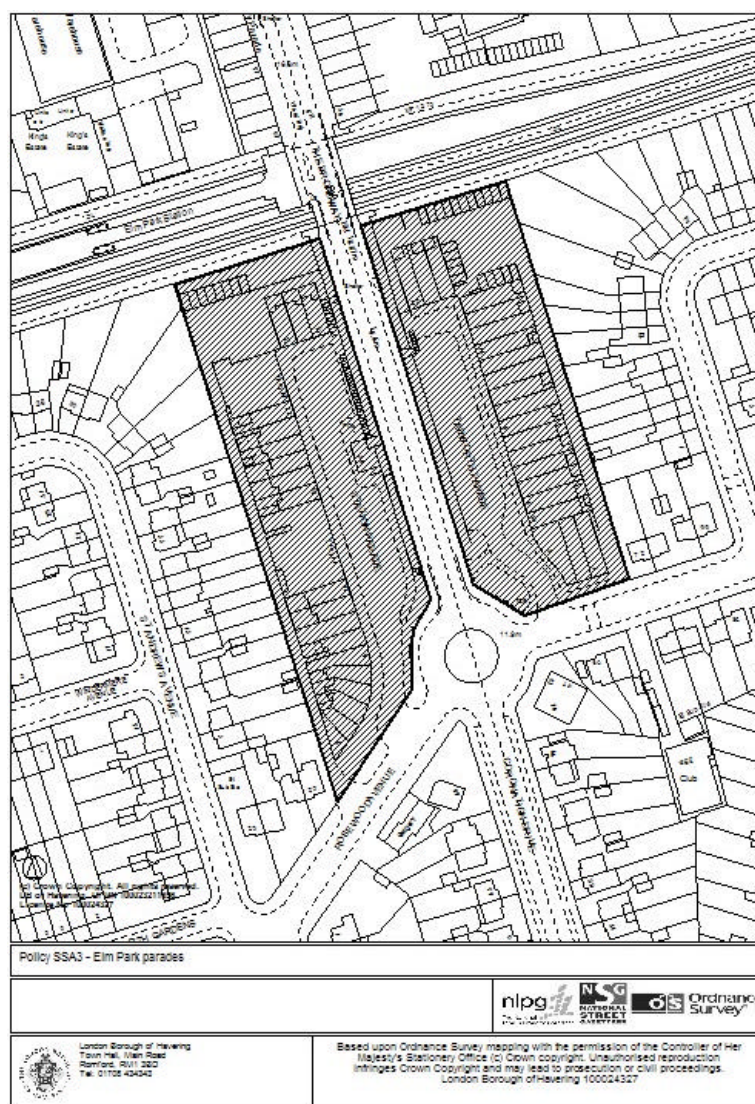
As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 26

pedestrians and cyclists have convenient access to this centre a link should be provided through to Appleby Drive.

# Town centres

## **POLICY SSA 3 – ELM PARK PARADES**

<b>Map ref</b>	TQ 526856
<b>Location &amp; Site Description</b>	Station Parade & Tadworth Parade. These parades are immediately south of Elm Park station, and either side of the Broadway.
<b>Area (ha)</b>	1.4
<b>PTAL</b>	3-4
<b>Implementation</b>	This site is owned by the London Borough of Havering
<b>Applicable Core Strategy policies</b>	DC2, DC3, DC6, DC7, DC16, DC20, DC33, DC34, DC35, DC36, DC40, DC49, DC50, DC51, DC52, DC53, DC54, DC55, DC56, DC59, DC61, DC62, DC63, DC65, DC72
<p><b>Redevelopment of the Station and Tadworth Parades will be permitted provided that:</b></p> <ul style="list-style-type: none"><li>• <b>Retail floorspace is retained at ground level in line with policy DC16 of the Core Strategy, with preferably increased convenience floorspace</b></li><li>• <b>A new and a better mix of housing is provided</b></li><li>• <b>The pedestrian and cyclist environment is improved</b></li><li>• <b>Better functional and visual linkages to the Broadway, Elm Park Station and the rest of Elm Park District Centre are provided</b></li></ul> <p><b>Residential development must be in the 50-150 units per hectare density range with 0-1.5 car parking spaces per unit provided. Contributions will be sought towards the implementation of a Controlled Parking Zone.</b></p>	



## **REASONED JUSTIFICATION**

- 1.1 Elm Park district centre has two very different characters. North of the station the centre is characterised by a domestic style of architecture with shops lining the Broadway as it rises to the underground station providing an attractive and functional pedestrian friendly streetscape. South of the station the character of the centre changes. The shops are set back from the Broadway at ground level, so there is little visual or functional continuity with the rest of the centre. Consequently whilst vehicular access to these shops is good, pedestrian and cyclist access is poor. Pedestrians must either negotiate flights of stairs to reach the Broadway or take a detour to the end of the parades if they wish to avoid the steps. The separation and isolation of these two parades also gives rise to community safety concerns.

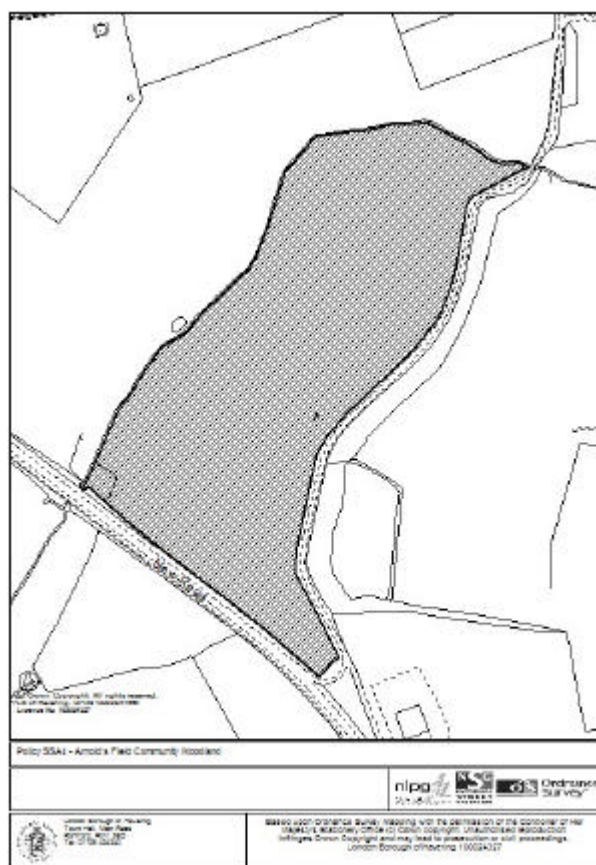
As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 28

- 1.2 The Council considers that the best way to address these issues is for the two parades to be completely redeveloped to enable the shops and homes south of the Station to be integrated into the centre. This would also enable the significant deficiency in convenience floorspace to be addressed, where the Havering Retail and Leisure Study identified a deficit of 1500-1900 square metres. Redevelopment would also enable a better mix of homes to be provided in terms of tenure and size.

# Culture

## **POLICY SSA 4 – ARNOLD’S FIELD COMMUNITY WOODLAND**

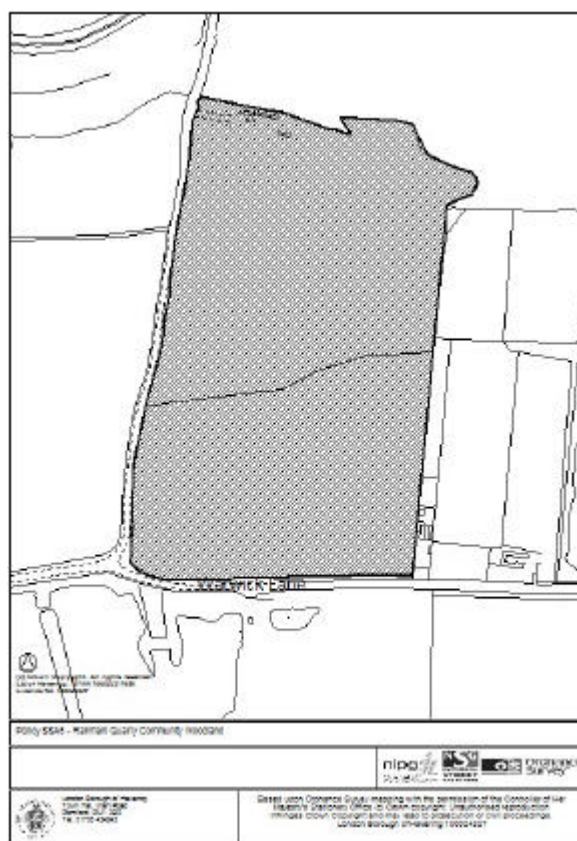
<b>Map ref</b>	TQ 542821
<b>Location &amp; Site Description</b>	Launders Lane, Rainham The site is located to the west of Launders Lane and to the north of the A1306.
<b>Area (ha)</b>	17.0
<b>PTAL</b>	0-1a
<b>Implementation</b>	Planning permission has been granted for restoration to woodland in accordance with Thames Chase principles
<b>Applicable Core Strategy policies</b>	DC42, DC46, DC49
<b>This former mineral extraction/landfill site should be restored and a community woodland created in line with the Thames Chase Action Plan.</b>	



## **POLICY SSA 5 – RAINHAM QUARRY COMMUNITY WOODLAND**

<b>Map ref</b>	TQ 551832
<b>Location &amp; Site Description</b>	North of Warwick Lane, Rainham. The site is located to the east of Gerpins Lane and to the north of Warwick Lane.
<b>Area (ha)</b>	13.0
<b>PTAL</b>	0
<b>Implementation</b>	Planning permission has been granted for restoration to woodland in accordance with Thames Chase principles
<b>Applicable Core Strategy policies</b>	DC42, DC46, DC49
<b>This former mineral extraction/landfill site should be restored and a community woodland created in line with the Thames Chase Action Plan.</b>	

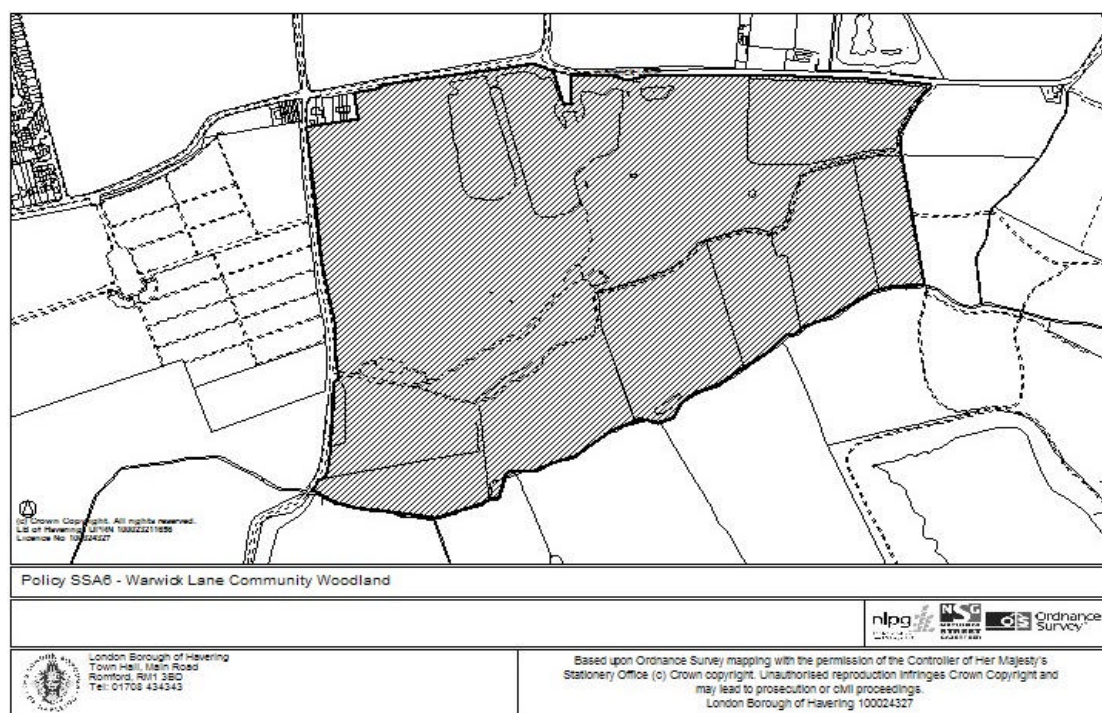
As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents.



## **POLICY SSA 6 – WARWICK LANE LANDFILL SITE COMMUNITY WOODLAND**

<b>Map ref</b>	TQ 549827
<b>Location &amp; Site Description</b>	South of Warwick Lane, Rainham. The site is located to the south of Warwick Lane and to the east of Launder's Lane.
<b>Area (ha)</b>	52.0
<b>PTAL</b>	0
<b>Implementation</b>	Planning permission has been granted for restoration to woodland in accordance with Thames Chase principles
<b>Applicable Core Strategy policies</b>	DC42, DC46, DC49
<b>This former mineral extraction/landfill site should be restored and a community woodland created in line with the Thames Chase Action Plan.</b>	

As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 32



## REASONED JUSTIFICATION

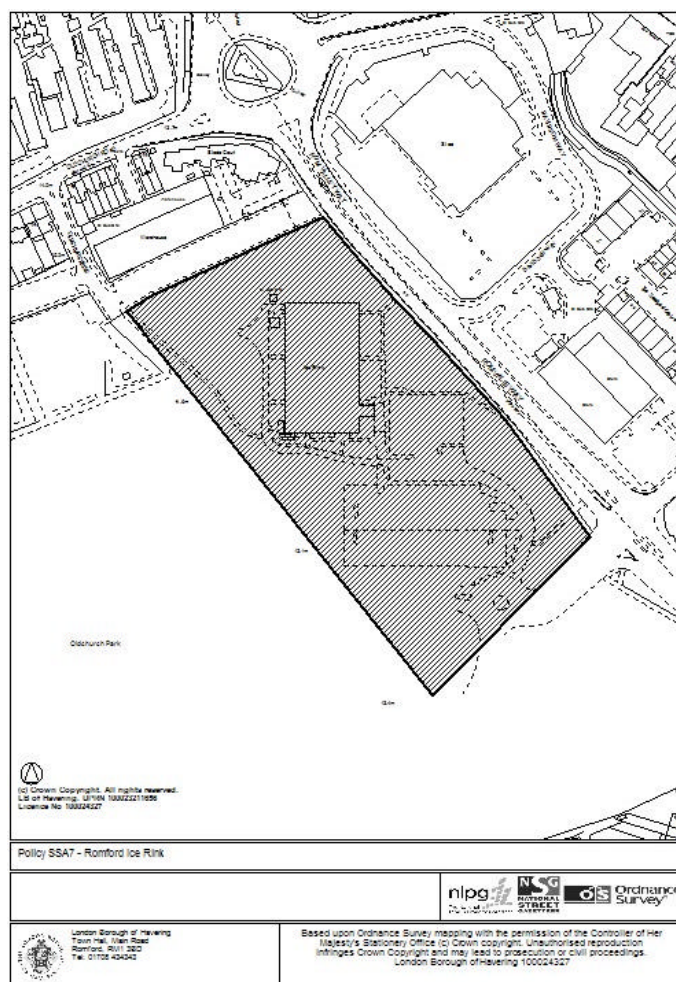
- 1.1 In February 2005 the Government published an implementation plan for greening Thames Gateway called "Greening the Gateway" as part of the Government's Sustainable Communities Plan and this has two objectives. Firstly, there should be a network of well-managed greenspace to provide a setting for new and existing commercial areas. Secondly, the landscape should be functional leading to benefits for recreation, wildlife and managing flood risk. This is called the Green Grid.
- 1.2 Delivering the Green Grid will involve the creation of new public areas and the enhancement of existing parks and green spaces in London. The green grid sites identified for enhancement in Havering are former mineral extraction sites. These sites are being promoted for restoration to community woodland in line with the Thames Chase Action Plan. These sites will provide informal recreation opportunities for residents within the Green Belt

## POLICY SSA 7 – ROMFORD ICE RINK

<b>Map ref</b>	TQ 513879
<b>Location &amp; Site Description</b>	Rom Valley Way, Romford. This site is adjacent to Romford Town Centre, immediately east of the New Oldchurch Hospital Site.
<b>Area (ha)</b>	3.4
<b>PTAL</b>	5-6

As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 33

<b>Implementation</b>	Site is owned by the London Borough of Havering
<b>Applicable Core Strategy policies</b>	DC2, DC3, DC6, DC7, DC15, DC18, DC19, DC20, DC21, DC29, DC30, DC33, DC34, DC40, DC49, DC50, DC51, DC52, DC53, DC54, DC55, DC56, DC59, DC61, DC62, DC63.
<p><b>Only mixed use development comprising residential, leisure and retail facilities will be allowed on the Romford Ice Rink site</b></p> <p><b>In line with policy DC2 residential densities should be in the range of 165-275 u/ha with 0-1.5 car parking spaces per unit provided.</b></p> <p><b>Development should in its scale and massing be consistent with the newly built Oldchurch Hospital and Blades Court.</b></p>	



## REASONED JUSTIFICATION

As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 34

- 1.1 Opportunities to create accessible, and well designed large scale leisure facilities are limited. The Romford Ice Rink site is on the edge of Romford Town Centre and the northern edge of the site is within 650 metres of Romford Station. The Ice Rink building has a floor plan of 3300 square metres yet occupies a site of 3.4 hectares, meaning more than 90% remains undeveloped. The Council, therefore, considers that there is significant potential to make better use of this site, through increasing leisure provision and enabling this through residential development.
- 1.2 In particular, the Council considers that this site is a good location for a swimming pool which Romford has lacked since the Dolphin Centre closed as identified in the Havering Open Space and Sports Assessment.

# Community Needs

## **POLICY SSA 8 – UPMINSTER CEMETERY & SOUTH ESSEX CREMATORIUM**

<b>Map ref</b>	TQ 569851
<b>Location &amp; Site Description</b>	Ockendon Road, Upminster. Upminster Cemetery adjoins South Essex Crematorium to the east of the site and is accessed via Ockendon Road to the south of the site.
<b>Area (ha)</b>	8.34
<b>PTAL</b>	0-1
<b>Implementation</b>	The existing site and allocated site is owned by the London Borough of Havering
<b>Applicable Core Strategy policies</b>	DC31, DC46, DC49, DC58, DC59.
<b>An area of 8.34 hectares has been identified to the east of the existing Upminster Cemetery and to the north of the existing South Essex Crematorium to provide for future burial space needs and to meet future crematorium needs.</b>  <b>Development of the site should ensure that:</b> <ul style="list-style-type: none"><li><b>Any relocation of existing buildings and minor extensions to them</b></li></ul>	

As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 35

or the provision of ancillary small scale buildings satisfies Green Belt policy DC46

- The use of the land has no adverse impact on water quality, water courses, groundwater, surface water or drainage systems unless sufficient mitigation measures can be secured through conditions attached to the planning permission, or a legal agreement.
- The use of the land has no adverse impact on biodiversity and the adjacent Cranham nature reserve
- A traffic assessment is provided to ensure that impact on the local road network and the environment is known and mitigated against.



## **REASONED JUSTIFICATION**

- 1.1 Currently, burial space needs and land for the burial of cremated remains in Havering are increasing by more than four acres every five years. The South Essex Crematorium and the Upminster Cemetery are close to maximum capacity. Cemetery space within Havering is

As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 36

essential as 18% of the total population is over 65 in comparison to neighbouring boroughs which ranges between 7% (Barking and Dagenham) and 14% (Redbridge). These facilities also serve neighbouring boroughs including Barking and Dagenham, Brentwood and Thurrock. There is also a requirement under the Civil Contingencies Act to allocate sufficient space for emergency provision.

- 1.2 There is therefore a need to plan for future burial space. Land at Romford Cemetery cannot be used due to waterlogging and attendant groundwater pollution concerns. However, there is the potential to extend Upminster Cemetery and the South Essex Crematorium to meet burial space and crematorium needs. This site specific allocation addresses this need by extending Upminster Cemetery and allocating land to bury cremation remains at Corbets Tey.
- 1.3 Particular attention must be paid to relevant Core Strategy policies dealing with water quality, biodiversity, transport and green belt to ensure that the use of the allocated land does not have an adverse impact on water quality, biodiversity, congestion, and the open character of the Green Belt.

# Transport

## **POLICY SSA 9 – CHANNEL TUNNEL RAIL LINK**

<b>Map ref</b>	Channel Tunnel Rail Link
<b>Location &amp; Site Description</b>	This rail link runs adjacent to the existing London, Tilbury, Southend railway and includes the railway and land either side of it.
<b>Area (ha)</b>	Not applicable
<b>PTAL</b>	Not applicable
<b>Implementation</b>	Not applicable
<b>Applicable Core Strategy policies</b>	DC37
<b>The London Borough of Havering is required by the Secretary of State to facilitate the Channel Tunnel Rail Link and in doing has identified land for safeguarding in the borough, in accordance with Core Strategy Policy CP10 and DC37.</b>	

See proposals map for extent of site

## **POLICY SSA 10 – CROSSRAIL**

<b>Map ref</b>	Crossrail
<b>Location &amp; Site Description</b>	The safeguarded land includes the London Liverpool Street Southend Line and land either side of it from the boundary with Barking and Dagenham to the Essex boundary.
<b>Area (ha)</b>	Not applicable
<b>PTAL</b>	Not applicable

As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 38

<b>Implementation</b>	Not applicable
<b>Applicable Core Strategy policies</b>	DC37
<b>The London Borough of Havering is required by the Secretary of State to facilitate Crossrail and in doing has identified land for safeguarding in the borough, in accordance with Core Strategy Policy CP10 and DC37.</b>	

See proposals map for extent of site

## **REASONED JUSTIFICATION**

- 1.1 Directions have been made by the Secretary of State for Transport to Havering to safeguard land for the Channel Tunnel Rail Link and separately for the Crossrail scheme. These policies safeguard land for the Channel Tunnel Rail Link, and Crossrail, which defines the limit of land subject to consultation.

# London Riverside sites

## Places to live

SSA11	Beam Park
SSA12	Rainham West
SSA13	Rainham-Land Between Railway and Broadway
SSA14	Mardyke Development

## Transport

SSA15	Rainham Traffic Management System
SSA16	Rainham Station Transport Interchange and Civic Square

## Town Centres

SSA17	Rainham Central
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## Culture

SSA18	Thames Gateway Regional Casino and Entertainment Centre
SSA19	London Riverside Conservation Park
SSA20	Ingrebourne Creek

## Heritage

SSA21	Rainham Hall and Grounds
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### **London Riverside Sites**

- 1.1 Havering Council is working in partnership with the London Thames Gateway Urban Development Corporation (LTGDC), the Greater London Authority, the London Development Agency, Transport for London and adjoining Boroughs to address the many opportunities the London Riverside Area presents for new development. All the sites within London Riverside are within the Thames Gateway Urban Development Corporation area, and therefore any major applications for new development in this area will be determined by them, with the exception of the Mardyke Development which abuts the area.
- 1.2 The London Riverside area is identified as an Opportunity Area within the London Plan and is within the Thames Gateway Growth Area identified in the Government's Sustainable Communities Plan. The regeneration of London Riverside therefore has national and regional support. The London Plan states that the planning framework for the area should reflect the vision of the London Riverside Urban Strategy .
- 1.3 In line with Local, Regional and Central Government ambitions the partners are proposing new residential communities, opportunities for entertainment, leisure, recreation, open space, greater access to the Thames and Rainham Marshes, new transport links and high quality employment areas to provide jobs for the existing and new populations.
- 1.4 The Local Development Framework will plan for the future of London Riverside through a combination of policies and policy designations within the Core Strategy and sites within this Site Specific Allocations Document. In addition, Havering's Local Development Scheme

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As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 41

identifies that the Council intends to adopt a Supplementary Planning Document in December 2007 for London Riverside. This will set out detailed guidance on the development of the sites within the London Riverside Area including masterplans for Rainham Village, Rainham West and Beam Park.

# Places to Live

## **POLICY SSA 11 – BEAM PARK**

<b>Map ref</b>	TQ505829
<b>Location &amp; Site Description</b>	Land between Marsh Way and the boundary with London Borough of Barking and Dagenham, north of LTS line and south of A1306.
<b>Area (ha)</b>	11.6
<b>Existing PTAL</b>	1
<b>Predicted future PTAL</b>	3
<b>Implementation</b>	Site is owned by the London Development Agency.  Havering Council is working in partnership with C2C, Transport for London, The Department for Transport Rail Group, LDA, and LTGDC to secure the successful upgrade of London Tilbury Southend line and new station at Beam Reach.
<b>Applicable Core Strategy policies</b>	DC2, DC3, DC6, DC7, DC15, DC19, DC20, DC21, DC25, DC26, DC29, DC30, DC32, DC33, DC34, DC40, DC49, DC50, DC51, DC52, DC53, DC54, DC55, DC56, DC59, DC61, DC62, DC63, DC72
<b>Residential and ancillary education, community, leisure, recreation and retail uses will be allowed within the Beam Park site.</b>	

As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 42

**A new station 'Beam Park Station' will be created on the London Tilbury Southend line to serve the existing communities, Beam Park, Rainham West, Beam Reach Business Park and the CEME complex.**

**The new station must be of a high quality inclusive design integrated with the Beam Park development, integrated with other public transport, provide an inclusive pedestrian and cyclist environment offering safe and attractive links to CEME and proposed and existing new communities.**

**Residential development must be phased so that new homes are not occupied before Beam Station and/or East London Transit are operational and serving the site. Conditions will be imposed to this effect. Due to the increase in PTALs these improvements will bring, densities should be in the range of 30-150 units per hectare and car parking provided within the range of 1-1.5 spaces per new home. However, immediately to the north of Beam Park station once it is operational, densities above this may be acceptable formed around a new local centre incorporating ancillary, retail, recreation, leisure and community uses. Car parking standards for non residential uses must be consistent with DC policy 33.**

**In line with Core Strategy policy DC2 and DC6 a mix of 1,2,3, 4 and 5 bed homes should be provided. New buildings should be predominantly three storeys high with a mix of houses and flats.**

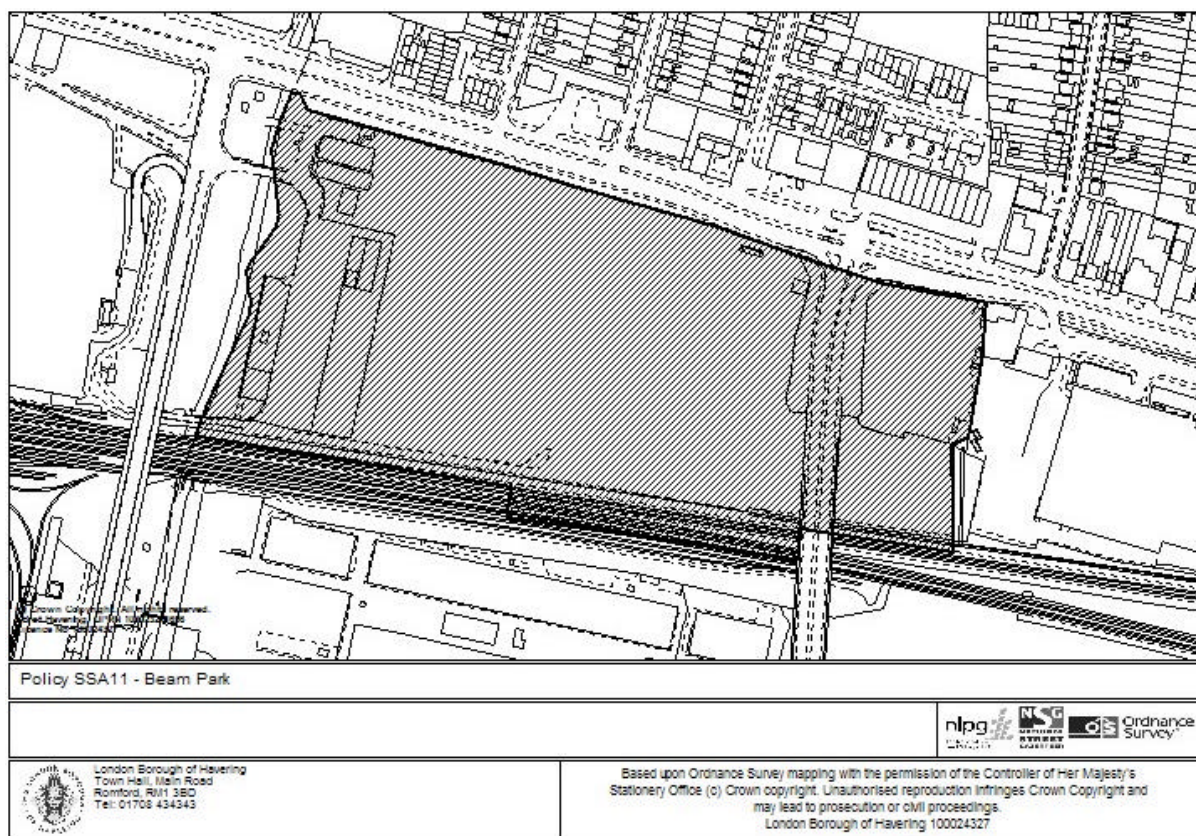
**In line with DC72 contributions will be sought for community facilities and leisure and recreation facilities to meet the needs of the new households. Contributions may also be sought towards the cost of the East London Transit and Beam Reach Station and other public transport improvements.**

**Development must achieve a tight mix of uses, be arranged on a traditional urban street layout and employ a permeable block structure with built development reinforcing the street pattern, providing continuity of frontage and maximizing surveillance of the public realm.**

**Pedestrian and cycling linkages must be provided east west through the heart of the site, and the road layout must enable a bus service to be routed through it.**

**Sustainable drainage should be provided to attenuate flooding and open spaces must be provided in line with Green Grid principles.**

**Development must embrace the A1306 frontage and seek to integrate the new and existing communities north and south of the road.**



## **REASONED JUSTIFICATION**

- 1.1 The partners involved in the regeneration of London Riverside are committed to achieving sustainable communities in the area stretching from the boundary of Barking and Dagenham which runs through to Dover's Corner sandwiched between the A1306 and London Tilbury Southend Line, together with the employment uses fronting the north side of the A1306.
- 1.2 The Beam Park site is bounded to the south by the London Tilbury Southend line and to the north by the A1306. Its eastern boundary is formed by the Victor Engineering Site and its western boundary by the River Beam.
- 1.3 The site is largely vacant as its previous industrial use has ceased and is currently used as open storage by the Ford Motor Company. The site was formerly designated as part of the Rainham Employment Area in the Havering UDP. However the alignment of the A13 means this part of the Employment Area no longer enjoys a strategically advantageous location. The subsequent detrunking of the A13 and associated environmental improvements call for a different land use strategy for the area and this has made the site suitable for de-designation to help address oversupply with regard to future business needs. Therefore, the Havering Employment Land Review

As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 44

recommends that all of the site can be released from the Rainham Employment Area for non-employment uses.

- 1.4 The opportunity to release this site from the Strategic Employment Area reserve enables this site to make a significant contribution to identified local and sub-regional housing need.
- 1.5 The successful development of this site depends on significant public transport improvements.
- 1.6 Currently public transport accessibility in this part of Havering is poor. The nearest stations are Dagenham Dock and Rainham Stations which are both over 2 kilometres away. Even then they are only served by 2 trains per hour which run between Fenchurch Street and Southend. Other public transport such as the District Line is on the periphery of the area. The only convenient public transport is in the form of several limited bus routes which alone are inadequate to serve the growth in households proposed for this area. The lack of public transport is therefore a barrier to securing high quality sustainable communities in this area, and without significant improvements sub-optimal development is the likely scenario. London Riverside partners therefore agree that a new station at Beam Reach on the London Tilbury Southend line is imperative to serve the proposed new households, students of CEME and employees in this area. London Riverside Partners are also pressing for improved service frequency on the line to 6 services per hour (a 'metro' service standard) and for increased capacity using 12 coach trains.
- 1.7 In addition the East London Transit (ELT) is proposed to run along the A1306 and improve the current low levels of public transport provision in this area. Therefore the policy sets out residential densities and car parking standards based on these anticipated improvements. Organising development around the needs of pedestrians and cyclists is also important and the layout of new development must facilitate the penetration of bus services. Particular attention should be paid to ensuring safe and convenient links to the proposed Beam Park Station to the south. Development must also embrace the A1306 frontage to maximize accessibility to the proposed East London Transit and also help integrate the development visually and functionally with the existing communities of South Hornchurch and Rainham.
- 1.8 The desired mix of new units is set out in Core Strategy Policy DC2 and the policy aims to ensure that a range of units sizes and tenures is provided so that a truly mixed and balanced community is achieved. For this reason the policy seeks to ensure that a preponderance of flatted development is avoided and instead seeks to secure a more balanced mix of houses and flats. The policy also seeks to ensure that new development is predominantly three storeys high, again to ensure

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As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 45

the development is integrated visually and functionally with the existing communities of South Hornchurch and Rainham. However the policy recognizes that higher densities may be appropriate immediately North of Beam Park station where a new local centre is considered necessary to provide day to day facilities. It is important to note that the Havering Retail and Leisure Study does not consider there is enough expenditure to support an additional centre of significant size such as a district centre here as this would dilute the focus on Rainham and mean expenditure would not be used to enhance the centre. It therefore suggests that a local top-up shopping function together with other limited services would be more appropriate for local residents, and the policy reflects this. However the proposed redevelopment of the Roman Close local centre on the Mardyke Estate may also serve this site.

- 1.9 The Council intends to prepare a Supplementary Planning Document which will include detailed design guidelines for the development of this site and more detailed guidance on the delivery of the pre-requisite social and physical infrastructure needed to serve the new households.

## **POLICY SSA 12 – RAINHAM WEST**

<b>Map ref</b>	TQ515826
<b>Location &amp; Site Description</b>	Land to the west of Bridge Road, north of the London Tilbury Southend Line and east of the Victor Engineering Site, including the strip of mixed uses north of the A1306.
<b>Area (ha)</b>	33.3
<b>Existing PTAL</b>	1-2
<b>Predicted future PTAL</b>	3
<b>Implementation</b>	Policy splits site into parcels of land reflecting fragmented land ownership. London Riverside Partners will work together to deliver the aims of the policy.
<b>Applicable Core Strategy policies</b>	DC2, DC3, DC6, DC7, DC13, DC15, DC19, DC20, DC21, DC25, DC26, DC29, DC30, DC32, DC33, DC34, DC40, DC49, DC50, DC51, DC52, DC53, DC54, DC55, DC56, DC59, DC61, DC62, DC63, DC72
<b>Residential and ancillary community, retail, recreation, educational and leisure uses, and appropriate employment uses will be allowed</b>	

As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 46

**within the Rainham West site.**

**South of the A1306 at least 33% of the site area must be developed for employment uses B1 (a, b) and education, community, recreation and leisure uses ancillary to the residential. Consideration will be given to reducing this figure where intensive employment uses are provided, for example multistorey office blocks. In some cases the retention of existing high quality employment uses where they are compatible with residential uses may be allowed. New employment uses should be accommodated in buildings that have an urban character, rather than industrial sheds, complementing the scale and character of nearby housing.**

**Due to the increase in PTALs East London Transit will bring, densities should be in the range of 30-150 units per hectare and car parking provided with the range of 1-1.5 spaces per new home. Car parking standards for non-residential uses must be consistent with DC33. Apart from Dover's Corner, residential development on the large sites to the south of the A1306, must be phased so that new homes are not occupied before East London Transit is operational and serving the site. Conditions will be imposed to this effect.**

**In line with Core Strategy policies DC2 and DC6 a mix of 1,2,3,4 and 5 bed homes should be provided. New buildings should be predominantly three storeys high.**

**In line with DC72 contributions will be sought for community facilities and leisure and recreation facilities to meet the needs of new households. Contributions may also be sought for public transport improvements in advance of the implementation of the East London Transit and environmental improvements to the A1306.**

**South of the A1306 only comprehensive development proposals of the following sub-sites which include an integrated mixture of employment, residential and where necessary community, leisure and recreation uses will be allowed.**

- **Dovers Corner**
- **Carpet Right**
- **Mudlands**
- **Rainham Steel**
- **Suttons Industrial Park**
- **Somerfields**

**Single use applications will not be allowed. Applications must demonstrate clearly how they enable the development of adjacent sites within the Rainham West site.**

**Development must be arranged on a traditional urban street layout and employ a permeable block structure with built development reinforcing the street pattern providing continuity of frontage and maximizing overlooking of the public realm.**

**Pedestrian and cycling linkages must be provided east west through the heart of the site, and the road layout must enable a bus service to be routed through it.**

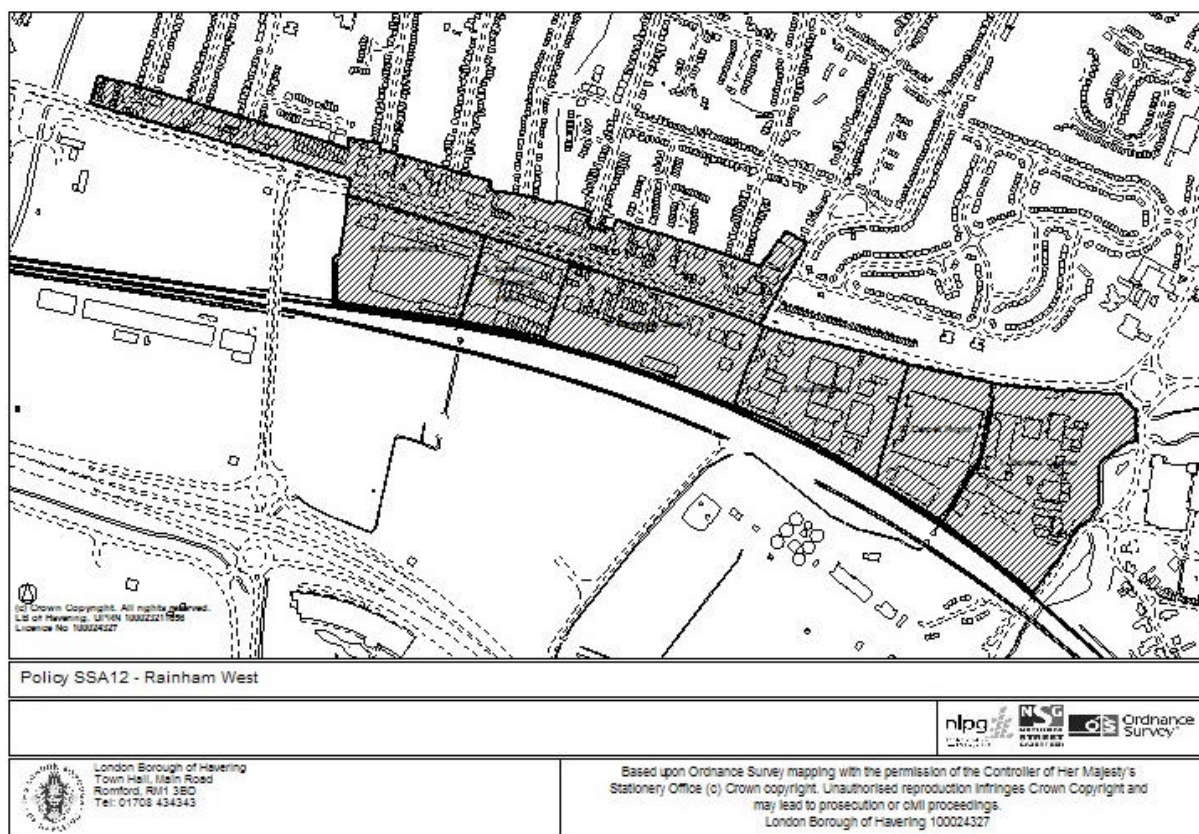
**At the eastern end of the site development must:**

- Provide a positive relationship with the proposed recreation of the historic quay on the River Ingrebourne and the adjacent Rainham Village**
- Reflect the character of the Rainham Conservation Area.**
- Provide convenient access for pedestrians and cyclists to Rainham Town Centre and Rainham Station**

**Sustainable drainage should be provided to attenuate flooding and open spaces must be provided in line with Green Grid principles.**

**North of the A1306 comprehensive residential redevelopment of the blocks defined by the roads running perpendicular to the A1306 is encouraged. Where this is not possible development must not prejudice the development of adjoining sites.**

**Development either side of the A1306, must embrace the road frontage and seek to integrate the new and existing communities north and south of New Road.**



## REASONED JUSTIFICATION

- 1.1 The partners involved in the regeneration of London Riverside are committed to achieving sustainable communities in the area stretching from the boundary of Barking and Dagenham which runs through to Dover's Corner sandwiched by the A1306 and London Tilbury Southend Line, and including the employment uses fronting the north side of the A1306.
- 1.2 The Rainham West site is bounded to the south by the London Tilbury Southend line. Its western boundary is formed by the Victor Engineering Site and its eastern boundary by Bridge Road. From Bridge Road to Cherry Tree Close its northern boundary is formed by the A1306 from which point it includes a narrow strip of mixed uses to the Dagenham Corridor. The A1306 runs through the heart of the site. The area south of the A1306 used to form part of the Rainham Employment Area. The area north of the A1306 was previously designated as the New Road Employment Area.
- 1.3 South of the A1306 the site has uses commensurate with its previous designation as the Rainham Employment Area. The alignment of the A13 means this part of the Employment Area no longer enjoys a strategically advantageous location, and the subsequent detrunking of

As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 49

the A13 and associated environmental improvements call for a different land use strategy for the area.

- 1.4 This has made the site suitable for de-designation to help address oversupply with regard to future business needs. Therefore the Havering Employment Land Review recommends that two thirds of the Rainham West site south of the A1306 can be released from the Rainham Employment Area for non-employment uses, and that the remaining area is appropriate for residential compatible B1 (a) and (b) uses.
- 1.5 The review recommends that the whole of the New Road Employment Area is no longer needed for employment uses. Therefore CP3 de-designates this site and highlights in line with CP1 that the land use priority is housing.
- 1.6 South of the A1306 current uses on the site range from large warehouse style operations such as Carpet Right and Somerfields Depot to smaller format commercial and employment uses. Given the size of the site it is very unlikely that the whole site will come forward as one for redevelopment. At the same time the successful redevelopment of the site will only be achieved through strategic interventions. Therefore the site has been split up into the following constituent sites. The piecemeal development of these constituent sites will not be allowed.
  - Dovers Corner
  - Carpet Right
  - Mudlands
  - Rainham Steel
  - Suttons Industrial Park
  - Somerfields
- 1.7 Proposals which bring forward any combination of the above sites will be welcomed.
- 1.8 The opportunity to release this site from the Strategic Employment Land reserve, therefore, enables this site to make a significant contribution to identified local and sub-regional housing need, while continuing to provide valuable employment opportunities through mixed-use schemes.
- 1.9 The East London Transit is proposed to run along the A1306 and improve the current low levels of public transport provision in this area. Therefore the policy sets out residential densities and car parking standards based on this improvement. For this reason new homes must not be occupied before ELT is operational and serving the site. This does not apply to Dover's Corner which is within walking distance

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As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 50

of Rainham Station and the bus services which serve Rainham Village. It is also important to ensure that the new development is organized around the needs of pedestrians and cyclists and also facilitates the penetration of bus services. Particular attention should be paid to ensuring safe and convenient links to Rainham Station to the East and the proposed Beam Park Station to the West. Development must also embrace the A1306 frontage to maximize accessibility to the proposed East London Transit and also help integrate the development visually and functionally with the existing communities of South Hornchurch and Rainham.

- 1.10 The desired mix of new units is set out in DC2 and the policy aims to ensure that a vital mix of units sizes and tenures is provided so that a truly mixed and balanced community is achieved. For this reason the policy seeks to ensure that a preponderance of flatted development is avoided and instead seeks to secure a more balanced mix of houses and flats. The policy also seeks to ensure that new development is predominantly three storeys high again, to ensure the development is integrated visually and functionally with the existing communities of South Hornchurch and Rainham.
- 1.11 North of the A1306, land ownership is more fragmented. In line with previous Supplementary Planning Guidance for the area the Council encourages comprehensive redevelopment of the constituent blocks which make up this part of the site. These blocks are defined by the roads which run off perpendicular from the A1306.
- 1.12 The Council intends to prepare a Supplementary Planning Document setting out detailed design guidelines for the development of this site and more detailed guidance on the delivery of the pre-requisite social and physical infrastructure needed to serve the new households.
- 1.13 The Council, working with its regeneration partners, will continue to offer assistance to existing firms to relocate to suitable alternative locations.

## **POLICY SSA 13 – RAINHAM-LAND BETWEEN RAILWAY AND BROADWAY**

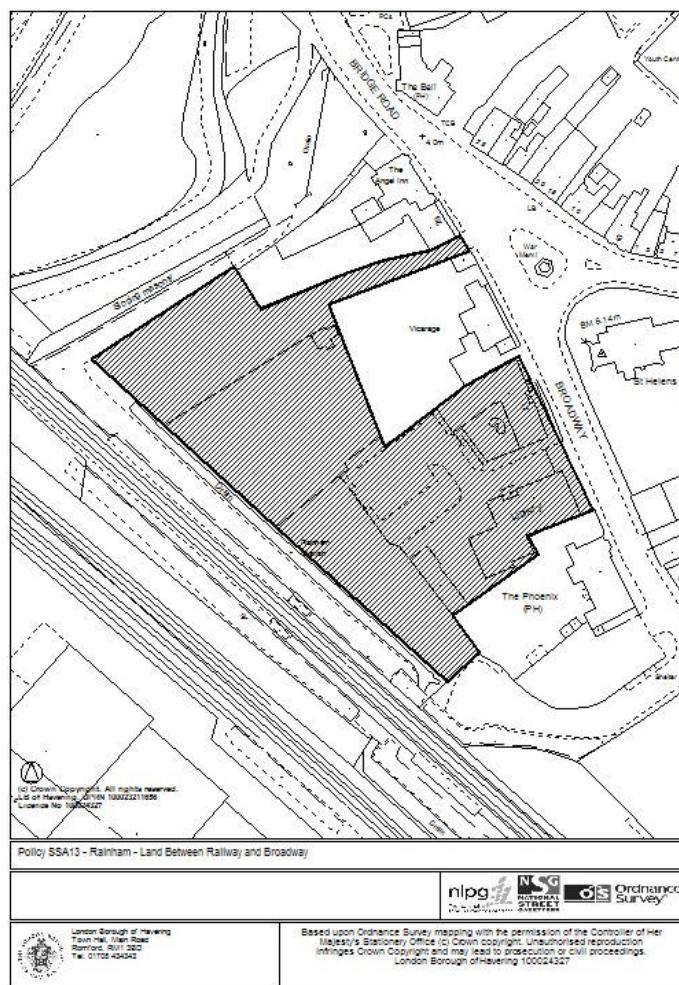
<b>Map ref</b>	TQ521821
<b>Location &amp; Site Description</b>	Land between London Tilbury Southend Line and the Broadway Rainham west of Rainham Station.
<b>Area (ha)</b>	0.77
<b>PTAL</b>	1-2
<b>Implementation</b>	The LTGDC is assembling this site which includes acquisition of the Council owned Rainham Library and Council offices. The rest of the site is in private ownership.
<b>Applicable Core Strategy policies</b>	DC2, DC3, DC6, DC7, DC15, DC16, DC21, DC25, DC26, DC29, DC30, DC33, DC34, DC40, DC49, DC50, DC51, DC52, DC53, DC54, DC55, DC56, DC59, DC61, DC62, DC63, DC67, DC68, DC72

**Only residential and community uses will be allowed on the land between the railway and Broadway. In addition retail and leisure uses will be encouraged along the Broadway frontage. Residential development must be within the 30-150 units per hectare density range and car parking provided within the range of 0-1.5 spaces per new home. New development should:**

- **respect the existing historic street pattern and scale of development**
- **retain and enhance views to and from the village**
- **not exceed three storeys in height**
- **provide enhanced pedestrian and cycling links to Rainham Station**
- **gain access from the eastern entrance to the site**

**The loss of the library will only be allowed where another suitable site has been agreed by the Council.**

**A heritage statement must be submitted with any application evidencing how the development preserves or enhances the character of the Rainham Conservation Area and makes a positive contribution to the Listed Buildings and Buildings of Local Historical and/or Architectural Interest within and beyond the site.**



## **REASONED JUSTIFICATION**

- 1.1 This site covers the backland which is situated between the Broadway and the London, Tilbury and Southend Railway. The site boundary excludes number 9 the Broadway and the Vicarage which are both Grade II Listed Buildings and the Phoenix Public House and Angel Inn. All these buildings individually and collectively make an important contribution to the character of the Conservation Area. However, it includes the former Council offices and Rainham Library as neither of these buildings make a positive contribution. The redevelopment of the library will only be allowed provided that it is re-provided either on site or in a similarly convenient location.
- 1.2 Although outside the Core and Fringe retail areas this site is within the confines of Rainham District Centre and therefore retail and leisure uses will be encouraged along the Broadway frontage to help integrate the proposed redevelopment of the station interchange with the rest of the district centre. In addition residential development is considered an appropriate use here with a density range of 30-150 units per hectare, with a corresponding car parking standard of 0-1.5 spaces per unit,

As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 53

reflecting its proximity to Rainham Station and nearby bus services. Development must preserve or enhance the character of the Conservation Area and must be no higher than three storeys in height. Particular care must be taken regarding the relationship between the new development and the Angel Inn, Vicarage and Phoenix Public House and the design and layout of the buildings along the Broadway frontage to ensure they make a positive contribution to the character of the village.

## **POLICY SSA 14 – MARDYKE DEVELOPMENT**

<b>Map ref</b>	TQ510837
<b>Location &amp; Site Description</b>	The site comprises the Mardyke housing estate with local shops, the Mardyke open space and the landfill site at Mardyke Farm east of the River Beam and south of Dagenham Road
<b>Area (ha)</b>	53.5
<b>PTAL</b>	1-2
<b>Implementation &amp; Monitoring</b>	The housing estate and the public open space are owned by the Council and the landfill site is in a single private ownership.
<b>Applicable Core Strategy policies</b>	DC2, DC3, DC6, DC7, DC15, DC16, DC18, DC20, DC21, DC22, DC26, DC27, DC30, DC32, DC33, DC34, DC40, DC49, DC50, DC51, DC52, DC53, DC54, DC55, DC56, DC57, DC58, DC59, DC61, DC62, DC63, DC67, DC72
<b>Planning permission for the comprehensive redevelopment and regeneration of the Mardyke Farm and Mardyke Estate site will be granted provided that:</b> <ul style="list-style-type: none"><li>• The existing landfill site is remediated across the whole site including the area to remain in the Green Belt, to a standard in line with the land's future intended use, via a scheme agreed in advance with the Council and the Environment Agency.</li><li>• A high quality public open space in line with Green Grid principles and the Thames Chase Plan incorporating formal and informal leisure and recreation usage, landscape improvements, and biodiversity enhancements to the River Beam and adjacent grasslands is provided on the remaining Green Belt area with convenient pedestrian and cyclist links to the new development and existing communities.</li><li>• Its design, layout and boundary treatment is sympathetic to the Green Belt and minimizes its impact on it.</li><li>• The existing adventure playground, commonly known as Mardyke Green, remains in its current position, with the playing fields / football pitches adjacent to Mardyke Green being re-provided elsewhere in the development prior to them being redeveloped.</li><li>• Residential densities on average are in the range of 50-80 units per</li></ul>	

As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 54

hectare with 1-1.5 car parking spaces per unit provided.

- The housing mix for market housing and affordable housing set out in policies DC2 and DC6 is achieved, with regard to the GLA Housing Requirements Study 2004 and the East London Affordable Housing Investment Framework. At least 50% of new dwellings (both affordable and market) must be houses.
- The existing housing floorspace of the Mardyke Estate is re-provided in its current tenure and in line with Core Strategy Policy DC6, 35% of the additional housing is affordable split 70/30 between social rented and intermediate forms.
- Appropriate legal mechanisms are in place to secure the delivery of the redevelopment of the Mardyke Estate and the satisfactory rehousing of tenants and leaseholders on the development.

The new development must be designed with regard to the following principles:

- The existing Mardyke Estate must be demolished and redeveloped, save for any properties on peripheral sites not contiguous with the main Estate site which are to be refurbished to at least decent homes standard as part of the redevelopment and except for key pieces of social infrastructure to be agreed with the Council and the local community.
- The Mardyke Estate must not be treated as a separate entity but instead form part of the comprehensive redevelopment of the whole site and be seamlessly integrated with it.
- Housing mix in terms of housing types and tenures must be balanced across the whole site avoiding concentrations of tenure.
- Affordable housing must be indistinguishable from the market housing.
- A community hub must be provided at the heart of a new Mardyke local centre including new shops, conveniently positioned so as to be accessible to new and existing residents.
- The phasing of the site must enable the decanting of residents from the Mardyke Estate during its redevelopment, without recourse to off-site decanting for those residents who wish to remain on the development.

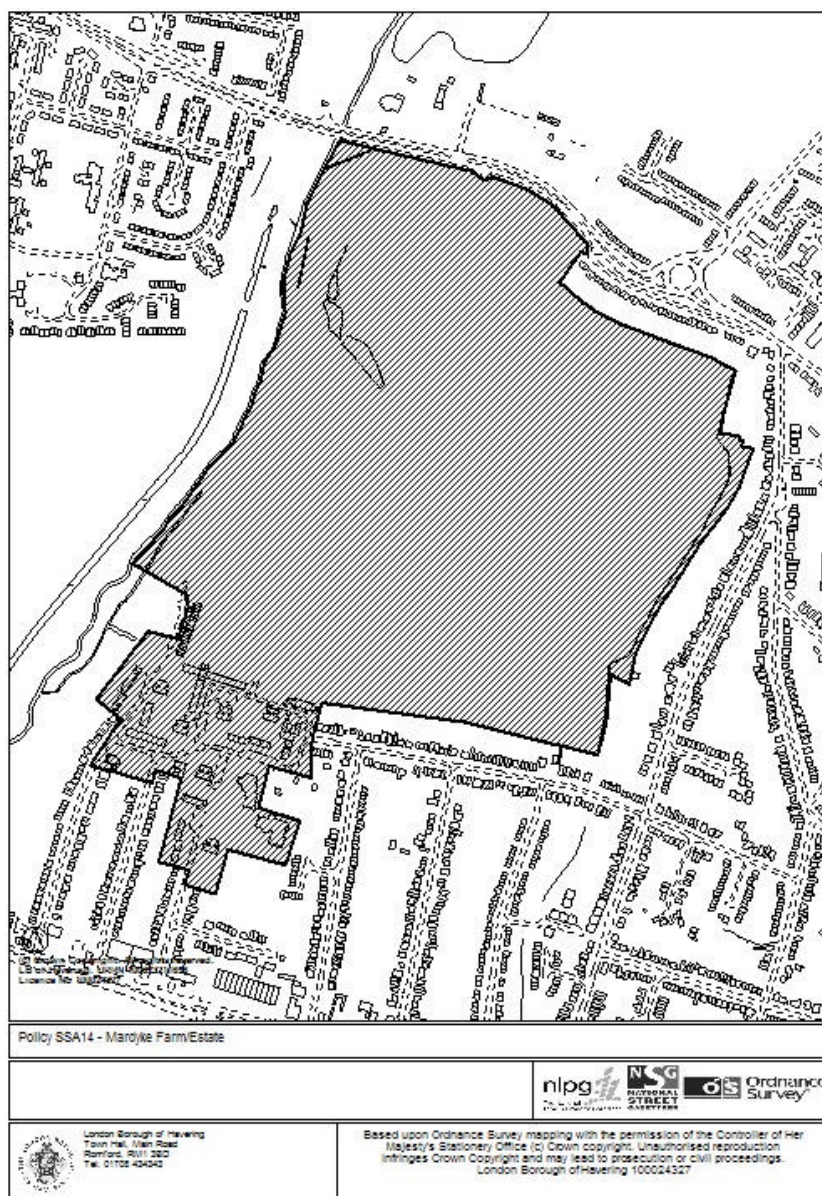
The detailed design of the development must be resolved through a Masterplan and Design Guide developed in consultation with Mardyke Estate residents and the surrounding local community.

The Council will seek to enter into an agreement with the developer to deliver the following:

- funds to manage and maintain the public open spaces in perpetuity
- contribution towards the provision of a new Primary Care Trust Healthcare Centre agreed in advance with the Havering Primary

**Care Trust**

- **Initial capital and revenue costs of a new bus route through the site which also serves the current location of the Mardyke Estate and links to the A1306, enabling future links to the proposed Beam Park Station and East London Transit**
- **education contributions through the application of the formula in related SPD**
- **improvements to and traffic management measures on surrounding roads as necessary to enable improvements to local bus services and manage car usage and car parking**
- **payment of statutory minimum home loss and payment of disturbance allowances to each Mardyke Estate household decanted/rehoused**
- **opportunities for Mardyke Estate leaseholders to access intermediate forms of affordable housing**



## **Reasoned Justification / Explanation**

- 1.1 This site covers two contiguous areas, Mardyke Farm and the Mardyke Estate. The site is in the south west corner of the borough within the South Hornchurch ward. It is bounded to the north by Dagenham Road, to the west by the River Beam which also forms the borough boundary with Barking and Dagenham, to the south by the rear boundary of the homes along Frederick Road and incorporates the Mardyke Estate. The Mardyke Farm site is entirely within the Green Belt.

As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 57

- 1.2 The Mardyke Estate, which while being a typical 1960's housing schemes, is an atypical development in the borough, the majority of the affordable housing being provided through low rise developments of traditional construction. Historically, the estate has suffered from a poor reputation amongst local residents with issues of anti-social behaviour and fear of crime being a major concern for the council and the residents. Many tenants have sought to relocate from the estate through the housing transfer system which created a continuous turnover of tenancies, destabilizing the community. However the Council with key partners have sought to address these issues through a number of regeneration initiatives and consequently quality of life on the estate has improved in recent years.
- 1.3 Nevertheless the Mardyke area remains one of the most deprived areas not only in Havering but in the country. It is covered by 3 of the 149 lower level super output areas for which deprivation data was published in the Index of Deprivation 2004. One of these (E01002368) is the most deprived in Havering and falls within the 11% most deprived in the country. In particular it scores badly on the income deprivation affecting children index (within the 5% most deprived in the country, on employment (within the 6% most deprived in the country), and on income (within the 8% most deprived in the country).
- 1.4 At the same time the area is located just north of the London Riverside Opportunity Area which lies at the heart of the Thames Gateway Growth Area, and has the potential to establish a critical fit with this area's regeneration due to:
- its proximity to planned public transport improvements in particular East London Transit and the proposed Beam Reach Station.
  - access to the increased employment opportunities particularly those being sought within the Beam Reach Industrial Park next to the Centre of Engineering and Manufacturing Excellence.
  - the formation of new mixed and balanced communities which will inject new vitality into the area and help support the wider provision of new and improved social infrastructure
- 1.5 In recognition of the scale of deprivation here, the Council in partnership with other agencies and the local community has undertaken a number of initiatives to help address social exclusion, including the provision of a highly valued community centre. More fundamentally in 2005 following an opinion survey the Mardyke Estate Steering Group recommended stock transfer and the Council is now proceeding on this basis in partnership with Circle Anglia, and has submitted a bid to Government for a comprehensive redevelopment of the Mardyke Estate. The aim of this process is to bring about a

substantial and sustainable regeneration of the estate. It is proposed to achieve this by complete redevelopment of the estate, providing homes to a Decent Homes Plus Standard, diversifying tenures and the property type mix, and improving the design and layout of the estate, including the local centre, so as to create a more balanced and viable community.

- 1.6 While the Mardyke Estate is in close proximity to the Green Belt this is of little recreational value and reinforces the poor image of the area, particularly that part of the Green Belt which is covered by this site. Much of this part of the Green Belt is taken by the Mardyke Waste Site. This is a large, poorly restored, contaminated, landfill site that occupies the site of a former aggregates quarry. Despite the existence of an agreement to restore the site with the majority secured for public access there is no provision for the transfer of the site to any public authority or for the long term management of the space to require the land to be used positively. In any event for reasons outside the Council's control there is little prospect of the development being completed and this agreement being met. The result is that the site is degraded, inaccessible and unusable in its current form and contributes to the isolation of the Mardyke Estate, detracting from the amenity of the Green Belt and the purpose of the Dagenham Corridor which is to separate the built up areas of Dagenham from Hornchurch and to provide recreation opportunities, increased access and an improved landscape. It is also subject to vandalism and anti-social behaviour.
- 1.7 If part of the Mardyke Farm site is removed from the Green Belt and developed for housing, this will deliver the following exceptional benefits:
- The complete remediation of the Mardyke Farm Landfill Site, to a higher specification than would otherwise be achieved under the approved restoration scheme.
  - The creation of a high quality public open space on the retained Green Belt land, providing a mix of formal and informal parkland, open space and sports facilities, greatly improving the environment and amenity of this part of the 'Dagenham Corridor'.
  - Creation of a sustainable new community by:
    - providing a more mixed and more balanced community than could be achieved via the redevelopment of the Mardyke Estate alone, through the provision of a wider variety of dwelling tenures, sizes and types, particularly houses rather than flats
    - enabling the decanting of residents from the Mardyke Estate during its redevelopment, without recourse to off-site decanting for those residents who wish to continue living in the development .

- making much better social provision in the form of improved public transport, shops, services and community facilities.

1.8 This proposal also has important synergies with the London Riverside developments.

- It will help deliver the Greening the Gateway initiative and Green Grid programme, for the benefit of new and existing communities.
- It will increase the potential patronage of the proposed East London Transit and Beam Reach station and therefore strengthen their case for early implementation.
- It will provide a flagship model for social regeneration and sustainable communities to serve as a catalyst for the development of other schemes in the London Riverside Area

1.9 The Council considers that these reasons constitute in combination exceptional circumstances justifying the removal of part of the site from the Green Belt and are expanded in greater detail below. The amount of land removed from the Green Belt has been dictated by:

- the quantum of development necessary to deliver these exceptional benefits
- the densities that are considered appropriate in this area
- the need for the Green Belt boundary to be defensible with regard to the pattern of existing development and the purpose of including land in it

1.10 In line with paragraph 2.9 of PPG2 the new road proposed to serve the new development forms the boundary of the Green Belt. The policy requires that new development is sympathetic to the green belt and therefore in its design, layout and boundary treatment, minimizes its impact on it.

#### Affordable housing

1.11 The policy sets out the required mix of housing and approach to affordable housing. The approach to affordable housing recognizes that the existing amount of affordable housing must be re-provided in line with London Plan policy 3A.12. The Council will seek 35% of the remaining housing as affordable in line with Core Strategy policy DC6 and accordingly will seek 70% of these units as social rented and 30% as intermediate.

#### Housing Mix and Density

1.12 The approach to housing mix aims to reduce the current predominance of flats on the Mardyke Estate. This allocation enables existing densities to be reduced by dispersing the flatted element of the scheme

across the whole site. All the properties of the current Estate are flats and maisonettes. The redevelopment of the Estate within the current boundaries would require that most if not all the new properties would need to be flats, rather than houses, even though there is a need for significant number of larger homes (3 bedroom rather than 1 bedroom properties). The provision of houses rather than flats will more effectively meet the housing needs of current Mardyke Estate residents and will provide greater choice for those residents. This will also eliminate the need to disperse residents across the borough during redevelopment, and so result in a more stable and sustainable local community.

- 1.13 Currently PTAL levels across the site are two at the Roman Road local centre and one across the remainder of the site. The provision of a new bus service on a five minute frequency would increase levels across the site to level two. The site would therefore with regard to Core Strategy Development Control policy DC2 normally be suitable for densities in the 30-50 units per hectare range. However the Council recognizes that a balance needs be struck, between the quantum of development necessary to fund the exceptional costs that will be incurred in remediating the site and meeting the needs of a greatly expanded community, and minimising the amount of land that needs to be taken from the Green Belt. For this reason densities in the range 50-80 units per hectare will be allowed on this site to lessen the amount of land taken from the Green Belt. The corresponding car parking standard will be 1-1.5 spaces per unit. However in line with DC2 developers must follow a design led approach in determining the type, size and form of new housing with regard to the housing mix and types being sought, and densities should be the product not the determinant of these.

#### Transport

- 1.14 The isolation of the Mardyke estate has been a major case of social exclusion. A key part of the development must therefore be the provision of a new or improved bus service through the estate connecting Dagenham Road with New Road. The service must include convenient bus stops including at the local centre. Pedestrian and cyclist links must also be significantly enhanced both formal and informal. Car usage and parking must be carefully controlled to avoid rat running and encourage modal shift. On average there should not be more than 1.5 spaces per unit, at the same time less than 1 for 1 parking will not be appropriate. Due to the nature of surrounding streets the Council will seek contributions towards any works necessary to accommodate the passage of bus services through to New Road. The Council will also expect contributions towards traffic control measures including those to manage on street parking.

#### Open space

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As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 61

- 1.15 Through the Core Strategy the Council is seeking to implement the Green Grid network and the Thames Chase Plan in line with the Greening the Gateway initiative. This development offers the opportunity to make a significant contribution towards this and deliver Green Belt objectives through the provision of functional green infrastructure by:
- improving opportunities for informal and formal recreation within the Dagenham Corridor for the benefit of new and existing communities and help achieve the implementation of a strategic greenspace corridor in line with the Greening the Gateway Initiative. This includes the provision of a north-south path linking Essex through the Dagenham Corridor to the Thames.
  - enhancing the biodiversity value of the Green Belt particularly the River Beam and adjacent grasslands which is a Grade 1 Site of Borough Importance for Nature Conservation. (Please see the proposals map for the extent of this designation.)
  - improving the attractiveness of the landscape through sensitive grass land management and tree planting

The developer will be expected to provide/fund these improvements to a standard agreed in advance with the Council.

- 1.16 Currently the Mardyke open space serves the Mardyke Estate. This includes formal sports pitches as well as the Mardyke Green adventure playground. The Mardyke Green is a highly valued and well used facility which has been improved recently, and must be retained in its current location for these reasons. However the sports pitches should be relocated to the new public park on Green Belt land within the site where the quality and quantity of provision can be enhanced. The Council will seek to enter into an agreement with the developer to secure the long term management and maintenance of the remaining Green Belt and the facilities within it and any other open space within the development.

Shops, services and community facilities

- 1.17 A key justification for this development is the opportunity to significantly improve the quality of local shops, services and community facilities. The limited existing facilities are focused on the Roman Close Local Centre and Lowen Road. The development offers the opportunity to consolidate these facilities within a new local centre. However developers must take this forward in consultation with the local community. This is because some facilities, in particular the Mardyke Youth and Community Centre, are of a high quality and highly valued and the consensus may be that these are best kept where they are rather than re-provided elsewhere within the estate. Roman Close currently has a very basic retail and service offer which will need to be

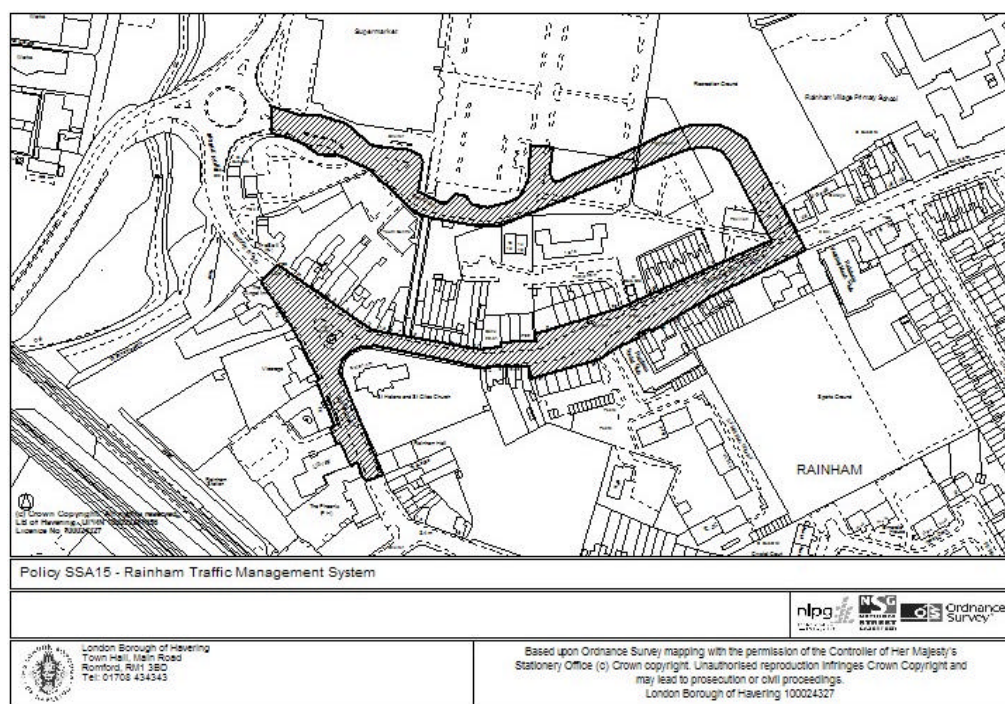
significantly enhanced not only because of the increased population it will need to serve but also to remedy existing deficiencies in provision.

- 1.18 The quality of healthcare also needs to be improved. Average GP patient lists in surrounding practices are well above the NHS standard of 1900 patients per GP, moreover due to high levels of deprivation the call of local residents on these services is higher than for the borough as a whole. Therefore the new local centre must include a new healthcare centre to a standard agreed with the Havering Primary Care Trust and the developer will be expected to make a significant contribution to the cost of providing this service.
- 1.19 The new local centre must be provided in a location which is no less accessible to existing residents than the existing centre but must also be integrated in terms of access and visual links with the whole development. It must also be served by any new or improved bus service and have excellent pedestrian and cyclist access from the surrounding area. The new local centre must be embedded within the development and offer a high quality public realm embodying secure by design principles.

# Transport

## **POLICY SSA 15 – RAINHAM TRAFFIC MANAGEMENT SYSTEM**

<b>Map ref</b>	TQ521822
<b>Location &amp; Site Description</b>	Bridge Road, Viking Way, Bridge Road and Upminster Road South.
<b>Area (ha)</b>	Not applicable
<b>PTAL</b>	2-1
<b>Implementation</b>	Havering Council will seek agreement with affected private land owners, Future funding may be available from the LTGDC and Transport for London.
<b>Applicable Core Strategy policies</b>	DC32, DC33, DC34, DC35, DC36, DC61, DC62, DC67, DC68, DC72
<b>The management of traffic in Rainham will be improved through the introduction of a new traffic management system. This will involve the removal of one direction of traffic from Upminster Road South, the extension of Viking Way through to Upminster Road South, and the creation of a T-junction to replace the traffic island where Upminster Road South meets the Broadway. It will include designated cycle lanes and improved pavements. A new parking system for short-term users will be introduced to create a safer village environment. Traffic calming measures will also be implemented. The materials used must preserve or enhance the character of the Conservation Area.</b>	



### REASONED JUSTIFICATION

- 1.1 A new traffic management system is considered necessary in Rainham Village to help to promote the vitality of the shopping parade and create improved conditions for pedestrians, cyclists public transport users and motorists. The extension of Viking Way through to Upminster Road South will help release the development potential of the plots which front Upminster Road South and enable consolidation of the retail core.

## POLICY SSA 16 – RAINHAM STATION TRANSPORT INTERCHANGE AND CIVIC SQUARE

<b>Map ref</b>	TQ521821
<b>Location &amp; Site Description</b>	The site is to the south of Wennington Road, to the west of Anglesey Drive and to the north of and including Rainham Station.
<b>Area (ha)</b>	1.5
<b>PTAL</b>	3
<b>Implementation</b>	The site is owned by the LTGDC, Network Rail and the Post Office.
<b>Applicable Core Strategy policies</b>	DC2, DC3, DC6, DC7, DC15, DC16, DC19, C21, DC25, DC26, DC29, DC30, DC33, DC34, DC40, DC49, DC50, DC51, DC52, DC53, DC54, DC55, DC56, DC59, DC61, DC62, DC63, DC67, DC68, DC72
<b>To increase the attractiveness of public transport, improve community facilities and the public realm, and to signify the area's civic</b>	

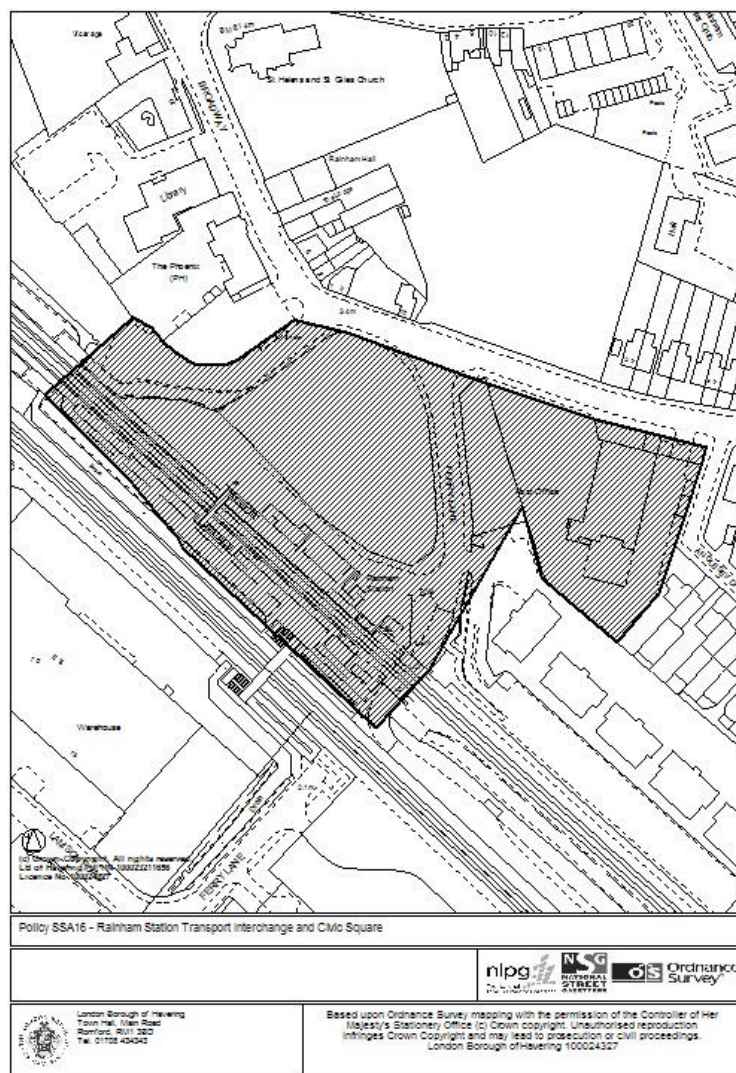
As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents.

**importance the redevelopment of Rainham Station and the land to the north will be allowed provided that the following is provided:**

- **New civic square reinforced by landmark mixed use buildings incorporating new community, retail and leisure uses at ground floor level with residential above. Residential development must be within the 30-150 units per hectare density range and car parking provided within the range of 0-1.5 spaces per new home.**
- **Upgraded station providing convenient and safe interchange facilities between bus, taxi, cycling, walking, transit and rail.**
- **A turning circle for East London Transit**
- **Improved pedestrian and cyclist access across railway lines to Ferry Lane and the London Riverside Conservation Park and Thames Gateway Regional Casino and Entertainment Centre.**

**Development must safeguard important views into and out of the village.**

**A heritage statement must be submitted with development proposals evidencing how the development preserves or enhances the character of the Conservation Area and enhances the setting of Rainham Hall. Rainham Station will be promoted as a major transport interchange.**



## **REASONED JUSTIFICATION**

- 1.1 Rainham Station has been identified as the main transport hub for this part of London Riverside offering a Gateway into the Docklands and London, and to the London Riverside Conservation Park and Thames Gateway Regional Casino and Entertainment Centre. The station's redevelopment is therefore a crucial component in the regeneration of London Riverside.
- 1.2 Befitting its proposed new role, the partners want to achieve a high quality interchange here with an improved public realm and anchored by two landmark mixed use buildings.
- 1.3 The station in the future will serve three primary purposes.
  - It will be the main gateway for residents in the existing and proposed communities to access employment opportunities in

As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 67

other parts of London Riverside, Canary Wharf, Stratford and Central London.

- It will be the main local gateway for access to the Olympic Park via West Ham
- It will be the main gateway for visitors from the South East and London to access the London Riverside Conservation Park and the Thames Gateway Regional Casino and Entertainment Centre.

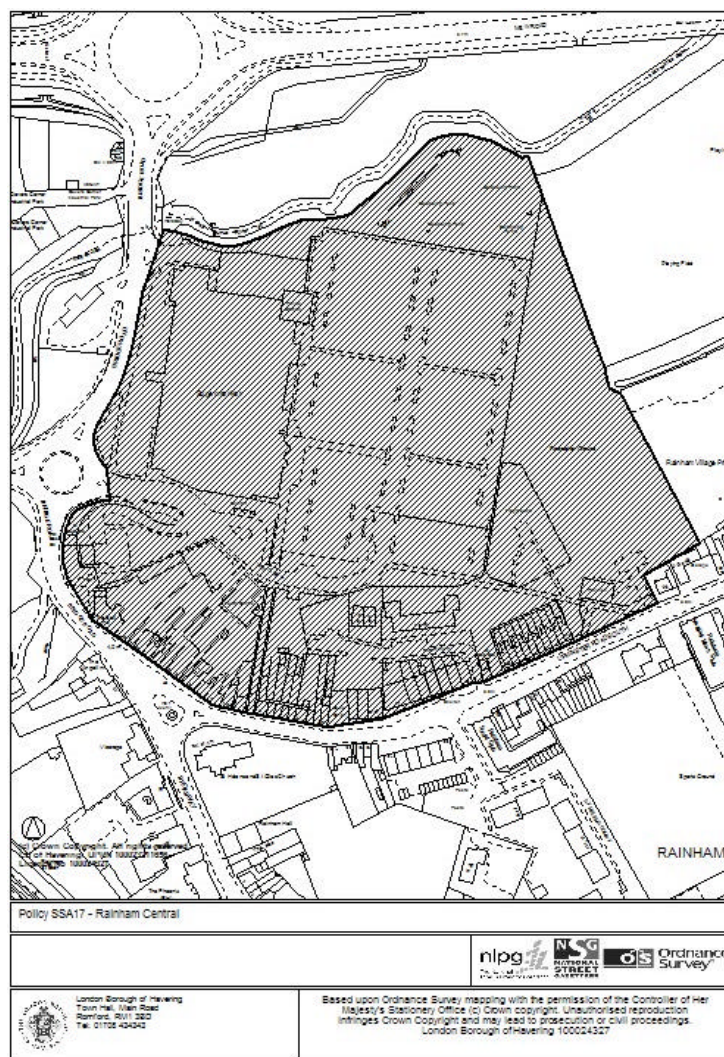
1.4 The intention is that residents from new and existing communities in Rainham and South Hornchurch will be able to reach the station via East London Transit. A turn around facility is planned in front of the station. London Riverside partners are also looking to secure funding for increased length and frequency of trains on the London Tilbury Southend Line. Improvements to pedestrian and cyclist access across this line and the CTRL line are crucial to improve accessibility to the visitor destinations south of the station, and to link to any proposed tram/bus service to these.

1.5 At present Rainham Station is detached from the heart of Rainham Village. The redevelopment of the station presents the opportunity to better integrate it visually and functionally into Rainham Village. The land north of the station is within the Rainham Conservation Area and has exciting potential to improve the setting of the Grade II listed Rainham Hall and grounds through the provision of a new civic square. The final component of this redevelopment is the provision of two landmark mixed use buildings. Again these must make a positive contribution to the conservation area and either preserve or enhance its setting. However the buildings need to also help integrate the station into the fabric of the village. It is considered that community uses are appropriate here. In particular, there is potential to re-provide a much improved Rainham library here, which will help along with the new public square to increase the civic importance of this area.

# Town Centres

## POLICY SSA 17 – RAINHAM CENTRAL

<b>Map ref</b>	TQ521824
<b>Location &amp; Site Description</b>	Includes land east of Bridge Road, south of Ingrebourne Creek, north of Bridge Road/Upminster Road south and west of Rainham Village Primary School.
<b>Area (ha)</b>	9
<b>PTAL</b>	2
<b>Implementation</b>	Environmental improvements, shop front scheme currently being carried out in this area.
<b>Applicable Core Strategy policies</b>	DC2, DC3, DC6, DC7, DC15, DC16, DC21, DC25, DC29, DC30, DC33, DC34, DC40, DC49, DC50, DC51, DC52, DC53, DC54, DC55, DC56, DC59, DC61, DC62, DC63, DC67, DC68, DC72
<p><b>Any redevelopment of this site should:</b></p> <ul style="list-style-type: none"><li>• <b>Better integrate the foodstore functionally and visually into the heart of Rainham Village</b></li><li>• <b>Provide a positive frontage to Bridge Road</b></li><li>• <b>Improve the retail offer of the units within the fringe and core retail areas along the Broadway and Upminster Road South</b></li><li>• <b>Provide new homes with a density range of 30-150 units per hectare, predominantly three storeys high and with 0-1.5 car parking spaces per unit</b></li><li>• <b>Protect and improve the existing open space</b></li><li>• <b>Improve the amenity and biodiversity value of Ingrebourne Creek</b></li><li>• <b>Be accompanied by a heritage statement evidencing how the proposal preserves or enhances the character of the Conservation Area and the setting of listed buildings.</b></li><li>• <b>Provide contributions towards the implementation of the Rainham Traffic Management System</b></li></ul>	



## **REASONED JUSTIFICATION**

- 1.1 This site is bounded to the west by Bridge Road, to the South by Upminster Road South, to the north by the Ingrebourne River and the East by the eastern boundary of the public open space.
- 1.2 The boundary incorporates the Tesco supermarket, the buildings along Bridge Close and Upminster Road South and the public open space to the east, and the land either side of the Ingrebourne Creek to the north.
- 1.3 The site, therefore, covers the major part of Rainham's retail floorspace and includes:
  - 12-28 Broadway – Fringe Area
  - 9-53 Upminster Road South – Retail Core
- 1.4 Havering's Retail and Leisure Survey identifies that the Tesco store has had a detrimental impact on the vitality and viability of the town

As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 70

centre and effectively performs as a one stop shop as it does not appear to generate any significant number of trips to the remainder of Rainham Town Centre. The study identifies that there is scope for some improvement to the retail offer within Rainham Town Centre due to the additional population proposed in London Riverside. The study therefore identifies scope for small to medium development in the centre of Rainham to provide larger shop units to attract national and independent retailers and to encourage additional investment into the centre. This is in line with CP4.

- 1.5 The objective of this site allocation therefore from a retailing perspective is two fold, firstly to better integrate the Tesco store into Rainham Village to encourage linked trips, secondly to improve the remaining retail offer in Rainham of the units along Upminster Road South and the Broadway within the balance of uses set out in DC16. This will be enabled by the proposed new Rainham Traffic Management System. See SSA15.
- 1.6 The remodeling of the Tesco's store also presents the opportunity to make better use of the site which at present is mainly used for surface car parking. Drawing the store closer to the heart of Rainham Village, and remodeling the car park will enable residential development to be introduced to the site which can take advantage of views to the east and north of the site across the open space to the Ingrebourne Valley. The redevelopment of the Rainham West site means that Bridge Road will no longer separate Rainham from the employment uses but instead act as the interface between the new communities and the town centre. Any redevelopment of the Tesco's site therefore must present a positive frontage to Bridge Road and the proposed improvements to the Ingrebourne Creek.
- 1.7 The existing buildings along the Broadway and Upminster Road South are within the Rainham Conservation Area and any proposals must be accompanied by a heritage statement evidencing how they maintain or enhance the character of the conservation and the setting of the adjacent listed buildings including the Grade I listed Church of St Helens and St Giles and the Grade II listed Rainham Hall and 2, 4, 6, 8 Rainham Road South.
- 1.8 Any redevelopment must also improve the nature conservation and recreational value of the Ingrebourne Creek and the land either side of it, which lies to the north of the site, and protect and improve the recreation and playgrounds to the east.

# Culture

## **POLICY SSA 18 – THAMES GATEWAY REGIONAL CASINO AND ENTERTAINMENT CENTRE.**

<b>Map ref</b>	TQ518819
<b>Location &amp; Site Description</b>	Land west of Ferry Lane south of LTS line north of A13 and east of Rainham Creek.
<b>Area (ha)</b>	23.9
<b>PTAL</b>	2-1
<b>Implementation</b>	If the Council is able to award a regional casino premises licence it will follow a transparent selection process open to all operators. Nevertheless the very strong interest of Sun International/Development Securities demonstrates that the proposal is realistic and deliverable.
<b>Applicable Core Strategy policies</b>	DC15, DC19, DC21, DC25, DC30, DC33, DC34, DC35, DC36, DC40, DC49, DC50, DC51, DC52, DC53, DC54, DC55, DC56, DC57, DC58, DC59, DC61, DC62, DC63, DC72
<p><b>London Riverside partners are committed to achieving a new entertainment centre on the Ferry Lane North site anchored by a Regional Casino. As well as a Regional Casino, hotel and conference facilities, restaurants, entertainment, sports and leisure and complementary retail uses will be allowed where they can be demonstrated to be necessary and vital to the functioning and viability of the entire centre. Proposals must satisfy DC19 ‘Locating Cultural Facilities’.</b></p> <p><b>The remainder of the site must be developed for a range of B1 and B2 uses commensurate with the Rainham Employment Area designation.</b></p> <p><b>Proposals for the site must provide a landmark iconic building built to the very highest sustainability standards.</b></p> <p><b>Planning agreements may be sought:</b></p> <ul style="list-style-type: none"><li><b>• To fund the provision of a shuttle bus from Rainham Station and on to the Conservation Park Visitor Centre</b></li><li><b>• Towards the funding of the provision of local priority community facilities and use of the centre’s facilities for community events and activities</b></li><li><b>• To help fund the development and ongoing management of the</b></li></ul>	

As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 72

**London Riverside Conservation Park**

- **To fund an improved crossing of the LTS and CTRL railways for pedestrians and cyclists**
- **To secure the provision of an ice rink and an undertaking to operate the rink for an agreed period**
- **Towards the plans for improving Rainham Station and for the adjoining development of a new public square and transport interchange**
- **To provide revenue support for the extension of bus services south of the railway**
- **Towards the improvement of Ferry Lane and development of safe and attractive pedestrian and cyclist routes between the centre and the station**
- **For a green travel plan**
- **For environmental improvements to Rainham Creek from the site to the railway**
- **To secure a contribution to the wider infrastructure needed to regenerate London Riverside**
- **For training and recruitment programmes targeted towards deprived parts of the labour market area and excluded groups.**



## **REASONED JUSTIFICATION**

- 1.1 Havering Council, with support from the LTGDC is bidding for a licence for a regional casino would anchor the Thames Gateway Regional Casino and Entertainment Centre on the Ferry Lane North site. The casino will be the cornerstone of a multi-faceted entertainment centre which is planned to include high quality hotel and conference facilities, a range of restaurants, nightspots, and family entertainment, Olympic size ice rink, multi-screen cinema, health/sports club, ancillary retail and a large multi-purpose venue. The casino will create a completely new leisure destination of a world class international standard for London and the Thames Gateway attracting over 3 million visitors per year. It is forecast to provide 2500 direct jobs and require a private

As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 74

sector investment of circa £250 million and will bring with it massive environmental, social and economic regeneration benefits.

- 1.2 The site is bounded to the East by Ferry Lane to the north by the Ferry Lane Link Road, to the west by the River Ingrebourne and to the South by the A13. The centre is proposed to occupy around 10 hectares with the remaining land identified for modern business and industrial uses. Currently the site is occupied by low-grade uses which are seriously damaging the environment and image of the area and this proposal will replace these with landmark development befitting this important Gateway into East London.
- 1.3 The location of the centre is entirely consistent with national and regional planning policy guidance. According to the national policy statement on casinos, the Government expects that a regional casino will be a major development, offering clear potential for regeneration, including a critical mass of leisure and complementary uses as well as gambling facilities: this in turn requires a large site that is available and can be economically developed for these purposes. The Council considers that a town centre location is unsuitable for a regional casino as it would increase the risk of problem, particularly ambient gambling. In any event there are no suitable, viable, and available sites of sufficient size for a regional casino and entertainment centre in town centre or edge-of-centre locations in the Thames Gateway in London. Havering's proposal is therefore consistent with the sequential approach, being an out-of-centre site which will be accessible and well served by a choice of means of transport, with good links to the nearby Rainham centre.
- 1.4 Nevertheless applicants will need to demonstrate that the uses they are proposing are necessary to the overall functioning and viability of the centre with regard to the concept of disaggregation and town centre first approach in PPS6. The policy recognises that a critical mass of leisure, recreation and entertainment uses will be necessary to support the Casino, and to secure the regeneration benefits.
- 1.5 Historically the site has been in industrial use as it is within the Rainham Employment Area. The site is currently dominated by high stacks of stored containers, transport yards, car breakers, waste transfer stations, scrap metal and similar uses. The development scenario for Ferry Lane in the Urban Strategy for London Riverside is better road access and new public transport services, which will be the catalyst for the revitalisation of the industrial area, and its progressive redevelopment for higher quality predominantly employment uses. Havering's Employment Land Review, 2006, recommends that the regional casino and entertainment centre should proceed because it would create much higher than industrial employment levels, and it would vastly improve the prospects for development of the remaining strategic employment land in the locality.

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As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 75

- 1.6 Although the regional casino and entertainment centre will involve the use of some industrial land for leisure purposes, it will generate much higher employment levels than from an equivalent industrial redevelopment, deliver the required transport infrastructure improvements, and stimulate the redevelopment of employment land in the surrounding area. It will also replace low density and low grade employment uses.
- 1.7 The Casino will dramatically increase leisure opportunities in an area where they are very few and will provide important synergies with the proposed London Riverside Conservation Park. Combined they will not only provide a significant boost to the tourist economy of Rainham but will also help raise the image and profile of this area and help kick start the regeneration of the rest of London Riverside.
- 1.8 Therefore the centre in this location will bring with it massive regeneration benefits including:
- Securing for the London Thames Gateway the maximum potential regeneration benefits from a regional casino and its associated development.
  - Delivering world class leisure, entertainment and tourism facilities, and direct support for the delivery of strategic proposals for Rainham Marshes and the Conservation Park, to create a nationally important tourist destination and environmental asset for the Thames Gateway.
  - Providing the catalyst for regeneration, bringing forward the environmental, economic, and social regeneration of London Riverside much sooner and better than would otherwise be possible.
  - Bringing into the area over three million people annually (Source Sun International) who would not otherwise come to the Thames Gateway or Rainham, showcasing the opportunities to live, work and invest here.
  - Overcoming existing demand deficiency by bringing in spending power from much wider regional, national and international markets.
  - Securing a £250m private investment and creating development confidence, stimulating further development over an extensive area within the Thames Gateway.
  - Delivering comprehensive redevelopment of a seriously degraded industrial area needing major investment, but currently devoid of market interest.
  - Replacing unsightly and inappropriate uses, which are seriously damaging the image of the Thames Gateway in a very conspicuous location, with a landmark development of high environmental and architectural quality.
  - Providing a model of sustainable construction and operation, including exceeding current standards for energy efficient buildings,

exploiting the potential for on-site renewable energy generation, and implementing sustainable urban drainage.

- Strengthening the business infrastructure by providing a high quality hotel, restaurants, conference centre, and entertainment venues, suitable for entertaining national and international clients and project partners.
- Boosting the sub-regional economy by providing opportunities to develop new skills, receive training, and access jobs for people from Thames Gateway boroughs, particularly those who experience deprivation, and by deliberately using local suppliers, in both construction and operational phases.
- Diversifying the economy, creating a leisure and tourism sector where it does not presently exist, and increasing the level of business and industrial activity both directly and indirectly.
- Radically improving the viability of public transport improvements, notably C2C services, DLR extension to Dagenham Dock, and East London Transit to Rainham; and funding an improved station interchange, bus services, and local accessibility, enhancing development prospects over a wide area.
- Contributing to the funding of priority community facilities, particularly for deprived communities in this part of Thames Gateway, including access to the entertainment centre facilities for community events and activities.

1.9 In Rainham itself, the land value uplift and business confidence engendered by the regional casino and entertainment centre will lead to the redevelopment of Ferry Lane and nearby sites such as Beam Reach for good quality employment uses. These sites are ideally located to become a cluster to supply goods and services to the cultural and entertainment industries. The regional casino and entertainment centre can stimulate this cluster and focus its procurement on those businesses that operate in the cluster. The cluster will be further supported by the capabilities of the Centre for Engineering and Manufacturing Excellence and the University of East London.

1.10 There will be good physical connections between the regional casino and entertainment centre and the centre of Rainham, where the historic core of the village includes the Grade 1 listed church, and Rainham Hall and its grounds (National Trust). This will assist the development of tourism within the village, creating new commercial opportunities for local shops and businesses whose trade has fallen sharply in recent years. This will complement plans for more intensive residential development within Rainham as part of the regeneration strategy.

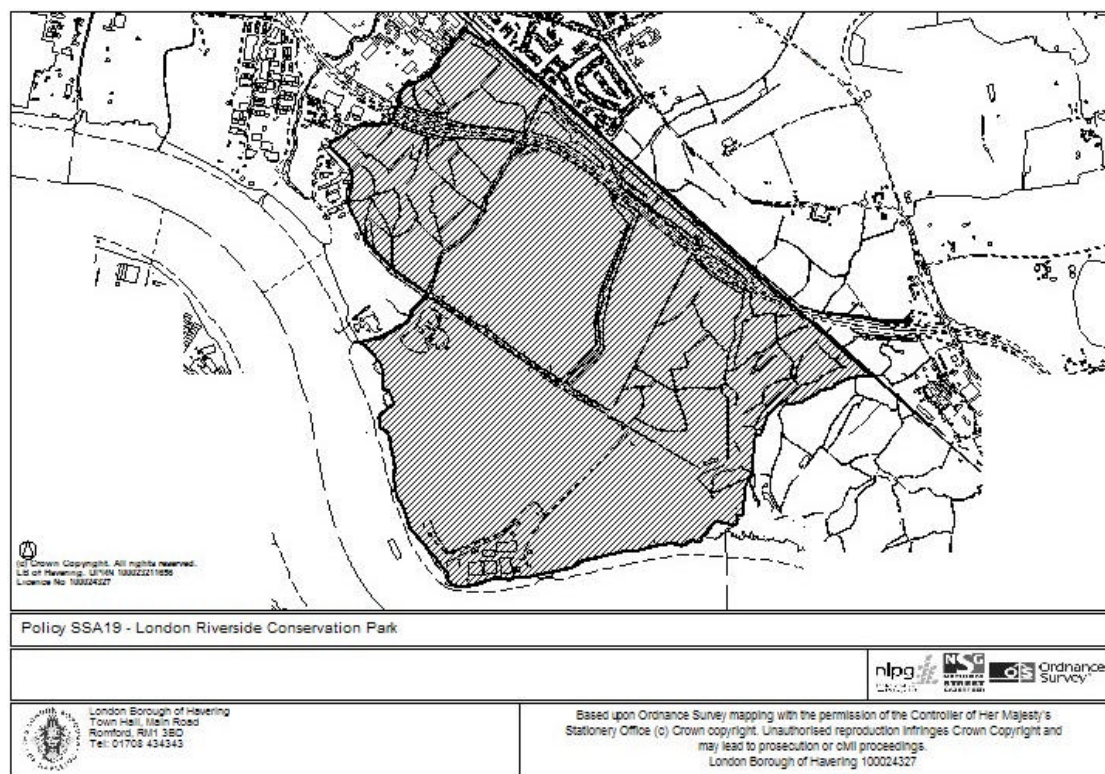
1.11 The policy sets out a range of planning obligations which any applicant will be expected to enter into. This range of obligations aims to

maximize the regeneration impact of the centre and ensure the development:

- Is self-sufficient in meeting all the needs of visitors, including overnight accommodation fully accessible by public transport, walking and cycling as well as by car
- Is of maximum benefit to the local community
- Maximizes the mutually beneficial synergies with the Conservation Park

## **POLICY SSA 19– LONDON RIVERSIDE CONSERVATION PARK**

<b>Map ref</b>	TQ525800
<b>Location &amp; Site Description</b>	The site is bounded by Ferry Lane, the River Thames, the London Tilbury Southend Line and Havering's boundary with Thurrock.
<b>Area (ha)</b>	515.0
<b>PTAL</b>	0
<b>Implementation</b>	<p>Existing landfill permission expires 2018 and site required to be restored by then. Havering Council has option on land and trust established for ongoing maintenance.</p> <p>SSSI owned by Havering Council/RSPB Remaining site is a few large private ownerships.</p> <p>ODPM, TTGDC and LTGDC funding has already been secured for trails, boardwalks and outdoor classroom facilities and Environment and Education Centre and further funding will be sought to implement, manage and maintain the park and associated infrastructure. Contributions will be sought from Thames Gateway Regional Casino and Entertainment Centre.</p>
<b>Applicable Core Strategy policies</b>	DC9, DC19, DC20, DC22, DC33, DC34, DC35, DC40, DC46, DC49, DC50, DC51, DC52, DC53. DC55. DC56. DC58, DC61, DC62, DC63, DC72
<b>The London Thames Gateway Development Corporation, the Royal Society for the Protection of Birds, Havering and Thurrock Councils, the Thurrock Riverside Thames Gateway Development Corporation and other agencies will work in partnership to deliver the London Riverside Conservation Park 'Wildspace for a World City'.</b>	



## REASONED JUSTIFICATION

- 1.1 The London Riverside Conservation Park covers the Inner Thames Marshes SSSI (Rainham, Wennington and Aveley Marshes) which are north of Coldharbour Lane and the waste and employment uses including the Cleanaway Landfill Site which are south. Most of the SSSI is managed by the RSPB as a nature reserve. The western part of the marshes is owned by the Council and is designated as a local nature reserve. The Cleanaway Landfill permission expires in 2018 and will be progressively restored as public open space. Havering Council has the option to acquire the site, and a trust has been established to cover ongoing maintenance costs.
- 1.2 The Coldharbour Lane area has been de-designated and has been included within the London Riverside Conservation Park Site Specific Allocation. The Coldharbour Lane Commercial Area as previously designated in the Havering UDP comprises a landfill site which has a temporary permission up to 2018, ancillary waste uses including an Autoclave, material recycling facility and composting facility which also have temporary permissions tied to 2018 as residues from these are landfilled. There are also a number of other employment uses in the far south east of the site on the former Freighmaster Estate site. The medium to long term aspirations of the Council and the Development Corporation is to incorporate the former Coldharbour Lane Commercial Area into the London Riverside Conservation Park in its entirety, once

As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 79

the landfill tipping is complete and the land restored. At this date the other waste uses will also cease and the Council considers that use of this site for waste and other employment uses beyond this date would generate a level of heavy vehicle movements along Coldharbour Lane which would seriously conflict with and jeopardize the enjoyment of and plans for the London Riverside Conservation Park. The employment uses will be acceptable in their current location in the short term, however the Council and its partners aim to incorporate them into the London Riverside Conservation Park in the medium to long term.

- 1.3 The London Plan identifies that Rainham Marshes and the adjacent riverside open space should be planned to provide a 'regionally important environmental and leisure asset for East London'. The Government's 'Greening the Gateway' strategy similarly identifies this as an 'internationally significant conservation park', forming a key part of its aim of creating a network of green open space to improve the quality of life for all those who live and work in the Thames Gateway.
- 1.4 The London Riverside Conservation Park is projected to attract several hundreds of thousands of visitors annually, whilst protecting and conserving the nationally important marshland habitat and creating new areas of accessible greenspace in line with Green Grid principles which will provide a setting for major cultural events and include a range of exciting outdoor visitor attractions.
- 1.5 The park will include a visitor centre situated between the nature reserve and the restored riverside parkland, on the edge of the landfill site overlooking the Wennington Marshes and a 'green tram' is proposed to run from both Rainham and Purfleet to this centre, enabling people to access the whole site in a sustainable way. The multi-use Rainham to Purfleet Path is being developed to provide excellent accessibility for pedestrians and cyclists.



## **POLICY SSA 20 – INGREBOURNE CREEK**

As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 80

<b>Map ref</b>	TQ520824
<b>Location &amp; Site Description</b>	Land between Bridge Road and Ingrebourne Creek.
<b>Area (ha)</b>	0.5
<b>PTAL</b>	1-2
<b>Implementation</b>	LTGDC funding will be sought to implement the improvements.
<b>Applicable Core Strategy policies</b>	DC22, DC26 DC33, DC34, DC35, DC49, DC52, DC55, DC56, DC57, DC58, DC59, DC61, DC62, DC63, DC68, DC72
<p><b>The historic quay on the river Ingrebourne will be restored as a public recreation facility with an emphasis on water based recreation and community uses. The Ingrebourne Valley Greenway will be expanded along the Creek towards the river Thames to provide recreation opportunities.</b></p> <p><b>The site will be protected as open space and may include a café to meet the demand created by the new water based recreation facility.</b></p>	



As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 81

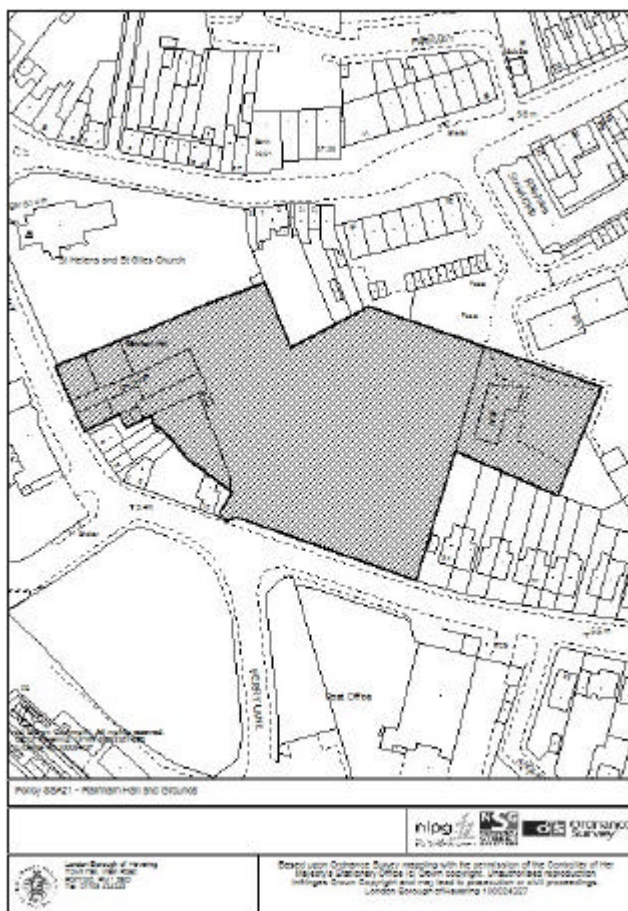
**REASONED JUSTIFICATION**

- 1.1 The Ingrebourne Creek is located between Dover's Corner and Bridge Road. It presents an exciting opportunity to integrate visually and functionally the proposed new communities in Rainham West with Rainham Village and establish a sense of place.
- 1.2 This policy seeks to enhance the historic quay and provide facilities for the existing and new communities in the area and supports the provision of a café ancillary to the site's recreational use. The proposed redevelopment of the Tesco's site will also help define this important gateway into Rainham Village and Rainham West.

# Heritage

## POLICY SSA 21 – RAINHAM HALL AND GROUNDS

<b>Map ref</b>	TQ521821
<b>Location &amp; Site Description</b>	Land to north of the Broadway and Wennington Road, to the south of 2-26 Upminster Road South and to the south east of St Helens and St Giles Church including Rainham Hall and grounds.
<b>Area (ha)</b>	1.20
<b>PTAL</b>	3
<b>Implementation</b>	The site is owned by National Trust. Havering Council and LTGDC will work with the National Trust and English Heritage in implementing this policy.
<b>Applicable Core Strategy policies</b>	DC2, DC3, DC7, DC34, DC35, DC40, DC49, DC59, DC61, DC62, DC63, DC67, DC68, DC72
<b>Rainham Hall and grounds will be preserved or enhanced and their recreational value increased to ensure they continue to make a positive contribution to the character and vitality of Rainham Village.</b>	



As well as satisfying the Site Specific Policy applications for planning permission will also be judged against the relevant Core and Development Control Policies of the Core Strategy and related Supplementary Planning Documents. 83

## **REASONED JUSTIFICATION**

- 1.1 This site is centred on Rainham Hall and gardens within the Rainham Village Conservation Area and includes:
- Rainham Hall and gardens – Grade II\* listed
  - The Lodge – Grade II\* listed
- 1.2 The focus of this allocation therefore is on ensuring that the setting of these listed buildings and their contribution to the character of the Conservation Area is preserved or enhanced, in recognition not only of their heritage value but also their importance in creating a sense of place and civic pride and as a reference point for the redevelopment opportunities within the rest of the village. National Trust who own the property are working in partnership with the Council and the LTGDC to increase access to Rainham Hall and grounds and its recreational value.
- 1.3 The site includes a small site behind St Helen's Court which has scope for residential development. Even though this site is not within the Conservation Area any development here must be extremely sensitive to the area's heritage value and therefore must be accompanied by a heritage statement which evidences how the proposal preserves or enhances the character of the conservation area and setting of listed buildings.

**Appendix 4 Soundness tests**

1. The soundness tests fall into three categories: Procedural Tests; Conformity Tests and Coherence, Consistency and Effectiveness Tests. The tests are as follows and a commentary is provided to illustrate how the Submission Core Strategy and Site Specific Allocations Development Plan Documents comply with these.

2.	Procedural tests	
i.	“has been prepared in accordance with the local development scheme”;	The Core Strategy and Site Specific Allocation Documents are identified in the Council’s approved Local Development Scheme and have been prepared in line with the programme set out in it.
ii.	“has been prepared in compliance with the Statement of Community Involvement (SCI), or with the minimum requirements set out in the regulations where no SCI exists”;	Havering’s Statement of Community Involvement (SCI) was adopted in February 2006. Up until this point the Council has complied with the minimum requirements set out in the Town and Country Planning Regulations 2004 and also the draft SCI. No consultation has taken place since this date.
iii.	“the plan and its policies have been subjected to sustainability appraisal”.	A sustainability appraisal has been carried out of the options, and preferred options and significant changes to these.
3.	Conformity tests	
iv.	“it is a spatial plan which is consistent with national planning policy and in general conformity with the RSS for the region or the spatial development strategy if in London, and it has properly had regard to any other relevant plans, policies and strategies relating to the area or to adjoining areas”;	The submission documents take into account the need to be consistent with national planning policy and the requirement to be in general conformity with the London Plan and to also have regard to other relevant plans, policies and strategies relating to the area or to adjoining areas. This is clearly set out in section 4 of the Submission Core Strategy.
v.	“it has had regard to the authority’s community strategy”.	The vision and objectives of the Core Strategy are consistent with Havering Strategic Partnership’s updated Community Strategy. This is shown in

	section 6 of the Core Strategy and section 4 of the Site Allocations document.
4. Coherence, consistency and effectiveness	
vi. “the strategies / policies / allocations in the plan are coherent and consistent within and between development plan documents prepared by the authority and by neighbouring authorities, where cross boundary issues are relevant”;	The Council is producing a Joint Waste Development Plan Document with the London Borough’s of Barking and Dagenham, Redbridge and Newham to set out planning policy for future waste management needs. The Submission Core Strategy includes a vision and strategic framework for the preparation of the more detailed plans as required by the soundness tests.
vii. “the strategies / policies / allocations represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are founded on a robust and credible evidence base”;	The evidence base was clearly presented as the context for the options consultation.
viii. “there are clear mechanisms for implementation and monitoring”;	Section 10 of the Core Strategy covers the clear mechanisms for implementation and monitoring and each Core Policy includes details on monitoring. Each Site Allocation policy includes a dedicated Implementation section. The Site Specific Allocations report explains that the progress of each site allocation will be covered in the AMR.
ix “it is reasonably flexible to enable it to deal with changing circumstances”.	The Council intends through its Annual Monitoring Report to monitor the effectiveness of policies and make changes as necessary where with regard to the evidence base the policy is not performing as intended.



# **MINUTES OF A CABINET MEETING**

## **Havering Town Hall, Romford**

### **Wednesday, 20 September 2006 (7.30pm – 7.55pm)**

#### **Present:**

Councillor Michael White, Leader of the Council, in the Chair

#### **Cabinet Member responsibility:**

Councillor Steven Kelly (Deputy Leader)	Sustainable Communities
Councillor Michael Armstrong	Housing & Regeneration
Councillor Peter Gardner	Public Safety
Councillor Andrew Curtin	Public Realm
Councillor Barry Tebbutt	StreetCare & Parking
Councillor Eric Munday	Performance & Corporate
Councillor Roger Ramsey	Resources
Councillor Geoffrey Starns	Children's Services

Councillors June Alexander, Clarence Barrett, Gillian Ford, Linda Hawthorn, Andrew Mann, Ray Morgon and Barbara Reith were present

A representative of the press and two members of the public were also present.

An apology was received for the absence of Councillor Paul Rochford

All decisions were agreed with no vote against.

On behalf of the Chairman, those present were reminded of the action to be taken in the event of an emergency.

#### **26 MINUTES**

The minutes of the meeting held on 26 July 2006 were approved as a correct record and signed by the Chairman.

#### **27 THE FUTURE PROVISION OF RESIDENTIAL AND DAY CARE SERVICES IN HAVERING AND THE FUTURE OF MARKS LODGE RESIDENTIAL CARE HOME**

*Councillor Steven Kelly, Cabinet Member for Sustainable Communities, introduced the report.*

In July 2005, Cabinet had confirmed the preferred way forward in relation to Elmhurst Lodge and Winifred Whittingham House and made a number of associated decisions. Reference had been made to the limitations of Marks Lodge and Hampden Lodge in relation to their layout and design and the impact that had on both the quality of resident care and the safety of staff carrying out care tasks. The report also evidenced difficulties in remodelling both buildings to meet the requirements set out in the National Minimum Standards.

Cabinet had accordingly agreed that Hampden Lodge and Marks Lodge were to close as and when all residents had transferred from them to suitable alternative provision and all staffing issues had been resolved in accordance with the Council's existing policies. The vacant surplus sites would then be sold.

In December 2004, Cabinet had determined that, should there be any transfer of residents, the Havering risk management would be utilised for the transfer of permanent vulnerable/frail residents.

Cabinet was now advised of developments that had occurred specifically at Marks Lodge, both in relation to the movement of residents and in the management of the home. Difficulties had been experienced in providing good quality care within the home, having regard to the staff changes which have occurred.

The report now submitted concluded that the time was now appropriate for closure of the Home to be considered.

**Reasons for the decision:**

The report gave details of the movement of residents as they have transferred in a planned way to other care establishments in accordance with the Council's agreed protocol. No permanent residents now remained within the home and therefore the proposal to close it could be implemented.

**Alternative options considered:**

Attempts could be made to continue to operate the care home as a specialist respite resource only but there would be operational difficulties in a facility having only temporary residents.

It was further noted that Hampden Lodge would remain open for the time being, providing up a mixture of permanent and respite care accommodation, and was currently full to capacity. No new permanent residents would be admitted.

**Cabinet:**

- 1 Confirmed the closure of Marks Lodge now that suitable alternative placements have been found for the remaining permanent residents in accordance with the Council's agreed protocol on risk management to be implemented once all care placements have come to an end.**
- 2 Agreed that arrangements be made for the premises to be secured and declared surplus to the Council's requirements.**
- 3 Authorised the Property Strategy Manager, in consultation with the Assistant Chief Executive (Legal and Democratic Services), to deal with all preliminary matters and thereafter to arrange the disposal of the property.**
- 4 Noted that arrangements would be made for all service users currently receiving respite care at Marks Lodge to continue to receive respite care, as and when**

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**assessed as necessary, in alternative settings prior to the closure of Marks Lodge.**

## 28 **FRAMEWORK FOR COMMISSIONING FOR CHILDREN'S SERVICES**

*Councillor Geoffrey Starns, Cabinet Member for Children's Services, introduced the report.*

The report described the DfES approach to commissioning for children's services and within that context offered a Havering approach consistent with that of the DfES, building on current practices within the borough.

Cabinet noted that the Havering Children's Trust Board had considered the proposal and commended it to Cabinet, and has made recommendations as to priority action within it, which Cabinet was now invited to confirm.

### **Reasons for the decision:**

It is Council policy that service reviews should take place and alternative service delivery options be explored continually. Children's Trusts are expected to engage in a process of commissioning. These are the same thing using different language so the proposal confirms current Council policy, applied in the special case of Havering's Children's Trust arrangements.

### **Other options considered:**

The proposed approach to commissioning has been the result of considering a number of good practice examples and producing a Havering model, so the alternatives considered have been of differing approaches to commissioning.

### **Cabinet:**

1. **Agreed the approach to commissioning for children's services set out in the Commissioning Principles and Framework document appended to the report.**
2. **Noted the progress in creating structural change to support the development and delivery of commissioning.**
3. **Noted the priorities of the Director of Children's Services for commissioning as supported by the Trust Board.**

## 29 **PILOT PROGRAMME FOR TELECARE PREVENTATIVE TECHNOLOGY**

*Councillor Steven Kelly, Cabinet Member for Sustainable Communities, introduced the report.*

The report outlined the Government's expectations of local authorities in receipt of Preventative Technology Grant in 2006/07 and 2007/08, notably that authorities' Adult Social Services, Housing and Supporting People services would work together with health, police, fire and voluntary sector services to use technological interventions to promote independent living, in particular among older people with conditions that would otherwise mean them being unable to remain living in their own home.

A two year pilot programme to maximise the number of Havering residents benefiting from technological interventions was proposed, which would meet a broad range of stakeholders'

strategic priorities and culminate in the definition of a Havering Telecare Service that could be implemented from 2008/09.

**Reasons for the decision:**

The proposed pilot programme represents a systematic and effective means of piloting the introduction of telecare in Havering. The approach and priorities have been developed by the multi-agency Steering Group and it is the Group's firm belief that the proposed approach will provide a robust means of developing a comprehensive Havering Telecare Service for implementation from 2008/09.

**Other options considered:**

The Steering Group considered a wide range of approaches. The proposed approach is considered by all constituent agencies to provide the best opportunity for maximising the number of service users benefiting from the pilot while at the same time meeting the different agencies' strategic objectives.

In response to a suggestion that monitoring reports be provided to the Adult Services and Housing & Regeneration Overview & Scrutiny Committees, Cabinet noted that the format of Member-level monitoring had yet to be agreed. Cabinet also noted that revenue cost of the scheme would be met from government grant and the capital costs by the Primary Care Trust.

**Cabinet:**

- 1 Endorsed a cross-service approach to developing Telecare Preventative Technology built on joint working between the Adult Social Care, Housing and Supporting People services, and multi-agency working with Havering PCT and other statutory and voluntary services.**
- 2 Approved the use of the borough's Preventative Technology Grant as outlined in this report to provide the proposed cross-service pilot programme for Telecare Preventative Technology.**
- 3 Approved the creation of a Telecare Project Manager post to be employed on a fixed term contract until March 2008, the making of an appointment to that post and the employment of temporary administrative staff to work on the project from time-to-time to assist with the set-up and/or running of the pilots, subject to the posts being entirely funded from the Preventative Technology Grant and liaison with the Cabinet Members for Sustainable Communities and for Resources.**

**30 ADOPTION OF INTERIM PLANNING GUIDANCE ON SUSTAINABLE DESIGN AND CONSTRUCTION**

*Councillor Michael Armstrong, Cabinet Member for Housing & Regeneration, introduced the report.*

In December 2005, Cabinet had agreed to consult on draft Interim Planning Guidance on Sustainable Design and Construction to replace the Council's existing guidance, approved in 2002.

The report submitted gave details of the outcome of the consultation process and brought forward revised and updated Interim Planning Guidance for adoption.

**Reasons for the decision:**

The Council's current Sustainability Issues Interim Planning Guidance needs review pending adoption of the new Local Development Framework (LDF), due to a wide range of recent government guidance and the London Plan and its associated Supplementary Planning Guidance.

**Other options considered:**

The alternative is to rely on the present Interim Planning Guidance until the adoption of an updated and expanded guidance in the form of a Supplementary Planning Document (SPD) as part of the LDF in 2007/08. However, this is unacceptable as it would leave a local policy vacuum leading to an inconsistency between national and regional planning policies and those operating in Havering. The preparation of the SPD linked to the LDF, in due course, will include a sustainability appraisal of the SPD itself. This is not necessary for the revised IPG under the current legislation because work on this started before the operational date became effective. Undertaking such an appraisal when the SPD is prepared will enhance the 'weight' given to it. Staff consider that the absence of an appraisal for the revised IPG is not a major issue and, on balance, the priority should be to ensure that this new guidance is in place promptly so that it can be used in assessing proposals and providing guidance to prospective developers.

**Cabinet agreed that the revised Interim Planning Guidance on Sustainable Design and Construction (appended to these minutes) be adopted for development control purposes.**

**31 ROMFORD CAR PARKS VARIABLE MESSAGE SIGNING (VMS) PROJECT – AWARD OF CONTRACT**

*Councillor Michael Armstrong, Cabinet Member for Housing & Regeneration, introduced the report.*

Proposals were submitted for the provision of an electronic Variable Message Signing System (VMS) for Romford Town centre. The aim was to direct effectively motorists looking for a parking space to 'empty' spaces in car parks linked to the scheme, reducing congestion on the Ring Road and the key approaches to the town and also encouraging motorists to use those car parks which were underused.

Following Cabinet Member approval in autumn 2005, a procurement exercise had been carried out to select an external supplier to supply and install the VMS system for Romford.

The procurement process has identified Siemens plc as a suitable provider and approval was now sought to appoint Siemens plc as the supplier for the Romford VMS project. The total capital cost to deliver the project would be £591,000, and the annual revenue cost will be £34,000.

**Reasons for the decision:**

The approval of the tender evaluation panel's recommendation for award of contract will allow the winning bidder to be notified and the scheme to continue to be moved forward towards the contract commencement date.

**Other options considered:**

Alternative options for scheme delivery (such as a reduced scheme with fewer Variable Message Signs), may marginally reduce the overall costs to deliver the project. However, to remove elements/signs (potentially up to 4/5 in order to provide a significant level of cost reduction) from the scheme in an effort to reduce costs may be regarded as prejudicing the design 'integrity' of the overall scheme such that it would not be feasible to proceed with the scheme at all.

**Cabinet agreed:**

- 1 That the contract to supply and install the Romford VMS system be awarded to Siemens plc and that they be formally commissioned to deliver the VMS system in accordance with the Invitation to Tender.**
- 2 The funding arrangements set out in the report.**

## Interim Planning Guidance Sustainable Design and Construction

### Summary

1. This Interim Planning Guidance (IPG) sets out the London Borough of Havering's approach to securing sustainable design and construction on major developments.

### Introduction

- 2 This IPG replaces the 2002 IPG on Sustainability Issues pending the adoption of Havering's Local Development Framework in late 2007. This IPG reflects the guidance in the Government's Planning Policy Statements (listed below) and relevant policies in the Greater London Authority's (GLA) London Plan. It also reflects the priorities expressed in the updated Havering Strategic Partnership's Community Strategy and the UK Sustainable Development Strategy '*Securing the Future*'

Havering's original IPG on sustainability issues was adopted in 2002 but became out of date with regard to national and regional planning guidance. Section 38(6) of the Planning and Compulsory Purchase Act 2004 sets out that the statutory development plan will continue to be the starting point in the consideration of planning applications for the development or use of land. Havering's current statutory development plan consists of the Council's Unitary Development Plan (1993) and the Greater London Authority's London Plan (2004). The Council's sustainable design and construction policy will be updated through the preparation of Havering's Local Development Framework but this is not due to be adopted until late 2007. In the interim, the Council has revised and updated its former guidance, and adopted this Interim Planning Guidance pending the adoption of the Local Development Framework and related Supplementary Planning Document. This IPG document is non-statutory guidance which will be taken into account as a material consideration in considering planning proposals.

As IPG this document cannot set new policy. However after revision following consultation the IPG can be taken into account as a further material consideration.

### Policy Context

#### National and regional strategies and initiatives.

#### UK Sustainable Development Strategy- *Securing the Future*

6. The UK Sustainable Development Strategy sets out the policies, resources and partnerships the Government intends to put in place to improve quality of life without compromising the quality of life of future generations. The four agreed priorities in the

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strategy are- sustainable consumption and production, climate change, natural resource protection and sustainable communities.

## **Local strategies and initiatives**

### **Havering Strategic Partnership-Community Strategy 2005**

7. A key priority of the Havering Community Strategy is to contribute to tackling climate change and promote sustainable energy. The strategy includes a number of related key actions these include, work with regeneration partners to achieve high standards of sustainable construction and sustainable energy use in London Riverside developments and ensure that planning policies within the Havering Local Development Framework require high standards of sustainable construction and sustainable energy use. This guidance is a key tool in delivering this.

## **National and regional planning policy**

### **Planning Policy Statement 1 (PPS1) : Delivering Sustainable Development**

8. PPS1 sets out the overarching planning policies on the delivery of sustainable development through the planning system. PPS1 states that local planning authorities should ensure that development plans contribute to global sustainability by addressing the causes and potential impacts of climate change through policies which reduce energy use, reduce emissions (for example, by encouraging patterns of development which reduce the need to travel by private car, or reduce the impact of moving freight), promote the development of renewable energy resources, and take climate change impacts into account in the location and design of development.

### **Planning Policy Statement 9 (PPS9) : Biodiversity and Geological Conservation**

9. PPS9 acknowledges that biodiversity can contribute to rural renewal and urban renaissance by enhancing biodiversity in green spaces and among developments so that they are used by wildlife and valued by people, recognising that healthy functional ecosystems can contribute to a better quality of life and to people's sense of well being.
10. The statement goes on to say that development proposals provide many opportunities for building-in beneficial biodiversity or geological features as part of good design. When considering proposals, it says that local planning authorities should maximise such opportunities in and around developments, using planning obligations where appropriate.

### **Planning Policy Guidance 25 (PPG25) : Development and Flood Risk**

11. This PPG explains how flood risk should be considered at all stages of the planning and development process in order to reduce future damage to property and loss of life through the application of the sequential test. Sustainable drainage systems can help reduce the

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environmental impact of development. Their use provides a significant contribution towards more sustainable development. It is due to be replaced by PPS25 later 2006.

**Planning Policy Statement 22 (PPS22) : Renewable Energy**

- 12 This PPS states that “Local planning authorities may include policies in local development documents that require a percentage of the energy to be used in new residential, commercial or industrial developments to come from on-site renewable energy developments”. A Parliamentary Statement was issued on 6<sup>th</sup> June 2006 in which the government minister stated that “ It is essential that all planning authorities follow this example and take account fully of the positive approach to renewables set out in PPS22 at the earliest opportunity in their plan-making. In particular the Government expect all planning authorities to include policies in their development plans that require a percentage of the energy in new developments to come from on-site renewables, where it is viable. Such policies have a vital role to play in reducing emissions, through the use of carbon-neutral energy sources. Local authorities who are now updating their plans through new local development frameworks should take the opportunity to update their policies in this area. The Government's forthcoming draft planning policy statement on climate change will be an opportunity to consider further how the planning process more generally can help combat climate change by extending the contribution of renewables from both on-site and off-site sources.” The Parliamentary Statement can be used as a material consideration should local authorities receive challenges to developing such policies

**The London Plan (2004)**

13. The London Plan contains a number of policies which deal with the issues covered by this IPG and, these policies are reproduced below in full. Additionally, the London Plan is supported by recent Supplementary Planning Guidance (May 2006). This IPG provides guidance on the way that the measures identified in these policies and can be implemented to meet the London Plan objectives.

***Policy 4A.9 Providing for renewable energy***

The Mayor will and boroughs should require major developments to show how the development would generate a proportion of the site's electricity or heat needs from renewables, wherever feasible

***Policy 4A.8 Energy assessment***

The Mayor will and boroughs should request an assessment of the energy demand of proposed major developments, which should also demonstrate the steps taken to apply the Mayor's energy hierarchy.

The Mayor will expect all strategic referrals of commercial and residential schemes to demonstrate that the proposed heating and cooling systems have been selected in accordance with the following order of preference: passive design; solar water heating; combined heat and power, for heating and cooling, preferably fuelled by renewables; community heating for heating and cooling; heat pumps; gas condensing boilers and gas central heating.

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Boroughs should apply the same criteria to major developments.
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*Policy 4B.6 Sustainable design and construction*

The Mayor will, and boroughs should, ensure future developments meet the highest standards of sustainable design and construction and reflect this principle in UDP policies. These will include measures to:

- re-use land and buildings
- conserve energy, materials, water and other resources
- ensure designs make the most of natural systems both within and around the building
- reduce the impacts of noise, pollution, flooding and micro-climatic effects
- ensure developments are comfortable and secure for users
- conserve and enhance the natural environment, particularly in relation to biodiversity
- promote sustainable waste behaviour in new and existing developments, including support for local integrated recycling schemes, CHP schemes and other treatment options (subject to Policy 4A.1 and 4A.2).

Applications for strategic developments should include a statement showing how sustainability principles will be met in terms of demolition, construction and long-term management.

Boroughs should ensure that, where appropriate, the same sustainability principles are used to assess planning applications.

*Policy 4C.8 Sustainable drainage*

The Mayor will, and boroughs should, seek to ensure that surface water run-off is managed as close to its source as possible. The use of sustainable urban drainage systems should be promoted for development unless there are practical reasons for not doing so. Such reasons may include the local ground conditions or density of development. In such cases, the developer should seek to manage as much run-off as possible on site and explore sustainable methods of managing the remainder as close as possible to the site.

*Policy 4A.7 Energy efficiency and renewable energy*

The Mayor will and boroughs should support the Mayor's Energy Strategy and its objectives of reducing carbon dioxide emissions, improving energy efficiency and increasing the proportion of energy used generated from renewable sources by:

- improving the integration of land use and transport policy and reducing the need to travel by car
- requiring the inclusion of energy efficient and renewable energy technology and design, including passive solar design, natural ventilation, borehole cooling, combined heat and power, community heating, photovoltaics, solar water heating, wind, fuel cells, biomass fuelled electricity and heat generating plant in new developments wherever feasible
- facilitating and encouraging the use of all forms of renewable energy where appropriate including giving consideration to the impact of new development on existing renewable energy schemes
- minimising light lost to the sky, particularly from street lights.

The Mayor will work with strategic partners to ensure that the spatial, transport and design policies of this plan support the Mayor's Energy Strategy and contribute towards achieving CO<sub>2</sub> and renewable energy targets.

**Cabinet, 20 September 2006**

Supplementary Planning Guidance to the London Plan on Sustainable Design and Construction

14. This Supplementary Planning Guidance (SPG) was published in May 2006 has been produced to provide additional information to support the implementation of the Mayor's London Plan (especially Policy 4B.6) in regard to sustainable design and construction and is a further material consideration.

## INTERIM PLANNING GUIDANCE ON SUSTAINABLE DESIGN AND CONSTRUCTION

### **This Interim Planning Guidance applies to Major Developments only**

This Interim Planning Guidance applies to Major Developments only. For the purposes of this guidance **major developments are defined** as :

- **dwelling**s: where 10 or more dwellings are to be constructed (or if number not given, area is more than 0.5 hectares)
- **all other uses**: where the floor space will be 1000 sq metres or more (or site is 1 hectare or more). The area of the site is that directly involved in some aspect of the development. Floor space is defined as the sum of floor area within the building measured externally to the external wall faces at each level. Basement car parks, rooftop plant rooms, caretakers' flats etc. should be included in the floor space figure.

- A) **THE COUNCIL WILL REQUIRE APPLICANTS FOR MAJOR DEVELOPMENTS TO PRODUCE DOCUMENTATION FROM THE BUILDING RESEARCH ESTABLISHMENT, OR EQUIVALENT, TO CONFIRM THAT THE DEVELOPMENT IS PREDICTED TO ACHIEVE A RATING UNDER THE ECO-HOMES OR BREEAM SCHEMES (OR EQUIVALENT METHODOLOGY) OF AT LEAST 'VERY GOOD'.**
- B) **THE COUNCIL WILL REQUIRE THE USE OF SUSTAINABLE URBAN DRAINAGE SYSTEMS FOR DEVELOPMENTS UNLESS THERE ARE PRACTICAL REASONS FOR NOT DOING SO (FOR EXAMPLE, LOCAL GROUND CONDITIONS). IN ALL CASES, THE DEVELOPER MUST DEMONSTRATE HOW THE SYSTEM WILL BE MAINTAINED IN A SUSTAINABLE MANNER**
- C) **THE COUNCIL WILL REQUIRE THAT, FOR MAJOR DEVELOPMENTS, CARBON EMISSIONS FROM THE TOTAL ASSESSED ENERGY NEEDS (HEAT AND POWER) OF THE DEVELOPMENT SHOULD BE REDUCED BY AT LEAST 10% BY THE ON SITE GENERATION OF RENEWABLE ENERGY, WHERE FEASIBLE.**
- D) **THE COUNCIL WILL REQUIRE MAJOR DEVELOPMENTS TO BE DESIGNED AND CONSTRUCTED TO TAKE FULLY INTO ACCOUNT THE FOLLOWING SUSTAINABILITY ISSUES:**
  - 1. **WHERE DEVELOPMENT IS ALLOWED IN AREAS OF FLOOD RISK IT SHOULD BE DESIGNED TO BE FLOOD RESISTANT.**
  - 2. **DEVELOPMENT SHOULD NOT SUBSTANTIALLY INCREASE, AND IF POSSIBLE REDUCE, NOISE, AIR, LIGHT OR WATER POLLUTION, RUNOFF OR ADVERSE MICROCLIMATIC EFFECTS.**

3. DEVELOPMENTS SHOULD SEEK TO REDUCE IMPACTS FROM CONSTRUCTION AND DEMOLITION WHERE FEASIBLE (INCLUDING POLLUTION, WASTE, NOISE AND BIODIVERSITY).
  4. WITH REGARD TO THE THRESHOLDS IN ANNEX D OF PPG13 FOR A SIGNIFICANT TRIP GENERATING DEVELOPMENT THE PROVISION AND IMPLEMENTATION OF A TRAVEL PLAN SHOULD BE AGREED WITH THE COUNCIL.
  5. ACCESS AND CIRCULATION ARRANGEMENTS OF THE DEVELOPMENT SHOULD BE DESIGNED AND LOCATED TO TAKE ACCOUNT OF THE NEEDS OF CYCLISTS AND PEDESTRIANS.
  6. SAFE, SECURE AND SHELTERED CYCLE PARKING AND CHANGING AND SHOWER FACILITIES SHOULD BE PROVIDED APPROPRIATE TO THE NATURE, SCALE AND LOCATION OF THE DEVELOPMENT.
  7. IN NEW RESIDENTIAL DEVELOPMENTS ADEQUATE PROVISION SHOULD BE MADE FOR WASTE RECYCLING. OTHER USES SUCH AS LARGE RETAIL AND EMPLOYMENT DEVELOPMENTS SHOULD PROVIDE SPACE AND FACILITIES FOR WASTE SEPARATION AND COLLECTION.
- E) THE COUNCIL WILL REQUIRE THAT ALL PROPOSALS FOR MAJOR DEVELOPMENTS DEMONSTRATE CONSIDERATION OF THESE ISSUES. THE MEASURES AND SAFEGUARDS INCORPORATED (OR THEIR ABSENCE) WILL BE TAKEN INTO CONSIDERATION IN DETERMINING ALL SUCH APPLICATIONS.

**Cabinet, 20 September 2006**