



Havering

LONDON BOROUGH

**CABINET MEETING
19th JULY 2017**

**HAVERING LOCAL PLAN
CONSULTATION STATEMENT 2017**

Local Plan Consultation Statement

Appendix 6

Local Plan Regulation 18 Representations
and Council Responses

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1. Introduction

- 1.1 Initial (regulation 18) consultation on the Local Plan ran for a six week period from Monday 9th February until Monday 23rd March. The consultation material included a questionnaire comprising of 17 questions on different planning policy issues. 73 responses were received and are set out in this document. This includes 4 responses received outside of the formal consultation period.
- 1.2 Section 2 provides a list all of the individuals and organisations that responded to the consultation. Each consultation response has been allocated a 'response number'. This is for clarity and identification purposes.
- 1.3 Section 3 sets out the responses received to each of the 17 questions within the consultation questionnaire. The responses are included in full and as submitted, they have not been summarised or edited.
- 1.4 Where respondents did not identify which questions or 'policy topics' they were referring to, their responses have been included under question 17 (additional comments).
- 1.5 Section 4 includes supplementary (largely non text based) information that was submitted as part of the responses such as maps and diagrams.
- 1.6 Section 5 provides a summary table of who responded to each question.

2. Respondents

Response No.	Respondent
REG18.1	AECOM
REG18.2	Adams Family (Bidwells)
REG18.3	Anonymous
REG18.4	Barratt London (GVA)
REG18.5	Basildon Borough Council
REG18.6	Bill England
REG18.7	Brentwood Borough Council
REG18.8	Brett Aggregates Limited (MJCA)
REG18.9	C.Cole
REG18.10	Chelmsford City Council
REG18.11	Clive Narrainen
REG18.12	D. Campbell
REG18.13	D.K. Symes Associates
REG18.14	Edward Gittins & Associates
REG18.15	Ellandi (Savills)
REG18.16	English Heritage
REG18.17	Epping Forest District Council
REG18.18	Essex County Council
REG18.19	Gidea Park and District Civic Society
REG18.20	Greater London Authority
REG18.21	Havering College of Further and Higher Education (Iceni Projects)
REG18.22	Havering Friends of the Earth (Ian Pirie)
REG18.23	Heine Planning (Alison Heine)
REG18.24	Higgins Homes (Nathaniel Lichfield and Partners)
REG18.25	Highways Agency
REG18.26	Ian Weatherley
REG18.27	Janet Davy
REG18.28	Joe Coogan
REG18.29	John Peterson
REG18.30	LB Barking and Dagenham
REG18.31	LB Bexley
REG18.32	Lee Clements
REG18.33	Leslie Budge (Mr) (Andrew Martin Planning)
REG18.34	Margaret Whippy
REG18.35	Mobile Operators Association (Mono Consultants)
REG18.36	Moody Homes and Mr John Wakeling (Bidwells)
REG18.37	Mr Barrie Stone and Miss Eleanor Stone
REG18.38	Mr T Clemence (DHA Planning)
REG18.39	Mrs S J Ellis (Bidwells)
REG18.40	Ms M Blackman

REG18.41	National Grid Property (Carter Jones)
REG18.42	Natural England
REG18.43	Omega After Alpha Ltd (Bidwells)
REG18.44	Persimmon Homes Essex
REG18.45	Planning Potential
REG18.46	Planning Potential Rep 2.
REG18.47	R. Watt and Partners (Phillips Planning Services)
REG18.48	R.A.Montague
REG18.49	Rainham & South Hornchurch Green Belt Action Group (R.A. Montague)
REG18.50	Rainham Preservation Society (Coral Jeffery)
REG18.51	Ray Whitehouse
REG18.52	Romford Civic Society (Andrew Curtin)
REG18.53	Romford Golf Club (Joe Coogan)
REG18.54	Romford YMCA
REG18.55	Rowley Cardrome Ltd (Montague Evans)
REG18.56	S.D. Olney
REG18.57	Sheila Clements
REG18.58	Sport England
REG18.59	Stephen Saggars
REG18.60	Thames Water Utilities Ltd (Savills)
REG18.61	The Crown Estate (Amec Foster Wheeler)
REG18.62	Theatres Trust
REG18.63	Thomas Bates and Son Ltd. (Andrew Martin Planning)
REG18.64	Thurrock Council
REG18.65	Transport for London
REG18.66	Trinity Hall (Bidwells)
REG18.67	Veolia ES (UK) Ltd
REG18.68	Woodland Trust
REG18.69	Wyevale Garden Centres (Gregory Gray Associates)
POST18.1	Trevor Lawrence
POST18.2	Phillip Bowen
POST18.3	Nigel Teelan
POST18.4	V. Rajan and Associates

3. Responses

Question 1: Do you agree that these are the right priorities for the new Havering Local Plan

Response Number	Respondent Name	Response to Q1	Council's response
REG18.1	AECOM	We would have welcomed more detailed priorities for the Plan to deliver, rather than a series of topics that are generalist.	Noted. The Proposed Submission version of the Local Plan provides further details on the local priorities issues being tackled.
REG18.2	Adams Family (Bidwells)	<p>We agree, but in seeking to protect and enhance the Borough's Green Belt the Council should take account of the other priorities identified and whether or not the current Green Belt boundary is still suitable. In doing so, the Council should consider changes in the character of land within and adjoining the Green Belt and whether or not all of the land currently designated still performs a valuable function.</p> <p>Land which no longer serves the purposes of the Green Belt could be better utilised to address other Local Plan priorities, including the need for new housing. The Council will clearly need to take account of significant pressure for new development during the Plan period and balance competing demands for a limited land resource. At the same time, many areas of Green Belt offer opportunities for enhanced access and recreation, including the land owned by my client, and limited new development may enable its beneficial use.</p>	The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.
REG18.3	Anonymous	No	Noted.
REG18.8	Brett Aggregates Limited (MJCA)	We agree that the priorities raised are suitable as they cover a range of economic, social and environmental issues and acknowledge and include the need to address mineral extraction.	Support noted.
REG18.9	C. Cole	Yes, need to include police and safety.	Support noted. The Proposed Submission version of the Local Plan includes policies referencing police and safety.
REG18.11	Clive Narrainen	Yes	Support noted.

Response Number	Respondent Name	Response to Q1	Council's response
REG18.12	D. Campbell	The culture and leisure of the community should reflect existing residents lifestyle, liaising directly with residents will help understand what is best for the town. To update local buildings to simply make buildings a bit contemporary but not change the Rainham look too drastically.	The Proposed Submission version of the Local Plan supports a diverse leisure and culture offer to meet the needs of residents. The Design policies in the Proposed Submission version of the Local Plan seek to ensure that positive local character is enhanced.
REG18.13	D.K.Symes Associates	Yes	Support noted.
REG18.14	Edward Gittins & Associates	Yes. However, rather than the adopted 'topic' approach – with segregated analysis, proposals and policies for each subject area (Housing, Employment etc.), we would wish to see a more holistic approach based on a clear Vision Statement.	Support noted. The Proposed Submission version of the Local Plan contains a vision, detailed spatial strategy as well as specific subject areas.
REG18.19	Gidea Park and District Civic Society	We agree with the priorities as listed although not necessarily in that order. It is of great importance that Havering's Heritage Assets are protected and wherever appropriate enhances, because the result, if neglected would be an everlasting loss to the Borough	Support noted. The order of the priorities does not reflect an order of significance. The Proposed Submission version of the Local Plan recognises the importance of Havering's historic environment and contains a policy which seeks to preserve and enhance heritage assets.
REG18.20	Greater London Authority	GLA officers agree that the key priorities set out for the new Local Plan are appropriate as they broadly reflect the strategic priorities contained with the relevant chapters of the London Plan.	Support noted.
REG18.21	Havering College of Further and Higher Education (Iceni Projects)	HCFHE are very supportive of the Borough's strategic priorities and objectives as defined on page 3 of the Local Plan questionnaire. In particular HCFHE is pleased to see 'Social Infrastructure' as a key priority for the Borough over the next 15 years. However, HCFHE note that 'social infrastructure' as defined in this document refers to 'schools' and 'health provision', and as such, HCFHE encourages LBH to broaden the scope of social infrastructure to include higher and further education provision. Creating a greater focus on higher and further skills and education will also	Support noted The definition of social infrastructure in the Proposed Submission version of the Local Plan is expanded to include Higher and further education. Provision is also considered as part of the Infrastructure Delivery Plan. The Proposed

Response Number	Respondent Name	Response to Q1	Council's response
		help to contribute to LBH's key priority surrounding business growth and economic activity.	Submission version of the Local Plan contains a policy requiring major developers to provide a proportion of apprenticeships positions as part of their Employment and Skills Plan.
REG18.23	Heine Planning	NO. These do not read as priorities, merely general headings common to most plans. Disappointing to not find clearer idea as to what the actual priorities are in Havering as opposed to general themes. There would appear to be nothing of particular importance in Havering to be addressed in which case why bother with a local plan –NPPF covers all these issues. What is missing is any consideration of Gypsy Traveller issues which is a priority for this district	Noted. The Proposed Submission version of the Local Plan sets out the priorities for the Borough as opposed to general themes. With regards to Gypsy and Traveller issues, the Council has undertaken a Gypsy and Traveller Accommodation Assessment and seeks to address identified needs within the Proposed Submission version of the Local Plan.
REG18.24	Higgins Homes (Nathaniel Lichfield & Partners)	Yes	Support noted
REG18.26	Ian Weatherley	Yes – but health provision should be a priority	Support noted. The need for new Health provision is addressed within the Infrastructure Delivery Plan and the Proposed Submission version of the Local Plan contains policies to deliver the identified need.
REG18.27	Janet Davy	Yes	Support noted.
REG18.28	Joe Coogan	I agree with the general principles, though it is important to consider every site on its own merits, in particular what it contributes currently and what it could contribute.	Support noted.
REG18.29	John Peterson	In general yes	Support noted.
REG18.30	London Borough of	The priorities should say something about who new houses are for. A commitment to new housing provision alone doesn't give any indication	A Strategic Housing Market Assessment (SHMA) has been prepared jointly with the

Response Number	Respondent Name	Response to Q1	Council's response
	Barking and Dagenham	about how meeting local needs will be balanced with meeting wider London housing needs.	London Boroughs of Barking and Dagenham and Redbridge as part of the evidence base for the Proposed Submission version of the Local Plan in line with the requirements of the National Planning Policy Framework. The SHMA assesses housing need within the Outer North East London Housing Market Area (HMA). The Proposed Submission version of the Local Plan contains policies on housing mix and tenure to ensure need is met.
REG18.31	London Borough of Bexley (officer response)	This is an officer level response to the consultation. The London Borough of Bexley is in general agreement that the broad strategic priorities identified in this consultation document are right for the London Borough of Havering and accord with national guidance (NPPF, paragraph 156).	Support noted.
REG18.32	Lee Clements	Yes	Support noted.
REG18.34	Margaret Whippy	I agree that better employment in the area will mean also that the community will have more to spend locally.	Support noted.
REG18.36	Moody Homes and Mr John Wakeling (Bidwells)	<p>We agree, but in seeking to protect and enhance the Borough's Green Belt the Council should take account of the other priorities identified and whether or not the current Green Belt boundary is still suitable. In doing so, the Council should consider changes in the character of land within and adjoining the Green Belt and whether or not all of the land currently designated still performs a valuable function.</p> <p>Land which no longer serves the purposes of the Green Belt could be better utilised to address other Local Plan priorities, including the need for new housing. The Council will clearly need to take account of significant pressure for new development during the Plan period and balance competing demands for a limited land resource.</p>	The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.

Response Number	Respondent Name	Response to Q1	Council's response
REG18.37	Mr Barrie Stone and Miss Eleanor Stone	Agree	Support noted.
REG18.39	Mrs S J Ellis (Bidwells)	<p>We agree, but in seeking to protect and enhance the Borough's Green Belt the Council should take account of the other priorities identified and whether or not the current Green Belt boundary is still suitable. In doing so, the Council should consider changes in the character of land within and adjoining the Green Belt and whether or not all of the land currently designated still performs a valuable function.</p> <p>Land which no longer serves the purposes of the Green Belt could be better utilised to address other Local Plan priorities, including the need for new housing. The Council will clearly need to take account of significant pressure for new development during the Plan period and balance competing demands for a limited land resource. At the same time, many areas of Green Belt offer opportunities for enhanced access and recreation, including the land owned by my client, and limited new development may enable its beneficial use.</p>	The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.
REG18.40	Ms M Blackman	Yes, however requires good financial management	Support noted.
REG18.41	National Grid Property (Carter Jones)	It is agreed that new housing provision is one of the most important priorities for Havering. The Local Plan must support the delivery of new homes, particularly on brownfield sites located in close proximity to town centres.	Support noted. A Strategic Housing Market Assessment (SHMA) has been prepared jointly with the London Boroughs of Barking and Dagenham and Redbridge as part of the evidence base for the Proposed Submission version of the Local Plan in line with the requirements of the National Planning Policy Framework. The SHMA assesses housing need within the Outer North East London Housing Market Area (HMA). The Proposed Submission version of the Local Plan contains policies on

Response Number	Respondent Name	Response to Q1	Council's response
			housing mix and tenure to ensure need is met. The Proposed Submission Local Plan supports the use of brownfield land and housing development in well-connected locations such as town centres.
REG18.43	Omega After Alpha Ltd (Bidwells)	<p>We agree, but in seeking to protect and enhance the Borough's Green Belt the Council should take account of the other priorities identified and whether or not the current Green Belt boundary is still suitable. In doing so, the Council should consider changes in the character of land within and adjoining the Green Belt and whether or not all of the land currently designated still performs a valuable function.</p> <p>Land which no longer serves the purposes of the Green Belt could be better utilised to address other Local Plan priorities, including the need for new housing. The Council will clearly need to take account of significant pressure for new development during the Plan period and balance competing demands for a limited land resource.</p>	The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.
REG18.44	Persimmon Homes Essex	Persimmon Homes agrees that the document identifies the right priorities that will need to be considered as part of the new Havering Local Plan.	Support noted.
REG18.47	R. Watt and Partners (Phillips Planning Services)	Yes-Priorities highlighted appear to reflect likely key spatial planning issues.	Support noted.
REG18.48	R.A.Montague	Yes, but the starting point for a Local Plan should not be an externally imposed housing target. To be a local plan the borough should decide for itself what the pace of development is going to be and whether the quality of life for existing residents will be impacted by an unsustainably high indefinite growth.	Support noted. A Strategic Housing Market Assessment (SHMA) has been prepared jointly with the London Boroughs of Barking and Dagenham and Redbridge as part of the evidence base for the Proposed Submission version of the Local Plan in

Response Number	Respondent Name	Response to Q1	Council's response
		For a system to be sustainable there should be an element equilibrium not externally imposed targets which take no account of resources or impact on the existing local community	<p>line with the requirements of the National Planning Policy Framework. The SHMA assesses housing need within the Outer North East London Housing Market Area (HMA). The Proposed Submission version of the Local Plan contains policies on housing mix and tenure to ensure need is met.</p> <p>The 2016 SHMA indicates that Havering's full Objectively Assessed Need (OAN) is for 30,052 new homes over the period 2011 – 2033 or 1,366 per annum. The London Plan sets the borough a target of delivering a minimum of 11,700 new homes over a ten year the period 2015 - 2025 with a proviso that the annual average (1,170) should be rolled forward for the remainder of the Local Plan period. The trajectory and quality of the built environment has been addressed in the Proposed Submission version of the Local Plan Housing and Social Infrastructure Delivery policies. This is informed by the Strategic Housing Market Assessment to assess housing need. The aim of the Proposed Submission version of the Local Plan is to balance a range of issues and ensure sustainable development.</p>
REG18.50	Rainham Preservation Society	Yes, but make mineral extraction and waste management number 1 in view of the abuse Rainham has, and is, suffered for centuries.	Support noted. The Council is committed to minimising the production of waste, maximising the re-use and recycling of waste and minimising the use of landfill. Havering seeks to address waste

Response Number	Respondent Name	Response to Q1	Council's response
			<p>management by using the waste hierarchy principle, which requires waste prevention and reuse measures be employed as much as possible. Where waste cannot be prevented or reused, only then should recycling/composting be considered, with disposal seen as the final option for dealing with waste. Policy 36 in the Proposed Submission version of the Local Plan underpins such commitments, with developments now required to provide suitable facilities for the management, storage and sorting of waste for recycling as a matter of course.</p> <p>The Council's current waste strategy is outlined within the adopted Joint Waste Development Plan Document for East London prepared by the four east London Waste authority boroughs, signed with the London Boroughs of Barking and Dagenham, Havering, Newham and Redbridge. Within the Joint Waste Plan is Policy 'W2' which seeks to safeguard the capacity of existing waste management.</p>
REG18.51	Ray Whitehouse	Yes, but I consider some of them to be sort of do your job anyway priorities. In fact if you delete environment, waste, green belt and design then you end up with the ones which need extra effort to do well.	Support noted. The Proposed Submission version of the Local Plan provides further detail on how these priorities will be delivered
REG18.52	Romford Civic Society	Yes	Support noted.
REG18.53	Romford Golf Club (Joe Coogan)	I agree with the general principles, though it is important to consider every site on its own merits, in particular what it contributes currently and what it could contribute.	Support noted.

Response Number	Respondent Name	Response to Q1	Council's response
REG18.54	Romford YMCA	Romford YMCA agrees with the key priorities which have been set out by the Council.	Support noted.
REG18.56	S.D. Olney	Yes, the local plan covers nearly all the aspects of the development of Havering.	Support noted.
REG18.57	Sheila Clements	Havering Council have always ignored resident's wishes on where priorities lie and it will not be any different this time.	Noted.
REG18.58	Sport England	Sport England is encouraged to note the inclusion of cultural and leisure facilities in the list of key priorities. The terms 'leisure' should include all sports facilities, including built facilities and playing fields.	Support noted. The term 'leisure' incorporates playing pitches, sport courts and leisure centres etc. including ancillary provision such as changing rooms.
REG18.60	Thames Water Utilities Ltd (Savills)	<p>In commenting on planning consultations Thames Water's key considerations are to ensure that adequate water supply and waste water infrastructure is in place to serve new development, as well as to provide for existing customers.</p> <p>Water and sewerage undertakers have limited powers under the Water Industry Act to prevent connection ahead of infrastructure upgrades and therefore rely heavily on the planning system to ensure that where necessary essential infrastructure is provided ahead of development, either through phasing or the use of planning conditions. Thames Water therefore relies heavily on the planning process to ensure that water and waste water infrastructure is in place to serve new development.</p> <p>If sufficient infrastructure is not provided, capacity problems possibly leading to sewer flooding for example, could occur in some cases if we have not been given the opportunity, either through advance planning or through conditional planning approvals, to provide additional capacity prior to development.</p> <p>Thames Water would therefore recommend the inclusion of the following as a priority for the new Havering Local Plan: "The provision of utilities infrastructure, including water and waste water services, to support development and growth."</p>	Ensuring that sufficient and adequate infrastructure facilities to support the quantum of proposed development are a key priority of the Proposed Submission version of the Local Plan. The need for utilities infrastructure including water and waste water infrastructure is assessed as part of the Infrastructure Delivery Plan (IDP). The Proposed Submission version of the Local Plan includes policies to manage water and waste water and these were drafted in co-operation with Thames Water.

Response Number	Respondent Name	Response to Q1	Council's response
REG18.62	Theatres Trust	The Theatres Trust agrees with culture being included as a key priority. Sustainable communities rely on a range of accessible cultural and community facilities to ensure their social and cultural wellbeing. The function of community facilities is to provide services and access to venues for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community. Your cultural facilities include theatres, cinema, concert halls, music venues (usually in pubs), museums, libraries, public art installations and art galleries.	Support noted. The Proposed Submission version of the Local Plan sets out a positive strategy for the protection and diversification of the cultural offer in the borough.
REG18.66	Trinity Hall (Bidwells)	<p>We agree, but in seeking to protect and enhance the Borough's Green Belt the Council should take account of the other priorities identified and whether or not the current Green Belt boundary is still suitable. In doing so, the Council should consider changes in the character of land within and adjoining the Green Belt and whether or not all of the land currently designated still performs a valuable function.</p> <p>Land which no longer serves the purposes of the Green Belt could be better utilised to address other Local Plan priorities, including the need for new housing. The Council will clearly need to take account of significant pressure for new development during the Plan period and balance competing demands for a limited land resource.</p>	The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no land will be released from Green Belt and the Green Belt boundary will be retained as it is currently.
REG18.67	Veolia ES (UK) Ltd	The strategic priorities would appear to be appropriate.	Support noted
REG18.68	Woodland Trust	Yes	Support noted.
REG18.69	Wyevale Garden Centres (Gregory Gray)	Yes	Support noted

Response Number	Respondent Name	Response to Q1	Council's response
	Associates)		
POST18.4	V. Rajan and Associates	Yes. Internal security should be added.	Support noted. Safety and security are covered in the Local Plan via the Urban design policy.

Question 2: How should the Local Plan support business growth, training opportunities and a strong local economy?

Response Number	Respondent Name	Response to Q2	Council's response
REG18.1	AECOM	<p>Havering's emerging Local Plan should consider its role and geography as a London borough. The strong inter-reliance between the boroughs, and beyond into Essex, offers the opportunity for co-operation and joint working on employment and business growth. Collaboration between the boroughs, the GLA and the London Enterprise Panel has the potential to drive growth nationally and locally, capitalising on London's global city status and strong existing business base.</p> <p>A new garden village would present an opportunity to deliver a mixed use community that includes new businesses and jobs and a range of housing types and tenure. This should be considered as a growth option by Havering in the draft Plan, with new employment opportunities necessary to attract and support the residents of a new settlement.</p>	<p>The Proposed Submission version of the Local Plan considers Havering's role and geography as a London Borough given that it is being drafted in joint working and strong co-operation between Havering Council and other adjoining boroughs, including beyond into Essex to ensure that the potential to drive growth nationally and locally, capitalising on London's global city status and strong business base is enhanced and maximised for the benefit of Havering. Consequently, the Rainham and Beam Park Area is identified as a major growth and regeneration area where an exciting new residential neighbourhood incorporating mixed use community that includes retail and commercial units linked to the delivery of a new railway station on the existing C2C line at Beam Park is being established within the London Riverside Opportunity Area, as it has the capacity to provide significant number of new homes and jobs. Whilst seizing this opportunity to deliver this new garden community the Proposed Submission version of the Local Plan strategy also seeks to assure the protection of employment and Green Belt areas and direct the delivery of the majority of new</p>

Response Number	Respondent Name	Response to Q2	Council's response
			homes to appropriate sustainable locations within the borough.
REG18.2	Adams Family (Bidwells)	<p>The Local Plan should ensure that sufficient land is allocated and protected for employment purposes throughout the Plan period, and not unnecessarily lost to residential development, particularly if such land is previously developed.</p> <p>There is an urgent need for a more up-to-date and robust evidence base on the suitability and demand for existing employment land within the Borough to inform forthcoming decisions on the allocation of previously developed land for new uses. We understand that a new Employment Land Review (ELR) is to be published in due course, as an update to the Council's current ELR which is now nearly ten years old (published 2006).</p> <p>The Council should use the new ELR to support continuing growth of the local economy. Under no circumstances should decisions be made on the loss of existing employment sites in favour of other uses without first having thoroughly assessed demand and suitability via published evidence that can be subject to independent scrutiny. Sites may have remained vacant during the economic downturn, but demand for employment land is likely to continue to improve during the Plan period. It would be short-sighted to support the loss of vacant sites simply to avoid the need to undertake a review of other potential sources of land supply, including a review of the Green Belt.</p>	The Havering Employment Land Review (ELR) 2015 provides a robust evidence to support the protection of the Borough's Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs). The Proposed Submission version of the Local Plan includes policies to protect employment land on the basis of the ELR.
REG18.3	Anonymous	They shouldn't support business growth. They should support apprenticeships though.	Noted. The Proposed Submission version of the Local Plan supports apprenticeship by requiring major developers to provide a proportion of apprenticeships positions as part of their Employment and Skills Plan.
REG18.8	Brett Aggregates Limited (MJCA)	The new Local Plan should recognise that a diverse and wide range of businesses are required to support sustainable growth and a strong local economy including the mineral production industry sector which provides essential materials for the construction and maintenance of buildings and	The Council is committed to minimising the production of waste, maximising the re-use and recycling of waste and minimising the use of landfill. Havering seeks to address

Response Number	Respondent Name	Response to Q2	Council's response
		<p>infrastructure in the Borough and Greater London. The NPPF confirms (Para 142) that minerals are essential to support sustainable economic growth and the quality of life. The Plan should recognise that the principles of sustainable development enshrined in the NPPF encourage the minimisation of the use of raw materials including aggregates and encourage the use of recovered materials such as secondary aggregates from wastes. The Plan should support the development of secondary aggregate production facilities, particularly as ancillary development at quarry sites. Quarries which also provide suitable land for ancillary activities create a number of direct and indirect employment opportunities as well as demand for local goods and services.</p>	<p>waste management by using the waste hierarchy principle, which requires waste prevention and reuse measures be employed as much as possible. Where waste cannot be prevented or reused, only then should recycling/composting be considered, with disposal seen as the final option for dealing with waste. Policy 36 in the Proposed Submission version of the the Local Plan underpins such commitments, with developments now required to provide suitable facilities for the management, storage and sorting of waste for recycling as a matter of course.</p> <p>The Council's current waste strategy is outlined within the adopted Joint Waste Development Plan Document for East London prepared by the four east London Waste authority boroughs, signed with the London Boroughs of Barking and Dagenham, Havering, Newham and Redbridge. Within the Joint Waste Plan is Policy 'W2' which seeks to safeguard the capacity of existing waste management.</p> <p>The Joint Waste Plan sets out a strategy for sustainable waste management until 2021 and outlines preferred sites for waste management facilities (including disposal) moving forward. This will ensure that residential amenity is preserved.</p>
REG18.9	C. Cole	– Support fewer business properties of very high quality	The Proposed Submission version of the

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		<ul style="list-style-type: none"> - Introduce high quality residential property in town centre. - See if councils can have apprentices. 	Local Plan supports the delivery of high quality business properties in line with the recommendations of Employment Land Review (2015) to meet the needs of a variety of businesses. The delivery of high quality residential units in Romford and other town centres is also supported and promoted. The Proposed Submission version of the Local Plan contains a policy requiring major developers to provide a proportion of apprenticeships positions as part of their Employment and Skills Plan.
REG18.12	D. Campbell	To build relevant resources to help unemployment in the area. To not overcrowd the area with large buildings which can over populate or overcrowd a lovely calm area	The Proposed Submission version of the Local Plan contains policies encouraging business growth and skills and training opportunities to help unemployment in the area. The Proposed Submission version of the Local Plan strategy supports the delivery of well-designed development that responds to local context and seeks to balancing development with protecting valued assets such as open spaces, green spaces, heritage assets, etc.
REG18.14	Edward Gittins & Associates	We consider that new housing and employments should, wherever possible, be planned together. This can be achieved through mixed use developments, by geographically close but separate residential/employment allocations, or by focusing residential development along the principal transportation/public transport routes to encourage ease of access to the main employment hubs.	The Proposed Submission version of the Local Plan supports new housing and employments being planned together, wherever possible and located in the most well connected areas of the borough as exemplified in the Romford Strategic Development Area, where mixed use developments incorporating residential on upper floors is promoted in town centres.
REG18.18	Essex	LB Havering may wish to consider relevant links to the Economic Plan for	Havering's Proposed Submission version

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	County Council	<p>Essex 2014 (EpfE) and 'A127 Corridor for Growth' an Economic Plan 2014, for context and to identify cross boundary projects, issues and opportunities which require co-investment.</p> <p>The EpfE identifies a range of projects which require co-investment with Government to secure sustainable growth across the county. ECC is therefore looking to Ministers to shape national policy and practice to help enable local government and in so doing, secure an economic return for the UK as a whole. The following projects are identified within close proximity to the LB Havering to bring forward transport investments and are funded through Network Rail, Highways Agency and other national budgets,</p> <ul style="list-style-type: none"> – the Lower Thames Crossing; – a comprehensive solution to the lack of capacity at Junction 30/31 of the M25; – corridor improvements on the A12, A120 and M11 (including Junction 7a); – works at Brentwood and Shenfield Stations to support Crossrail development; – capacity improvements and integrated transport initiatives on the Great Eastern Mainline (GEML); – Exploring a smart card travel system for rail and bus travel in Essex, Southend and Thurrock; and – Upgrading stretches of the A13 in neighbouring Thurrock and in Essex to serve the new deep sea container port at London Gateway. (EpfE paragraph(s) 57) <p>The EpfE expands on the proposals for the heart of Essex corridor for growth (A12 and Great Eastern mainline – GEML) which runs through the centre of Essex, linking London to the Haven ports, and onwards to Norfolk and Suffolk. The A12 and the GEML rail services link the key urban centres of Brentwood, Chelmsford, Colchester and Maldon. The corridor has strong links with the London labour market, supporting substantial commuter flows</p>	<p>of the Local Plan has been prepared in the context of growth and development within London and the wider south east region in recognition of the fact that the entire region is experiencing significant development pressure to meet the needs of its growing population. In light of this, the London Borough of Havering have been working co-operatively with neighbouring boroughs in Essex and London to identify and address cross boundary projects, issues and opportunities to ensure that its Proposed Submission version of the Local Plan has regards to these matters and is aligned to the emerging local plans of the surrounding respective Essex authorities.</p> <p>The Duty to Co-operate Statement sets out in greater detail how this co-operation has been taking place to address emerging strategic issues.</p> <p>Havering recognises the concerns Essex CC have regarding capacity constraints along the A127 and welcomed being invited in July 2016 to attend discussions with Essex and neighbouring authorities on the work that has been progressed to date on A127 Corridor for Growth project.</p> <p>There is an acknowledgement on all sides that tackling capacity constraints along the A127 needs to be tackled at a sub-regional</p>

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		<p>to and from the capital. These links will grow and strengthen as Crossrail is completed, when new services will stop at Brentwood and Shenfield, both of which will benefit from planned improvement works to facilitate these new services.</p> <p>Additional investment in rail and road infrastructure is essential for unlocking the full economic potential of the corridor, and a package of investment is proposed to address bottlenecks on the A12 to support growth. An A13/A127 South Essex Growth Corridor has been identified. Within this growth corridor are the districts of Basildon, Castle Point and Rochford which, along with the unitary authorities of Thurrock and Southend, form South Essex. Along this corridor the A13 links the key port infrastructure of Tilbury and London Gateway with London, while the A127 corridor connects the capital to the manufacturing hub of Basildon, and to Rochford, Southend, London Southend Airport and surrounding employment areas.</p> <p>Development is constrained by the limited capacity of the strategic road network, particularly J30/31 of the M25 and the dual carriageway stretch of the A13. The A127 also carries a volume of traffic comparable to a motorway in other parts of the country and has significant capacity issues which need to be addressed, particularly around Basildon, London Southend Airport and the Southend central area. Southend Borough Council and ECC have developed a joint "A127 Corridor for Growth" economic plan to identify, plan and coordinate investment decisions and manage the asset. Furthermore, the potential impact of the additional Thames River crossing would be significant on transport routes in this corridor, with one of the two short-listed options being to connect the M2 in Kent with the A13 and the M25 between junctions 29 and 30. (EpfE paragraph(s) 133-136)</p> <p>These projects cover South Essex, the Heart of Essex and West Essex, and the emerging Havering Local Plan should have regard these projects and to the emerging local plans in the respective Essex authorities, especially</p>	<p>level and most recent discussions between the authorities have focussed on looking at the A127 from Gallows Corner in LB Havering out to Southend. Havering is committed to continue to work with Essex and other neighbouring authorities on addressing such issues.</p>

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		Brentwood Borough Council and Epping Forest District Council.	
REG18.21	Havering College of Further and Higher Education (Iceni Projects)	As noted within the Local Plan questionnaire, key to promoting business growth and economic activity is to ensure that local people have access to training and skills development to enable them to take advantage of, and compete for future jobs in Havering. HCFHE clearly takes a leading role on this issue as the College's existing facilities provide a number of opportunities to develop training and skills in a number of academic and vocational areas. As such, HCFHE believe that as the Local Plan evolves, it should include details on how LBH intends to support local educational institutions within the Borough. The existing college facilities seek to ensure that both young adults and those returning to education gain the necessary skills which enable them to access jobs within Havering. This process helps to strengthen the local economy.	The Proposed Submission version of the Local Plan contains a policy requiring major developers to provide a proportion of apprenticeships positions as part of their Employment and Skills Plan. The Proposed Submission version of the Local Plan sets out a positive strategy supporting education, employment and skills development opportunities for local residents. Outlining details of how LBH intends to support local educational institutions within the borough is outside the scope of the Proposed Submission version of the Local Plan. However, the needs for HCFHE are addressed through the Infrastructure Delivery Plan.
REG18.26	Ian Weatherley	By utilising and developing the existing open spaces for housing and local shopping (not shopping centres) for local communities. Health care and schools must feature more in these plans as our community gets older.	Planning is about meeting the varied needs of the community (the need for homes, business, local shops and shopping centres, access to good quality open spaces, recreation and leisure facilities, community use with the necessary infrastructure supporting these) and balancing these with competing demands for their land uses. The Proposed Submission version of the Local Plan

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			recognises that health care and schools should be planned for as the society gets older by incorporating policies which support proposals that provide opportunities for healthy lifestyles and for the extension and expansion of schools. Access to good quality open space and sports facilities also play important roles in promoting healthy lifestyles as well.
REG18.27	Janet Davy	Keep rates low for local small businesses. Hornchurch has lost many specialist shops (Art, Sewing, Lighting, Curtains etc.) in recent years, presumably because they are not economically viable. The money could be recouped by increasing rates for larger business e.g. Boots and McDonalds.	The Proposed Submission version of the Local Plan supports small businesses through protecting employment sites/floor space for employment use, and through encouraging the development of affordable and flexible business spaces. Keeping rates low for small businesses is outside the scope of the Proposed Submission version of the Local Plan.
REG18.28	Joe Coogan	The Council needs to leverage the opportunities the local plan presents to unlock underused land than can contribute to the economy and improve the lives of local people. The council, especially in times of austerity, should ensure underused land that is currently contributing little or no value be considered for development. There are examples of waste land that is classified as 'Green belt' next to major roads that in reality offer no recreational value and no support to the economy.	The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.

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REG18.29	John Peterson	Reduce parking controls outside shops	The introduction or reduction of parking controls is outside the scope of the Proposed Submission version of the Local Plan.
REG18.31	London Borough of Bexley (officer response)	In addition to supporting business growth and training opportunities within the Borough, it is suggested that the Local Plan should also support opportunities for 'larger than local' economic growth which could be realised as a result of increased transport connectivity to boroughs south of the River Thames. A potential river crossing, currently under consideration by Transport for London, between the London Boroughs of Havering and Bexley would directly connect businesses and economically active workforces on either side of the river – bringing with it the prospect of joint strategic business growth, training opportunities and the strengthening of local economies across two London Plan Opportunity Areas. This increased connectivity would support and encourage innovation and investment to the area.	<p>Havering supports the principle of additional river crossings which improves connectivity and provides opportunities for sustainable economic growth.</p> <p>Havering continues to lobby and work collaboratively with Transport for London, the Highway Agency, the DfT and other relevant agencies for better transport services within the borough and between the borough and other adjoining local authorities.</p> <p>The Proposed Submission version of the Local Plan contains policies for improving connectivity within the borough as well as cross borough connectivity.</p>
REG18.32	Lee Clements	By: ensuring transport infrastructure is in place to allow workers and customers to easily reach businesses; Cutting traffic congestion; Supporting small and medium sized businesses more; Investing in education and training for all ages.	The Council continues to lobby relevant bodies including DfT, TfL, and other partners to ensure transport infrastructure is in place to improve connectivity within the borough to allow workers and customers to easily reach businesses. The Proposed Submission version of the Local Plan contains policies for tackling traffic congestion 'hotspots'; and encouraging active travel and modal shift away from the car including through the School Travel Planning process, and business

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			<p>engagement activities.</p> <p>The Proposed Submission version of the Local Plan also contains policies for supporting small and medium sized businesses by requiring major developments to provide flexible affordable workspaces, and for supporting development proposals delivering education facilities in accordance with the Council's agreed Commissioning Plan for Education Provision and the Schools Expansion Programme, and for requiring a proportion of apprenticeships positions from major developers as part of their Employment and Skills Plan to support training opportunities.</p>
REG18.34	Margaret Whippy	<p>More training and skills in relevant job opportunities are essential to fit in a modern workforce for the future. Apprenticeships and more practical skills training in recent years have been decidedly lacking and encouraging employers to come to the area and contribute to this will go some way to fill the gaps in employment in areas such as engineering and/or manufacturing left out while encouraging graduates to go into IT.</p>	<p>The Proposed Submission version of the Local Plan contains a policy requiring major developers to provide a proportion of apprenticeships positions as part of their Employment and Skills Plan.</p>
REG18.36	Moody Homes and Mr John Wakeling (Bidwells)	<p>The Local Plan should ensure that sufficient land is allocated and protected for employment purposes throughout the Plan period, and not unnecessarily lost to residential development, particularly if such land is previously developed.</p> <p>There is an urgent need for a more up-to-date and robust evidence base on the suitability and demand for existing employment land within the Borough</p>	<p>The Havering Employment Land Review (ELR) 2015 provides a robust evidence to support the protection of the Borough's Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs). The Proposed Submission version of the Local Plan includes policies to protect</p>

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		<p>to inform forthcoming decisions on the allocation of previously developed land for new uses. We understand that a new Employment Land Review (ELR) is to be published in due course, as an update to the Council's current ELR which is now nearly ten years old (published 2006).</p> <p>The Council should use the new ELR to support continuing growth of the local economy. Under no circumstances should decisions be made on the loss of existing employment sites in favour of other uses without first having thoroughly assessed demand and suitability via published evidence that can be subject to independent scrutiny. Sites may have remained vacant during the economic downturn, but demand for employment land is likely to continue to improve during the Plan period. It would be short-sighted to support the loss of vacant sites simply to avoid the need to undertake a review of other potential sources of land supply, including a review of the Green Belt.</p>	employment land on the basis of the ELR.
REG18.37	Mr Barrie Stone and Miss Eleanor Stone	New and support infrastructure required.	Noted. The Council has assessed infrastructure needs for the Proposed Submission version of the Local Plan and set these out in the Infrastructure Delivery Plan.
REG18.39	Mrs S J Ellis (Bidwells)	<p>The Local Plan should ensure that sufficient land is allocated and protected for employment purposes throughout the Plan period, and not unnecessarily lost to residential development, particularly if such land is previously developed.</p> <p>There is an urgent need for a more up-to-date and robust evidence base on the suitability and demand for existing employment land within the Borough to inform forthcoming decisions on the allocation of previously developed land for new uses. We understand that a new Employment Land Review (ELR) is to be published in due course, as an update to the Council's current ELR which is now nearly ten years old (published 2006).</p> <p>The Council should use the new ELR to support continuing growth of the</p>	The Havering Employment Land Review (ELR) 2015 provides a robust evidence to support the protection of the Borough's Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs). The Proposed Submission version of the Local Plan includes policies to protect employment land on the basis of the ELR.

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		<p>local economy. Under no circumstances should decisions be made on the loss of existing employment sites in favour of other uses without first having thoroughly assessed demand and suitability via published evidence that can be subject to independent scrutiny. Sites may have remained vacant during the economic downturn, but demand for employment land is likely to continue to improve during the Plan period. It would be short-sighted to support the loss of vacant sites simply to avoid the need to undertake a review of other potential sources of land supply, including a review of the Green Belt.</p>	
REG18.40	Ms M Blackman	<p>Encourage greater development and business enterprise and aspiration. Create a strategy to develop specific use zones where complementary business can develop. More focus at primary/junior school age children having basic skills in place to enable them to be educated with skills potential employers actually need. Need young people to have the potential to work or earn for themselves across a long life span. This requires skills that have adaptability</p>	<p>The Proposed Submission version of the Local Plan protects suitable employment land to encourage greater business development and employment creation. The Proposed Submission version of the Local Plan contains a policy requiring major developers to provide a proportion of apprenticeships positions as part of their Employment and Skills Plan.</p> <p>Equipping primary/junior school age children to have basic skills potential employers actually need is outside the scope of the Proposed Submission version of the Local Plan.</p>
REG18.41	National Grid Property (Carter Jones)	<p>There must be realistic assumptions for employment-allocated land and provisions to regularly review such allocations. This may include reassessing non-residential site allocations which clearly have the potential and capability to deliver a significant number of new homes in sustainable locations (e.g. near town centres) through a revised 'Employment Land Review'. Employment policies must also have sufficient flexibility to allow new housing. Where there is a compelling case to deliver new housing on employment-allocated land, there must be policy provisions to allow sites to be re-allocated for housing.</p>	<p>The Havering Employment Land Review (ELR) 2015 provides a robust evidence to support the protection of the Borough's Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs). The Proposed Submission version of the Local Plan includes policies to protect employment land on the basis of the ELR.</p>

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REG18.43	Omega After Alpha Ltd (Bidwells)	<p>The Local Plan should ensure that sufficient land is allocated and protected for employment purposes throughout the Plan period, and not unnecessarily lost to residential development, particularly if such land is previously developed.</p> <p>There is an urgent need for a more up-to-date and robust evidence base on the suitability and demand for existing employment land within the Borough to inform forthcoming decisions on the allocation of previously developed land for new uses. We understand that a new Employment Land Review (ELR) is to be published in due course, as an update to the Council's current ELR which is now nearly ten years old (published 2006).</p> <p>The Council should use the new ELR to support continuing growth of the local economy. Under no circumstances should decisions be made on the loss of existing employment sites in favour of other uses without first having thoroughly assessed demand and suitability via published evidence that can be subject to independent scrutiny. Sites may have remained vacant during the economic downturn, but demand for employment land is likely to continue to improve during the Plan period. It would be short-sighted to support the loss of vacant sites simply to avoid the need to undertake a review of other potential sources of land supply, including a review of the Green Belt.</p>	<p>The Havering Employment Land Review (ELR) 2015 provides a robust evidence to support the protection of the Borough's Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs). The Proposed Submission version of the Local Plan includes policies to protect employment land on the basis of the ELR.</p>
REG18.47	R. Watt and Partners (Phillips Planning Services)	<p>It is highlighted in the consultation document that "The new Local Plan will set out where employment land and businesses are going to be located" and it is assumed that it is also proposed that there would be associated policies which would enable their growth. It is however considered that the allocation/designation of land, sites and buildings for various 'employment generating uses' (be it either existing or proposed sites) must be carefully balanced against the ever evolving demands of the market to ensure that the council is in a position to approve and support the promotion of developments which will actually deliver jobs and associated training opportunities within the borough. The provision/protection of land alone will not guarantee employment growth if the finalised policy approach provides</p>	<p>The Havering Employment Land Review (ELR) 2015 provides a robust evidence to support the protection of the Borough's Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs). The Proposed Submission version of the Local Plan includes policies to protect employment land on the basis of the ELR.</p>

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		no flexibility to react to market demand.	
REG18.50	Rainham Preservation Society	We were promised high quality industry in Ferry Lane and Beam Reach, which never materialised. Priority should be given to Rainham Riverside an area designated for regeneration by LTGDC. Havering paid £50,000 for a feasibility study which confirmed the Covington's Site, Coldharbour Lane, as an ideal area for a jetty/mooring. This area, with its riverside path and walks to the RSPB is ideal for tourism and river transport.	The Havering Employment Land Review (ELR) 2015 provides a robust evidence to support the protection of the Borough's Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs). The Proposed Submission version of the Local Plan includes policies to protect employment land on the basis of the ELR. The Proposed Submission version of the Local Plan supports better use of industrial sites in this area designated as a Strategic Development Area for major growth and regeneration to accommodate significant number of jobs and housing.
REG18.51	Ray Whitehouse	By improving access to the town centres and local shopping facilities with less reliance on hypermarkets and "express supermarkets" then it would do wonders for the local businesses and local communities. Possible more emphasis on the creation of accessible offices and light industry with supporting job creation would be great.	The Proposed Submission version of the Local Plan supports initiatives (e.g. working with partners to improve accessibility into town centres for active travel users, tackling congestion "hotspots", improving road safety and the public realm within town centres, etc.) which improve access to town centres. The Proposed Submission version of the Local Plan also encourages provision of a wider retail offer and the delivery of more accessible offices and light industry space for a variety of businesses.
REG18.52	Romford Civic Society	It should promote the resilience of Romford by promoting a varied offer in the Romford economy. Is it intended that the plan should control the ability to convert office space to residential space?	The Proposed Submission version of the Local Plan promotes a varied offer in Romford economy by encouraging mix-use schemes incorporating residential on upper floors over commercial units on the ground

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			<p>floor.</p> <p>Controlling the ability to convert office space to residential is outside the scope of the Proposed Submission version of the Local Plan. The conversion from office to residential is controlled via Permitted Development Rights.</p>
REG18.53	Romford Golf Club (Joe Coogan)	<p>The Council needs to leverage the opportunities the local plan presents to unlock underused land than can contribute to the economy and improve the lives of local people. The council, especially in times of austerity, should ensure underused land that is currently contributing little or no value be considered for development. There are examples of waste land that is classified as 'Green belt' next to major roads that in reality offer no recreational value and no support to the economy.</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p>
REG18.54	Romford YMCA	<p>The Local Plan should support business growth through an increase in inward investment into the borough.</p> <p>It should:</p> <ul style="list-style-type: none"> – Initiate a regular review of employment land and, where appropriate, policies to protect existing employment sites; – Work with partners, such as the London LEP, the Mayor of London, the Chamber of Commerce, Federation of Small Businesses and the voluntary sector to identify strategic employment areas – Recognise and support the borough's local strengths, its proximity to London and key transport links 	<p>The Havering Employment Land Review (ELR) 2015 provides a robust evidence to support the protection of the Borough's Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs). The Proposed Submission version of the Local Plan includes policies to protect employment land on the basis of the ELR.</p> <p>The Proposed Submission version of the</p>

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		<p>Businesses key assets are its staff, so Romford YMCA would like to see opportunities for young people to access relevant training courses, which lead onto employment in the borough.</p> <p>Romford YMCA sees the further education sector as being key to address some the shortfall with the gap in skills.</p>	<p>Local Plan contains a policy requiring major developers to provide a proportion of apprenticeships positions as part of their Employment and Skills Plan.</p>
REG18.56	S.D. Olney	<p>By promoting business to locate in Havering, this will develop both training and a buoyant economy.</p>	<p>The Proposed Submission version of the Local Plan strategy promotes business to locate in Havering through protecting employment land, and through encouraging delivery of flexible affordable business units of various unit sizes to meet the varied needs of small, medium and large enterprises that want to set up or expand in the borough.</p>
REG18.57	Sheila Clements	<p>We should not support supermarkets such as Tescos, Sainsburys, etc. and other large businesses that can easily afford to pay a decent wage for a good days work. Their staff get a pittance from these companies and our taxes should not be used to top up wages just to get people back into work. They make billions in profits, expand all over Britain until they knock all the smaller shops out and then find that they have over-reached themselves and we step in with taxpayers money. It is not right or fair.</p>	<p>A Retail and Leisure Needs Assessment (2015) has been published with recommendation for a net additional need of 7,500sqm convenience goods floorspace, increasing to an indicative requirement of 13,200sqm net by 2031. The Proposed Submission version of the Local Plan encourages the provision of a wider retail offer and choice from all kind of retailers. Matters relating to competition and pricing are outside the scope of the Proposed Submission version of the Local plan. .</p>
REG18.64	Thurrock Council	<p>Thurrock Council supports a strategy that focuses on economic growth and jobs in the town centres and key employment locations identified by the London Plan and Havering Local Plan. It is assumed that Havering supports the approach set out by the Mayor for London in the London Riverside</p>	<p>Support is noted. The Havering Employment Land Review (ELR) 2015 provides a robust evidence to support the protection of the Borough's Strategic</p>

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		<p>Opportunity Area and there is no conflict with the approach between the new Local Plan and draft proposals in the Mayor's London Riverside Opportunity Area Planning Framework. The London Plan also identifies Havering as a potential Strategic Outer London Develop Centre for logistics and this should be clarified in the local plan policies.</p> <p>A difference is noted between the draft London Riverside Opportunity Area Planning Framework which identifies the retention and allocation of the Freightmaster Industrial Estate at Rainham as a new Strategic Industrial Land (SIL) location and the current adopted Havering Site Allocations Plan Policy SSA 12 proposal to incorporate the site as part of the London Riverside Conservation Park. The Site Allocation Plan states that retention of employment uses generate a level of vehicle movements which would conflict with enjoyment of the park.</p> <p>It is considered it would be necessary to understand how the continued activity and operation of Freightmaster site for employment would not have an adverse impact on the amenity and biodiversity value of the Rainham Marshes and London Riverside Conservation Park.</p>	<p>Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs). The Proposed Submission version of the Local Plan includes policies to protect employment land on the basis of the ELR. Consequently, the Proposed Submission version of the Local Plan's strategy supports economic growth and jobs in both town centres and key employment locations identified by the London Plan, as well as clarify the Council's support for the Mayor of London's proposed identification and designation of the borough as a Strategic Outer London Development Centre for logistics.</p> <p>The Proposed Submission version of the Local Plan contains policies which would ensure that adverse impacts of developments are mitigated.</p>
REG18.66	Trinity Hall (Bidwells)	<p>The Local Plan should ensure that sufficient land is allocated and protected for employment purposes throughout the Plan period, and not unnecessarily lost to residential development, particularly if such land is previously developed.</p> <p>There is an urgent need for a more up-to-date and robust evidence base on the suitability and demand for existing employment land within the Borough to inform forthcoming decisions on the allocation of previously developed land for new uses. We understand that a new Employment Land Review (ELR) is to be published in due course, as an update to the Council's current ELR which is now nearly ten years old (published 2006).</p> <p>The Council should use the new ELR to support continuing growth of the</p>	<p>The Havering Employment Land Review (ELR) 2015 provides a robust evidence to support the protection of the Borough's Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs). The Proposed Submission version of the Local Plan includes policies to protect employment land on the basis of the ELR.</p>

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		local economy. Under no circumstances should decisions be made on the loss of existing employment sites in favour of other uses without first having thoroughly assessed demand and suitability via published evidence that can be subject to independent scrutiny. Sites may have remained vacant during the economic downturn, but demand for employment land is likely to continue to improve during the Plan period. It would be short-sighted to support the loss of vacant sites simply to avoid the need to undertake a review of other potential sources of land supply, including a review of the Green Belt.	
REG18.67	Veolia ES (UK) Ltd	The plan should provide support for and a positive approach to new and innovative industries particularly those that support the circular economy. The plan should provide support for the retention of all existing areas used for industrial and commercial purposes and provide support for the redevelopment of these areas. (Such areas would include the Freight master Estate and the Veolia Integrated Waste Management Facilities off Coldharbour Lane).	The Havering Employment Land Review (ELR) 2015 provides a robust evidence to support the protection of the Borough's Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs). The Proposed Submission version of the Local Plan includes policies to protect employment land on the basis of the ELR.
REG18.69	Wyevale Garden Centres (Gregory Gray Associates)	By supporting the sustainable growth of existing businesses including those in rural areas in accordance with para. 28 of the NPPF.	The Proposed Submission version of the Local Plan contains policies supporting the sustainable growth of existing businesses including those in rural areas.
POST18.4	V. Rajan and Associates	<ol style="list-style-type: none"> 1. Bank finance 2. Business support 3. Training 4. Skill development 5. Innovation 	Bank finance is beyond the scope of the Local Plan. The Local Plan sets out a positive approach towards skills development and training. The Business Growth policy also seeks to optimise the environment for a range of businesses in the borough.

Question 3: What do you think the Local Plan priorities for housing should be?

Response Number	Respondent Name	Response to Q3	Council's response
REG18.1	AECOM	<p>The requirement by Local Planning Authorities to prioritise development in the most sustainable locations needs to be made upfront and clear in the plan. Clearly, the Council is faced with a higher housing need than the previous Core Strategy had planned for, and so, the new Local Plan must demonstrate how it's going to meet its objectively assessed housing need (OAHN).</p> <p>The Further Alterations to the London Plan (FALP) were adopted by the GLA on 10th March 2015 which includes a minimum ten year target of 11,701 for Havering between 2015-2025. This represents an annual housing target of 1,170 units, greater than the previous target of 970 units a year. When compared to the delivery of 396 net additional dwellings completed in 2012-2013 and the 464 dwellings per year in the preceding five years (2007-2008 to 2011-2012), this previous under provision of housing is an issue that must be considered by the Plan. Havering must demonstrate how they have met the Duty to Co-operate on strategic cross boundary matters with their neighbouring local planning authorities, in producing effective and deliverable policies. In this regard, meeting the Duty to Co-operate will be paramount in securing the delivery of sufficient homes; this must be reflected in the emerging Plan. Further representation is provided under the response to question 10.</p>	<p>The Spatial Strategy of the Proposed Submission version of the Local Plan sets out the Council's prioritisation of development in the most sustainable locations, whilst the policy on Housing supply demonstrates the proactive approach of how the Council would be seeking to increase the supply of housing in Havering.</p> <p>The new allocated housing target by the London Plan to the borough is acknowledged in the Proposed Submission version of the Local Plan, which also recognises that there is a significant need for new housing to meet both local need and sub regional housing need the Council forms a part of. To meet this need the Council has sought to identify additional capacity in order to close the gap between its allocated housing target and its Objectively Assessed Housing Need. In recognising that meeting both local and sub-regional housing need is a strategic matter the Council worked co-operatively with the London Boroughs of Barking and Dagenham and Redbridge with whom it forms the outer north east London sub housing market area and prepared a Strategic Housing Market Assessment.</p>

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			<p>Consequently, a Strategic Housing Market Assessment (SHMA) 2016 has been prepared jointly with the London Boroughs of Barking and Dagenham and Redbridge as part of the evidence base for the Local Plan in line with the requirements of the National Planning Policy Framework. The SHMA assesses housing need within the Outer North East London Housing Market Area (HMA).</p>
REG18.2	Adams Family (Bidwells)	<p>The Local Plan should prioritise three key aspects: (a) achieving the London Plan's minimum targets for new housing delivery; (b) exceeding the London Plan's minimum targets to address objectively assessed housing needs and (c) ensuring that the Plan enables the provision of a suitable mix of homes in accordance with local needs. These are explained in detail below.</p> <p><u>The need to achieve the London Plan's minimum targets for new housing delivery</u></p> <p>The Local Plan will clearly need to conform to the requirements of the London Plan (published March 2015, consolidated with alterations since 2011), including the annualised target for Havering to deliver at least 1,170 dwellings per annum. We would strongly contend that the Council should identify and allocate additional sites to seek to significantly exceed this target, including a proportion of greenfield land, to ensure that the Local Plan is sufficiently flexible to ensure delivery.</p> <p>The Borough's London Plan housing target is identical to the capacity of sites identified as having potential to come forward for development during the London Plan period (2015 – 2025) in the London-wide Strategic Housing Land Availability Assessment 2013 (SHLAA). There is clearly very little margin for error in the anticipated delivery of these sites if the London Plan's objectives for Havering are to be achieved, unless additional sites are</p>	<p>A Strategic Housing Market Assessment (SHMA) has been prepared jointly with the London Boroughs of Barking and Dagenham and Redbridge as part of the evidence base for the Proposed Submission version of the Local Plan in line with the requirements of the National Planning Policy Framework. The SHMA assesses housing need within the Outer North East London Housing Market Area (HMA). The Proposed Submission version of the Local Plan contains policies on housing mix and tenure to ensure need is met.</p> <p>The 2016 SHMA indicates that Havering's full Objectively Assessed Need (OAN) is for 30,052 new homes over the period 2011 – 2033 or 1,366 per annum. The London Plan sets the borough a target of delivering a minimum of 11,700 new homes over a ten year the period 2015 - 2025 with a proviso that the annual</p>

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		<p>identified and allocated for development to provide a sufficient buffer for non-delivery.</p> <p>Indeed, we would contend that there is a very real risk that not all of the sites identified in the SHLAA will be delivered as anticipated, primarily because its estimate of capacity is based entirely on a supply of previously developed, brownfield sites. We understand that any land currently located within the Green Belt was automatically discounted as unsuitable for development when assessed by the SHLAA. By their very nature, previously developed sites are generally less deliverable than greenfield land due to complications such as availability, existing use values and abnormal costs such as contamination. As a consequence, it would appear that relying entirely on brownfield land to seek to achieve the London Plan's housing target would present a very real risk of not delivering minimum targets.</p> <p>Havering's history of under delivery against London Plan targets compounds these concerns. Table 3.20 of the SHLAA (p86) confirms that the Borough delivered an average of only 367 dwellings between 2008 and 2012. This compares with an average London Plan target of 644 dwellings per annum during the same period and follows an average of 1,109 dwellings being granted planning permission every year between 2004 and 2012. This is an alarming pattern of undersupply that needs to be redressed.</p> <p>At present, there is a lack of any robust, locally derived evidence demonstrating that the supply of suitable brownfield land identified in the SHLAA will come forward as anticipated. The conclusions of the SHLAA were supported by a Viability Assessment, but this is a very broad, high level study covering the whole of London. It provides a qualitative assessment of the current housing market across the capital, but due to its very broad approach this Assessment does not provide a sound basis to conclude that sites proposed for allocation in Havering's Local Plan will come forward as anticipated. Two key weaknesses supporting this contention are highlighted below:</p>	<p>average (1,170) should be rolled forward for the remainder of the Local Plan period.</p> <p>The proposed Submission Local Plan aims to achieve the London Plan's minimum target for new housing delivery allocated to Havering and will seek to exceed the London Plan's minimum targets to close the gap between this and Havering's Objectively Assessed Housing Need as informed by the Outer North East London Strategic Housing Market Assessment (SHMA).</p> <p>The Council is aware of the potential risk that not all of the sites identified in the 2013 GLA SHLAA could be delivered as anticipated. To offset this risk the Council has reviewed the supply of housing and has taken a positive and proactive approach to identify and enable development opportunities for housing use of a combination of policy tools such as optimising housing output for different types of location within the relevant London Plan density range on brownfields sites, resisting the net loss of housing, positively and proactively enabling housing intensification in Council estates, in town and district centres, along transport corridors and prioritising all non-designated land for housing when it becomes available, and supporting initiatives to bring</p>

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		<ul style="list-style-type: none"> <li data-bbox="517 300 1496 464">– Due to the scale of the area that it needed to cover, the methodology employed by the Assessment was based on the appraisal of 40 case study sites drawn from 8 boroughs across the capital. None of these sites were located in Havering and therefore the particular issues affecting the local market were not fully examined. <li data-bbox="517 472 1496 772">– Boroughs providing case study sites were selected where they were expected to make a significant contribution to overall housing land supply in London but had shown significant undersupply compared to London Plan targets in the three years to 2011/124. Havering was initially selected as a case study on this basis, highlighting concerns about the Borough amongst the authors of the report, but it was later rejected in favour of Hounslow to provide greater geographical spread. The concerns about viability in Havering were therefore never properly analysed. <p data-bbox="517 810 1496 1075">The SHLAA Viability Appraisal does not provide sufficient information to enable a definitive, or even a reasonable, conclusion to be reached in respect of local policy making. We would urge the Council to ensure that additional sites are identified and allocated to provide flexibility for non-delivery and to prepare additional, locally specific evidence to provide greater certainty about delivery. Without such evidence, the Local Plan would be vulnerable to a significant risk of non-delivery and would be unsound.</p> <p data-bbox="517 1118 1496 1377">In addition to the above, it is also pertinent to highlight that the National Planning Policy Framework (the “Framework” published 2012) requires local authorities to identify and update annually a supply of specific deliverable sites with an additional 5% buffer moved forward from later in the Plan period⁵ to ensure choice and competition in the market for land. This reaffirms the need to allocate sufficient sites to maintain flexibility. The Council’s latest publicly available Annual Monitoring Report (AMR)⁶ suggests that it has a 5 year housing land supply with an additional 5%</p>	<p data-bbox="1536 264 2083 395">back empty residential properties into use. The Council’s approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement</p> <p data-bbox="1536 435 2083 868">The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more the purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan</p> <p data-bbox="1536 908 2083 1377">It should, be noted that, irrespective of the inherent limitation of the broad approach in the qualitative assessment of the current housing market across London, the GLA SHLAA supported by a Viability Assessment has always been the accepted approach to identifying capacity for housing supply in London. Nonetheless, its output has always been accepted at EIPs as the basis for estimating capacity and allocating housing targets to London boroughs. A number of sites identified through the SHLAA process have already come forward for development.</p>

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		<p>buffer as required by the Framework when assessed against the previous (2011) London Plan target. If, under a brownfield-only approach, the Council were to bring forward allocations from later in the Plan period to provide a 5% buffer and ensure flexibility in the short term, it would still be necessary to allocate further land (potentially Green Belt) to meet the displaced development requirements from the later stages of the Plan period. This could be undertaken through a partial review of the Local Plan process at that time, but such an approach carries risk because the certainty of delivery of such subsequent sites would not be known until that review process commences, contrary to the Framework.</p> <p>The Framework also urges local planning authorities to identify a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15 of the Plan period. Without an understanding of broad locations for growth (which could be realised through a Green Belt review), the Council would not have sufficient evidence to determine how it will deliver the development required in the latter stages of the Plan period, and the Plan would be unsound. We therefore consider that the time for the Council to consider such an approach, by commissioning a Green Belt review for the consideration of such suitable sites for housing, is now.</p> <p>Failure to take account of any of the above would result in an inflexible and non-deliverable Plan that would be unsound. The only reasonable solution is to consider the release of Green Belt land in the preparation of the Local Plan. This is why housing delivery should be a priority in the Local Plan.</p> <p><u>The need to exceed the London Plan's minimum targets to address objectively assessed housing needs</u></p> <p>The Framework requires local planning authorities to significantly boost the supply of housing. It requires authorities to use their evidence base to ensure that their Local Plans meet their objectively assessed housing</p>	

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		<p>needs. The new London Plan targets, taken as a whole, are 6,600 dwellings per annum short of meeting the objectively assessed housing needs of the capital. Nevertheless, it confirms that Boroughs should use their housing supply targets as minima, augmented by additional housing capacity to reduce the gap between local and strategic housing need and supply. This underlines the need for the Council to take full account the potential contribution of Green Belt sites which no longer serve a valuable Green Belt function.</p> <p><u>Housing Mix</u></p> <p>In addition to a sufficient quantum of new development, the Local Plan will also need to ensure that it enables the provision of a suitable mix of homes in accordance with local needs. The London Plan and its supporting evidence do not provide a breakdown of the mix and tenure of dwellings that should be provided in order to meet local need but a forthcoming update to the East London Strategic Housing Market Assessment (SHMA) will provide clarity on this matter. The Local Plan should therefore ensure that it adequately provides for the needed mix of housing as identified through the SHMA.</p> <p>It is likely that the mix of units required will include a good proportion of family homes with their own reasonably sized private amenity spaces, together with specialist accommodation, flats and affordable housing to cater for the needs of the community as a whole, to deliver mixed and balanced communities as required by the Framework. Not all types of site will be capable of delivering the mix of units required, with town centres and brownfield sites in other urban areas less likely to be capable of delivering family housing with private amenity areas and access to open space. To overcome this, the Local Plan should allocate a range of types of sites, including greenfield Green Belt land.</p> <p>To help illustrate this point, we are aware of a resolution by the Council's</p>	

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		<p>planning committee in 2014 to grant permission for 497 new dwellings on the former Somerfield depot in Rainham. No affordable housing was proposed because it would have been unviable to provide it. This was a brownfield site and it is likely that many of the viability constraints apply to other previously delivered land in the Borough. If Council were to adopt a brownfield-only approach, this example indicates that the Plan may be incapable of delivering sufficient affordable housing, which would be unsustainable and therefore contrary to wider objectives.</p> <p>We therefore consider that the Local Plan should ensure that a suitable range of sites, including Green Belt land, are made available and allocated in the Plan in order to facilitate a suitable mix of homes.</p>	
REG18.3	Anonymous	It is good to have mostly small developments but the prices should be much, much, much lower.	Noted.
REG18.9	C. Cole	<ul style="list-style-type: none"> – Small properties but top quality – Including in town centres – Develop leisure use in town centres 	Noted. The Local Plan promotes high quality homes with appropriate mix and tenure that meet local needs in sustainable locations including town centres. It also supports development of leisure use in town centres.
REG18.12	D. Campbell	People who work and have families will benefit from this.	Noted.
REG18.13	D.K.Symes Associates	The Government and London Plan targets should be viewed as an absolute minimum. Priority should be given to starter homes as well as providing a mix of housing types to satisfy a range of demand.	The Local Plan seeks to meet and exceed its London Plan target as well as provide a mix of housing types, tenures and size mix including starter homes to meet the local needs.
REG18.14	Edward Gittins & Associates	The priority should be to plan to meet Havering's housing needs in full in line with the NPPF.	The proposed Submission Local Plan aims to achieve the London Plan's minimum target for new housing delivery allocated to Havering and will seek to exceed the London Plan's minimum targets to close the gap between this and Havering's Objectively Assessed Housing Need as

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			informed by the Outer North East London Strategic Housing Market Assessment (SHMA). The Council's approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement
REG18.21	Havering College of Further and Higher Education (Iceni Projects)	HCFHE believe that housing should be provided across the Local Plan period to accommodate the demands of existing residents wishing to stay within the Borough, but also to provide new homes for those looking to move into the Borough.	The Proposed Submission version of the Local Plan will provide housing across the Local Plan period to accommodate the demands of existing residents wishing to stay within the borough and provide for those looking to move into the borough. The Council's approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement
REG18.23	Heine Planning	To assess the need and identify suitable sites for Travellers including show persons.	The Council has undertaken a Gypsy and Traveller Accommodation Assessment and seeks to address identified needs within the Proposed Submission version of the Local Plan.
REG18.24	Higgins Homes (Nathaniel Lichfield & Partners)	<p>Ensuring that the Borough has sufficient housing allocations to meet and exceed the latest FALP target – and the likely increase in the housing requirement following the London Plan Review;</p> <p>Ensuring the 'delivery' of housing, in sustainable locations across the Borough as a whole, at sites where a 'range' of sizes of new homes can be provided. Sites within the urban area alone are not 'delivering' the new homes and range of sizes required;</p> <p>Releasing Green Belt land for housing, where it forms a natural extension to existing urban areas, where there are clearly defined boundaries and where none of the purposes of the Green Belt are met; and,</p>	The proposed Submission Local Plan aims to achieve the London Plan's minimum target for new housing delivery allocated to Havering and will seek to exceed the London Plan's minimum targets to close the gap between this and Havering's Objectively Assessed Housing Need as informed by the Outer North East London Strategic Housing Market Assessment (SHMA). The Council's approach to increasing housing supply is set out in further detail in the Local Plan Housing

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		<p>Maximising the density of sites where they are well served by existing services and public transport.</p>	<p>Position Statement</p> <p>The Proposed Submission version of the Local Plan promotes sustainable development and prioritises the delivery of housing in sustainable locations across the Borough at sites where a range of dwelling sizes and types can be provided.</p> <p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p> <p>The Proposed Submission version of the Local Plan will seek to optimise residential output and densities consistent with the London Plan.</p>
REG18.26	Ian Weatherley	<p>The plans should be for high quality houses – not flats! – For families to move into and make a move into a home for a full family. This borough needs houses – not flats.</p>	<p>The Proposed Submission version of the Local Plan supports a mix of homes (both flats and houses) including 3+ bed properties for families.</p>

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REG18.27	Janet Davy	Given that a certain number of new homes must be provided in Havering, ensure developers must a) not delay building on sites which have planning permission, and b) include affordable housing.	Ensuring that developers do not delay building on sites which have planning permission is outside the scope of the Proposed Submission version of the Local Plan. The Proposed Submission version of the Local Plan does however seek to secure the highest level of affordable housing contribution from developers to ensure Havering residents have access to affordable homes.
REG18.28	Joe Coogan	<p>Development of homes should be evenly spread throughout the borough. The majority of working families in Havering do not want to live in flats in Romford town centre or at Riverside. Opportunities for quality family homes to be developed in popular areas should be sought out. Areas like Upminster/Cranham and Gidea Park should be considered if underused sites can be unlocked for housing.</p> <p>Some housing should be affordable. It is important to build key worker specific accommodation to ensure public services can attract and retain good nurses, teachers and social workers to support the community.</p> <p>The development of extra care housing can also unlock family homes and help balance out Havering's ageing population. It would be interesting to see how many family homes were freed up by older persons choosing to move into Dreywood Court.</p>	With two housing zones, an ambitious estates regeneration programme and support for appropriate development of infill, under-utilised and vacant sites throughout the borough, the Local Plan aims to spread housing development throughout the borough to ensure provision of a range of housing types and tenures, including affordable housing and extra care homes, in different locations, to meet local needs.
REG18.29	John Peterson	The current developments appear to import more people than help residents	The Proposed Submission version of the Local Plan aims to deliver the Council's new vision which focuses on four cross-cutting priorities of Communities, Places, Opportunities and Connections which is about embracing the best of what Havering has to offer and how the borough can play an active role in the success of the whole

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			<p>of London. In light of this vision, the Proposed Submission version of the Local Plan aims to promote, support and encourage balanced development which helps meet residents' needs for housing, employment, education, open space and leisure facilities, community facilities, etc., taking into account the need to minimise their adverse effects on residents and on the local environment. The expected outcome is that Havering will see significant levels of growth in the form of high quality, well managed sustainable development which will further enhance the borough as a highly desirable, attractive, safe and clean place to live, offering residents a high quality of life.</p>
REG18.30	London Borough of Barking and Dagenham	<p>As a borough with a relatively low proportion of affordable housing it's important that Havering helps meet London's housing need for affordable housing particularly for those on low to middle incomes.</p>	<p>The Proposed Submission version of the Local Plan commits to securing the highest level of affordable housing contributions as the rise in average house prices has made housing unaffordable for many of the Borough's low to middle income households.</p>
REG18.32	Lee Clements	<p>Ensuring that: there is sufficient infrastructure and facilities alongside new housing (not just housing estates with little else); new homes are more sustainable and well-designed; more social housing is available to local people; new homes are in-keeping with their surroundings; there are restrictions on the number of HMOs in an area; natural spaces (gardens/green spaces) are included in all developments.</p>	<p>The Council has worked co-operatively with a wide range of infrastructure providers, in the process of the Proposed Submission version of the Local Plan preparation, to ensure that the quality and capacity of needed infrastructure are sufficient for the proposed quantum of development; the Proposed Submission version of the Local Plan policies require</p>

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			new homes to be well-designed and be more sustainable and to provide high quality amenity space, and to secure the highest level of affordable housing contribution, with a 10% restriction threshold of properties per street being allowed to become HMOs in order to ensure mixed use communities.
REG18.33	Mr Leslie Budge (Andrew Martin Planning)	<p>In light of the Inspector's conclusions and recommendations following the examination in public of the Further Alterations to the London Plan document, Boroughs are expected, as a minimum, to be allocating sufficient housing land to meet their housing supply targets as outlined in Table 3.1 in the FALP. For LB Havering, this means allocating land that is suitable and deliverable in sustainable locations that can provide 11,701 dwellings over the period 2015 – 2025. LB Havering conducted their Strategic Housing Land Availability Assessment 'Call for Sites' process during August / September 2014, the information from which will inform the housing strategy within the new Local Plan.</p> <p>The National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) acknowledge the sustainability benefits associated with brownfield land and consequently encourage the prioritisation of previously developed land for new residential development. It is widely recognised, however, that previously developed land is a finite resource and thus, to meet identified objectively assessed housing needs, local planning authorities are accepting that a degree of development will need to be delivered on greenfield and green belt land where this complies with sustainability objectives. In light of this, LB Havering should conduct a review of their Green Belt boundaries in line with the preparation of a new Local Plan (paragraph 83 of the NPPF), in order to identify areas of land that no longer fulfil the five purposes of the Green Belt and are thus not necessary to keep permanently open.</p>	The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.
REG18.34	Margaret	One area has to be housing which is affordable for families some of which	The Proposed Submission version of the

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	Whippy	<p>could be low income. It is decidedly difficult for young families to save for a deposit as the costs keep rising for new houses. Funding for part rent/part buy schemes would be one way, providing enough homes with up to 3 bedrooms could be incorporated in those schemes. Schemes which give preference to local families would be an advantage as well, thereby preventing homes being advertised abroad before developers sell them locally.</p>	<p>Local Plan aims to securing the highest level of affordable housing contribution from development with the provision of family sized 3 bedroom or more units prioritised to meet the needs of local residents. The delivery of a variety of affordable housing products to meet the varying needs of local low to medium income households will be promoted. However, the allocation of affordable homes including schemes which give preference to local families is outside the scope of the Proposed Submission version of the Local Plan.</p>
REG18.36	Moody Homes and Mr John Wakeling (Bidwells)	<p>The Local Plan should prioritise three key aspects: (a) achieving the London Plan's minimum targets for new housing delivery; (b) exceeding the London Plan's minimum targets to address objectively assessed housing needs and (c) ensuring that the Plan enables the provision of a suitable mix of homes in accordance with local needs. These are explained in detail below.</p> <p><u>The need to achieve the London Plan's minimum targets for new housing delivery</u></p> <p>The Local Plan will clearly need to conform to the requirements of the London Plan (published March 2015, consolidated with alterations since 2011), including the annualised target for Havering to deliver at least 1,170 dwellings per annum. We would strongly contend that the Council should identify and allocate additional sites to seek to significantly exceed this target, including a proportion of greenfield land, to ensure that the Local Plan is sufficiently flexible to ensure delivery.</p> <p>The Borough's London Plan housing target is identical to the capacity of sites identified as having potential to come forward for development during</p>	<p>A Strategic Housing Market Assessment (SHMA) has been prepared jointly with the London Boroughs of Barking and Dagenham and Redbridge as part of the evidence base for the Proposed Submission version of the Local Plan in line with the requirements of the National Planning Policy Framework. The SHMA assesses housing need within the Outer North East London Housing Market Area (HMA). The Proposed Submission version of the Local Plan contains policies on housing mix and tenure to ensure need is met.</p> <p>The 2016 SHMA indicates that Havering's full Objectively Assessed Need (OAN) is for 30,052 new homes over the period 2011 – 2033 or 1,366 per annum. The</p>

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		<p>the London Plan period (2015 – 2025) in the London-wide Strategic Housing Land Availability Assessment 2013 (SHLAA). There is clearly very little margin for error in the anticipated delivery of these sites if the London Plan's objectives for Havering are to be achieved, unless additional sites are identified and allocated for development to provide a sufficient buffer for non-delivery.</p> <p>Indeed, we would contend that there is a very real risk that not all of the sites identified in the SHLAA will be delivered as anticipated, primarily because its estimate of capacity is based entirely on a supply of previously developed, brownfield sites. We understand that any land currently located within the Green Belt was automatically discounted as unsuitable for development when assessed by the SHLAA. By their very nature, previously developed sites are generally less deliverable than greenfield land due to complications such as availability, existing use values and abnormal costs such as contamination. As a consequence, it would appear that relying entirely on brownfield land to seek to achieve the London Plan's housing target would present a very real risk of not delivering minimum targets.</p> <p>Havering's history of under delivery against London Plan targets compounds these concerns. Table 3.20 of the SHLAA (p86) confirms that the Borough delivered an average of only 367 dwellings between 2008 and 2012. This compares with an average London Plan target of 644 dwellings per annum during the same period and follows an average of 1,109 dwellings being granted planning permission every year between 2004 and 2012. This is an alarming pattern of undersupply that needs to be redressed.</p> <p>At present, there is a lack of any robust, locally derived evidence demonstrating that the supply of suitable brownfield land identified in the SHLAA will come forward as anticipated. The conclusions of the SHLAA were supported by a Viability Assessment, but this is a very broad, high level study covering the whole of London. It provides a qualitative assessment of the current housing market across the capital, but due to its</p>	<p>London Plan sets the borough a target of delivering a minimum of 11,700 new homes over a ten year the period 2015 - 2025 with a proviso that the annual average (1,170) should be rolled forward for the remainder of the Local Plan period.</p> <p>The proposed Submission Local Plan aims to achieve the London Plan's minimum target for new housing delivery allocated to Havering and will seek to exceed the London Plan's minimum targets to close the gap between this and Havering's Objectively Assessed Housing Need as informed by the Outer North East London Strategic Housing Market Assessment (SHMA).</p> <p>The Council is aware of the potential risk that not all of the sites identified in the 2013 GLA SHLAA could be delivered as anticipated. To offset this risk the Council has reviewed the supply of housing and has taken a positive and proactive approach to identify and enable development opportunities for housing use of a combination of policy tools such as optimising housing output for different types of location within the relevant London Plan density range on brownfields sites, resisting the net loss of housing, positively and proactively enabling housing intensification in Council estates, in town</p>

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		<p>very broad approach this Assessment does not provide a sound basis to conclude that sites proposed for allocation in Havering's Local Plan will come forward as anticipated. Two key weaknesses supporting this contention are highlighted below:</p> <ul style="list-style-type: none"> - Due to the scale of the area that it needed to cover, the methodology employed by the Assessment was based on the appraisal of 40 case study sites drawn from 8 boroughs across the capital. None of these sites were located in Havering and therefore the particular issues affecting the local market were not fully examined. - Boroughs providing case study sites were selected where they were expected to make a significant contribution to overall housing land supply in London but had shown significant undersupply compared to London Plan targets in the three years to 2011/12. Havering was initially selected as a case study on this basis, highlighting concerns about the Borough amongst the authors of the report, but it was later rejected in favour of Hounslow to provide greater geographical spread. The concerns about viability in Havering were therefore never properly analysed. <p>The SHLAA Viability Appraisal does not provide sufficient information to enable a definitive, or even a reasonable, conclusion to be reached in respect of local policy making. We would urge the Council to ensure that additional sites are identified and allocated to provide flexibility for non-delivery and to prepare additional, locally specific evidence to provide greater certainty about delivery. Without such evidence, the Local Plan would be vulnerable to a significant risk of non-delivery and would be unsound.</p> <p>In addition to the above, it is also pertinent to highlight that the National Planning Policy Framework (the "Framework" published 2012) requires local authorities to identify and update annually a supply of specific deliverable sites with an additional 5% buffer moved forward from later in the Plan</p>	<p>and district centres, along transport corridors and prioritising all non-designated land for housing when it becomes available, and supporting initiatives to bring back empty residential properties into use. The Council's approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement</p> <p>The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more the purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan</p> <p>It should, be noted that, irrespective of the inherent limitation of the broad approach in the qualitative assessment of the current housing market across London, the GLA SHLAA supported by a Viability Assessment has always been the accepted approach to identifying capacity for housing supply in London. Nonetheless, its output has always been accepted at EiPs as the basis for estimating capacity and</p>

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		<p>period to ensure choice and competition in the market for land. This reaffirms the need to allocate sufficient sites to maintain flexibility. The Council's latest publicly available Annual Monitoring Report (AMR) suggests that it has a 5 year housing land supply with an additional 5% buffer as required by the Framework when assessed against the previous (2011) London Plan target. If, under a brownfield-only approach, the Council were to bring forward allocations from later in the Plan period to provide a 5% buffer and ensure flexibility in the short term, it would still be necessary to allocate further land (potentially Green Belt) to meet the displaced development requirements from the later stages of the Plan period. This could be undertaken through a partial review of the Local Plan process at that time, but such an approach carries risk because the certainty of delivery of such subsequent sites would not be known until that review process commences, contrary to the Framework.</p> <p>The Framework also urges local planning authorities to identify a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15 of the Plan period. Without an understanding of broad locations for growth (which could be realised through a Green Belt review), the Council would not have sufficient evidence to determine how it will deliver the development required in the latter stages of the Plan period, and the Plan would be unsound. We therefore consider that the time for the Council to consider such an approach, by commissioning a Green Belt review for the consideration of such suitable sites for housing, is now.</p> <p>Failure to take account of any of the above would result in an inflexible and non-deliverable Plan that would be unsound. The only reasonable solution is to consider the release of Green Belt land in the preparation of the Local Plan. This is why housing delivery should be a priority in the Local Plan.</p> <p><u>The need to exceed the London Plan's minimum targets to address objectively assessed housing needs</u></p>	<p>allocating housing targets to London boroughs. A number of sites identified through the SHLAA process have already come forward for development.</p>

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		<p>The Framework requires local planning authorities to significantly boost the supply of housing. It requires authorities to use their evidence base to ensure that their Local Plans meet their objectively assessed housing needs. The new London Plan targets, taken as a whole, are 6,600 dwellings per annum short of meeting the objectively assessed housing needs of the capital. Nevertheless, it confirms that Boroughs should use their housing supply targets as minima, augmented by additional housing capacity to reduce the gap between local and strategic housing need and supply. This underlines the need for the Council to take full account of the potential contribution of Green Belt sites which no longer serve a valuable Green Belt function.</p> <p><u>Housing Mix</u></p> <p>In addition to a sufficient quantum of new development, the Local Plan will also need to ensure that it enables the provision of a suitable mix of homes in accordance with local needs. The London Plan and its supporting evidence do not provide a breakdown of the mix and tenure of dwellings that should be provided in order to meet local need but a forthcoming update to the East London Strategic Housing Market Assessment (SHMA) will provide clarity on this matter. The Local Plan should therefore ensure that it adequately provides for the needed mix of housing as identified through the SHMA.</p> <p>It is likely that the mix of units required will include a good proportion of family homes with their own reasonably sized private amenity spaces, together with specialist accommodation, flats and affordable housing to cater for the needs of the community as a whole, to deliver mixed and balanced communities as required by the Framework. Not all types of site will be capable of delivering the mix of units required, with town centres and brownfield sites in other urban areas less likely to be capable of delivering family housing with private amenity areas and access to open space. To</p>	

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		<p>overcome this, the Local Plan should allocate a range of types of sites, including greenfield Green Belt land.</p> <p>To help illustrate this point, we are aware of a resolution by the Council's planning committee in 2014 to grant permission for 497 new dwellings on the former Somerfield depot in Rainham. No affordable housing was proposed because it would have been unviable to provide it. This was a brownfield site and it is likely that many of the viability constraints apply to other previously delivered land in the Borough. If Council were to adopt a brownfield-only approach, this example indicates that the Plan may be incapable of delivering sufficient affordable housing, which would be unsustainable and therefore contrary to wider objectives.</p> <p>We therefore consider that the Local Plan should ensure that a suitable range of sites, including Green Belt land, are made available and allocated in the Plan in order to facilitate a suitable mix of homes.</p>	
REG18.37	Mr Barrie Stone and Miss Eleanor Stone	Mix of private and PRS (Private Rented Sector) homes and social units integrated.	The Proposed Submission version of the Local Plan supports the provision of a balanced mix of homes reflecting varied types and tenures.
REG18.38	Mr T Clemence (DHA Planning)	Provide homes to meet the Boroughs objectively assessed housing needs; look for opportunities for housing in not only the urban areas but also sustainable locations in rural areas. For example development that makes efficient use of a site located within green belt, on the edge of an existing residential area, with good access to a range of local services and public transport should be promoted. Ensure not only that homes meet the boroughs quantitative need but the qualitative need. Ensure new residential development reflects the layout, form and grain of surrounding development.	The Proposed Submission version of the Local Plan will aim to address the borough's objectively assessed housing needs and will encourage and optimise housing development and output in opportunity sites in both urban and sustainable rural locations where access to a range of local services and public transport is available. New housing will be required to be of high architectural quality and design that respects and responds to the distinctive local building form, layout and patterns of development taking into account the scale, massing, building line

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			and height of the surrounding physical context.
REG18.39	Mrs S J Ellis (Bidwells)	<p>The Local Plan should prioritise three key aspects: (a) achieving the London Plan's minimum targets for new housing delivery; (b) exceeding the London Plan's minimum targets to address objectively assessed housing needs and (c) ensuring that the Plan enables the provision of a suitable mix of homes in accordance with local needs. These are explained in detail below.</p> <p><u>The need to achieve the London Plan's minimum targets for new housing delivery</u></p> <p>The Local Plan will clearly need to conform to the requirements of the London Plan (published March 2015, consolidated with alterations since 2011), including the annualised target for Havering to deliver at least 1,170 dwellings per annum. We would strongly contend that the Council should identify and allocate additional sites to seek to significantly exceed this target, including a proportion of greenfield land, to ensure that the Local Plan is sufficiently flexible to ensure delivery.</p> <p>The Borough's London Plan housing target is identical to the capacity of sites identified as having potential to come forward for development during the London Plan period (2015 – 2025) in the London-wide Strategic Housing Land Availability Assessment 2013 (SHLAA). There is clearly very little margin for error in the anticipated delivery of these sites if the London Plan's objectives for Havering are to be achieved, unless additional sites are identified and allocated for development to provide a sufficient buffer for non-delivery.</p> <p>Indeed, we would contend that there is a very real risk that not all of the sites identified in the SHLAA will be delivered as anticipated, primarily because its estimate of capacity is based entirely on a supply of previously developed, brownfield sites. We understand that any land currently located within the Green Belt was automatically discounted as unsuitable for</p>	<p>A Strategic Housing Market Assessment (SHMA) has been prepared jointly with the London Boroughs of Barking and Dagenham and Redbridge as part of the evidence base for the Proposed Submission version of the Local Plan in line with the requirements of the National Planning Policy Framework. The SHMA assesses housing need within the Outer North East London Housing Market Area (HMA). The Proposed Submission version of the Local Plan contains policies on housing mix and tenure to ensure need is met.</p> <p>The 2016 SHMA indicates that Havering's full Objectively Assessed Need (OAN) is for 30,052 new homes over the period 2011 – 2033 or 1,366 per annum. The London Plan sets the borough a target of delivering a minimum of 11,700 new homes over a ten year the period 2015 - 2025 with a proviso that the annual average (1,170) should be rolled forward for the remainder of the Local Plan period.</p> <p>The proposed Submission Local Plan aims to achieve the London Plan's minimum target for new housing delivery allocated to Havering and will seek to exceed the London Plan's minimum targets to close</p>

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		<p>development when assessed by the SHLAA. By their very nature, previously developed sites are generally less deliverable than greenfield land due to complications such as availability, existing use values and abnormal costs such as contamination. As a consequence, it would appear that relying entirely on brownfield land to seek to achieve the London Plan's housing target would present a very real risk of not delivering minimum targets.</p> <p>Havering's history of under delivery against London Plan targets compounds these concerns. Table 3.20 of the SHLAA (p86) confirms that the Borough delivered an average of only 367 dwellings between 2008 and 2012. This compares with an average London Plan target of 644 dwellings per annum during the same period and follows an average of 1,109 dwellings being granted planning permission every year between 2004 and 2012. This is an alarming pattern of undersupply that needs to be redressed.</p> <p>At present, there is a lack of any robust, locally derived evidence demonstrating that the supply of suitable brownfield land identified in the SHLAA will come forward as anticipated. The conclusions of the SHLAA were supported by a Viability Assessment, but this is a very broad, high level study covering the whole of London. It provides a qualitative assessment of the current housing market across the capital, but due to its very broad approach this Assessment does not provide a sound basis to conclude that sites proposed for allocation in Havering's Local Plan will come forward as anticipated. Two key weaknesses supporting this contention are highlighted below:</p> <ul style="list-style-type: none"> - Due to the scale of the area that it needed to cover, the methodology employed by the Assessment was based on the appraisal of 40 case study sites drawn from 8 boroughs across the capital. None of these sites were located in Havering and therefore the particular issues affecting the local market were not fully examined. - Boroughs providing case study sites were selected where they were expected to make a significant contribution to overall housing land 	<p>the gap between this and Havering's Objectively Assessed Housing Need as informed by the Outer North East London Strategic Housing Market Assessment (SHMA).</p> <p>The Council is aware of the potential risk that not all of the sites identified in the 2013 GLA SHLAA could be delivered as anticipated. To offset this risk the Council has reviewed the supply of housing and has taken a positive and proactive approach to identify and enable development opportunities for housing use of a combination of policy tools such as optimising housing output for different types of location within the relevant London Plan density range on brownfields sites, resisting the net loss of housing, positively and proactively enabling housing intensification in Council estates, in town and district centres, along transport corridors and prioritising all non-designated land for housing when it becomes available, and supporting initiatives to bring back empty residential properties into use. The Council's approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement</p> <p>The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of</p>

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		<p>supply in London but had shown significant undersupply compared to London Plan targets in the three years to 2011/12. Havering was initially selected as a case study on this basis, highlighting concerns about the Borough amongst the authors of the report, but it was later rejected in favour of Hounslow to provide greater geographical spread. The concerns about viability in Havering were therefore never properly analysed.</p> <p>The SHLAA Viability Appraisal does not provide sufficient information to enable a definitive, or even a reasonable, conclusion to be reached in respect of local policy making. We would urge the Council to ensure that additional sites are identified and allocated to provide flexibility for non-delivery and to prepare additional, locally specific evidence to provide greater certainty about delivery. Without such evidence, the Local Plan would be vulnerable to a significant risk of non-delivery and would be unsound.</p> <p>In addition to the above, it is also pertinent to highlight that the National Planning Policy Framework (the "Framework" published 2012) requires local authorities to identify and update annually a supply of specific deliverable sites with an additional 5% buffer moved forward from later in the Plan period to ensure choice and competition in the market for land. This reaffirms the need to allocate sufficient sites to maintain flexibility. The Council's latest publicly available Annual Monitoring Report (AMR) suggests that it has a 5 year housing land supply with an additional 5% buffer as required by the Framework when assessed against the previous (2011) London Plan target. If, under a brownfield-only approach, the Council were to bring forward allocations from later in the Plan period to provide a 5% buffer and ensure flexibility in the short term, it would still be necessary to allocate further land (potentially Green Belt) to meet the displaced development requirements from the later stages of the Plan period. This could be undertaken through a partial review of the Local Plan process at that time, but such an approach carries risk because the certainty of delivery</p>	<p>the Green Belt in the borough makes a contribution towards one or more the purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan</p> <p>It should, be noted that, irrespective of the inherent limitation of the broad approach in the qualitative assessment of the current housing market across London, the GLA SHLAA supported by a Viability Assessment has always been the accepted approach to identifying capacity for housing supply in London. Nonetheless, its output has always been accepted at EIPs as the basis for estimating capacity and allocating housing targets to London boroughs. A number of sites identified through the SHLAA process have already come forward for development.</p>

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		<p>of such subsequent sites would not be known until that review process commences, contrary to the Framework.</p> <p>The Framework also urges local planning authorities to identify a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15 of the Plan period. Without an understanding of broad locations for growth (which could be realised through a Green Belt review), the Council would not have sufficient evidence to determine how it will deliver the development required in the latter stages of the Plan period, and the Plan would be unsound. We therefore consider that the time for the Council to consider such an approach, by commissioning a Green Belt review for the consideration of such suitable sites for housing, is now.</p> <p>Failure to take account of any of the above would result in an inflexible and non-deliverable Plan that would be unsound. The only reasonable solution is to consider the release of Green Belt land in the preparation of the Local Plan. This is why housing delivery should be a priority in the Local Plan.</p> <p><u>The need to exceed the London Plan's minimum targets to address objectively assessed housing needs</u></p> <p>The Framework requires local planning authorities to significantly boost the supply of housing. It requires authorities to use their evidence base to ensure that their Local Plans meet their objectively assessed housing needs. The new London Plan targets, taken as a whole, are 6,600 dwellings per annum short of meeting the objectively assessed housing needs of the capital. Nevertheless, it confirms that Boroughs should use their housing supply targets as minima, augmented by additional housing capacity to reduce the gap between local and strategic housing need and supply. This underlines the need for the Council to take full account the potential contribution of Green Belt sites which no longer serve a valuable Green Belt function.</p>	

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		<p><u>Housing Mix</u></p> <p>In addition to a sufficient quantum of new development, the Local Plan will also need to ensure that it enables the provision of a suitable mix of homes in accordance with local needs. The London Plan and its supporting evidence do not provide a breakdown of the mix and tenure of dwellings that should be provided in order to meet local need but a forthcoming update to the East London Strategic Housing Market Assessment (SHMA) will provide clarity on this matter. The Local Plan should therefore ensure that it adequately provides for the needed mix of housing as identified through the SHMA.</p> <p>It is likely that the mix of units required will include a good proportion of family homes with their own reasonably sized private amenity spaces, together with specialist accommodation, flats and affordable housing to cater for the needs of the community as a whole, to deliver mixed and balanced communities as required by the Framework. Not all types of site will be capable of delivering the mix of units required, with town centres and brownfield sites in other urban areas less likely to be capable of delivering family housing with private amenity areas and access to open space. To overcome this, the Local Plan should allocate a range of types of sites, including greenfield Green Belt land.</p> <p>To help illustrate this point, we are aware of a resolution by the Council's planning committee in 2014 to grant permission for 497 new dwellings on the former Somerfield depot in Rainham. No affordable housing was proposed because it would have been unviable to provide it. This was a brownfield site and it is likely that many of the viability constraints apply to other previously delivered land in the Borough. If Council were to adopt a brownfield-only approach, this example indicates that the Plan may be incapable of delivering sufficient affordable housing, which would be unsustainable and therefore contrary to wider objectives.</p>	

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		We therefore consider that the Local Plan should ensure that a suitable range of sites, including Green Belt land, are made available and allocated in the Plan in order to facilitate a suitable mix of homes.	
REG18.40	Ms M Blackman	Housing should be where there are work and enterprise opportunities, and suitable for the kind of people that will need to work there. If employment opportunities are more appropriate for younger people, then build more flats and starter homes. Similarly housing suitable for able elderly residents should be considered.	The Proposed Submission version of the Local Plan supports new housing to be where work and enterprise opportunities are, wherever possible, as exemplified in the Romford Strategic Development Area and the Rainham and Beam Park Strategic Development Area, where mixed use developments are promoted in town centres with new flatted residential units above ground floor commercial floor space focussed along the principal transportation/public transport routes to encourage ease of access to work and enterprise opportunities hubs consistent with the NPPF and the London Plan. The Proposed Submission version of the Local Plan supports affordable housing and the delivery of homes suitable for older people.
REG18.41	National Grid Property (Carter Jones)	<p>There is a clear need to deliver new homes in London. Given the pressure to develop greenfield sites, the best use of brownfield sites must be utilised. In view of the abnormal costs usually associated with remediating some brownfield land, there must be sufficient flexibility in the Local Plan to respond to challenges in viability, otherwise there is a risk that housing redevelopment may not come forward.</p> <p>The Local Plan must also prioritise maximising residential density to ensure the best use of brownfield land.</p>	The Proposed Submission version of the Local Plan recognises the clear need to deliver new homes and so prioritises the best use of brownfield land and includes policies to optimise residential density with some flexibility to respond to challenges in viability.
REG18.43	Omega After Alpha Ltd	The Local Plan should prioritise three key aspects: (a) achieving the London Plan's minimum targets for new housing delivery; (b) exceeding the London	A Strategic Housing Market Assessment (SHMA) has been prepared jointly with the

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	(Bidwells)	<p>Plan's minimum targets to address objectively assessed housing needs and (c) ensuring that the Plan enables the provision of a suitable mix of homes in accordance with local needs. These are explained in detail below.</p> <p><u>The need to achieve the London Plan's minimum targets for new housing delivery</u></p> <p>The Local Plan will clearly need to conform to the requirements of the London Plan (published March 2015, consolidated with alterations since 2011), including the annualised target for Havering to deliver at least 1,170 dwellings per annum. We would strongly contend that the Council should identify and allocate additional sites to seek to significantly exceed this target, including a proportion of greenfield land, to ensure that the Local Plan is sufficiently flexible to ensure delivery.</p> <p>The Borough's London Plan housing target is identical to the capacity of sites identified as having potential to come forward for development during the London Plan period (2015 – 2025) in the London-wide Strategic Housing Land Availability Assessment 2013 (SHLAA). There is clearly very little margin for error in the anticipated delivery of these sites if the London Plan's objectives for Havering are to be achieved, unless additional sites are identified and allocated for development to provide a sufficient buffer for non-delivery.</p> <p>Indeed, we would contend that there is a very real risk that not all of the sites identified in the SHLAA will be delivered as anticipated, primarily because its estimate of capacity is based entirely on a supply of previously developed, brownfield sites. We understand that any land currently located within the Green Belt was automatically discounted as unsuitable for development when assessed by the SHLAA. By their very nature, previously developed sites are generally less deliverable than greenfield land due to complications such as availability, existing use values and abnormal costs such as contamination. As a consequence, it would appear that relying entirely on brownfield land to seek to achieve the London Plan's housing</p>	<p>London Boroughs of Barking and Dagenham and Redbridge as part of the evidence base for the Proposed Submission version of the Local Plan in line with the requirements of the National Planning Policy Framework. The SHMA assesses housing need within the Outer North East London Housing Market Area (HMA). The Proposed Submission version of the Local Plan contains policies on housing mix and tenure to ensure need is met.</p> <p>The 2016 SHMA indicates that Havering's full Objectively Assessed Need (OAN) is for 30,052 new homes over the period 2011 – 2033 or 1,366 per annum. The London Plan sets the borough a target of delivering a minimum of 11,700 new homes over a ten year the period 2015 - 2025 with a proviso that the annual average (1,170) should be rolled forward for the remainder of the Local Plan period.</p> <p>The proposed Submission Local Plan aims to achieve the London Plan's minimum target for new housing delivery allocated to Havering and will seek to exceed the London Plan's minimum targets to close the gap between this and Havering's Objectively Assessed Housing Need as informed by the Outer North East London Strategic Housing Market Assessment</p>

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		<p>target would present a very real risk of not delivering minimum targets.</p> <p>Havering's history of under delivery against London Plan targets compounds these concerns. Table 3.20 of the SHLAA (p86) confirms that the Borough delivered an average of only 367 dwellings between 2008 and 2012. This compares with an average London Plan target of 644 dwellings per annum during the same period and follows an average of 1,109 dwellings being granted planning permission every year between 2004 and 2012. This is an alarming pattern of undersupply that needs to be redressed.</p> <p>At present, there is a lack of any robust, locally derived evidence demonstrating that the supply of suitable brownfield land identified in the SHLAA will come forward as anticipated. The conclusions of the SHLAA were supported by a Viability Assessment, but this is a very broad, high level study covering the whole of London. It provides a qualitative assessment of the current housing market across the capital, but due to its very broad approach this Assessment does not provide a sound basis to conclude that sites proposed for allocation in Havering's Local Plan will come forward as anticipated. Two key weaknesses supporting this contention are highlighted below:</p> <ul style="list-style-type: none"> - Due to the scale of the area that it needed to cover, the methodology employed by the Assessment was based on the appraisal of 40 case study sites drawn from 8 boroughs across the capital. None of these sites were located in Havering and therefore the particular issues affecting the local market were not fully examined. - Boroughs providing case study sites were selected where they were expected to make a significant contribution to overall housing land supply in London but had shown significant undersupply compared to 	<p>(SHMA).</p> <p>The Council is aware of the potential risk that not all of the sites identified in the 2013 GLA SHLAA could be delivered as anticipated. To offset this risk the Council has reviewed the supply of housing and has taken a positive and proactive approach to identify and enable development opportunities for housing use of a combination of policy tools such as optimising housing output for different types of location within the relevant London Plan density range on brownfields sites, resisting the net loss of housing, positively and proactively enabling housing intensification in Council estates, in town and district centres, along transport corridors and prioritising all non-designated land for housing when it becomes available, and supporting initiatives to bring back empty residential properties into use. The Council's approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement</p> <p>The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more the purposes of the Green Belt identified in the NPPF and is based on defensible</p>

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		<p>London Plan targets in the three years to 2011/12. Havering was initially selected as a case study on this basis, highlighting concerns about the Borough amongst the authors of the report, but it was later rejected in favour of Hounslow to provide greater geographical spread. The concerns about viability in Havering where therefore never properly analysed.</p> <p>The SHLAA Viability Appraisal does not provide sufficient information to enable a definitive, or even a reasonable, conclusion to be reached in respect of local policy making. We would urge the Council to ensure that additional sites are identified and allocated to provide flexibility for non-delivery and to prepare additional, locally specific evidence to provide greater certainty about delivery. Without such evidence, the Local Plan would be vulnerable to a significant risk of non-delivery and would be unsound.</p> <p>In addition to the above, it is also pertinent to highlight that the National Planning Policy Framework (the "Framework" published 2012) requires local authorities to identify and update annually a supply of specific deliverable sites with an additional 5% buffer moved forward from later in the Plan period⁵ to ensure choice and competition in the market for land. This reaffirms the need to allocate sufficient sites to maintain flexibility. The Council's latest publicly available Annual Monitoring Report (AMR) suggests that it has a 5 year housing land supply with an additional 5% buffer as required by the Framework when assessed against the previous (2011) London Plan target. If, under a brownfield-only approach, the Council were to bring forward allocations from later in the Plan period to provide a 5% buffer and ensure flexibility in the short term, it would still be necessary to allocate further land (potentially Green Belt) to meet the displaced development requirements from the later stages of the Plan period. This could be undertaken through a partial review of the Local Plan process at that time, but such an approach carries risk because the certainty of delivery</p>	<p>boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan</p> <p>It should, be noted that, irrespective of the inherent limitation of the broad approach in the qualitative assessment of the current housing market across London, the GLA SHLAA supported by a Viability Assessment has always been the accepted approach to identifying capacity for housing supply in London. Nonetheless, its output has always been accepted at EiPs as the basis for estimating capacity and allocating housing targets to London boroughs. A number of sites identified through the SHLAA process have already come forward for development.</p>

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		<p>of such subsequent sites would not be known until that review process commences, contrary to the Framework.</p> <p>The Framework also urges local planning authorities to identify a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15 of the Plan period. Without an understanding of broad locations for growth (which could be realised through a Green Belt review), the Council would not have sufficient evidence to determine how it will deliver the development required in the latter stages of the Plan period, and the Plan would be unsound. We therefore consider that the time for the Council to consider such an approach, by commissioning a Green Belt review for the consideration of such suitable sites for housing, is now.</p> <p>Failure to take account of any of the above would result in an inflexible and non-deliverable Plan that would be unsound. The only reasonable solution is to consider the release of Green Belt land in the preparation of the Local Plan. This is why housing delivery should be a priority in the Local Plan.</p> <p><u>The need to exceed the London Plan's minimum targets to address objectively assessed housing needs</u></p> <p>The Framework requires local planning authorities to significantly boost the supply of housing. It requires authorities to use their evidence base to ensure that their Local Plans meet their objectively assessed housing needs. The new London Plan targets, taken as a whole, are 6,600 dwellings per annum short of meeting the objectively assessed housing needs of the capital. Nevertheless, it confirms that Boroughs should use their housing supply targets as minima, augmented by additional housing capacity to reduce the gap between local and strategic housing need and supply. This underlines the need for the Council to take full account the potential contribution of Green Belt sites which no longer serve a valuable Green Belt function.</p>	

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		<p><u>Housing Mix</u></p> <p>In addition to a sufficient quantum of new development, the Local Plan will also need to ensure that it enables the provision of a suitable mix of homes in accordance with local needs. The London Plan and its supporting evidence do not provide a breakdown of the mix and tenure of dwellings that should be provided in order to meet local need but a forthcoming update to the East London Strategic Housing Market Assessment (SHMA) will provide clarity on this matter. The Local Plan should therefore ensure that it adequately provides for the needed mix of housing as identified through the SHMA.</p> <p>It is likely that the mix of units required will include a good proportion of family homes with their own reasonably sized private amenity spaces, together with specialist accommodation, flats and affordable housing to cater for the needs of the community as a whole, to deliver mixed and balanced communities as required by the Framework. Not all types of site will be capable of delivering the mix of units required, with town centres and brownfield sites in other urban areas less likely to be capable of delivering family housing with private amenity areas and access to open space. To overcome this, the Local Plan should allocate a range of types of sites, including greenfield Green Belt land.</p> <p>To help illustrate this point, we are aware of a resolution by the Council's planning committee in 2014 to grant permission for 497 new dwellings on the former Somerfield depot in Rainham. No affordable housing was proposed because it would have been unviable to provide it. This was a brownfield site and it is likely that many of the viability constraints apply to other previously delivered land in the Borough. If Council were to adopt a brownfield-only approach, this example indicates that the Plan may be incapable of delivering sufficient affordable housing, which would be unsustainable and therefore contrary to wider objectives.</p>	

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		<p>We therefore consider that the Local Plan should ensure that a suitable range of sites, including Green Belt land, are made available and allocated in the Plan in order to facilitate a suitable mix of homes.</p>	
REG18.44	Persimmon Homes	<p>The Local Plan must ensure that it meets the housing need as identified in the Further Alterations London Plan (March 2015). This document is currently out for public consultation and sets out the London Borough's housing targets. The emerging London Plan requires Havering Borough Council to deliver 11,701 new homes over a 10 year period (2015-2025) or 1,170 dwellings per annum.</p> <p>Havering Borough Council adopted their Core Strategy in 2008 which sought to deliver 535 new homes a year. The adoption of the new London Plan in 2011 increased this provision to 970 new homes a year. Havering Council's latest Housing Trajectory demonstrates that the council have under delivered on this figure since 2009/2010. The new Local Plan must ensure that it takes account of any shortfall accumulated over the Core Strategy plan period.</p> <p>The housing shortage in London is having an effect on the neighbouring Local Planning Authorities (LPAs) in the South East with the need to take account of any potential shortfall in the London Boroughs. Housing should be focused towards areas in which there is high demand, this will minimise the need to travel and maintain an affordable housing market. To minimise the pressure on neighbouring LPAs, London Borough Council's must demonstrate through the Local Plan process that they have considered all reasonable alternatives and have supporting background studies to sustain their policies. The London Plan is not required to conform with the Duty to Cooperate but Local Plans are and, as such, Havering Council must demonstrate this through the Plan process.</p>	<p>A Strategic Housing Market Assessment (SHMA) has been prepared jointly with the London Boroughs of Barking and Dagenham and Redbridge as part of the evidence base for the Proposed Submission version of the Local Plan in line with the requirements of the National Planning Policy Framework. The SHMA assesses housing need within the Outer North East London Housing Market Area (HMA). The Proposed Submission version of the Local Plan contains policies on housing mix and tenure to ensure need is met.</p> <p>The 2016 SHMA indicates that Havering's full Objectively Assessed Need (OAN) is for 30,052 new homes over the period 2011 – 2033 or 1,366 per annum. The London Plan sets the borough a target of delivering a minimum of 11,700 new homes over a ten year the period 2015 - 2025 with a proviso that the annual average (1,170) should be rolled forward for the remainder of the Local Plan period.</p> <p>The proposed Submission Local Plan aims to achieve the London Plan's minimum target for new housing delivery allocated to</p>

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			<p>Havering and will seek to exceed the London Plan's minimum targets to close the gap between this and Havering's Objectively Assessed Housing Need as informed by the Outer North East London Strategic Housing Market Assessment (SHMA).</p>
REG18.46	Planning Potential Rep 2.	<p>We support the Council's emphasis on ensuring that there are enough high quality homes in Havering to meet local need. We also support the Council's acknowledgment that the new London Plan (2015) sets out the revised housing targets for each Borough, which should be carried forward in the Plan process.</p> <p>The Borough's housing target has increased from 535 new dwellings per annum (dpa) as set out in Havering's Core Strategy and Development Control Policies Document Development Plan Document (2008), to 970 dpa in the London Plan (2008 – consolidated with Alterations since 2004), to 1,170 per year in The London Plan (2015), which should be the figure Havering adopts moving forward.</p> <p>It is our view that this significant increase in housing need within Havering may have an impact upon the Council's ability to demonstrate a five year housing land supply. Therefore, the Council should be looking into the potential to redevelop alternative sites, outside of those broad locations for residential development, namely Romford Town Centre and London Riverside, where the sites' redevelopment would constitute sustainable development.</p> <p>It is our opinion also that the Council should not limit development to small infill sites. In order for the Council to deliver housing that is of a mix and type suitable to meet varying needs, including affordable housing, the Council should be looking at larger sites capable of delivering such housing and</p>	<p>Support noted.</p> <p>A Strategic Housing Market Assessment (SHMA) has been prepared jointly with the London Boroughs of Barking and Dagenham and Redbridge as part of the evidence base for the Proposed Submission version of the Local Plan in line with the requirements of the National Planning Policy Framework. The SHMA assesses housing need within the Outer North East London Housing Market Area (HMA). The Proposed Submission version of the Local Plan contains policies on housing mix and tenure to ensure need is met.</p> <p>The 2016 SHMA indicates that Havering's full Objectively Assessed Need (OAN) is for 30,052 new homes over the period 2011 – 2033 or 1,366 per annum. The London Plan sets the borough a target of delivering a minimum of 11,700 new homes over a ten year the period 2015 -</p>

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		allocating them through the local plan process.	<p>2025 with a proviso that the annual average (1,170) should be rolled forward for the remainder of the Local Plan period.</p> <p>The proposed Submission Local Plan aims to achieve the London Plan's minimum target for new housing delivery allocated to Havering and will seek to exceed the London Plan's minimum targets to close the gap between this and Havering's Objectively Assessed Housing Need as informed by the Outer North East London Strategic Housing Market Assessment (SHMA).</p>
REG18.47	R. Watt and Partners (Phillips Planning Services)	During the course of this consultation, 'Further Alterations' to the London Plan have been adopted and have increased the borough's minimum housing delivery target from 970 dwellings per year to 1,170 dwellings per year. In noting that this target is expressed as a minimum and that there is a national planning policy objective to significantly increase the supply of housing, it is considered that the key priority of the Local Plan should be to exceed the target. It is of course also considered that type, size, form and mix of new dwellings should be reflective of the needs of the borough.	<p>A Strategic Housing Market Assessment (SHMA) has been prepared jointly with the London Boroughs of Barking and Dagenham and Redbridge as part of the evidence base for the Proposed Submission version of the Local Plan in line with the requirements of the National Planning Policy Framework. The SHMA assesses housing need within the Outer North East London Housing Market Area (HMA). The Proposed Submission version of the Local Plan contains policies on housing mix and tenure to ensure need is met.</p> <p>The 2016 SHMA indicates that Havering's full Objectively Assessed Need (OAN) is for 30,052 new homes over the period</p>

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			<p>2011 – 2033 or 1,366 per annum. The London Plan sets the borough a target of delivering a minimum of 11,700 new homes over a ten year the period 2015 - 2025 with a proviso that the annual average (1,170) should be rolled forward for the remainder of the Local Plan period.</p> <p>The proposed Submission Local Plan aims to achieve the London Plan's minimum target for new housing delivery allocated to Havering and will seek to exceed the London Plan's minimum targets to close the gap between this and Havering's Objectively Assessed Housing Need as informed by the Outer North East London Strategic Housing Market Assessment (SHMA).</p>
REG18.48	R.A.Montague	The number should be set locally otherwise how can it be a Local Plan if the number of houses are imposed from outside the borough by the Mayor. This is not a local plan but a centralised plan.	A Strategic Housing Market Assessment (SHMA) has been prepared jointly with the London Boroughs of Barking and Dagenham and Redbridge as part of the evidence base for the Proposed Submission version of the Local Plan in line with the requirements of the National Planning Policy Framework. The SHMA assesses housing need within the Outer North East London Housing Market Area (HMA). The Proposed Submission version of the Local Plan contains policies on housing mix and tenure to ensure need is met.

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			<p>The 2016 SHMA indicates that Havering's full Objectively Assessed Need (OAN) is for 30,052 new homes over the period 2011 – 2033 or 1,366 per annum. The London Plan sets the borough a target of delivering a minimum of 11,700 new homes over a ten year the period 2015 - 2025 with a proviso that the annual average (1,170) should be rolled forward for the remainder of the Local Plan period.</p> <p>The proposed Submission Local Plan aims to achieve the London Plan's minimum target for new housing delivery allocated to Havering and will seek to exceed the London Plan's minimum targets to close the gap between this and Havering's Objectively Assessed Housing Need as informed by the Outer North East London Strategic Housing Market Assessment (SHMA).</p>
REG18.50	Rainham Preservation Society	Gated single storey communities for the elderly, where they feel safe, should be given priority, also more family homes with gardens and high quality flatted developments of not above 3 storeys.	The Proposed Submission version of the Local Plan aims to deliver high quality mix of homes with a range of types, tenures and sizes including family homes, and homes for older peoples that meet local need and optimises housing output from a given site.
REG18.51	Ray Whitehouse	I just don't agree with more housing in Romford. There is poor infrastructure, no schools, not enough doctors etc. In fact the ring road is a major obstruction to access to the town centre. For example the pedestrian, cycling, mother with pushchair and disabled routes from the new houses on the old hospital site are basically disgusting. The only option is to have to	Romford town centre and Rainham and Beam Park will be the main growth areas in Havering for housing as a result of their development potential.

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		walk through unpleasant alleyways and underpasses. The council has missed an enormous opportunity with that development to make Romford more accessible for none car users, but have failed. The ring road is a major barrier to the town centre and until this is resolved more housing is just a waste of time, never mind a major lack of other facilities. Riverside is a good example of an opportunity to create a wonderful place to live, work and play as long as Havering gets its act together.	The Proposed Submission version of the Local Plan aims to ensure that the quantum of proposed development is matched with supporting infrastructure. Provision of infrastructure is planned for in the Infrastructure Delivery Plan.
REG18.52	Romford Civic Society	Flats should have high-quality amenity space. Housing should be greener in terms of energy generation and use and biodiversity. Policy DC 50 from the current LDF should be transferred into the new document. High quality design of housing should be required in Romford, as this is a key determiner of the quality and visual appeal of the urban environment. The Mayor of London's Housing Design Guide should be adhered to.	The Proposed Submission version of the Local Plan aims to deliver high quality homes, whether flats or houses which are greener in terms of energy efficiency and biodiversity, and so includes policies on design, amenity space, energy and biodiversity.
REG18.53	Romford Golf Club (Joe Coogan)	<p>Development of homes should be evenly spread throughout the borough. The majority of working families in Havering do not want to live in flats in Romford town centre or at Riverside. Opportunities for quality family homes to be developed in popular areas should be sought out. Areas like Upminster/Cranham and Gidea Park should be considered if underused sites can be unlocked for housing.</p> <p>Some housing should be affordable. It is important to build key worker specific accommodation to ensure public services can attract and retain good nurses, teachers and social workers to support the community.</p> <p>The development of extra care housing can also unlock family homes and help balance out Havering's ageing population. It would be interesting to see how many family homes were freed up by older persons choosing to move into Dreywood Court.</p>	With two housing zones, an ambitious estates regeneration programme and support for appropriate development of infill, under-utilised and vacant sites throughout the borough, the Local Plan aims to spread housing development throughout the borough to ensure provision of a range of housing types and tenures, including affordable housing and extra care homes, in different locations, to meet local needs.
REG18.54	Romford YMCA	Housing is an issue of significant importance to the borough with the provision of appropriate housing. We would like to see the borough offer housing for all types of housing to meet the needs and demands of different people in our community. This includes young people, families, older	The Proposed Submission version of the Local Plan aims to deliver all types of high quality housing (houses and flats of varying sizes and tenures) which adhere to

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		<p>people, people with disabilities, and students. We suggest that any new housing developments must take account of local need to create a balanced and sustainable community, which gives a genuine choice in housing.</p> <p>Romford YMCA would like to see a flexible housing stock that helps meet the wide range of accommodation needs. New homes should support the changing needs of individuals and families, and the communities in which they live and at their different stages of life.</p> <p>In regard to affordable homes, Romford YMCA would like developments to provide the required amount of affordable housing.</p> <p>Young people find it increasingly difficult to access the housing market. A solution to this would be an increase in the availability of social housing in the borough. Romford YMCA hope that the borough will continue with its programme of council house building, and would as a result offer local young people the opportunity to gain apprenticeships in building.</p> <p>Romford YMCA would like to add that to encourage social housing developments to come forward across the borough and to meet the demand of local people for affordable housing, Romford YMCA would like to see some flexibility in the council's Section 106 policy, regarding the contribution social housing providers have to make. Unrealistic Section 106 agreements can be an obstacle to house building, at a time when the government is seeking to provide more homes to meet a growing population and to promote construction and economic growth.</p>	<p>'Lifetime Homes Standards' to meet the demands and needs of Havering's local need taking into account the need to create a balanced and sustainable community, and give a genuine choice in housing, as well as support the changing needs of individuals and families, and the community in which they live, at their different stages of life.</p> <p>The Proposed Submission version of the Local Plan aims to secure the highest level of affordable housing contributions by supporting a transparent approach to viability and information submission, in order to provide the required amount of affordable housing needed in the borough.</p> <p>The Proposed Submission version of the Local Plan contains policies on the Council's estates regeneration and skills development opportunities which support apprentices that will offer local young people the opportunity to gain apprenticeship in building.</p> <p>The Council will implement a Community Infrastructure Levy which is set at a rate which keeps development viable.</p>
REG18.56	S.D. Olney	<p>This is dependent on the number of houses in the council proposal. Additional schools, shops, doctors surgeries, transport links etc.</p>	<p>The Proposed Submission version of the Local Plan aims to ensure that the quantum of proposed development is matched with supporting infrastructure.</p>

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			Provision of infrastructure is planned for in the Infrastructure Delivery Plan.
REG18.57	Sheila Clements	<p>People moving into the borough should not be allowed to turn housing into multi occupation residencies where every room is used as a bedroom just for mattresses. This has happened in other boroughs over the last 30 years and these places just begin to go downhill with the way people live in them and the rubbish produced around the areas they live in. Housing should be using up empty houses and places that we already have not necessarily building more and more until we are at saturation point. Offices have been built in Romford where they have never been rented out and are standing empty. Why is this allowed? When these were built there were already enough office, but planning still gives the go ahead. Planning never takes the wishes of the residents into account. It is a fact that the Council have never taken notice of one single protest in Havering when residents do not want something to be built. Planning just goes ahead and does what it wants and probably always will regardless of this questionnaire.</p>	The Proposed Submission version of the Local Plan contains policies to control HMOs and bring back empty residential property into use.
REG18.60	Thames Water Utilities Ltd (Savills)	<p>As set out above, it is crucial that policies within Local Plans ensure the adequate provision of water and waste water infrastructure to provide for new and existing development. Thames Water therefore recommends the inclusion of the following policy within the new Local Plan:</p> <p><u><i>“PROPOSED POLICY – WATER AND SEWERAGE INFRASTRUCTURE CAPACITY:</i></u></p> <p>Planning permission will only be granted for developments which increase the demand for off-site service infrastructure where:</p> <ol style="list-style-type: none"> 1. sufficient capacity already exists or 2. Extra capacity can be provided in time to serve the development which will ensure that the environment and the amenities of local residents are not adversely affected. <p>When there is a capacity problem and improvements in off-site infrastructure</p>	The requirement for wastewater infrastructure is sufficiently covered by London Plan Policy 5.14, which is also part of the Council's Development Plan. There is, therefore, no need to repeat the policy in the Proposed Submission version of the Local Plan. The Council has engaged with Thames Water for the preparation with of the Infrastructure Delivery Plan.

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		<p>are not programmed, planning permission will only be granted where the developer funds appropriate improvements which will be completed prior to occupation of the development.”</p> <p>It is considered that text along the following lines should be added to the Local Plan to support the above proposed Policy:</p> <p><u>“PROPOSED NEW POLICY SUPPORTING TEXT:</u></p> <p>The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will be required to 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. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, the Council will require the developer to fund appropriate improvements which must be completed prior to occupation of the development.</p>	
REG18.61	The Crown Estate (Amec Foster Wheeler)	<p>The Crown Estate considers the New Plan will have to provide a positive framework to tackle the significant housing need in the Borough and within the wider London region. The priority for the new Local Plan should be to significantly boost housing supply to address the housing needs within the Borough in line with NPPF, paragraph 14, which states that local planning authorities should “use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing.”</p> <p>The adopted Core Strategy sets a target to deliver a minimum of 535 new dwellings per annum. The London Borough of Havering is covered by the London Plan. In March 2015, Further Alterations to the London Plan (FALP)</p>	A Strategic Housing Market Assessment (SHMA) has been prepared jointly with the London Boroughs of Barking and Dagenham and Redbridge as part of the evidence base for the Proposed Submission version of the Local Plan in line with the requirements of the National Planning Policy Framework. The SHMA assesses housing need within the Outer North East London Housing Market Area (HMA). The Proposed Submission version of the Local Plan contains policies on

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		<p>were adopted. This sets a minimum ten year target of 11,701 dwellings (1,170 dwellings p.a) in Havering between 2015 and 2025. The Council's base date for the revised Local Plan is likely to be 2015 with the plan period running to 2030/31. Over the plan period this will equate to an overall housing requirement of around 18,000 dwellings. In the previous five years (2007-08 – 2011-12), a total of 2,321 dwellings (464 dwellings p.a) were completed in Havering. This figure is well short of the new London Plan target. The latest 2012 based household projections also show significant upward pressure on housing need with a projected increase from 101,000 households in 2015 to 131,000 households by 2037. This equates to over 1,300 new households per year in that period.</p> <p>This evidence highlights the need to provide a step change in housing delivery in line with the emphasis of NPPF including the need to ensure local plans are positively prepared (paragraph 182) and significantly boost housing supply (paragraph 47). In addition, local plans should be sufficiently flexible to adapt to rapid changes (paragraph 14).</p> <p>NPPF (paragraph 47) also requires local planning authorities to identify a specific supply of developable sites or broad locations for years 6-10 and, where possible, for years 11-15 and update this annually. The level of housing required in the Borough over the full 15 year period will inevitably require additional greenfield sites and the release of Green Belt land. Sites and development should be focussed on sustainable locations that can deliver the Plan's Spatial Strategy, such as Collier Row (see response to question 10 below).</p> <p>Furthermore, Paragraph 182 of NPPF states that in examining local plans an Inspector will assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is therefore sound. This includes the test of 'effective' in which it should be demonstrated that the plan is deliverable over its period and based on effective joint working on cross-boundary strategic priorities. In November</p>	<p>housing mix and tenure to ensure need is met.</p> <p>The 2016 SHMA indicates that Havering's full Objectively Assessed Need (OAN) is for 30,052 new homes over the period 2011 – 2033 or 1,366 per annum. The London Plan sets the borough a target of delivering a minimum of 11,700 new homes over a ten year the period 2015 - 2025 with a proviso that the annual average (1,170) should be rolled forward for the remainder of the Local Plan period.</p> <p>The proposed Submission Local Plan aims to achieve the London Plan's minimum target for new housing delivery allocated to Havering and will seek to exceed the London Plan's minimum targets to close the gap between this and Havering's Objectively Assessed Housing Need as informed by the Outer North East London Strategic Housing Market Assessment (SHMA).</p> <p>The Proposed Submission Local Plan takes a positive and proactive approach to housing delivery through a combination of policy tools such as optimising housing output for different types of location within the relevant London Plan density range on brownfields sites, resisting the net loss of housing, positively and proactively</p>

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		<p>2014 London Mayor Boris Johnson announced plans to hold a summit with Home Counties council leaders in 2015, to discuss cooperation on managing the capital's housing growth. Recent research by AECOM looked at the London city-region housing need (including the 127 councils representing London and the Home Counties, within 90km of the capital). AECOM compiled data on the housing capacity identified in the Strategic Housing Land Availability Assessments (SHLAAs) of these local authorities, and compared this to population growth as projected by the Office for National Statistics (ONS) and GLA. The study found that, if current building trends continue, there would be a million-home deficit in the region by 2036.</p> <p>In order to meet London's substantial housing needs, there is a need for cooperation between London boroughs to manage the capital's housing growth. In line with guidance in NPPF and Planning Practice Guidance, local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plan for examination. Therefore in arriving at a housing target in the New Local Plan, the Council will need to consider how it can meet the development needs of the Borough and the wider region.</p>	<p>enabling housing intensification in Council estates, in town and district centres, along transport corridors and prioritising all non-designated land for housing when it becomes available, and supporting initiatives to bring back empty residential properties into use. The Council's approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement.</p> <p>Further details on the duty to-cooperate are set out in the Local Plan Duty to Co-operate Statement.</p>
REG18.63	Thomas Bates and Son Ltd. (Andrew Martin Planning)	<p>In light of the Inspector's conclusions and recommendations following the examination in public of the Further Alterations to the London Plan document, Boroughs are expected, as a minimum, to be allocating sufficient housing land to meet their housing supply targets as outlined in Table 3.1 in the FALP. For LB Havering, this means allocating land that is suitable and deliverable in sustainable locations that can provide 11,701 dwellings over the period 2015 – 2025. LB Havering conducted their Strategic Housing Land Availability Assessment 'Call for Sites' process during August / September 2014. This will inform the housing strategy within the new Local Plan.</p> <p>The National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) acknowledge the sustainability benefits associated with brownfield land and consequently encourage the prioritisation of previously</p>	<p>A Strategic Housing Market Assessment (SHMA) has been prepared jointly with the London Boroughs of Barking and Dagenham and Redbridge as part of the evidence base for the Proposed Submission version of the Local Plan in line with the requirements of the National Planning Policy Framework. The SHMA assesses housing need within the Outer North East London Housing Market Area (HMA). The Proposed Submission version of the Local Plan contains policies on housing mix and tenure to ensure need is met.</p>

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		<p>developed land for new residential development. It is widely recognised, however, that previously developed land is a finite resource and thus, to meet identified objectively assessed housing needs, local planning authorities are accepting that a degree of development will need to be delivered on greenfield and Green Belt land where this complies with sustainability objectives. In light of this, LB Havering should conduct a review of their Green Belt boundaries in line with the preparation of a new Local Plan (paragraph 83 of the NPPF), in order to identify areas of land that no longer fulfil the five purposes of the Green Belt and are thus not necessary to keep permanently open.</p>	<p>The 2016 SHMA indicates that Havering's full Objectively Assessed Need (OAN) is for 30,052 new homes over the period 2011 – 2033 or 1,366 per annum. The London Plan sets the borough a target of delivering a minimum of 11,700 new homes over a ten year the period 2015 - 2025 with a proviso that the annual average (1,170) should be rolled forward for the remainder of the Local Plan period.</p> <p>The proposed Submission Local Plan aims to achieve the London Plan's minimum target for new housing delivery allocated to Havering and will seek to exceed the London Plan's minimum targets to close the gap between this and Havering's Objectively Assessed Housing Need as informed by the Outer North East London Strategic Housing Market Assessment (SHMA).</p> <p>The Council's approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement.</p> <p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a</p>

Response Number	Respondent Name	Response to Q3	Council's response
			<p>contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p>
REG18.64	Thurrock Council	<p>Thurrock Council supports the approach of the London Plan and Havering Council to focus housing development on key town centres and the London Riverside area in the south of the Borough. This approach also reflects the current strategy of the adopted Local Plan.</p> <p>The London Plan with alterations (published March 2015) sets a target of 1171 dwellings a year for Havering to 2025 which is above the current adopted Local Plan (2008) target of 535 dwellings a year to 2020. It is understood that based on the current SHLAA technical work that most if not all of the housing requirement for Havering to meet its target in the newly published London Plan with alterations can be met on brownfield land. The London Plan only sets the target to 2025 and is subject to an early review. However Policy 3.3 of the London Plan does state that where Local plans are to be adopted before the London Plan Review the current annual figure for the borough should be rolled forward. Does Havering have sufficient sites identified on brownfield land or other to cover this as an annual requirement through the proposed new Local Plan period to 2031?</p> <p>Havering Council along with other North East London Boroughs is commencing a Strategic Housing Market Assessment (SHMA) in order to inform the preparation of Local Plans. The North East London SHMA would be consistent with the London Plan approach and also focus on requirements to identify tenure and type of housing. Further clarification on</p>	<p>Support noted.</p> <p>A Strategic Housing Market Assessment (SHMA) has been prepared jointly with the London Boroughs of Barking and Dagenham and Redbridge as part of the evidence base for the Proposed Submission version of the Local Plan in line with the requirements of the National Planning Policy Framework. The SHMA assesses housing need within the Outer North East London Housing Market Area (HMA). The Proposed Submission version of the Local Plan contains policies on housing mix and tenure to ensure need is met.</p> <p>The 2016 SHMA indicates that Havering's full Objectively Assessed Need (OAN) is for 30,052 new homes over the period 2011 – 2033 or 1,366 per annum. The London Plan sets the borough a target of delivering a minimum of 11,700 new</p>

Response Number	Respondent Name	Response to Q3	Council's response
		<p>the approach for SHMAs to be undertaken at local level is expected to be provided in a update to the London Plan Housing SPG. Thurrock Council supports this approach and welcomes the opportunity to be engaged and kept informed of the progress of the North East London Housing Market.</p> <p>The recently published London Plan with alterations (March 2015) sets a target of 1170 dwellings per annum for Havering as a minimum and only covers the period to 2025 based on assessment from the GLA SHLAA. If the North East London SHMA identifies an Objectively Assessed Need (OAN) figure higher the SHLAA capacity-derived figure of 1170 dwellings per annum from the London Plan what are the implications for the Havering new Local Plan in terms of a higher housing number? As previously highlighted is there sufficient land identified to meet the London Plan or a higher SHMA derived OAN figure for Havering for the period 2031?</p> <p>It is unclear at this stage if Havering Council identified sufficient brownfield land to accommodate a higher housing requirement and or whether this can this realistically be met by a further increase of density on brownfield sites in key development of other locations or here will be some requirement for Green Belt release. The London Plan with alterations suggests that further capacity to exceed the current minimum targets in the plan should be brought forward from intensification on sites, opportunity and other policy areas and further residential development in town centres and mixed use development.</p> <p>Thurrock Council along with other South Essex local authorities have commenced a further review of the Thames Gateway South Essex SHMA. Whilst the North East London and TGSE SHMAs may both remain self-contained for the purposes of the assessment it will be helpful to understand the key issues and challenges that impact on both housing market areas and support the exchange of any relevant information, data and understanding of methodologies as part of the technical work preparation and to support Duty to Co-operate on strategic planning issues.</p>	<p>homes over a ten year the period 2015 - 2025 with a proviso that the annual average (1,170) should be rolled forward for the remainder of the Local Plan period.</p> <p>The proposed Submission Local Plan aims to achieve the London Plan's minimum target for new housing delivery allocated to Havering and will seek to exceed the London Plan's minimum targets to close the gap between this and Havering's Objectively Assessed Housing Need as informed by the Outer North East London Strategic Housing Market Assessment (SHMA).</p> <p>The Council's approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement.</p> <p>The Council has engaged with Thurrock under the Duty to Co-operate and has shared a working draft of the Proposed Submission Local Plan for informal engagement. Housing supply was also discussed at our most recent meeting on 24th May 2017.</p>

Response Number	Respondent Name	Response to Q3	Council's response
REG18.66	Trinity Hall (Bidwells)	<p>The Local Plan should prioritise three key aspects: (a) achieving the London Plan's minimum targets for new housing delivery; (b) exceeding the London Plan's minimum targets to address objectively assessed housing needs and (c) ensuring that the Plan enables the provision of a suitable mix of homes in accordance with local needs. These are explained in detail below.</p> <p><u>The need to achieve the London Plan's minimum targets for new housing delivery</u></p> <p>The Local Plan will clearly need to conform to the requirements of the London Plan (published March 2015, consolidated with alterations since 2011), including the annualised target for Havering to deliver at least 1,170 dwellings per annum. We would strongly contend that the Council should identify and allocate additional sites to seek to significantly exceed this target, including a proportion of greenfield land, to ensure that the Local Plan is sufficiently flexible to ensure delivery.</p> <p>The Borough's London Plan housing target is identical to the capacity of sites identified as having potential to come forward for development during the London Plan period (2015 – 2025) in the London-wide Strategic Housing Land Availability Assessment 2013 (SHLAA). There is clearly very little margin for error in the anticipated delivery of these sites if the London Plan's objectives for Havering are to be achieved, unless additional sites are identified and allocated for development to provide a sufficient buffer for non-delivery.</p> <p>Indeed, we would contend that there is a very real risk that not all of the sites identified in the SHLAA will be delivered as anticipated, primarily because its estimate of capacity is based entirely on a supply of previously developed, brownfield sites. We understand that any land currently located within the Green Belt was automatically discounted as unsuitable for development when assessed by the SHLAA. By their very nature, previously developed sites are generally less deliverable than greenfield land due to</p>	<p>A Strategic Housing Market Assessment (SHMA) has been prepared jointly with the London Boroughs of Barking and Dagenham and Redbridge as part of the evidence base for the Proposed Submission version of the Local Plan in line with the requirements of the National Planning Policy Framework. The SHMA assesses housing need within the Outer North East London Housing Market Area (HMA). The Proposed Submission version of the Local Plan contains policies on housing mix and tenure to ensure need is met.</p> <p>The 2016 SHMA indicates that Havering's full Objectively Assessed Need (OAN) is for 30,052 new homes over the period 2011 – 2033 or 1,366 per annum. The London Plan sets the borough a target of delivering a minimum of 11,700 new homes over a ten year the period 2015 - 2025 with a proviso that the annual average (1,170) should be rolled forward for the remainder of the Local Plan period.</p> <p>The proposed Submission Local Plan aims to achieve the London Plan's minimum target for new housing delivery allocated to Havering and will seek to exceed the London Plan's minimum targets to close the gap between this and Havering's Objectively Assessed Housing Need as</p>

Response Number	Respondent Name	Response to Q3	Council's response
		<p>complications such as availability, existing use values and abnormal costs such as contamination. As a consequence, it would appear that relying entirely on brownfield land to seek to achieve the London Plan's housing target would present a very real risk of not delivering minimum targets.</p> <p>Havering's history of under delivery against London Plan targets compounds these concerns. Table 3.20 of the SHLAA (p86) confirms that the Borough delivered an average of only 367 dwellings between 2008 and 2012. This compares with an average London Plan target of 644 dwellings per annum during the same period and follows an average of 1,109 dwellings being granted planning permission every year between 2004 and 2012. This is an alarming pattern of undersupply that needs to be redressed.</p> <p>At present, there is a lack of any robust, locally derived evidence demonstrating that the supply of suitable brownfield land identified in the SHLAA will come forward as anticipated. The conclusions of the SHLAA were supported by a Viability Assessment³, but this is a very broad, high level study covering the whole of London. It provides a qualitative assessment of the current housing market across the capital, but due to its very broad approach this Assessment does not provide a sound basis to conclude that sites proposed for allocation in Havering's Local Plan will come forward as anticipated. Two key weaknesses supporting this contention are highlighted below:</p> <ul style="list-style-type: none"> - Due to the scale of the area that it needed to cover, the methodology employed by the Assessment was based on the appraisal of 40 case study sites drawn from 8 boroughs across the capital. None of these sites were located in Havering and therefore the particular issues affecting the local market were not fully examined. - Boroughs providing case study sites were selected where they were expected to make a significant contribution to overall housing land supply in London but had shown significant undersupply compared to 	<p>informed by the Outer North East London Strategic Housing Market Assessment (SHMA).</p> <p>The Council is aware of the potential risk that not all of the sites identified in the 2013 GLA SHLAA could be delivered as anticipated. To offset this risk the Council has reviewed the supply of housing and has taken a positive and proactive approach to identify and enable development opportunities for housing use of a combination of policy tools such as optimising housing output for different types of location within the relevant London Plan density range on brownfields sites, resisting the net loss of housing, positively and proactively enabling housing intensification in Council estates, in town and district centres, along transport corridors and prioritising all non-designated land for housing when it becomes available, and supporting initiatives to bring back empty residential properties into use. The Council's approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement</p> <p>The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more the</p>

Response Number	Respondent Name	Response to Q3	Council's response
		<p>London Plan targets in the three years to 2011/124. Havering was initially selected as a case study on this basis, highlighting concerns about the Borough amongst the authors of the report, but it was later rejected in favour of Hounslow to provide greater geographical spread. The concerns about viability in Havering were therefore never properly analysed.</p> <p>The SHLAA Viability Appraisal does not provide sufficient information to enable a definitive, or even a reasonable, conclusion to be reached in respect of local policy making. We would urge the Council to ensure that additional sites are identified and allocated to provide flexibility for non-delivery and to prepare additional, locally specific evidence to provide greater certainty about delivery. Without such evidence, the Local Plan would be vulnerable to a significant risk of non-delivery and would be unsound.</p> <p>In addition to the above, it is also pertinent to highlight that the National Planning Policy Framework (the "Framework" published 2012) requires local authorities to identify and update annually a supply of specific deliverable sites with an additional 5% buffer moved forward from later in the Plan period⁵ to ensure choice and competition in the market for land. This reaffirms the need to allocate sufficient sites to maintain flexibility. The Council's latest publicly available Annual Monitoring Report (AMR)⁶ suggests that it has a 5 year housing land supply with an additional 5% buffer as required by the Framework when assessed against the previous (2011) London Plan target. If, under a brownfield-only approach, the Council were to bring forward allocations from later in the Plan period to provide a 5% buffer and ensure flexibility in the short term, it would still be necessary to allocate further land (potentially Green Belt) to meet the displaced development requirements from the later stages of the Plan period. This could be undertaken through a partial review of the Local Plan process at that time, but such an approach carries risk because the certainty of delivery</p>	<p>purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan</p> <p>It should be noted that, irrespective of the inherent limitation of the broad approach in the qualitative assessment of the current housing market across London, the GLA SHLAA supported by a Viability Assessment has always been the accepted approach to identifying capacity for housing supply in London. Nonetheless, its output has always been accepted at EIPs as the basis for estimating capacity and allocating housing targets to London boroughs. A number of sites identified through the SHLAA process have already come forward for development.</p>

Response Number	Respondent Name	Response to Q3	Council's response
		<p>of such subsequent sites would not be known until that review process commences, contrary to the Framework.</p> <p>The Framework also urges local planning authorities to identify a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15 of the Plan period. Without an understanding of broad locations for growth (which could be realised through a Green Belt review), the Council would not have sufficient evidence to determine how it will deliver the development required in the latter stages of the Plan period, and the Plan would be unsound. We therefore consider that the time for the Council to consider such an approach, by commissioning a Green Belt review for the consideration of such suitable sites for housing, is now.</p> <p>Failure to take account of any of the above would result in an inflexible and non-deliverable Plan that would be unsound. The only reasonable solution is to consider the release of Green Belt land in the preparation of the Local Plan. This is why housing delivery should be a priority in the Local Plan.</p> <p><u>The need to exceed the London Plan's minimum targets to address objectively assessed housing needs</u></p> <p>The Framework requires local planning authorities to significantly boost the supply of housing. It requires authorities to use their evidence base to ensure that their Local Plans meet their objectively assessed housing needs. The new London Plan targets, taken as a whole, are 6,600 dwellings per annum short of meeting the objectively assessed housing needs of the capital. Nevertheless, it confirms that Boroughs should use their housing supply targets as minima, augmented by additional housing capacity to reduce the gap between local and strategic housing need and supply⁸. This underlines the need for the Council to take full account the potential contribution of Green Belt sites which no longer serve a valuable Green Belt function.</p>	

Response Number	Respondent Name	Response to Q3	Council's response
		<p><u>Housing Mix</u></p> <p>In addition to a sufficient quantum of new development, the Local Plan will also need to ensure that it enables the provision of a suitable mix of homes in accordance with local needs. The London Plan and its supporting evidence do not provide a breakdown of the mix and tenure of dwellings that should be provided in order to meet local need but a forthcoming update to the East London Strategic Housing Market Assessment (SHMA) will provide clarity on this matter. The Local Plan should therefore ensure that it adequately provides for the needed mix of housing as identified through the SHMA.</p> <p>It is likely that the mix of units required will include a good proportion of family homes with their own reasonably sized private amenity spaces, together with specialist accommodation, flats and affordable housing to cater for the needs of the community as a whole, to deliver mixed and balanced communities as required by the Framework. Not all types of site will be capable of delivering the mix of units required, with town centres and brownfield sites in other urban areas less likely to be capable of delivering family housing with private amenity areas and access to open space. To overcome this, the Local Plan should allocate a range of types of sites, including greenfield Green Belt land.</p> <p>To help illustrate this point, we are aware of a resolution by the Council's planning committee in 2014 to grant permission for 497 new dwellings on the former Somerfield depot in Rainham. No affordable housing was proposed because it would have been unviable to provide it. This was a brownfield site and it is likely that many of the viability constraints apply to other previously delivered land in the Borough. If Council were to adopt a brownfield-only approach, this example indicates that the Plan may be incapable of delivering sufficient affordable housing, which would be unsustainable and therefore contrary to wider objectives.</p>	

Response Number	Respondent Name	Response to Q3	Council's response
		We therefore consider that the Local Plan should ensure that a suitable range of sites, including Green Belt land, are made available and allocated in the Plan in order to facilitate a suitable mix of homes.	
REG18.67	Veolia ES (UK) Ltd	As a business with a large workforce in the LBH plan priority should be to ensure that there is supply of affordable property within the Borough.	The Proposed Submission version of the Local Plan aims to secure the highest level of affordable housing contributions by supporting a transparent approach to viability and information submission, in order to provide the required amount of affordable housing needed in the borough.
REG18.68	Woodland Trust	<p>The proximity of woodland to a proposed development site also needs to be acknowledged at some point with land going to be put forward for housing development. This should also be part of enhancing biodiversity and nature conservation, and also as a sustainable design principle for surface water run-off.</p> <p>The Woodland Trust would wish to see the view taken that proximity and access to woodland is an important contributor to creating healthy communities and 'place making'. As highlighted in Government policy by the Public Health White Paper (Healthy Lives, Healthy People; Nov 2010), there are currently tremendous opportunities for native woodland to contribute positively towards delivering improved mental and physical health. Research shows that woodland can provide benefits for air quality, urban heat island cooling, physical exercise provision and relief from mental illness.</p> <p>The White Paper states that: <i>"Access to green spaces is associated with better mental and physical health across socioeconomic groups."</i> and that <i>"Defra will lead a national campaign to increase tree planting throughout England, particularly in areas where tree cover would help to improve residents' quality of life and reduce the negative effects of deprivation, including health inequalities."</i></p>	<p> Havering's natural environment covers a wide range of natural assets, open spaces and designated nature conservation sites. The Proposed Submission version of the Local plan acknowledges the multiple benefits of Green Infrastructure and sets out how it requires development to provide for this.</p> <p>The Proposed Submission Version of the Local Plan seeks, informed by the Open Space Assessment Report and Standards Paper, to optimise proximity to open space for all development, rather than woodland specifically. This approach follows the requirements in the NPPF.</p>

Response Number	Respondent Name	Response to Q3	Council's response											
		<p>Recognising these policy linkages, the Woodland Trust has researched and developed the Woodland Access Standard (WAS_t) for local authorities to aim for, encapsulated in our <i>Space for People</i> publication. We believe that the WAS_t can be an important policy tool complimenting other access standards used in delivering green infrastructure for health benefits.</p> <p>Woodland Trust Woodland Access Standard recommends:</p> <ul style="list-style-type: none"> – that no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size – that there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round-trip) of people's homes. <p>Applying this standard in Havering, with a comparison against all the authorities in London as a whole, gives the following figures (see table below). It shows that although Havering has more access to woodland within 500m than the London average, for an outer London borough there is potential to do more.</p> <p>The data used can be supplied free of charge by the Woodland Trust both in map and in numerical/GIS form.</p> <p><u>Accessibility to Woodland in Havering using the Woodland Trust Woodland Access Standard</u></p> <table border="1" data-bbox="562 1046 1462 1281"> <thead> <tr> <th></th> <th></th> <th>Havering</th> <th>All London</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Accessible woods</td> <td>% population with access to 2ha+ wood within 500m</td> <td>14.7%</td> <td>12.9%</td> </tr> <tr> <td>% population with access to 20ha+ wood within 4km</td> <td>97.1%</td> <td>74.6%</td> </tr> </tbody> </table>			Havering	All London	Accessible woods	% population with access to 2ha+ wood within 500m	14.7%	12.9%	% population with access to 20ha+ wood within 4km	97.1%	74.6%	
		Havering	All London											
Accessible woods	% population with access to 2ha+ wood within 500m	14.7%	12.9%											
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		<p>'Space for People' is the first UK-wide assessment of any form of greenspace – the full 'Space for People' report can be found at http://www.woodlandtrust.org.uk/en/about-us/publications/key-publications/space-for-people/Pages/space-for-people.aspx.</p> <p>We would be pleased for <i>Space for People</i> and the WAsT to be used to inform the development of your new Local Plan for Havering.</p>	
POST18.4	V. Rajan and Associates	Demand based	<p>A Strategic Housing Market Assessment (SHMA) has been prepared jointly with the London Boroughs of Barking and Dagenham and Redbridge as part of the evidence base for the Proposed Submission version of the Local Plan in line with the requirements of the National Planning Policy Framework. The SHMA assesses housing need within the Outer North East London Housing Market Area (HMA). The Proposed Submission version of the Local Plan contains policies on housing mix and tenure to ensure need is met.</p>

Question 4: Where do you think new homes should be located?

Response Number	Respondent Name	Response to Q4	Council's response
REG18.1	AECOM	<p>We believe the best option of accommodating a significant proportion of the borough's housing growth is a garden village at Bush Farm. The site would provide a significant portion of much needed housing, with employment and community uses for the borough whilst minimising the spread of sporadic development. This would alleviate the challenges to existing town and village infrastructure from having to provide increased services to accommodate small piecemeal developments.</p> <p>A new settlement would present a significant opportunity that must be realised, through:</p> <ul style="list-style-type: none"> – Providing community open space as part of a new settlement, and not placing any strain on provision; – Providing sufficient economies of scale to deliver new infrastructure and services, including schools, again placing no additional strain on existing provision; – Providing the flexibility to locate a new town in an area of low landscape / biodiversity sensitivity, and to incorporate any significant features as part of the development; – Avoiding any negative impact on historic character by locating the majority of development away from existing historic towns and villages; and – Delivering mixed use development, creating a community that includes new shops and services, rather than locating homes on the periphery of existing towns, away from the existing town centre and services. <p>Land at Bush Farm in Corbets Tey has the potential to deliver approximately 1,186 homes. This figure would significantly contribute to meeting the housing requirements of the authority as well as supporting economic</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt land in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to make any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p> <p>For these reasons the Council will not be seeking to release green belt land for housing.</p> <p>The Council's approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement.</p>

Response Number	Respondent Name	Response to Q4	Council's response
		growth and sustainable development over a 15 year period.	
REG18.2	Adams Family (Bidwells)	<p>The Council should seek to allocate a balance of brownfield and Green Belt land for new homes across the Borough.</p> <p>This approach would mean that suitable Green Belt sites which do not contribute to the function of the Green Belt, as well as brownfield sites, could accommodate new homes. A balanced approach to the location of new housing is the only way the Plan would be able to provide sufficient flexibility to be able to deliver the scale and mix of housing needed to meet the Borough's minimum target as prescribed by the London Plan, and to address housing needs as informed by the SHMA.</p> <p>As an absolute minimum the Council should conduct a Green Belt review to help determine what Green Belt land is the least sensitive to new development. We commend the approach taken by London Borough of Redbridge which identifies that some Green Belt release is needed to meet its significant local housing needs; furthermore this approach is supported by evidence. We would urge the Council to take a similar approach.</p> <p>In conclusion, we consider that new homes should be located on a range of carefully selected sites including Green Belt land, in order to provide sufficient flexibility that the Plan is deliverable. The Council should commission a Green Belt Review to assist in this process.</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt land in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to make any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p> <p>For these reasons the Council will not be seeking to release green belt land for housing.</p> <p>The Council's approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement.</p>
REG18.3	Anonymous	There should be individual planning applications for approximately five houses at a time. All developments should only be tiny.	This approach would not be consistent with the NPPF or in general conformity with the London Plan.
REG18.8	Brett Aggregates Limited (MJCA)	<p>The Local Plan should make provision for a range of housing requirements in the Borough in keeping with local needs however the provision of new homes should not result in the sterilisation of mineral resources.</p> <p>There are only four boroughs in Greater London that are capable of producing London's aggregates and the majority of the aggregate demand of the capital is met by importing aggregates from outside the capital by</p>	The Local Plan aims to deliver a range of high quality new high quality housing of varying types, tenures and sizes in keeping with local needs on brownfield sites in sustainable locations across the borough that will not result in the sterilisation of mineral resources. The Proposed

Response Number	Respondent Name	Response to Q4	Council's response
		<p>waterway, rail or road. It is therefore important to safeguard, maintain and make use of local sources of aggregates for use in the construction and maintenance of housing stock, building and infrastructure in the local area as well as the wider area of Greater London in accordance with The London Plan.</p> <p>The Minerals Safeguarding Areas included in the current Havering Local Plan should be preserved and continued in the new Local Plan in order to safeguard mineral reserves from being sterilised by non-mineral development. Through the Plan development process information should be sought and obtained actively to identify any further areas of mineral reserves which should be subject to safeguarding. The Plan should recognise that suitably located mineral extraction sites can be restored by backfilling with suitable materials to specified standards to recover the land to a form suitable for subsequent built development including housing.</p>	Submission version of the Local Plan aims to maintain an appropriate landbank of mineral resources by safeguarding mineral reserves in Havering.
REG18.9	C. Cole	<ul style="list-style-type: none"> - Town centres - In fill anywhere (gardens) 	The Council's approach to housing is to deliver new high quality homes on brownfield sites including town centres and appropriate infill development in sustainable locations across the borough. Support is also given for residential development on garden and backland sites subject to detailed design, amenity and access considerations.
REG18.11	Clive Narrainen	Harold Hill	The Local Plan aims to deliver a range of high quality new high quality housing of varying types, tenures and sizes in keeping with local needs on brownfield sites in sustainable locations across the borough
REG18.12	D. Campbell	Factories and unused buildings would be a sufficient place to rebuild homes. Not on our green.	The Council's approach to housing is to deliver new high quality homes on brownfield sites, including sites released from industrial use, in sustainable locations

Response Number	Respondent Name	Response to Q4	Council's response
			across the borough
REG18.13	D.K.Symes Associates	Generally through the reuse of land within the existing developed areas. However, in view of the strong levels of demand the Green Belt boundaries need to be reviewed to see if there are acceptable areas that can be developed.	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt land in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to make any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p> <p>For these reasons the Council will not be seeking to release green belt land for housing.</p> <p>The Council's approach to increasing housing supply is set out in further detail in the Proposed Submission version of the Local Plan Housing Position Statement.</p>
REG18.14	Edward Gittins & Associates	We consider that in order to meet the housing needs in full, in addition to redevelopment at higher densities and brownfield sites, carefully selected sites within the Green Belt will need to be identified on the edge of the existing built-up area.	The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt land in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to make any modifications to the Green Belt in the

Response Number	Respondent Name	Response to Q4	Council's response
			<p>Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p> <p>For these reasons the Council will not be seeking to release green belt land for housing.</p> <p>The Council's approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement.</p>
REG18.21	Havering College of Further and Higher Education (Iceni Projects)	HCFHE believe that new homes should be delivered proportionally across the Borough. Existing brownfield land in the Borough should be utilised for residential development. However, HCFHE encourages LBH to recognise the importance and fundamental role that previously developed sites in the Green Belt play in accommodating residential development incorporating a number of family sized dwellings. This is important on sites such as the College's Quarles campus at Tring Gardens, Harold Hill – further details are provided in response to Question 10.	The Council recognises the importance and fundamental role that previously developed sites in the Green Belt can play in accommodating residential development, and will, in the specific instance of the College's Quarles campus at Tring Gardens, Harold Hill, support redevelopment.
REG18.24	Higgins Homes (Nathaniel Lichfield & Partners)	Within or at the boundary of existing settlements – Given the need to meet the increased housing requirements outlined in the London Plan, consideration should be given to releasing areas of the Green Belt for residential development which are in a sustainable location as extensions to existing settlements, where there are clearly defined boundaries and where none of the purposes of the Green Belt are met.	The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt land in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to make any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.

Response Number	Respondent Name	Response to Q4	Council's response
			<p>For these reasons the Council will not be seeking to release green belt land for housing.</p> <p>The Council's approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement.</p>
REG18.26	Ian Weatherley	<p>The beam reach area is a good example where space exists to build high-quality homes and social infrastructure for a thriving community to live and grow.</p> <p>There are also many brown-field sites on the outskirts of Havering where new developments can be built for high quality homes – where wealthier Havering residents could move to – freeing up existing homes and flats within the borough.</p>	<p>Rainham and Beam Park is identified within the Proposed Submission Local Plan as a major growth area where an exciting new residential neighbourhood linked to the delivery of a new railway station on the existing C2C line at Beam Park will be established.</p> <p>The Council's approach to housing is to deliver high quality new homes on brownfield sites in sustainable locations across the borough.</p>
REG18.27	Janet Davy	<p>On brownfield sites, not green belt, public open spaces or school playing fields. Preferably houses (possibly bungalows for sheltered housing) – restrict flats to areas near stations – better for commuters and reduction in car use.</p> <p>New 'luxury' housing not required.</p>	<p>The Council's approach to housing is to deliver new high quality homes on brownfield sites. The Proposed Submission version of the Local Plan supports the delivery of a range of high quality housing types, tenures and sizes to meet the varying needs of local residents.</p>
REG18.28	Joe Coogan	<p>Where sites allow, even development across the borough should be sought. Opportunities to expand existing estates should be considered if underused greenbelt land can be reclassified and brought into use.</p>	<p>The Council's approach to housing is to deliver new high quality homes on brownfield sites including the redevelopment of Council housing estates.</p> <p>The Council has undertaken a Green Belt</p>

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			<p>study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt land in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to make any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p> <p>For these reasons the Council will not be seeking to release green belt land for housing.</p> <p>The Council's approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement.</p>
REG18.29	John Peterson	Away from town centres already too crowded. The slums of tomorrow	The Council's approach to housing is to deliver new high quality homes on brownfield sites in sustainable locations across the borough including in town centres. The Proposed Submission Local Plan includes policies on urban design, residential amenity and infrastructure provision to create places where residents wish to live.
REG18.30	London Borough of Barking and	As partners with Havering in the London Riverside Opportunity Area we support the strategy set out in the draft London Riverside Opportunity Area and we hope this will be taken forward in the review of the Local Plan.	Support noted.

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	Dagenham		
REG18.32	Lee Clements	Only on brownfield land.	The Council's approach to housing is to deliver new high quality homes on brownfield sites in sustainable locations.
REG18.33	Mr Leslie Budge (Andrew Martin Planning)	<p>The site lies to the north of Shepherds Hill, a local road running in an east-west direction and linking the site to Romford in the southwest and Brentwood in the northeast. The site is centred within a triangular shaped area of land bounded by three principal routes – the M25 (2.8 miles), the A12 (1 mile) and A127 (0.8 miles). Harold Wood railway station lies some 0.64 miles to the northwest of the site and is on the main line into London Liverpool Street station. Notably Harold Wood station is also proposed to serve Crossrail, once it has been extended from Stratford to Shenfield. Services are expected to commence in 2018 and will introduce 12 high capacity trains at peak times in each direction between central London and Shenfield. Other services and facilities within close proximity of the site, including Harold Wood neighbourhood centre, are shown on the local services plan that accompanies the enclosed sustainability appraisal.</p> <p>The site is currently in use predominantly as pasture for grazing horses. In the southwest, the site has continuous frontage with Shepherds Hill. Further to the southeast it is separated from the road by a line of existing housing in a ribbon form along both sides of the road. There has also been some backland development. There are two main vehicular access points to the site from Shepherds Hill; one in the centre of the site leads to the property known as Little Paddocks and its associated land.</p> <p>The site is visually contained by existing housing to the south and vegetation along the field boundaries and the flood plain of the River Ingrebourne to the west and north-west. The northern boundary of the site is in close proximity to the railway line, which is set on an embankment. To the north-east lies Harold Court Woods, a dense area of woodland in the ownership of the Forestry Commission. A private access road to Harold Court Woods forms the eastern edge of the site and is bounded along its</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt land in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to make any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p> <p>For these reasons the Council will not be seeking to release green belt land for housing.</p> <p>The Council's approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement.</p>

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		<p>length by existing vegetation. Existing vegetation within the site along field boundaries provides further screening.</p> <p>The overall total site area, as shown on the enclosed site location plan, extends to 33.5 hectares. Much of the site is capable of accommodating new residential-led development. The remainder of the site could accommodate open space and / or an extension to the adjoining Harold Court Woods recreation area, together with a network of new footpaths and buildings for public enjoyment, including a new riverside walk adjacent to the River Ingrebourne, which could form a new link to Harold Court Woods.</p> <p>The landowners confirm that this site is 'deliverable'. Consistent with paragraph 47 of the NPPF, this means the site is:</p> <ul style="list-style-type: none"> – available now (the site has no current use that would delay development, and if necessary, prior mineral extraction could take place while an application for housing development is being prepared); – offers a suitable location for development (the site is well connected and contained as outlined above and the enclosed sustainability appraisal recognises that the site performs well against key sustainability objectives); and – is achievable with a realistic prospect that housing will be delivered within five years (any workable minerals could be extracted prior to development and the first 100 dwellings could be completed by the end of 2019) and that development will be viable (the landowners do not envisage any viability issues here). <p>This site could accommodate in excess of 500 dwellings, which is based on</p>	

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		<p>a modest density in view of the site's constraints and the sensitivity of the boundaries, i.e. the adjoining Harold Court Woods to the north-east. There is scope to provide new public green space, a riverside walk adjacent to the River Ingrebourne and / or an extension to the adjoining Harold Court Woods recreation area, in the more environmentally sensitive parts of the site. An indicative master plan accompanies this submission and this illustrates how residential development can be accommodated on this site, whilst having consideration for the site's constraints and surrounding context.</p>	
REG18.34	Margaret Whippy	<p>As more than half of Havering is green belt there is plenty of space around existing towns where housing could be developed. Holding land purely for green belt when not all of it is prime agricultural land makes no sense, especially as a nation we need to build more homes for our own people. Filling pockets of land between existing housing needs to be encouraged, also towns need to expand so allowing for that makes sense.</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt land in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to make any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p> <p>For these reasons the Council will not be seeking to release green belt land for housing.</p> <p>The Council's approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement.</p>
REG18.36	Moody Homes and	<p>The Council should seek to allocate a balance of brownfield and Green Belt land for new homes across the Borough.</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the</p>

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	Mr John Wakeling (Bidwells)	<p>This approach would mean that suitable Green Belt sites which do not contribute to the function of the Green Belt, as well as brownfield sites, could accommodate new homes. A balanced approach to the location of new housing is the only way the Plan would be able to provide sufficient flexibility to be able to deliver the scale and mix of housing needed to meet the Borough's minimum target as prescribed by the London Plan, and to address housing needs as informed by the SHMA.</p> <p>As an absolute minimum the Council should conduct a Green Belt review to help determine what Green Belt land is the least sensitive to new development. We commend the approach taken by London Borough of Redbridge which identifies that some Green Belt release is needed to meet its significant local housing needs; furthermore this approach is supported by evidence. We would urge the Council to take a similar approach.</p> <p>In conclusion, we consider that new homes should be located on a range of carefully selected sites including Green Belt land, in order to provide sufficient flexibility that the Plan is deliverable. The Council should commission a Green Belt Review to assist in this process.</p>	<p>Local Plan. The study concluded that all of the Green Belt land in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to make any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p> <p>For these reasons the Council will not be seeking to release green belt land for housing.</p> <p>The Council's approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement.</p>
REG18.37	Mr Barrie Stone and Miss Eleanor Stone	Within reasonable distance of town centre with good transport links.	The Council's approach to housing is to deliver new high quality homes on brownfield sites in sustainable locations across the borough including both within town centres and within reasonable distance of town centres with good transport links.
REG18.38	Mr T Clemence (DHA Planning)	In sustainable locations in the urban area, on land located on the edge of settlement confines and on greenfield land within the green belt which is sustainable and appropriate for residential development which is unnecessary to keep permanently open.	The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt land in the borough makes a contribution towards one or more purposes of the Green Belt identified in the

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			<p>NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to make any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p> <p>For these reasons the Council will not be seeking to release green belt land for housing.</p> <p>The Council's approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement.</p>
REG18.39	Mrs S J Ellis (Bidwells)	<p>The Council should seek to allocate a balance of brownfield and Green Belt land for new homes across the Borough.</p> <p>This approach would mean that suitable Green Belt sites which do not contribute to the function of the Green Belt, as well as brownfield sites, could accommodate new homes. A balanced approach to the location of new housing is the only way the Plan would be able to provide sufficient flexibility to be able to deliver the scale and mix of housing needed to meet the Borough's minimum target as prescribed by the London Plan, and to address housing needs as informed by the SHMA.</p> <p>As an absolute minimum the Council should conduct a Green Belt review to help determine what Green Belt land is the least sensitive to new development. We commend the approach taken by London Borough of Redbridge which identifies that some Green Belt release is needed to meet its significant local housing needs; furthermore this approach is supported by evidence. We would urge the Council to take a similar approach.</p>	<p>The Council's approach to housing delivery is to optimise housing output from brownfield sites in sustainable locations across the borough, but outside the Green Belt.</p> <p>The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt land in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to make any modifications to the Green Belt in the Proposed Submission version of the Local</p>

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		In conclusion, we consider that new homes should be located on a range of carefully selected sites including Green Belt land, in order to provide sufficient flexibility that the Plan is deliverable. The Council should commission a Green Belt Review to assist in this process.	Plan following the approach set out in the NPPF and London Plan. For these reasons the Council will not be seeking to release green belt land for housing. The Council's approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement.
REG18.40	Ms M Blackman	See Q3	N/A
REG18.41	National Grid Property (Carter Jones)	It is sensible for sites located within very close proximity to town centres (e.g. Romford Town Centre) to be utilised for the delivery of new homes. Making the best use of brownfield land must be supported by the Local Plan e.g. appropriate remediation in order to deliver new homes.	The Council's approach to housing delivery is to optimise housing output from brownfield sites in sustainable locations including those in close proximity to town centres.
REG18.42	Natural England	We note that the London Borough of Havering is looking to find suitable locations for new housing development within the Borough and we comment that it would be advisable if new housing in the Borough is not located within a 1km radius from the boundaries of either the Inner Thames Marshes or Ingrebourne Marshes. These are designated Sites of Special Scientific Interest (SSSIs) and are protected under UK legislation. For large scale housing applications or those affecting water courses, it is preferable if the radius from the SSSIs within which housing is not located is increased to 2km. The National Planning Policy Framework (NPPF) outlines the importance of the protection of SSSIs and any proposed development not having adverse impacts on SSSIs at paragraph 118 as follows: “...(any) proposed development on land within or outside a Site of Special	The Council has engaged with Natural England in the drafting of the Proposed Submission version of the Local Plan policies, which include policies seeking to ensure that developments do not have adverse impacts on SSSIs.

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		<p>Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest."</p> <p>The following link on our website provides access to details of individual SSSIs – http://www.sssi.naturalengland.org.uk/Special/sssi/search.cfm.</p>	
REG18.43	Omega After Alpha Ltd (Bidwells)	<p>The Council should seek to allocate a balance of brownfield and Green Belt land for new homes across the Borough.</p> <p>This approach would mean that suitable Green Belt sites which do not contribute to the function of the Green Belt, as well as brownfield sites, could accommodate new homes. A balanced approach to the location of new housing is the only way the Plan would be able to provide sufficient flexibility to be able to deliver the scale and mix of housing needed to meet the Borough's minimum target as prescribed by the London Plan, and to address housing needs as informed by the SHMA.</p> <p>As an absolute minimum the Council should conduct a Green Belt review to help determine what Green Belt land is the least sensitive to new development. We commend the approach taken by London Borough of Redbridge which identifies that some Green Belt release is needed to meet its significant local housing needs; furthermore this approach is supported by evidence. We would urge the Council to take a similar approach.</p> <p>In conclusion, we consider that new homes should be located on a range of carefully selected sites including Green Belt land, in order to provide sufficient flexibility that the Plan is deliverable. The Council should commission a Green Belt Review to assist in this process.</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt land in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to make any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p> <p>For these reasons the Council will not be seeking to release green belt land for housing.</p> <p>The Council's approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement.</p>

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REG18.44	Persimmon Homes	<p>New homes should be located in the most sustainable locations. This will ensure homes are delivered and minimise any impact on the local community and environment. The location of Havering in relation to Greater London means that development is predominately low density housing. Romford Town Centre and Neighbouring Centres of Hornchurch, Upminster, Collier Row, Elm Park, Harold Hill and Rainham provide higher density development. The new Local Plan should seek to maintain and enhance this development pattern within the borough.</p> <p>The release of Green Belt land for development receives more political and public opposition. National Planning Policy encourages the effective use of land by reusing land that has been previously development. Persimmon Homes agrees that council's should seek to achieve this requirement but argues that the development of brownfield land is not always achievable as they are often deemed unviable, due to site remediation costs. The Council should also therefore seek the allocation of greenfield land for development so that it can guarantee the timely delivery of these sites and thus maintain a 5 year housing land supply. The allocation of large strategic sites will enable the council to provide a steady supply of housing over a longer period of time.</p>	<p>Noted. The Council's approach to housing is to optimise the delivery of new high quality homes output including providing residential development consistent with the London Plan density range on brownfield sites in the most sustainable locations across the borough including in town centres.</p> <p>The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt land in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to make any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p> <p>For these reasons the Council will not be seeking to release green belt land for housing.</p> <p>The Council's approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement..</p>

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REG18.46	Planning Potential Rep 2.	<p>The London Plan (2015) identified broad locations for residential development in Romford, including Romford Town Centre and London Riverside. Given the significant increase in housing requirements to 1,170 new dpa, it is our view that the Council will need to identify areas for housing outside of these locations.</p> <p>It is understood that one of the core planning principles of the NPPF (Para 17) is to encourage the effective use of land by reusing land that has been previously developed. However, given the significant increase in housing need, we consider it highly likely that the Council will need to look at potential greenfield and Green Belt sites within the Borough, where development would constitute sustainable development in accordance with the 3 planning roles, social, environmental and economic. There is an acceptance, nationally, that the full objectively assessed housing need, is unlikely to be accommodated purely on previously developed land. It is also accepted that not all sites perform the function of Green Belt. On this basis, with regard to Havering, appropriate greenfield and Green Belt sites, should be reviewed and considered in relation to the need for housing.</p> <p>As part of this, we encourage the Council to investigate the potential for reviewing the Green Belt boundaries, which is supported by paragraphs 83-85 of the NPPF, as it is possible that some sites continue to be given this high level of protection where indeed its redevelopment would be more sustainable than that of greenfield sites, which do not have the same level of protection. Paragraph 83 states "Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At the time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period". We provide further detailed comments in our representations relating to Question 10.</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt land in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to make any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p> <p>For these reasons the Council will not be seeking to release green belt land for housing.</p> <p>The Council's approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement.</p>

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REG18.47	R. Watt and Partners (Phillips Planning Services)	It is considered that new homes should be located in accessible locations which are or have the potential to be well linked to services, facilities and places of work.	Noted. The Council's approach to housing is to deliver new high quality homes on brownfield sites in sustainable locations across the borough with adequate supporting infrastructure.
REG18.48	R.A.Montague	Brownfield and Greenfield locations but not in the Green Belt and not concentrated in one location.	Romford town centre and Rainham and Beam Park will be the main growth areas in Havering for housing as a result of their development potential. However the Council's approach to housing is to deliver new high quality homes on brownfield sites in sustainable locations across the borough.
REG18.50	Rainham Preservation Society	Spread fairly across the borough and not targeting Rainham and South Hornchurch for high density 'affordable' or housing association properties.	Romford town centre and Rainham and Beam Park will be the main growth areas in Havering for housing as a result of their development potential. However the Council's approach to housing is to deliver new high quality homes of various types, sizes and tenures including affordable homes across the borough.
REG18.51	Ray Whitehouse	Riverside together with improved infrastructure. Not Romford and not Harold Hill.	Noted. Rainham and Beam Park in Riverside is identified as a Strategic Development Area providing an opportunity where an exciting new residential neighbourhood will be established. Romford town centre and Rainham and Beam Park will be the main growth areas in Havering for housing as a result of their development potential. However the Council's approach to housing is to deliver

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			new high quality homes of various types, sizes and tenures including affordable homes across the borough.
REG18.52	Romford Civic Society	We support the principle of town centre development, but it requires an increase in amenity space and green space in the town centre to be socially sustainable.	Support noted. The Proposed Submission version of the Local Plan contains policies requiring development to provide high quality amenity space. The Plan also supports development which contributes to the 'greening' of Romford.
REG18.53	Romford Golf Club (Joe Coogan)	Where sites allow, even development across the borough should be sought. Opportunities to expand existing estates should be considered if underused greenbelt land can be reclassified and brought into use.	<p>The Proposed Submission version of the Local Plan contains policies supporting intensification and renewal of Council's estates.</p> <p>The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt land in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to make any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p> <p>For these reasons the Council will not be seeking to release green belt land for housing.</p> <p>The Council's approach to increasing</p>

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			housing supply is set out in further detail in the Local Plan Housing Position Statement.
REG18.54	Romford YMCA	<p>Romford YMCA suggests that the council explores all options to exhaust the brownfield sites within the borough. However, it is also understandable that the borough may need to review the Green Belt land, and Romford YMCA has on Upper Rainham Road which could be used to that effect.</p> <p>Romford YMCA also suggests that any new development, takes in the factors of schools, transport, leisure and health amenities.</p>	<p>Noted. The Council's approach to meet its housing supply target has been through the adoption and use of a combination of policy tools such as optimising housing output for different types of location within the relevant London Plan density range on brownfields sites, resisting the net loss of housing, positively and proactively enabling housing intensification in Council estates, in town and district centres, along transport corridors and prioritising all non-designated land for housing when it becomes available, and supporting initiatives to bring back empty residential properties into use.</p> <p>The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt land in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to make any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the</p>

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			<p>NPPF and London Plan.</p> <p>For these reasons the Council will not be seeking to release green belt land for housing.</p>
REG18.55	Rowley Cardrome Ltd (Montagu Evans)	<p>Core Strategy CP1 of the London Borough of Havering's (LBH) current Core Strategy (2008) states that the Council will build a minimum of 535 new homes per annum by prioritising the development of brownfield land and ensuring it is used efficiently. The recently published London Plan (Consolidated with Alterations since 2011) has set LBH a target of providing a minimum of 1,170 new homes per annum.</p> <p>The current Authority Monitoring Report (2012-2013) notes that the Borough has a five year projected completion figure of 5,676 new residential dwellings between 2013/14 to 2017/18. This falls short of the new annual requirement set out in the London Plan (5,850). In accordance with the NPPF, a 5% buffer should also be added to the annual requirement of 1,170, equating to a target of 6,143. Consequently, LBH must identify additional locations for housing provision to meet the increased strategic target both in the short term and across the Plan period.</p> <p>New homes should be located in sustainable locations, close to good public transport links, local amenities and other development that would not affect the residential amenity of the future occupiers.</p> <p>Residential development should be concentrated on previously developed land, preferably within or adjacent to existing residential areas to reduce the need to build on undeveloped greenfield land.</p> <p>The Site represents a previously developed site as established by its current allocation as a Major Developed Site in the Green Belt. Under the current</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt land in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to make any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p> <p>For these reasons the Council will not be seeking to release green belt land for housing.</p> <p>It is recognised that as the site was previously designated as a Major Developed site in the Green Belt there may be some potential for re-development in line with green belt policy set out in the National Planning Policy Framework.</p>

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		<p>allocation a certain amount of redevelopment is therefore already established under Core Strategy Policy DC46.</p> <p>Given the established need to release some Green Belt land it is logical that first focus should be on those Green Belt sites that are already identified for development. Optimisation of such sites can only serve to enhance the sustainability credentials of such sites on which some development</p> <p>In response to the advice provided by Montagu Evans' in terms of Planning Policy, Formation Architects were asked to prepare a masterplan for the site. A copy of the illustrative masterplan can be found at Appendix 2. This masterplan demonstrates that the redevelopment of the site has the potential to provide circa 250 residential units that would go towards the Council's existing and future housing targets.</p> <p>The delivery of a significant number of units on this previously developed site should be given significant weight by the Council. In addition, the site's location within a suburban area lends itself to proposing a residential led scheme of this scale, density and design proposed. With this provision there will also be significant allocation of affordable housing.</p>	
REG18.56	S.D. Olney	In areas where less dense properties are situated, but no high rise development.	Romford town centre and Rainham and Beam Park will be the main growth areas in Havering for housing as a result of their development potential. However, the Council's approach to housing is to optimise site output in delivering new high quality homes on brownfield sites in sustainable locations across the borough.
REG18.57	Sheila Clements	In places lying empty already, not building more and more. This should only be done in an emergency. Also it is not affordable housing that is being built. One developer in Rainham, when the financial downturn began, asked the Council if he could be let off from building affordable housing on his site because prices were low and he would not make the profit he had hoped	The Proposed Submission version of the Local Plan aims to secure the highest level of affordable housing contributions by supporting a transparent approach to viability and information submission, in

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		for. What did the Council do, they gave him the go ahead to just build high cost housing instead. He must be laughing all the way to the bank now.	order to provide the required amount of affordable housing needed in the borough.
REG18.58	Sport England	The location for new homes should not result in the loss of open space sport and recreation land and buildings in accordance with paragraph 74 of the NPPF. The Local Plan should reflect this.	The Proposed Submission version of the Local Plan contains policies to preserve open space.
REG18.60	Thames Water Utilities Ltd (Savills)	Thames Water would not object in principle to the allocation of any sites for housing development; however it is considered that development should not increase the risk or frequency of sewer flooding.	Noted, sewer capacity has been addressed by the London Plan.
REG18.61	The Crown Estate (Amec Foster Wheeler)	<p>The key theme running through NPPF is a presumption in support of sustainable development (paragraph 14). Other guidance provided in NPPF seeks to ensure that sustainable development is delivered through a number of steps including managing patterns of growth to ensure development takes place in locations which are or can be made sustainable (paragraph 17) and facilitate the use of sustainable modes of transport.</p> <p>To contribute to the aims of achieving sustainable patterns of development as per the requirement of NPPF, the Plan should ensure that housing is developed in suitable locations which offer a range of community facilities and with good access to jobs, key services and infrastructure. The Crown Estate believes that it can contribute towards delivering housing in sustainable locations through its extensive land ownership in Havering including land at Collier Row (see question 10).</p> <p>To save placing total reliance on brownfield sites which often have more constraints to bringing them forward for development, the Plan should allocate a mix of brownfield and greenfield sites, including a range of options such as The Crown Estate's land to provide flexibility in supply and allow the Council to respond quickly to fluctuations in delivery. Additional allocations, including The Crown Estate's sites (see question 10) can assist in planning for the longer term needs, including delivering affordable housing, rather than persisting with the piecemeal approach provided by an over reliance on brownfield sites and windfalls. We consider that there are a number of</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt land in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to make any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p> <p>For these reasons the Council will not be seeking to release green belt land for housing.</p> <p>The Council's approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement.</p>

Response Number	Respondent Name	Response to Q4	Council's response
		<p>benefits in identifying a supply of greenfield sites. These include:</p> <ul style="list-style-type: none"> – It can help with the delivery of market and affordable housing. It is far easier to bring forward affordable housing on planned greenfield allocations compared to brownfield sites; thereby reducing net migration of the economically active population and help to retain and attract a younger population. – Greenfield sites often have fewer constraints and can therefore make a greater contribution towards community facilities through CIL and s.106 contributions. – It reduces pressure on employment land being lost to housing which, risks undermining growth in the economy and creating dormitory settlements where people commute to larger centres outside for work. – It would save placing reliance on previously developed sites to deliver which may have more constraints such as contamination. 	
REG18.63	Thomas Bates and Son Ltd. (Andrew Martin Planning)	<p>As illustrated on the attached Site Location Plan, Land off Wingletye Lane, Hornchurch comprises a broadly square shaped plot of level scrubland bounded by existing housing to the south (rear of Wych Elm Road) and to the west (on the opposite side of Wingletye Lane), Lillyputts Farm to the north and agricultural fields to the east. The site extends to approximately 2.7 hectares (6.67 acres). Located on the outskirts of the existing Emerson Park settlement to the north east of Hornchurch town centre, the site is well linked in terms of community infrastructure, services and facilities.</p> <p>The site is located within a 20 minute walk from educational establishments catering for all age groups (primary through to sixth form). Emerson Park School is only a 5 minute walk from the site. In addition, well-established transportation links adjacent to the site, would ensure that schools further afield are also accessible.</p> <p>In addition to nearby existing bus routes, Emerson Park train station is a 20 minute walk from the site or, for a direct route into central London, Upminster station is a half an hour walk away (1.5 miles) and is served by</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt land in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to make any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p> <p>For these reasons the Council will not be seeking to release green belt land for housing.</p>

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		<p>the District line. Furthermore, Hornchurch station is a short bus ride away and is also served by District line. The site is therefore accessible to those who work in central London, in addition to those who work and/or shop more locally in Hornchurch, Romford or Upminster town centres. Highway access to the strategic road network (A127 – 0.8 miles and M25) is provided via Wingletye Lane.</p> <p>The landowner confirms that the site is 'deliverable', consistent with paragraph 47 of the NPPF, which means the site is:</p> <ul style="list-style-type: none"> – available now (the site has no current use that would delay development); – offers a suitable location for development (the site is well connected and contained); and – is achievable with realistic prospect that housing will be delivered within five years and that development will be viable (the landowners do not envisage there being any issues regarding viability). <p>This site could accommodate approximately 68 dwellings, based on a modest density of 25 dwellings per hectare, as shown on the master plan accompanying this submission. The master plan is indicative in nature and illustrates how residential development could be accommodated on site, allowing for the sensitive treatment of design in a Countryside Conservation Area. This density could be varied if deemed necessary by London Borough of Havering.</p>	<p>The Council's approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement.</p>
REG18.66	Trinity Hall (Bidwells)	<p>The Council should seek to allocate a balance of brownfield and Green Belt land for new homes across the Borough.</p> <p>This approach would mean that suitable Green Belt sites which do not</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt land in the borough makes</p>

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		<p>contribute to the function of the Green Belt, as well as brownfield sites, could accommodate new homes. A balanced approach to the location of new housing is the only way the Plan would be able to provide sufficient flexibility to be able to deliver the scale and mix of housing needed to meet the Borough's minimum target as prescribed by the London Plan, and to address housing needs as informed by the SHMA.</p> <p>As an absolute minimum the Council should conduct a Green Belt review to help determine what Green Belt land is the least sensitive to new development. We commend the approach taken by London Borough of Redbridge which identifies that some Green Belt release is needed to meet its significant local housing needs; furthermore this approach is supported by evidence. We would urge the Council to take a similar approach. In conclusion, we consider that new homes should be located on a range of carefully selected sites including Green Belt land, in order to provide sufficient flexibility that the Plan is deliverable. The Council should commission a Green Belt Review to assist in this process.</p>	<p>a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to make any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p> <p>For these reasons the Council will not be seeking to release green belt land for housing.</p> <p>The Council's approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement.</p>
REG18.69	Wyevale Garden Centres (Gregory Gray Associates)	<p>The Local Plan should be consistent with the NPPF by encouraging the reuse of previously developed (brownfield) land. Our client's site, Upminster Garden Centre, was submitted in response to the Council's 2014 call for sites. It is currently highly developed and benefits from good access arrangements. It would provide a suitable location for new residential (or employment) development which could be achieved in accordance with para. 89 of the NPPF.</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt land in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to make any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p>

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			<p>For these reasons the Council will not be seeking to release green belt land for housing.</p> <p>The Council's approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement.</p>
POST18.4	V. Rajan and Associates	Romford Town Centre	Romford is one of the two main areas for growth in the Local Plan. Support noted.

Question 5: How do you think the Local Plan should continue to support the protection, improvement and growth of the Borough's town centres?

Response Number	Respondent Name	Response to Q5	Council's response
REG18.2	Adams Family (Bidwells)	<p>The continued protection, improvement and growth of the Borough's town centres should be supported by a balanced approach to development that allocates suitable sites within the Green Belt for residential development.</p> <p>The Plan says that Havering's town centres are important to the economy because they provide shops, services and jobs as well as places to live. Indeed, the Framework recognises that town centre needs are dependent upon a range of uses to support their vitality. It is therefore critical for the new Local Plan to ensure that sufficient town centre sites are allocated for main town centre uses. The Framework states (in the same paragraph) that "needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability". Proliferation of residential development on brownfield sites in existing town centre locations is one potential contributor towards limited site availability.</p> <p>Allocating additional sites for residential development in town centres may exacerbate the issues caused by the office to residential permitted development rights. These have successfully accelerated the delivery of residential development on viable sites but in a way that reduces the scope for local planning authorities to appropriately manage land use development in town centre locations. The Council should therefore seek to plan as best that it can for an appropriate balance between residential uses and main town centre uses, rather than an imbalanced mix focussed in maximising residential densities on brownfield land.</p> <p>We would highlight that the Inspector's Report on Further Alterations to the London Plan published last year expressed deep concerns about whether</p>	<p>The Proposed Submission version of the Local Plan supports the continued protection, improvement and growth of the Borough's town centres through adopting a balanced approach to development that allocates suitable sites within the town centres for main town centre uses whilst allowing other complementary uses such as residential uses within mixed use schemes to optimise development output and ensure an effective and efficient use of brownfield sites for commercial and residential development in its town centres.</p> <p>In conformity to the National Planning Policy Framework, the Proposed Submission version of the Local Plan promotes mixed use developments in town centres</p> <p>Residential development will underpin and support the vitality and viability of town centres, secure sustainable development objectives and ensure an effective and efficient use of scarce brownfield sites in town centres.</p>

Response Number	Respondent Name	Response to Q5	Council's response
		<p>higher densities can or should be sought or achieved in order to find additional sources of supply. It would be inappropriate for local context and character, transport capacity, access to social infrastructure and open space (all factors relevant to the optimisation of housing potential) to be compromised if the Council were to seek to meet its London Plan housing target through the provision of new development on brownfield land alone. The Local Plan should therefore ensure that the degradation of town centre function does not occur through the loss of established town centre uses through an imbalanced mix containing too many new homes.</p> <p>Allowing residential development in suitable Green Belt locations would relieve the significant and mounting pressure on town centre brownfield sites to enable the protection, improvement and sustainable growth of the Borough's town centres.</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt land in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to make any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p>
REG18.3	Anonymous	<p>Town centres shouldn't be allowed to grow. Should keep out national and multi-national companies. Encourage independent retailers and stop internet shopping.</p>	<p>The Proposed Submission version of the Local Plan encourages a wide range of diversified retail offer from independent, national and multi-national companies in order to ensure the vibrancy of town centres.</p> <p>The stopping of internet shopping is an action outside the scope of the Proposed Submission version of the Local Plan.</p>
REG18.9	C. Cole	<ul style="list-style-type: none"> - Get rid of un-let retail and business premises, convert them to commuter and residential use - Create a coach park and have a big marketing drive with shopping trips 	<p>The Proposed Submission version of the Local Plan promotes a change of use of proven unlet retail and business premises to other complementary town centre uses, subject to meeting clearly defined criteria.</p>

Response Number	Respondent Name	Response to Q5	Council's response
REG18.12	D. Campbell	To update the local town centre a little just to make it a bit contemporary.	The Proposed Submission version of the Local Plan supports public realm improvements schemes including the provision of high quality shop front design, that enhance the character and appearance of town centres.
REG18.15	Ellandi (Savills)	<p>By way of context, Ellandi acquired the Mercury Shopping Centre in Romford Metropolitan Town Centre in December 2014. Ellandi was formed in 2008 by Morgan Garfield and Mark Robinson and is the UK's leading specialist shopping centre investment and asset manager.</p> <p>The Mercury Centre is an enclosed shopping centre in Romford Metropolitan Town Centre. It currently comprises of circa 21,430 sq m of retail floorspace across two levels and includes convenience and comparison operators such as ASDA (including George), Blue Inc, Bonmarche, Game, McDonald's, Peacocks, Poundland, Superdrug and Wilko. A third level forms an integrated leisure offer including an independently run cinema and bingo hall while the forth level is the former Pulse nightclub that closed in 1995.</p> <p>Ellandi's approach is to proactively help transform the towns in which they invest by working with occupiers and other stakeholders to ensure that their shopping centres perform a successful and vibrant role for the local communities that they serve. The work of Ellandi is pioneering a new form of shopping centres that are referred to as 'Community Shopping Centres'. Accordingly, Ellandi look forward to proactively working alongside the Council as a town centre stakeholder within the Local Plan process.</p> <p>We welcome the identification of Romford as the main town centre within the Borough of Havering which will see it remain as the focus for investment over the emerging Local Plan period.</p> <p>We note that the background evidence to the Core Strategy is to be updated</p>	<p>Support noted.</p> <p>The Council has undertaken a Retail and Commercial Leisure Needs Assessment study for the borough as part of the evidence base for the Proposed Submission version of the Local Plan. The study identified a quantitative need for the borough for comparison goods of up to 49,500sqm, for convenience goods of up to 13,200sqm and for commercial leisure floorspace (A3, A4, and A5 uses) of up to 21,000sqm by 2031.</p> <p>The identified capacity is allocated in accordance with the hierarchy of the borough's town centres with the largest amount accommodated within Romford as the Borough's largest town centre.</p> <p>The Proposed Submission version of the Local Plan policies comply with the requirements of the NPPF and the London Plan in applying a sequential test to</p>

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		<p>in support of the new Local Plan. Updating of evidence should extend to the 2006 Retail and Leisure Study as this is now out of date. In addition to updating the study to reflect the latest objectively assessed needs for the Borough, we would recommend that a new shopper survey is also prepared as it is now 10 years since the last survey was completed and retailing has changed significantly in that time.</p> <p>Once the retail evidence base has been updated, any capacity for new convenience or comparison goods floorspace identified within the Borough should respect the settlement hierarchy for Havering with Romford being the focus for substantial Town Centre improvements. Lower order centres such as Hornchurch, Upminster and Rainham should consolidate their role in the hierarchy by providing local convenience and niche comparison goods floorspace only.</p> <p>In addition to the above, we would stress the importance of complying with National planning policy which seeks to promote retail development in "town centre" locations first and at a scale appropriate to the role of settlements within a defined hierarchy. Paragraph 23 of the NPPF states that planning policies should be positive, promote competitive town centre (our emphasis) environments and set out policies for the management and growth of centres over the plan period. NPPF paragraph 24 continues to state that Local Planning Authorities should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre.</p> <p>The Local Plan is the opportunity for objectively assessed development requirements to be spatially planned, which includes identifying appropriate growth for different centres. This must be undertaken with full consideration of the role of each centre within the retail hierarchy, the market implications</p>	<p>applications for main town centre uses requiring them to be located first in town centres, then in edge-of-centre locations and only if suitable sites are not available should out-of-centre sites be considered. The Proposed Submission version of the Local Plan policy also makes clear that when considering edge-of-centre and out-of-centre proposals, preference would be given to accessible sites that are well connected to the town centre.</p> <p>The Proposed Submission version of the Local Plan contains policies setting out the borough's town centre hierarchy, and the role and function of each centre within the hierarchy.</p> <p>The Council will prepare a detailed masterplan for Romford which will be taken forward as a Supplementary Planning Document.</p> <p>The Proposed Submission version of the Local Plan contains policies for the management of uses within Primary and Secondary Frontages which reflect the Council's approach to securing the vitality and viability of its town centres.</p>

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		<p>of diverting retail growth to alternative centres and the infrastructure requirements that would be required. Without doing this then the plan cannot be effective.</p> <p>To facilitate this, and to effectively focus redevelopment opportunities on a town centre's first basis we would advocate the adoption of an overarching vision or strategy for Romford Metropolitan Town Centre. We acknowledge the adoption of an Area Action Plan for Romford in 2008 but consider that this would benefit from being refreshed. This could take the form of a Town Centre Masterplan / Vision document which actively looks to engage key town centre stakeholders such as Ellandi in sourcing and implementing redevelopment opportunities. There are a number of substantial opportunities at the Mercury Centre which should be recognised within an updated Area Action Plan and / or the new Local Plan. On this basis Ellandi and Savills would welcome the opportunity to meet and discuss these with Havering Borough Council.</p> <p>The Council's approach to encouraging vibrant town centres with a choice of shops and a mix of uses to enhance the visitor experience reflects Paragraph 23 of the NPPF and we actively support a strategy that adheres to this requirement. Policies for the management of uses in the Primary Shopping Area and Secondary and Primary Shopping Frontages should reflect this flexible approach and not be overly prescriptive. The ability to undertake a balanced consideration of complementary town centre uses in the Primary and Secondary Shopping Frontages at the time they are proposed, where this does not undermine the predominance of A1 retail, is the preferred approach of the NPPF to securing the vitality and viability of town centres</p>	
REG18.26	Ian Weatherley	By ensuring all town centres have a mix of residential, commercial, retail, healthcare and night-time economy opportunities to generate and maintain a balanced economy and economic growth of these areas/centres.	Noted. The Proposed Submission version of the Local Plan encourages mixed use development in town centres to generate and maintain a balanced economy and

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			economic growth.
REG18.27	Janet Davy	Support for local retail businesses – reduction in fast food outlets and 'takeovers' such as Boots in Hornchurch.	The Proposed Submission version of the Local Plan supports a diversified retail offer from both independent and national multiple retailers in order to widen choice for consumers and a restriction on the concentration of fast food outlets and certain other non-retail uses in defined frontages of town centres.
REG18.28	Joe Coogan	Balanced development across the borough will help town centres. Too many flats concentrated in one area can lead to buy-to-let ghettos with transient populations that can damage communities. Opportunities to develop high quality family homes should be sought to ensure town centres are supported by balanced population growth.	The Proposed Submission version of the Local Plan promotes a balanced development which includes mixed use development across the borough in sustainable locations. The Proposed Submission version of the Local Plan also supports the delivery of a dwelling mix of types, sizes and tenures with priority for provision of family units wherever possible, to achieve balanced communities.
REG18.29	John Peterson	Support Romford market without it Romford shopping will collapse	The Proposed Submission version of the Local Plan recognises Romford Market as vital to Romford shopping and contains policies for its transformation to act as a catalyst for the town's future growth.
REG18.30	London Borough of Barking and Dagenham	Many borough residents use Romford Town Centre yet bus links between Chadwell Heath and in particular Dagenham are poor mainly due to congestion along Rush Green Road. The Council intends to apply for bus priority funding for bus priority measures along route 5 and would support bus priority measures along the Havering section of the route too.	Support noted. The London Borough of Havering supports the London Borough of Barking and Dagenham's proposed application for a bus priority funding to tackle congestion along Rush Green Road to ease movement of residents using Romford Town Centre.
REG18.32	Lee Clements	By: supporting small and medium sized business; ensuring easy access for workers and customers; cutting car parking charges; a better police	The Proposed Submission version of the Local Plan supports small and medium

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		presence in order to keep crime low; planting more trees and plants to combat air pollution and make the areas more pleasant;	sized businesses, public realm improvement schemes including tree planting and improvement to connectivity within the borough to ensure easy access for workers and customers. Cutting car parking charges and a better police presence are outside the scope of the Proposed Submission version of the Local Plan.
REG18.34	Margaret Whippy	Despite the increase in internet shopping, town centre shopping is as important as ever. Improvements in those centres encourage shoppers to them as against allowing them to deteriorate, which has the opposite effect. Perhaps encouraging flats in the centres will bring more vibrancy using existing redundant blocks which may not be renting well.	The Proposed Submission version of the Local Plan encourages mixed use development with flats above shops and promotes public realm improvements to enhance character and appearance including vibrancy of its town centres.
REG18.36	Moody Homes and Mr John Wakeling (Bidwells)	<p>The continued protection, improvement and growth of the Borough's town centres should be supported by a balanced approach to development that allocates suitable sites within the Green Belt for residential development.</p> <p>The Plan says that Havering's town centres are important to the economy because they provide shops, services and jobs as well as places to live. Indeed, the Framework recognises that town centre needs are dependent upon a range of uses to support their vitality. It is therefore critical for the new Local Plan to ensure that sufficient town centre sites are allocated for main town centre uses. The Framework states (in the same paragraph) that <i>"needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability"</i>. Proliferation of residential development on brownfield sites in existing town centre locations is one potential contributor towards limited site availability.</p> <p>Allocating additional sites for residential development in town centres may exacerbate the issues caused by the office to residential permitted development rights. These have successfully accelerated the delivery of</p>	<p>The Proposed Submission version of the Local Plan supports the continued protection, improvement and growth of the Borough's town centres through adopting a balanced approach to development that allocates suitable sites within the town centres for main town centre uses whilst allowing other complementary uses such as residential uses within mixed use schemes to optimise development output and ensure an effective and efficient use of brownfield sites for commercial and residential development in its town centres.</p> <p>In conformity to the National Planning Policy Framework, the Proposed Submission version of the Local Plan promotes mixed use developments in town</p>

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		<p>residential development on viable sites but in a way that reduces the scope for Councils to appropriately manage land use development in town centre locations. The Council should therefore seek to plan as best that it can for an appropriate balance between residential uses and main town centre uses, rather than an imbalanced mix focussed in maximising residential densities on brownfield land.</p> <p>We would highlight that the Inspector's Report on Further Alterations to the London Plan published last year expressed deep concerns about whether higher densities can or should be sought or achieved in order to find additional sources of supply. It would be inappropriate for local context and character, transport capacity, access to social infrastructure and open space (all factors relevant to the optimisation of housing potential) to be compromised if the Council were to seek to meet its London Plan housing target through the provision of new development on brownfield land alone. The Local Plan should therefore ensure that the degradation of town centre function does not occur through the loss of established town centre uses through an imbalanced mix containing too many new homes.</p> <p>Allowing residential development in suitable Green Belt locations would relieve the significant and mounting pressure on town centre brownfield sites to enable the protection, improvement and sustainable growth of the Borough's town centres.</p>	<p>centres</p> <p>Residential development will underpin and support the vitality and viability of town centres, secure sustainable development objectives and ensure an effective and efficient use of scarce brownfield sites in town centres.</p> <p>The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt land in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to make any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p>
REG18.37	Mr Barrie Stone and Miss Eleanor Stone	Ensure accessibility and connectivity to all development.	The Proposed Submission version of the Local Plan promotes planning policies that ensure accessibility and connectivity to all development.
REG18.39	Mrs S J Ellis (Bidwells)	<p>The continued protection, improvement and growth of the Borough's town centres should be supported by a balanced approach to development that allocates suitable sites within the Green Belt for residential development.</p> <p>The Plan says that Havering's town centres are important to the economy because they provide shops, services and jobs as well as places to live.</p>	The Proposed Submission version of the Local Plan supports the continued protection, improvement and growth of the Borough's town centres through adopting a balanced approach to development that allocates suitable sites within the town

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		<p>Indeed, the Framework recognises that town centre needs are dependent upon a range of uses to support their vitality. It is therefore critical for the new Local Plan to ensure that sufficient town centre sites are allocated for main town centre uses. The Framework states (in the same paragraph) that <i>“needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability”</i>. Proliferation of residential development on brownfield sites in existing town centre locations is one potential contributor towards limited site availability.</p> <p>Allocating additional sites for residential development in town centres may exacerbate the issues caused by the office to residential permitted development rights. These have successfully accelerated the delivery of residential development on viable sites but in a way that reduces the scope for Councils to appropriately manage land use development in town centre locations. The Council should therefore seek to plan as best that it can for an appropriate balance between residential uses and main town centre uses, rather than an imbalanced mix focussed in maximising residential densities on brownfield land.</p> <p>We would highlight that the Inspector’s Report on Further Alterations to the London Plan published last year expressed deep concerns about whether higher densities can or should be sought or achieved in order to find additional sources of supply. It would be inappropriate for local context and character, transport capacity, access to social infrastructure and open space (all factors relevant to the optimisation of housing potential) to be compromised if the Council were to seek to meet its London Plan housing target through the provision of new development on brownfield land alone. The Local Plan should therefore ensure that the degradation of town centre function does not occur through the loss of established town centre uses through an imbalanced mix containing too many new homes.</p> <p>Allowing residential development in suitable Green Belt locations would relieve the significant and mounting pressure on town centre brownfield</p>	<p>centres for main town centre uses whilst allowing other complementary uses such as residential uses within mixed use schemes to optimise development output and ensure an effective and efficient use of brownfield sites for commercial and residential development in its town centres.</p> <p>In conformity to the National Planning Policy Framework, the Proposed Submission version of the Local Plan promotes mixed use developments in town centres</p> <p>Residential development will underpin and support the vitality and viability of town centres, secure sustainable development objectives and ensure an effective and efficient use of scarce brownfield sites in town centres.</p> <p>The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt land in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to make any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the</p>

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		sites to enable the protection, improvement and sustainable growth of the Borough's town centres.	NPPF and London Plan. Allowing residential development in Green Belt locations would be contrary to current national and regional planning policies.
REG18.40	Ms M Blackman	Encourage wider variety of people to live and remain in area – decent housing, education and jobs /business enterprise & ensure connectivity to key commercial centres.	The Proposed Submission version of the Local Plan contains policies that create and maintain a mix of balanced communities that ensure that a wider variety of people live and remain in the area.
REG18.41	National Grid Property (Carter Jones)	The Local Plan must support the redevelopment of sites near town centres which can provide a residential 'critical mass'. High-density residential redevelopment must be supported and good pedestrian links provided to and from town centres.	The Proposed Submission version of the Local Plan supports the redevelopment of sites near town centres for residential development and the optimisation of housing output for different types of location within the relevant London Plan density range, including providing for good pedestrian links to and from town centres.
REG18.43	Omega After Alpha Ltd (Bidwells)	<p>The continued protection, improvement and growth of the Borough's town centres should be supported by a balanced approach to development that allocates suitable sites within the Green Belt for residential development.</p> <p>The Plan says that Havering's town centres are important to the economy because they provide shops, services and jobs as well as places to live. Indeed, the Framework9 recognises that town centre needs are dependent upon a range of uses to support their vitality. It is therefore critical for the new Local Plan to ensure that sufficient town centre sites are allocated for main town centre uses. The Framework states (in the same paragraph) that "needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability". Proliferation of residential development on brownfield sites in existing town centre locations is one potential contributor towards limited site availability.</p>	<p>The Proposed Submission version of the Local Plan supports the continued protection, improvement and growth of the Borough's town centres through adopting a balanced approach to development that allocates suitable sites within the town centres for main town centre uses whilst allowing other complementary uses such as residential uses within mixed use schemes to optimise development output and ensure an effective and efficient use of brownfield sites for commercial and residential development in its town centres.</p> <p>In conformity to the National Planning</p>

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		<p>Allocating additional sites for residential development in town centres may exacerbate the issues caused by the office to residential permitted development rights. These have successfully accelerated the delivery of residential development on viable sites but in a way that reduces the scope for Councils to appropriately manage land use development in town centre locations. The Council should therefore seek to plan as best that it can for an appropriate balance between residential uses and main town centre uses, rather than an imbalanced mix focussed in maximising residential densities on brownfield land.</p> <p>We would highlight that the Inspector's Report on Further Alterations to the London Plan published last year expressed deep concerns about whether higher densities can or should be sought or achieved in order to find additional sources of supply¹⁰. It would be inappropriate for local context and character, transport capacity, access to social infrastructure and open space (all factors relevant to the optimisation of housing potential¹¹) to be compromised if the Council were to seek to meet its London Plan housing target through the provision of new development on brownfield land alone. The Local Plan should therefore ensure that the degradation of town centre function does not occur through the loss of established town centre uses through an imbalanced mix containing too many new homes.</p> <p>Allowing residential development in suitable Green Belt locations would relieve the significant and mounting pressure on town centre brownfield sites to enable the protection, improvement and sustainable growth of the Borough's town centres.</p>	<p>Policy Framework, the Proposed Submission version of the Local Plan promotes mixed use developments in town centres</p> <p>Residential development will underpin and support the vitality and viability of town centres, secure sustainable development objectives and ensure an effective and efficient use of scarce brownfield sites in town centres.</p> <p>The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt land in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to make any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p>
REG18.44	Persimmon Homes Essex	The allocation of sites for residential development, as well as sites for employment and retail, in the Borough's town centres will make the areas more prosperous and encourage the use of town's centres day and night.	Noted. The Proposed Submission version of the Local Plan policies ensure that sufficient land is available for both residential and employment uses over the plan period.
REG18.47	R. Watt and Partners	It is considered that there should be a flexible policy approach which facilitates and encourages usage of town centres so that they are able to	The Proposed Submission version of the Local Plan contains flexible planning

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	(Phillips Planning Services)	provide a diverse set of facilities and services to the borough and remain viable. Ensuring accessibility and connection from new development should also encourage and maintain viability.	policies that facilitate and encourage a wide range of uses within town centres to provide a diverse set of facilities and services to underpin the town centres' vitality and viability.
REG18.48	R.A.Montague	By ensuring that they are pedestrianized as much as possible and have covered walkways wherever possible.	The Proposed Submission version of the Local Plan contains policies that encourage improvement to public realm including pedestrianized schemes.
REG18.50	Rainham Preservation Society	By offering free parking after 10am, throughout the borough. This is the only way we can compete with Lakeside, Bluewater and Westfield.	The offering of free parking at any time is outside the scope of the Proposed Submission version of the Local plan.
REG18.51	Ray Whitehouse	To make them more accessible for people without cars, make them more friendly to move around in, slow traffic to less than 20mph. Romford is dead after 18:00 except for the pub trade. The market place would make a wonderful leisure facility if only someone could work out how to make it happen. It's just dead space. Hornchurch on the other hand has far too many restaurants, these should be encouraged to spread around other centres of Havering.	The Proposed Submission version of the Local Plan contains policies that encourage public realm improvements. The Proposed Submission version of the Local Plan also contains policies for the transformation of the Market Place
REG18.52	Romford Civic Society	Heritage conservation and design policies in the current LDF should be transferred over to the new Local Plan. Conservation Area Appraisals and the borough's current Heritage SPD should be retained and transferred over to the new Local Plan. The new Local Plan should identify how nature corridors will be developed running through town centres to prevent urban areas being detrimental to ecosystems. The borough's current Shop Front SPD should be retained and transferred to the new Local Plan. The River Rom should be opened up in central Romford and enhanced as a nature corridor in the centre of the town. Design and quality of materials in new housing should be high. More trees should be planted. Cultural and social infrastructure should be prioritised, the amount of green space within Romford Ring Road should be increased.	Since the adoption of the LDF the NPPG and revised versions of the Local Plan have been published. In addition, a substantial evidence base has been prepared to inform policies. In the light of the above, the policies have been revised in the Proposed Submission version of the Local Plan. However, the Council has made sure that issues previously covered by SPD's including design and heritage are sufficiently covered by the policies in the Proposed Submission version of the Local Plan.

Response Number	Respondent Name	Response to Q5	Council's response
			<p>The Proposed Submission version of the Local Plan contains policies which encourage extending wildlife corridors which includes new corridors developed running through town centres to prevent urban areas being detrimental to ecosystems with conditions imposed on development to make sure adverse impacts are prevented.</p> <p>The Proposed Submission version of the Local Plan promotes the important roles the River Rom and other rivers play as a nature corridor in central Romford.</p> <p>The Proposed Submission version of the Local plan requires high design quality development and use of quality materials for new housing, and for more trees to be planted and for cultural and social infrastructure to be prioritised.</p>
REG18.53	Romford Golf Club (Joe Coogan)	Balanced development across the borough will help town centres. Too many flats concentrated in one area can lead to buy-to-let ghettos with transient populations that can damage communities. Opportunities to develop high quality family homes should be sought to ensure town centres are supported by balanced population growth.	It is accepted that balanced development across the borough will help town centres. The Proposed Submission version of the Local Plan promotes a balanced sustainable development including achievement of a mixed and balanced community. This involves development of high quality family homes in town centres to ensure that town centres are supported by balanced population growth.
REG18.56	S.D. Olney	This is critical to Romford's development but must support the towns' heritage. Nearly all shops that become vacant re-open as fast food outlets.	The Proposed Submission version of the Local Plan contains policies that seek to

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			control the number and location of fast food outlets within specified frontages of town centres in order to limit their proliferation.
REG18.57	Sheila Clements	I think it is too late for Romford. You have ruined it with the various developments and now you plan to take the market away to South Street. It cannot survive like that. Many years ago you tried moving the market before and many stalls gave up and left. Then you had the cheek to put up a sign telling people it was a market town, but it was too late, the Council had already ruined it. Now you want to do that again. When you look at other market towns around Britain with the facades of old shops surrounding them, it makes you think what Romford could have looked like, but no, the Council just pulled all the old building down and put up monstrosities instead.	The Local Plan supports transformation of Romford Market Place.
REG18.64	Thurrock Council	<p>It is considered that the new local plan strategy should continue to support town centre as a focus for economic activity and development for jobs, retail and other services as well as places for people to live and have access to good transport connections.</p> <p>The new local plan policies should also recognise the need to diversify the role of town centre and enhance the public realm. The council should consider the further potential that town centres offer for sustainable development including additional provision for housing and mixed use development in order to meet the objectives of the London Plan.</p> <p>Thurrock Council is progressing its proposal to transform Lakeside into a regional Town centre and will continue to consult and engage with Havering on this strategic matter. Thurrock Council also welcomes the opportunity to discuss with Havering Council the wider issue of retail provision in the Thames Gateway and beyond as part of the ongoing Duty to Cooperate process on cross boundary planning matters.</p>	<p>The Proposed Submission version of the Local Plan Strategy supports Havering's town centres as the foci for economic activity and development for jobs, retail and other services as well as places for people to live and have access to good transport connections, in conformity with national and regional planning policies.</p> <p>The Proposed Submission version of the Local Plan encourages diversification of the role of the Borough's town centres through promoting and encouraging provision of a wide range of retail offer including encouraging mixed-use development and provision of additional housing and enhancement of their public realm, to sustain and support their vitality and viability. The Proposed Submission</p>

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			<p>version of the Local Plan encourages effective and efficient use of town centre sites to optimise development activity. The London Borough of Havering will continue to consult and engage with Thurrock Council and other neighbouring boroughs on all cross boundary planning matters as part of the ongoing Duty to Cooperate process.</p>
REG18.66	Trinity Hall (Bidwells)	<p>The continued protection, improvement and growth of the Borough's town centres should be supported by a balanced approach to development that allocates suitable sites within the Green Belt for residential development.</p> <p>The Plan says that Havering's town centres are important to the economy because they provide shops, services and jobs as well as places to live. Indeed, the Framework recognises that town centre needs are dependent upon a range of uses to support their vitality. It is therefore critical for the new Local Plan to ensure that sufficient town centre sites are allocated for main town centre uses. The Framework states (in the same paragraph) that <i>"needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability"</i>. Proliferation of residential development on brownfield sites in existing town centre locations is one potential contributor towards limited site availability.</p> <p>Allocating additional sites for residential development in town centres may exacerbate the issues caused by the office to residential permitted development rights. These have successfully accelerated the delivery of residential development on viable sites but in a way that reduces the scope for Councils to appropriately manage land use development in town centre locations. The Council should therefore seek to plan as best that it can for an appropriate balance between residential uses and main town centre uses, rather than an imbalanced mix focussed in maximising residential densities on brownfield land.</p>	<p>The Proposed Submission version of the Local Plan supports the continued protection, improvement and growth of the Borough's town centres through adopting a balanced approach to development that allocates suitable sites within the town centres for main town centre uses whilst allowing other complementary uses such as residential uses within mixed use schemes to optimise development output and ensure an effective and efficient use of brownfield sites for commercial and residential development in its town centres.</p> <p>In conformity to the National Planning Policy Framework, the Proposed Submission version of the Local Plan promotes mixed use developments in town centres</p> <p>Residential development will underpin and support the vitality and viability of town centres, secure sustainable development</p>

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		<p>We would highlight that the Inspector's Report on Further Alterations to the London Plan published last year expressed deep concerns about whether higher densities can or should be sought or achieved in order to find additional sources of supply. It would be inappropriate for local context and character, transport capacity, access to social infrastructure and open space (all factors relevant to the optimisation of housing potential) to be compromised if the Council were to seek to meet its London Plan housing target through the provision of new development on brownfield land alone. The Local Plan should therefore ensure that the degradation of town centre function does not occur through the loss of established town centre uses through an imbalanced mix containing too many new homes.</p> <p>Allowing residential development in suitable Green Belt locations would relieve the significant and mounting pressure on town centre brownfield sites to enable the protection, improvement and sustainable growth of the Borough's town centres.</p>	<p>objectives and ensure an effective and efficient use of scarce brownfield sites in town centres.</p> <p>The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt land in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to make any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p>
REG18.69	Wyevale Garden Centres (Gregory Gray Associates)	Town Centres should provide the focus for new retail development in accordance within the NPPF however the Council's attention is drawn to the fact that para. 23 also requires Local Plans to "set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres". This would apply to specialist retail uses such as garden centres which have large requirements for internal/external sales display and whose revenue per floor space cannot secure a town centre site.	The Proposed Submission version of the Local Plan identifies sites outside town centres which may accommodate main town uses that cannot be accommodated in or adjacent to town centres.
POST18.4	V. Rajan and Associates	<ol style="list-style-type: none"> 1. Shopping mall 2. Tourism 3. Interlinking of cities 	The Local Plan sets out a positive strategy for its town centres preserving the main shopping function and allowing for

Response Number	Respondent Name	Response to Q5	Council's response
			divarication of uses making it a place that people want to visit. Havering builds on its connections with other parts of London and beyond in the Local Plan.

Question 6: What do you think the transport priorities in Havering are and how should the Plan address them?

Response Number	Respondent Name	Response to Q6	Council's response
REG18.1	AECOM	In line with the NPPF, all plans should “protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people”. Developments should be located and designed where practical to ensure there is viable infrastructure necessary to support it. This should feed into any assessment of development potential during the Sustainability Appraisal of growth options.	Noted. The Local Plan contains a balanced suite of policies taking account of Havering’s position as an Outer London borough. These promote sustainable transport modes and require development to avoid or mitigate adverse impact on the transport network as well as improving the connectivity in the borough.
REG18.3	Anonymous	As a casual bus user – I have stopped using buses due to the way you have to pay for them now. Double rail service Upminster – Romford. Should be half price on rail to Emerson Park only.	Noted. TfL are responsible for setting payment methods for using bus services and London Overground services. This is outside the scope of the Proposed Submission version of the Local Plan.
REG18.9	C. Cole	Keep up the good work on good car parking. Awful mess outside stations.	Noted.
REG18.11	Clive Narrainen	Cycling	Noted. The Local Plan contains a balanced suite of policies taking account of Havering’s position as an Outer London borough. These promote sustainable transport modes and require development to avoid or mitigate adverse impact on the transport network as well as improving the connectivity in the borough.
REG18.12	D. Campbell	I find the transport flow is good.	Noted. The Local Plan contains a balanced suite of policies taking account of Havering’s position as an Outer London borough. These promote sustainable transport modes and require development to avoid or mitigate adverse impact on the transport network, as well as improving the

Response Number	Respondent Name	Response to Q6	Council's response
			connectivity in the borough.
REG18.13	D.K.Symes Associates	The Plan needs to recognise that many, if not most goods, products, minerals and waste are generally carried by road vehicles. Encouragement should be given to alternative transport modes (rail and water) where both practicable and appropriate.	This is beyond the remit of the Local Plan. The Proposed Submission version of the Local Plan contains policies promoting sustainable transport modes.
REG18.18	Essex County Council	<p>ECC, as a neighbouring highway authority, will need to be satisfied with the approach to highway modelling given the strategic location of the LB of Havering to the county of Essex. The LB of Havering's new local plan should take into account any likely impact on key transport corridors on the A12 Corridor and A127 Corridor and the key strategic junctions and transport corridors, which need to be considered in any modelling, namely M25 junctions 28 and 29. Despite recent improvements there are still a number of locations on the local strategic road network where journeys are unreliable or improvements will be required to support significant numbers of new homes. ECC will continue to identify measures to tackle the causes of unreliable journeys and work with local planning authorities to identify investment needs to support growth.</p> <p>The highways modelling should also have regard to a number of other national, sub—regional and local highway infrastructure projects and investment commitments surrounding the borough including:</p> <ul style="list-style-type: none"> – A12 M25 to Chelmsford (D17) – raising section from M25 to Chelmsford to 3 lanes to help address congestion problems and inconsistent standards in the next road period (next 5 years) – Strategic M25 Junction 28 & 29 improvements. Especially J28 (E12) – upgrading the interchange with the A12 to provide dedicated left turn slip lanes and improvement of gyratory system – Late Road Period (2021). – potential impact of the approved Lower Thames Crossing route especially Option C; – the A127 which is already operating at over capacity and the identified cumulative housing growth along the A127, as outlined in the “A127 Corridor for Growth –an Economic Plan” 2014; and 	Noted. The London Borough of Havering has prepared a Transport Position Statement to support the Local Plan. Additionally, the Council has engaged extensively with Essex authorities regarding the A127 Growth Corridor and implications for transport and land use planning. Highways England and Transport for London are also supporting this work. A Statement of Common Ground expressing shared commitment to further work is being progressed to support the Local Plan.

Response Number	Respondent Name	Response to Q6	Council's response
		<p>– impact on the neighbouring local road network, including the A128, and the A13 in neighbouring Thurrock.</p> <p>As part of any highway modelling it will be necessary to involve the Highways Agency given the proximity to the A12 and M25, and to ensure their support for any underlying parameters to modelling, and their views of the impact of strategic sites on their network.</p> <p>It is recommended that the emerging evidence base for the new Local Plan has regard to the following transportation plans, strategies and priorities, which are expanded upon below:</p> <ul style="list-style-type: none"> – Essex Transport Strategy, the Local Transport Plan for Essex (June 2011); and – A127 Corridor for Growth – An Economic Plan (April 2014). <p><u>Essex Transport Strategy, the Local Transport Plan for Essex (June 2011)</u></p> <p>The strategy sets the vision for transport, the outcomes ECC aim to achieve over a 15 year period, our policies for transport and the broad approach to implementing the policies. The following priorities are considered relevant to the LB Havering,</p> <p>Strategic transport priorities,</p> <ul style="list-style-type: none"> – Identifying an agreed and deliverable solution to address congestion at the Thames crossing and adjacent M25 junction 30/31; – Lobbying Government for enhancements to the A12, and onwards to the A120, Harwich Port and London Stansted Airport; and – Lobbying Government for additional capacity on the Great Eastern Main Line and West Anglia mainline to accommodate growing commuter demand, the provision of competitive journey times for Essex Thameside services, and an enhanced local role in the rail franchise process. 	

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		<p>Countywide priorities</p> <ul style="list-style-type: none"> – Working with partners to promote a safe and secure travelling environment; – Maintaining the Essex highway network and other transport assets; – Keeping the transport network safe and operational; and – Managing the impact of planned works on the highway network. <p>Heart of Essex priorities:</p> <ul style="list-style-type: none"> – Delivering transport improvements to support growth, including the North Chelmsford railway station; – Providing for, and promoting, sustainable forms of travel; – Maintaining and improving public transport links; – Tackling congestion and improving journey-time reliability; – Improving access to railway stations and improving station facilities; – Extending and upgrading the Chelmsford cycle network and promoting its use – Improving the attractiveness of streets and public spaces; – Improving journey time reliability on key routes including the A130; – Developing long-term solutions to resolving gaps within the strategic network. <p>South Essex priorities,</p> <ul style="list-style-type: none"> – Providing and promoting sustainable modes of travel to new development areas; – Improving public transport links within and between the South Essex towns (including the A13 Passenger Transport Corridor and South Essex Rapid Transport (SERT) schemes); – Improving the availability of sustainable travel choices and raising public awareness through travel planning; – Addressing maintenance, signing and broken links in the cycle network to improve conditions and create a safer atmosphere for cycling; 	

Response Number	Respondent Name	Response to Q6	Council's response
		<ul style="list-style-type: none"> – Improving the attractiveness and ease of use of public spaces to support regeneration; – Improving journey time reliability on strategic inter-urban routes including the A127, A129, A130 and the A13; and – Improving access to London Gateway port and London Southend Airport. <p>West Essex priorities</p> <ul style="list-style-type: none"> – Improving access to and from the M11 corridor;; – Providing the transport improvements needed to support housing and employment growth; – Improving the attractiveness of bus services; – Improving cycling networks and walking routes and encouraging their greater use; – Working with Transport for London to improve the journey experience of Essex residents using the Central Line underground services; – Improving access to Stansted Airport by low carbon forms of trans <p><u>A127 Corridor for Growth – An Economic Plan, March 2014</u> This joint strategy between ECC and Southend-on-Sea BC makes a case for the corridor, demonstrating its essential economic importance and the measures needed to ensure that South Essex remains a thriving economic engine of growth. The A127 corridor is a vital artery to economic competitiveness of the South Essex sub-region and indeed to the economy of Essex and beyond. It has been adopted to provide greater journey time reliability along the length of the corridor to sustain the economic advantage of the A127, as well as to facilitate future growth and prosperity in the region.</p>	
REG18.21	Havering College of Further and Higher	HCFHE would like to see improvements made to public transport infrastructure across the Borough – including safe pedestrian and cycle routes and improvements to the local bus services. HCFHE would like the Local Plan to focus on improving access by public transport to its	Noted. The Local Plan contains a balanced suite of policies taking account of Havering's position as an Outer London borough. These promote sustainable

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	Education (Iceni Projects)	educational facilities in the Borough – particularly the Rainham campus where significant investment is planned in the new Construction Infrastructure and Skills Innovation Centre ('CISIC').	transport modes and require development to avoid or mitigate adverse impact on the transport network, as well as improving the connectivity in the borough.
REG18.22	Havering Friends of the Earth	<p>More bus lanes are needed to cut congestion and improve air quality.</p> <p>Every train/bus stop connection should have a bus expectancy time panel. (There is not one at Hornchurch Station for example.) Connections from train to bus to reach outlying areas need to be better integrated. Huge bus stop queues at Harold Wood Station in rush hour with travellers wanting to reach Harold Hill. Better integration and transport information in outlying areas like Wennington.</p>	The Proposed Submission version of the Local Plan contains policies setting out that the Council will work with partners (including TfL and bus operators) to improve bus travel experience in the borough.
REG18.24	Higgins Homes (Nathaniel Lichfield & Partners)	Ensuring that all new residential developments are adequately served by existing or proposed public transport services.	Noted. The Local Plan contains a balanced suite of policies taking account of Havering's position as an Outer London borough. These promote sustainable transport modes and require development to avoid or mitigate adverse impact on the transport network, as well as improving the connectivity in the borough.
REG18.25	Highways Agency	<p>Thank you for your email of 9th February 2015 regarding the above Consultation process for the new Havering Local Plan. Thank you for inviting the Highways Agency to be involved in your consultation process.</p> <p>As you are aware, on behalf of the Secretary of State for Transport, the Highways Agency is responsible for managing and operating a safe and efficient Strategic Road Network (SRN), i.e. the Trunk Road and Motorway Network in England, as laid down in Department for Transport (DfT) Circular 02/2013 (Planning and The Strategic Road Network).</p> <p>Our interest in local plans is specifically focussed on the council's approach to highway and transport matters in relation to regeneration and new development. We are keen to understand how local authorities initially</p>	Havering initially identified sites for development through a range of means including a 'Call for Sites' exercise inviting land owners to put forward their sites and proposed uses for the sites, identification of sites with unimplemented planning permission, potential sites that have been brought forward to the Council's attention through enquiries, sites identified through studies, e.g. Strategic Housing Land Availability Assessment (SHLAA), Opportunity sites (large brownfield land with significant potential for development

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		<p>identify sites within their boundaries and set and implement policy to manage the resultant trip demands and how these might affect the safe and efficient operation of the Strategic Road Network for which we are responsible.</p> <p>In relation to your consultation questionnaire we are pleased to see that Transport Infrastructure is a key priority of the council and recommend that this remains a key priority. We note that in identifying new development sites, those that are well served or will be well served by public transport will of most interest to the council which we consider is a sensible approach to new development. It is also pleasing to note that in dealing with new development travel impact will be minimised by improving infrastructure to reduce congestion but impact will also be reduced by improving public transport services. In particular it is noted that the council will promote the use of more sustainable forms of transport such as cycling and walking this being useful in reducing the number and therefore environmental impact of car trips resulting from development.</p> <p>I trust that our initial comments are of assistance and thank you again for involving us in your consultation process. We look forward to further involvement as the plan develops.</p>	<p>and Intensification sites (built-up areas which can accommodate further development) nominated by the Council, and the estimation of their capacity for preferred uses on the basis of their surrounding context and uses and potential transport improvement programmes. The local plan identifies a number of key strategic transport infrastructure improvements needed to support the delivery of the Council's vision.</p> <p>The Council's approach recognises its position as an Outer London borough and the implications of this for transport. It seeks to deliver a balanced suite of transport policies to support a sustainable pattern of development that reduces the need to travel but offers a choice of transport modes to residents and businesses.</p> <p>The Council is statutorily required to set out how it will deliver the Mayor's Transport Strategy at a local level through its Local Implementation Plan which is effectively Havering's transport strategy. It contains a series of objectives for managing trip demand through delivering sustainable travel choices.</p> <p>The Council assesses the implications of major developments on the highway network at the planning application stage.</p>

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			<p>Conditions may be applied to an application where planning permission is granted.</p> <p>Travel Plans are reviewed for Major planning applications to ensure opportunities for non-motorised car residents are provided and achievable targets for modal shift are set.</p>
REG18.26	Ian Weatherley	By fully integrating all forms of transport (including cars) into a combined scheme to offer a mix of transit options for the community to travel into town centres – and so ensure growth and prosperity	The Proposed Submission version of the Local Plan contains a balanced suite of transport policies supporting a mix of transport modes.
REG18.27	Janet Davy	Improvements required for cyclists – this could lead to reduced car use and better air quality.	The Proposed Submission version of the Local Plan contains a balanced suite of transport policies. Policies supporting cycling infrastructure improvements are included within an overall approach to transport that seeks to improve movement and connectivity for all residents and businesses.
REG18.28	Joe Coogan	Every opportunity to improve public transport infrastructure should be sought. Havering's good transport links in and out of London are key to its success as a viable and pleasant suburb.	The Proposed Submission version of the Local Plan contains policies promoting improvements to all transport infrastructure including measures that will benefit public transport.
REG18.29	John Peterson	All seem ok	Noted.
REG18.30	London Borough of Barking and Dagenham	Havering has engaged Barking and Dagenham on proposals for improving the A1306 New Road and it is important that we continue to work together on transport infrastructure improvements within London Riverside which affect both boroughs.	The London Council will continue to work with Barking and Dagenham on strategic planning issues including the transport related issues. Additionally, both boroughs support the work of Transport for London

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			and the Sub-Regional Transport Panel.
REG18.31	London Borough of Bexley (officer response)	In addition to those priorities for transport as identified in the consultation document (i.e. minimising the impact of travel, locating new development where it will be well served by public transport), the London Borough of Bexley would also suggest that reference is made to the improvement of the strategic north south transport links to adjoining boroughs; specifically the potential for a future river crossing between Bexley and Havering, as promoted by Transport for London (TfL). As a strategic transport priority, this river crossing would significantly benefit both London Boroughs by improving connectivity and providing opportunities for sustainable economic growth and development – a key focus of the NPPF (see also, response to question 2). Additionally, the importance of ensuring good quality public transport links using the river crossing should be highlighted as a priority, as this would offer genuine alternative sustainable travel options to the north and south of the river.	Noted. The Council supports the principle of additional river crossings to improve connectivity and provide opportunities for sustainable economic growth. It continues to discuss these issues with other stakeholders including the Highways England, the London Mayor (through Transport for London) and other boroughs.
REG18.32	Lee Clements	Reducing traffic congestion; lobbying the government for a better train service on the Greater Anglia line and a better station at Romford; lobbying TfL for faster introduction of new trains on the District Line and improvements to Gallows Corner and the A12 from Gallows Corner to Brook Street Roundabout.	Noted. The Proposed Submission version of the Local Plan sets out the key strategic transport aspirations for the borough. The Council continues to lobby relevant bodies including the Department for Transport for better train services along the Greater Anglia line. The Proposed Submission version of the Local Plan sets out policies for improved public transport including the aspiration for longer and more frequent trains stopping at Romford station.
REG18.33	Mr Leslie Budge (Andrew Martin Planning)	The NPPF directs, at paragraph 29, that transport policies have an important role to play in facilitating sustainable development. Therefore local planning authorities should support a pattern of development that facilitates the use of sustainable modes of transport, where it is possible to do so. London Borough of Havering is well connected, by rail and road, to the rest	Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt land in the borough makes a contribution towards

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		<p>of London and the South East via its strategic connections and routes. Consequently the Borough's growth and housing strategies should be developed in accordance with these established links, so that residents are encouraged to utilise the public transport system in favour of private vehicle use.</p> <p>As has been mentioned above, the site is situated some 0.64 miles from Harold Wood railway station, which is on a main line into London Liverpool Street. This station is proposed to serve Crossrail once it has been extended from Stratford to Shenfield and services are expected to commence in 2018. The nearest bus stops to the site are:</p> <ul style="list-style-type: none"> - Shepherds Hill (along the southern boundary of the site) – this stop is served by the 347 service (includes stops at Ockendon Station, Upminster Station, Harold Wood Neighbourhood Centre, Harold Wood Station, Gallows Corner and Romford Station). - Gubbins Lane (500 metres to the east) – this stop is served by the 256 service (stops include St Ursula's School, Hilldene Avenue Shopping Centre, Harold Hill Community Centre, Harold Wood Station, Havering College, Emerson Park Station, Hornchurch Town Centre, Hornchurch Station and St George's Hospital), the 294 service (stops include Central Park leisure Centre, Harold Wood Station, Gidea Park Station, Romford Station, Romford Market, Parklands School and Havering Park), the 347 service (see above), the 646 service (stops include Upminster Station, Hornchurch Town Centre, Emerson Park Station, Havering College and Harold Wood Station) and the 656 service (includes stops at Gallows Corner, Harold Wood Station, Havering College and Emerson Park School). <p>A number of train stations, both under and over ground, are accessible via these bus links, as well as numerous schools / colleges and service centres,</p>	<p>one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to make any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For these reasons the Council will not be seeking to release green belt land for housing.</p> <p>The Council's approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement.</p>

Response Number	Respondent Name	Response to Q6	Council's response
		i.e. Upminster, Hornchurch and Romford. Furthermore the site is well situated with regard to the strategic highways network, as it is centred between the A127 (0.8 miles), the A12 (1 mile) and the M25 (2.8 miles). This site is therefore highly sustainable in terms of its proximity to services, facilities and various modes of public transport.	
REG18.34	Margaret Whippy	Having a transport system that allows for all age groups is essential, from a school service to one that allows for the needs of workers and families, but also the elderly. Reduced fares for students should be encouraged, as well as cycle ways for all age groups. Cutting fares for families by cycling. Improving pavements encourages more walking, which has health benefits. People need good accessible transport at all times.	Noted. The Proposed Submission version of the Local Plan contains policies supporting road safety improvements for all and including within the vicinity of schools. TfL are responsible for setting fares and this is outside the scope of the Proposed Submission version of the Local Plan.
REG18.37	Mr Barrie Stone and Miss Eleanor Stone	Utilise and improve existing routes and new arterial links.	Noted. The Proposed Submission version of the Local Plan includes a number of key strategic transport infrastructure improvements to enhance connectivity in Havering. The Proposed Submission version of the Local Plan aims to improve connectivity in the borough by supporting partnership working between the Council and other partners.
REG18.38	Mr T Clemence (DHA Planning)	Encourage sustainable transport and public transport. Promote development in locations that are within close proximity to a range of services, facilities and public transport to minimise the use of private car travel.	The Proposed Submission version of the Local Plan supports improvements to public transport networks including maximising the benefits from Crossrail in Havering. Additionally , it encourages a sustainable pattern of development to reduce the need to travel and offer a choice of transport modes to local businesses, residents and visitors..
REG18.40	Ms M Blackman	See Q5 answer – encourage more central London connectivity and fewer confusing one way/roundabout systems	Noted. The Proposed Submission version of the Local Plan contains policies seeking

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			improvements to public transport infrastructure including the aspiration for longer and more frequent trains into central London.
REG18.42	Natural England	<p>We note that the London Borough of Havering wishes to minimise the impact of travel by improving local infrastructure and by promoting a range of high quality, convenient and environmentally friendly transport options. These include cycling and walking and we confirm that we are in favour of such improvements, providing that they do not impact adversely on the environment or on protected sites.</p> <p>The NPPF emphasises the importance of ensuring that development:</p> <p>“ ... actively manage(s) patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus(es) significant development in locations which are or can be made sustainable” (para 17).</p> <p>It also states that “transport policies should:</p> <ul style="list-style-type: none"> – contribute to wider sustainability and health objectives – and encourage solutions which support reductions in greenhouse gas emissions”. <p>(NPPF paras 29 and 30).</p> 	Support noted.
REG18.44	Persimmon Homes	Havering Borough Council must continue to improve the public transport networks in the Borough. This will encourage the use of public transport, making households less dependent on the use of cars. The introduction of Cross Rail in 2018/2019 goes somewhat towards making these improvements and will open up Havering to Central London and the West.	Noted. The Proposed Submission version of the Local Plan supports improvements to public transport networks including maximising the benefits from Crossrail in Havering. Additionally, it encourages a sustainable pattern of development to reduce the need to travel and offer a choice of transport modes to local businesses, residents and visitors.
REG18.47	R. Watt and Partners	Integration of all developments into transport networks and careful consideration of potential impacts on capacity.	The Proposed Submission version of the Local Plan contains policies which support

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	(Phillips Planning Services)		integration of all developments into the transport network with a requirement for proposals to demonstrate that adverse impacts on the transport network are avoided or mitigated.
REG18.48	R.A.Montague	Mainly by improvements to bus services for travel within the borough	The Proposed Submission version of the Local Plan supports the enhancement of bus services within the borough. It highlights the importance of securing better bus services to / from Queen's Hospital in Romford.
REG18.50	Rainham Preservation Society	A bus route is needed from Rainham to Upminster via Corbets Tey Crematorium (residents who don't drive currently use two buses and a train or three buses to visit the graves of their loved ones.) All buses should stop at Rainham Station Interchange.	The Proposed Submission version of the Local Plan supports the enhancement of bus services within the borough. Determining where buses should specifically stop is outside the scope of the Proposed Submission version of the Local Plan. The Local Plan does though highlight the importance of enhancing accessibility to / from Romford Station including for buses. The Council will continue to work closely with Transport for London and bus operators to ensure that bus services and their facilities are well located, safe and convenient.
REG18.51	Ray Whitehouse	Significantly improve public transport to the riverside area. Improve public transports to Harold Hill Slower vehicular traffic to make the roads safer for all other users. Stop rat runs. Make schools safe to get to.	The Proposed Submission Version of the Local Plan includes several key transport infrastructure improvements. These recognise the importance of improving north-south connectivity in Havering as this would make it easier for journeys to be made to / from London Riverside.

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			The Local Plan contains policies seeking improvement to road safety in the vicinity of schools and for cyclists and pedestrians in the borough.
REG18.52	Romford Civic Society	A more attractive and greener environment in Romford and on its pedestrian approaches would encourage people to walk into the town more and feel safe doing so. Pedestrian permeability of the Ring Road needs addressing and improving. The underpasses leading into Romford from the areas just outside the centre of the town need dramatic improvement to encourage people to walk into the town more.	Noted. The Proposed Submission version of the Local Plan contains policies supporting a more attractive and greener environment in Romford. Policies also support the delivery of a new east-west shared use link from the railway station across the River Rom to the residential areas west, and improving the active travel links between Romford Station, Waterloo Road and Bridge Close and the quality and setting of the River to provide continuous, safe and accessible links alongside the river. This will assist in promoting active travel and improve north-south connectivity.
REG18.53	Romford Golf Club (Joe Coogan)	Every opportunity to improve public transport infrastructure should be sought. Havering's good transport links in and out of London are key to its success as a viable and pleasant suburb.	The Proposed Submission version of the Local Plan contains policies seeking improvements to the public transport infrastructure to improve connectivity within the borough particularly between north and south Havering. The Local Plan also seeks to improve connectivity to / from areas beyond Havering.
REG18.56	S.D. Olney	Adequate, but must stop parking in main roads to stop continued congestion at pin-points in the borough.	The control of on street parking is beyond the remit of the Proposed Submission version of the Local Plan.
REG18.57	Sheila Clements	For a start Hornchurch High Street was ok as it was. The Council and Boris Johnson had this great idea to make it into a rat run, where even ambulances have to go up on the middle walking section when cars are	The Proposed Submission version of the Local Plan contains policies to improve road safety in the borough including for

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		<p>going through. Pedestrians have to jump in the road, to let the ambulance pass You could not make it up. I would not trust the Council with the transport priorities. The traffic light signs are badly positioned so that you cannot see whether it is safe to cross if somebody is standing in front of the wait sign. God knows what mess you will make with the rest of the borough if you are let loose.</p>	<p>pedestrians and cyclists and for tackling congestion “hotspots”. Matters relating to traffic light signs are outside the scope of the Local Plan.</p>
REG18.63	Thomas Bates and Son Ltd. (Andrew Martin Planning)	<p>The NPPF directs, at paragraph 29, that transport policies have an important role to play in facilitating sustainable development. Therefore local planning authorities should support a pattern of development that facilitates the use of sustainable modes of transport, where it is possible to do so. London Borough of Havering is well connected, by rail and road, to the rest of London and the South East via its strategic connections and routes. Consequently the Borough’s growth and housing strategies should be developed in accordance with these established links, so that residents are encouraged to utilise the public transport system in favour of private vehicle use.</p> <p>As mentioned above, Emerson Park train station is a 20 minute walk from the site or, for a direct route into central London, Upminster station is a 30 minute walk (1.5 miles) and is served by the District Line. Furthermore, Hornchurch station is a short bus ride away and is also served by the District line. The nearest bus stops to the site are:</p> <ul style="list-style-type: none"> – Wingletye Lane (adjacent to the site) – this stop is served by the 193 service (includes stops at Essex Gardens, Havering Sixth Form College, Hornchurch Station, Romford Station and Queen’s Hospital). – Parkstone Avenue (150m to the east) – this stop is served by the 650 service (includes stops at Romford Bus Garage, Romford Station, Gidea Park Station and Emerson Park School) and the 656 service (includes stops at Gallows Corner, Harold Wood Station, Havering College and Emerson Park School). 	<p>Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt land in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defendable boundaries. No exceptional circumstances have been identified to make any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p> <p>For these reasons the Council will not be seeking to release green belt land for housing.</p> <p>The Council’s approach to increasing housing supply is set out in further detail in the Local Plan Housing Position Statement.</p>

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		<p>A number of train stations, both under and over ground, are accessible via these bus links, as well as numerous schools / colleges and service centres, i.e. Romford and Hornchurch. Furthermore, the site is well situated with regard to the strategic highways network, with the A127 within 0.8 miles and the M25 within 3 miles. This site is therefore highly sustainable in terms of its proximity to services, facilities and various modes of public transport.</p>	
REG18.64	Thurrock Council	<p>It is acknowledged that Havering Council support further river crossings in the Thames Gateway in order to promote economic development and growth and to provide enhanced connectivity in this key national and regional regeneration area.</p> <p>However it is noted that Havering Council strongly objected to a Belvedere Bridge crossing of the river Thames being the first bridge crossing as part of any new proposals for river crossings in London. In particular, strong concerns were expressed regarding the impact on housing and employment proposals in the Havering riverside area; the traffic impact on the strategic and local highway network and the implications of the route and any new junctions on the environment and planning of the area.</p> <p>If an announcement by the Government and TfL support a Belvedere Bridge crossing of the Thames and its early opening how will this impact on the Havering New Local Plan? It has been suggested during previous consultation by the TfL that such a scheme could be built and open in a timescale that would be during the period covered by the Havering new Local Plan. How would Havering Council seek to address such a scheme in the programme and preparation of the Local Plan? As stated by Havering Council the proposal could have implications for the mix and scale of development on Havering riverside and how would this be addressed?</p> <p>Havering Council has also stated its preferred support for new Lower Thames Crossing being Option A which is at the current Dartford crossing. It is recognised that a new Lower Thames Crossing will have economic and</p>	<p>Noted</p> <p>In October 2016 the Mayor of London announced he was prioritising additional crossing points at Silvertown as well as a cycling and walking crossing in the vicinity of Canary Wharf – Rotherhithe and a DLR extension to Thamesmead, amongst others.</p> <p>Havering supports the principle of improved provision of river crossings in east London. It will wish to ensure that any crossings have a satisfactory impact on the borough.</p> <p>The Council are working with Highways England following the announcement by the Minister for Roads of the preferred option for a Lower Thames Crossing. The Lower Thames Crossing will be a regular agenda item at future inter-borough liaison meetings between Havering and District and Unitary authorities in Essex.</p>

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		<p>environmental impacts on Havering as well as implications for the strategic and local highway networks. Havering Council have stated their concern that Option C also has a more negative environmental and Green Belt impact and in Havering where a new motorway junction is proposed.</p> <p>The Government is currently giving further consideration to Options A and C for the future Lower Thames Crossing. This includes assessing options within a wider corridor for the route of Option C. An option for a northern path for the route of option C could extend along a M25/A127/A128 corridor before crossing the river Thames.</p> <p>The announcement of the route of the Lower Thames Crossing will have a range economic, and transport implications for the new Havering local Plan and direct environmental and Green Belt implications if an Option C route requires a new junction on the M25 in Havering.</p> <p>If the Government announces an Option C route this would have significant implications for Thurrock as well as Havering. Depending on the nature of the crossing options and junctions it could create both positive and negative development pressures on the boroughs adjoining the route. Both authorities may wish to consider the future implications of the Lower Thames Crossing following the Government's announcement of the draft options.</p>	
REG18.65	Transport for London	<p><i>Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. These comments also do not necessarily represent the views of the Greater London Authority (GLA). Any views or opinions are given in good faith and relate solely to transport issues.</i></p> <p>Thank you for the opportunity to comment on the above mentioned plan. Comment from TfL is outlined in the correspondence below, TfL welcomes</p>	<p>Noted. Crossrail is specifically mentioned in the Proposed Submission version of the Local Plan. It will be a key factor in helping achieve the objectives for Romford set out in the Local Plan.</p> <p>The Council continues to work closely with TfL and is looking at options for improving bus services in the south of the borough and to improve bus capacity at Queens</p>

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		<p>further dialogue with the Council during the next stages of consultation.</p> <p><u>Crossrail</u></p> <p>There is an existing National Rail corridor that will be served by Crossrail from 2019. There will be 12 trains per hour at peak times in each direction between central London and Shenfield. It should be clarified in the document that Crossrail will open in 2019, not 2018/2019. TfL would require improved bus, walking and cycle links to improve access to the local centres, District line, National Rail and Crossrail stations. This will enable more people to benefit from the opportunities and facilities in and around London. The plan should make reference to maximising the arrival of Crossrail in terms of economic growth.</p> <p><u>Public transport and growth</u></p> <p>TfL would particularly support new development and growth areas in areas of good existing public transport accessibility, while any new growth areas would need to be supported by adequate improvements to walking, cycling, public transport and highway networks to maintain capacity. Conversely the section titled "Business Growth and Economic Productivity" should make reference to public transport improvements as a key enabler for economic growth.</p> <p>TfL is supportive of the Plan's aspiration to improve public transport provision. A key component of public transport provision in the London borough of Havering is buses, which falls under the responsibility of TfL. TfL would welcome further discussions with the Council on bus service enhancement and bus infrastructure together with opportunities for funding. Improvements to mitigate the impact of development would need to be funded from the Council's CIL charging schedule and Section 106 contributions and other non-TfL sources as there is no specific provision within the TfL Business Plan. Improvements to serve existing demand would</p>	<p>Hospital.</p> <p>The importance of London Riverside is addressed in the Rainham and Beam Park Strategic Development Area policy in the Local Plan.</p> <p>The Local Plan highlights the importance of the Beam Park station and the improvements being secured through working with Transport for London on the A1306 project.</p> <p>The Proposed Submission version of the Local Plan brings forward a balanced suite of policies including those for transport. It recognises that Havering is an Outer London borough where there is likely to be greater use of private cars for journeys because the public transport network is less 'dense' than in Inner and Central London. The preparation of the Local Plan has encompassed transport studies to evidence this particularly in regard to implications for parking provision.</p> <p>The Local Plan recognises the adverse implications from congestion in terms of reduced air quality and includes a specific policy aimed at improving air quality linked to transport.</p> <p>The Council is exploring options for car</p>

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		<p>need to be assessed and prioritised against TfL's standard criteria within the context of the funding available for bus services and infrastructure.</p> <p>The plan should also make specific reference to aspirations outlined in the London Riverside Opportunity Area Planning Framework (OAPF), which is currently undergoing public consultation. Funding should be secured in the future for Beam Park station and improvements to the A1306 New Road in particular.</p> <p><u>Walking and cycling</u></p> <p>TfL is supportive of the Council's aspiration to encourage the uptake of walking and cycling. Part of the challenges associated with this uptake is creating a legible walking and cycling environment. The Local Plan, in further iterations, would benefit from making reference to wayfinding and a clear and consistent signage strategy. Legible London is an easy-to-use signage system that presents information in a range of ways, including maps and directional information, to help people find their way. The maps would be integrated with the local railway stations and recreational sites to enable pedestrians to promptly identify the route to their destination. TfL would like to work with developers and Havering Council to expand this scheme. The scheme would need to be predominately funded through CIL and Section 106 contributions.</p> <p><u>Car parking and congestion</u></p> <p>There are multiple ways to address congestion and parking matters at local and regional levels, however, given the growth pressures facing London—and in particular east London—it is important to continue efforts to reduce car use.</p> <p>The National Planning Policy Framework (NPPF) sets out 12 core land-use</p>	<p>club provision in the borough and this is referenced in the Proposed Submission version of the Local Plan.</p> <p>The Council has undertaken a health impact assessment to support the preparation of the Local Plan and a specific policy on healthy communities identifies the linkages between health and travel and transport</p>

Response Number	Respondent Name	Response to Q6	Council's response
		<p>planning principles. These include supporting the transition to a low carbon future, reducing pollution and actively managing patterns of growth to make the fullest possible use of public transport, walking and cycling. The NPPF provides further detail on promoting sustainable transport, stating that the transport system needs to be balanced in favour of sustainable transport modes and that encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion.</p> <p>London is already the most densely populated part of the UK and is growing at a very fast rate, with 1.3% population growth between 2011 and 2012, compared to 0.7% across the UK. This growth poses major challenges in terms of the scale and density of development required to accommodate it. Over the last ten years in London we have succeeded in facilitating a move away from car use and towards public transport and active modes. In order for London's continued success, this mode shift must continue.</p> <p>London's rapidly growing population and increasing densities place a premium on space, both in terms of developable land and on the road network. The economic cost of congestion in London is already estimated to be £4bn per year and a restraint based approach to parking is considered vital to making more efficient use of space and mitigating the impacts of development on traffic and congestion. Congestion is now seen outside of the weekday peaks, with evening and weekend congestion worsening as the population grows.</p> <p>Measures to mitigate the impacts of growth on the road network include Controlled Parking Zones, limiting the number of parking permits per household, provision of car club memberships and parking bays as well as car free developments in areas with good access to public transport.</p> <p>The London Plan (2015) highlights the housing shortage in the Capital, and sets new, ambitious targets for growth. To meet the housing need in London while at the same time remaining a liveable city for existing residents, it is</p>	

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		<p>important to consider wider impacts of creating additional parking spaces in new developments.</p> <p><u>Public Health</u></p> <p>Following the Health & Social Care Act 2012 local authorities have taken on new public health responsibilities in 2014 and TfL, along with other agencies, have a role in supporting them to deliver improvements in the health of Londoners. TfL has prepared the document via the link, which might be useful to help link to transport and health and could perhaps become part of any evidence base for further work.</p> <p>http://www.tfl.gov.uk/info-for/media/press-releases/2014/february/tfl-publishes-worldsfirst-transport-health-action-plan</p>	
REG18.67	Veolia ES (UK) Ltd	As a business operating within the Borough which relies on the movement of waste and recycled materials primarily using the road network it is important that an efficient and sustainable road network is maintained within the Borough and that roads are managed to ensure that there is sufficient capacity and that local congestion issues are relieved.	Noted. The Proposed Submission version of the Local Plan contains a balanced suite of policies promoting sustainable transport modes and for development to avoid or mitigate adverse impact on the transport network.
POST18.1	V.Rajan and Ssociates	<p>The respondent identified the following :</p> <ol style="list-style-type: none"> 1. Road 2. Rail 3. Metro rail 4. Shipping 	Noted. The Local Plan sets out the transport priorities for the borough across a range of transport modes.

Question 7: How do you think the plan should address the need for community facilities and services including schools and health provision?

Response Number	Respondent Name	Response to Q7	Council's response
REG18.1	AECOM	We have no comment to make, only to suggest that a comprehensive approach to planning through the provision of a garden village would provide community facilities and services.	Noted. The Proposed Submission version of the Local Plan seeks to provide sufficient social infrastructure needed to match the quantum and location of proposed new development. The Local Plan is underpinned by a robust Infrastructure Delivery Plan.
REG18.2	Adams Family (Bidwells)	The Plan should address the need for community infrastructure arising from new development via a combination of the Community Infrastructure Levy and site specific planning obligations. The biggest opportunities in this respect are likely to arise from the development of greenfield sites which are likely to be subject to significantly fewer abnormal costs compromising viability.	Noted. The Council is in the early stages of preparing its Community Infrastructure Levy. The Infrastructure Delivery Plan which supports the Local Plan refers to funding for infrastructure facilities and sets out the various funding sources. The Proposed Submission version of the Local Plan seeks to ensure that sufficient community infrastructure is provided to match the quantum and location of proposed new development. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries.

Response Number	Respondent Name	Response to Q7	Council's response
			No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason, the Council will not be seeking development of greenfield sites to deliver community infrastructure facilities.
REG18.3	Anonymous	Should have real police in Havering. Stop outsiders travelling to our schools.	Noted. These issues are outside the scope of the Proposed Submission version of the Local Plan.
REG18.9	C. Cole	I have not felt the need for any changes on these.	Noted.
	D. Campbell	NHS building and other public sector buildings can be modernised but NOT too eccentric like London with skyscrapers, Havering does NOT need skyscrapers – they are depressing.	Noted. The Proposed Submission version of the Local Plan seeks to ensure that the design of new buildings responds to distinctive local building forms and respects the scale, massing, building line and height of the surrounding physical context.
REG18.18	Essex County Council	ECC as a neighbouring statutory authority and service provider will continue to work with the LB Havering on cross boundary issues regarding current provision and future requirements for social Infrastructure including schools and health provision. ECC recommend that the emerging local plan is supported by further investigation and evidence concerning the provision, commitment and timing of social infrastructure, to support the viability and deliverability of the Local Plan, and to determine any cross boundary impacts.	Noted. The Proposed Submission version of the Local Plan is supported by an Infrastructure Delivery Plan which presents evidence concerning the provision, commitment and timing of social infrastructure supporting the Proposed Submission version of the Local Plan. The Council will continue to work closely with other stakeholders involved in infrastructure provision and keep these matters under review.
REG18.21	Havering College of	This term of 'social infrastructure' includes facilities which are needed to serve existing and new residents and to ensure social inclusion, health	The Proposed Submission version of the Local Plan considers the provision of

Response Number	Respondent Name	Response to Q7	Council's response
	Further and Higher Education (Iceni Projects)	<p>and wellbeing and an improved quality of life. The provision of higher and further education should be considered within the context of social infrastructure as the opportunities that training and further qualifications present can contribute to an improved quality of life through better job prospects.</p> <p>Therefore in light of the comment above, the forthcoming Local Plan should include provision for further and higher education and an allowance for institutions such as the HCFHE to grow and change in line with the requirements of an increasing population. This includes such provisions as the protection of existing educational sites as well as the ability to take advantage of opportunities to expand at appropriate locations.</p>	<p>higher and further education within the context of social Infrastructure. The Local Plan has been prepared in the light of a robust Infrastructure Delivery Plan and close working with other Council departments including education.</p> <p>The Proposed Submission version of the Local Plan seeks to safeguard existing education provision and supports proposals for further or higher education where they contribute to the delivery of the Council's agreed Commissioning Plan for Education Provision and the Schools Expansion Programme.</p>
REG18.24	Higgins Homes (Nathaniel Lichfield & Partners)	These should be planned for, having regard to the housing requirements in the London Plan for the Borough.	Noted. The Local Plan is supported by a robust Infrastructure Delivery Plan. The quantum and location of community facilities necessary to support the growth envisaged in the Local Plan will be assessed in the light of housing delivery.
REG18.26	Ian Weatherley	By rationalising and standardising the different primary and secondary schools intakes from other boroughs, e.g. there are so many secondary schools that have many students from Barking and Dagenham – Why? Shouldn't Havering schools be for Havering Residents?	Havering Council works with other neighbouring statutory authorities and service providers on cross boundary issues regarding current provision and future requirements for schools, and other social infrastructure needs. On the basis of the requirement of Duty to Co-operate Havering Council must ensure that the needs of other adjoining boroughs are accommodated where it has the capacity, and they don't. The same principle applies

Response Number	Respondent Name	Response to Q7	Council's response
			to other neighbouring boroughs meeting the needs of Havering where they have the capacity and Havering doesn't.
REG18.27	Janet Davy	Encourage use of local school(s) – at present many students are travelling unnecessary distances to school – which is not good for them or the environment.	<p>The Proposed Submission version of the Local Plan seeks to provide sufficient school places in local areas to avoid the 'need' to travel long distances.</p> <p>Encouraging the use of local schools by Havering residents is outside the scope of the Proposed Submission version of the Local Plan.</p> <p>The Local Plan addresses issues around the journeys to and from schools and seeks to ensure that these are undertaken safely, conveniently and with minimal adverse impact on the environment.</p>
REG18.28	Joe Coogan	Opportunities to secure sites through creative discussions with landowners should be sought out as a priority. It is essential that the borough can cater for needs of children who need good school places, both now and in the future. Some Greenfield and Greenbelt sites could provide a solution, at little or no cost the council if planning obligations/sct 106 powers are used creatively.	<p>Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p> <p>The Local Plan says that proposals for education use in the Green Belt may be considered as very special circumstances</p>

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			where it can be robustly demonstrated that there are no suitable alternative sites within the relevant area and there is a demonstrable need for additional school places.
REG18.29	John Peterson	Support more walk in health centres and open longer hours	Health provision is addressed in the Infrastructure Delivery Plan which has been prepared to support the Local Plan. Support for more walk in health centres and health facilities being open for longer hours is outside the scope of the Proposed Submission version of the Local Plan.
REG18.30	London Borough of Barking and Dagenham	<p>Barking and Dagenham is experiencing an unprecedented growth in children of school age not only from new housing but from existing households. The Council has prioritised the use of S106 contributions to fund new school places and has secured new schools in new developments such as Academy Central, Barking Riverside and Lymington Fields. It is understood that Havering is now facing similar pressures and therefore it is essential that sufficient new school places are planned in parallel with the delivering of new housing.</p> <p>Barking and Dagenham continues to press for bus route 5 to serve Queen's Hospital and would welcome Havering's support in this regard.</p>	<p>The Proposed Submission version of the Local Plan supports the expansion of educational facilities to provide sufficient school places necessary for the additional new housing development identified in the Local Plan. The Local Plan is underpinned by a robust Infrastructure Delivery Plan.</p> <p>The Council is working closely with a wide range of stakeholders to improve access to / from Queens Hospital. The transport policies of the Local Plan highlight the importance of improved public transport links to / from the hospital.</p>
Reg18.32	Lee Clements	<p>By lobbying the government to allow the Council to build new schools rather than expanding existing ones or allowing free schools. Education provision is likely to be negatively impacted by making schools too large.</p> <p>The Council should also be trying to stop the further closure of NHS hospitals and other health centres in the Borough.</p> <p>If the Council wants to welcome more residents, the area needs more</p>	<p>The Proposed Submission version of the Local Plan supports the expansion of educational facilities to provide sufficient school places necessary for the additional new housing development identified in the Local Plan.</p> <p>The Local Plan is underpinned by a robust</p>

Response Number	Respondent Name	Response to Q7	Council's response
		facilities not less.	Infrastructure Delivery Plan. Lobbying the government to stop the further closure of NHS hospitals and other health centres in Havering is outside the scope of the Proposed Submission version of the Local plan.
REG18.34	Margaret Whippy	Consideration needs to be given to the health centres of excellence covering GP, Dental clinics (Such as walk-in) conveniently located at regular intervals within Havering. Thus smaller sites can be utilised and their needs changed according to need. This will add to local hospital complexes giving expansion where needed.	Noted. The Proposed Submission version of the Local Plan supports the co-location of complementary services within multi-use adaptable buildings that are accessible by public transport and active travel.
Reg18.36	Moody Homes and Mr John Wakeling (Bidwells)	The Council should address the need for community infrastructure arising from new development via a combination of the Community Infrastructure Levy and site specific planning obligations. The biggest opportunities in this respect are likely to arise from the development of greenfield sites which are likely to be subject to significantly fewer abnormal costs compromising viability.	Noted. The Council is in the early stages of preparing its Community Infrastructure Levy. The Infrastructure Delivery Plan which supports the Local Plan refers to funding for infrastructure facilities and sets out the various funding sources. The Proposed Submission version of the Local Plan seeks to ensure that sufficient community infrastructure is provided to match the quantum and location of proposed new development. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any

Response Number	Respondent Name	Response to Q7	Council's response
			modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason, the Council will not be seeking development of greenfield sites to deliver community infrastructure facilities.
Reg18.37	Mr Barrie Stone and Miss Eleanor Stone	New facilities and improved structures to represent new and changing population.	Noted. The Local Plan is underpinned by a robust Infrastructure Delivery Plan. The Proposed Submission version of the Local Plan seeks to provide sufficient community infrastructure needed to match the quantum and location of development proposed.
Reg18.39	Mrs S J Ellis (Bidwells)	The Council should address the need for community infrastructure arising from new development via a combination of the Community Infrastructure Levy and site specific planning obligations. The biggest opportunities in this respect are likely to arise from the development of greenfield sites which are likely to be subject to significantly fewer abnormal costs compromising viability.	Noted. The Council is in the early stages of preparing its Community Infrastructure Levy. The Infrastructure Delivery Plan which supports the Local Plan refers to funding for infrastructure facilities and sets out the various funding sources. The Proposed Submission version of the Local Plan seeks to ensure that sufficient community infrastructure facilities required for the quantum and location of proposed new development is provided. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF

Response Number	Respondent Name	Response to Q7	Council's response
			and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason, the Council will not be seeking development of greenfield sites to deliver community infrastructure facilities.
Reg18.40	Ms M Blackman	Can only do this when needs of local people regularly assessed. Some boroughs have a system of road or area ambassadors who enjoy interacting with their neighbours. Never going to keep everyone happy as funds are always under pressure. Focus on bringing in the business and people – money will follow.	Noted. The Local Plan is underpinned by a robust Infrastructure Delivery Plan. The Proposed Submission version of the Local Plan seeks to provide sufficient community infrastructure needed to match the quantum and location of proposed new development.
Reg18.43	Omega After Alpha Ltd (Bidwells)	The Council should address the need for community infrastructure arising from new development via a combination of the Community Infrastructure Levy and site specific planning obligations. The biggest opportunities in this respect are likely to arise from the development of greenfield sites which are likely to be subject to significantly fewer abnormal costs compromising viability.	Noted. The Council is in the early stages of preparing its Community Infrastructure Levy. The Infrastructure Delivery Plan which supports the Local Plan refers to funding for infrastructure facilities and sets out the various funding sources. The Proposed Submission version of the Local Plan seeks to ensure that sufficient community infrastructure required for the quantum and location of proposed new development is provided. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the

Response Number	Respondent Name	Response to Q7	Council's response
			<p>Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason, the Council will not be seeking development of greenfield sites to deliver community infrastructure facilities.</p>
Reg18.44	Persimmon Homes Essex	<p>Havering Borough Council are currently preparing their Community Infrastructure Levy (CIL) alongside the new Local Plan. The adoption of a CIL will enable the council to take financial contributions from all residential development delivered in the LPA. The allocation of large strategic sites can also provide and help to deliver much needed social infrastructure.</p>	<p>Noted. The Council is in the early stages of preparing its Community Infrastructure Levy.</p> <p>The Infrastructure Delivery Plan which supports the Local Plan refers to funding for infrastructure facilities and sets out the various funding sources.</p> <p>The policies in the Local Plan for the Strategic Development Areas in Romford and Rainham and Beam Park refer to the social and community infrastructure needed to support development in these areas.</p>
REG18.47	R. Watt and Partners (Phillips Planning Services)	<p>Inclusion of suitable/required facilities as part of sufficiently scaled allocations and are suitably accessible from other developments. Policy framework should also provide flexibility to ensure that facilities and services are reflective of need to enable them to remain viable.</p>	<p>Noted. The Proposed Submission version of the Local Plan seeks to provide sufficient social infrastructure necessary for the quantum of proposed new development. The Local Plan is underpinned by a robust Infrastructure</p>

Response Number	Respondent Name	Response to Q7	Council's response
			Delivery Plan.
REG18.48	R.A.Montague	Free Schools Academies and at least one Grammar School for social mobility.	Noted. The Proposed Submission version of the Local Plan supports provision of sufficient school places necessary for the quantum of development planned.
REG18.50	Rainham Preservation Society	Rainham desperately needs a new health centre as all our doctors are providing an excellent service in cramped and inadequate conditions. We were promised a new school and health centre and got neither. This disproportionate spending within this borough must stop!	The policy in the Proposed Submission version of the Local Plan for the Rainham and Beam Park Strategic Development Area includes reference to the provision of a new health centre and new school places in this area.
Reg18.51	Ray Whitehouse	Build schools where they are needed and create more spaces at schools which are overloaded. Don't move the people, move the schools closer to the people.	Noted. The Proposed Submission version of the Local Plan seeks to provide sufficient school places in the appropriate areas of Havering..
REG18.52	Romford Civic Society	We support the words relating to this in the consultation document.	Support noted.
Reg18.53	Romford Golf Club (Joe Coogan)	Opportunities to secure sites through creative discussions with landowners should be sought out as a priority. It is essential that the borough can cater for needs of children who need good school places, both now and in the future. Some Greenfield and Greenbelt sites could provide a solution, at little or no cost the council if planning obligations/sct 106 powers are used creatively.	Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason, the Council will not

Response Number	Respondent Name	Response to Q7	Council's response
			<p>be seeking to allocate some Greenfield and Greenbelt sites to provide for school places for children.</p> <p>The Local Plan says that proposals for education use in the Green Belt may be considered as very special circumstances where it can be robustly demonstrated that there are no suitable alternative sites within the relevant area and there is a demonstrable need for additional school places.</p>
Reg18.54	Romford YMCA	<p>Yes, the Local Plan should address the need for community facilities, which should reflect the communities in which they are based.</p> <p>Development of new homes must be seen in tandem with new health and educational facilities.</p>	<p>Noted. The Local Plan is underpinned by a robust Infrastructure Delivery Plan. The Proposed Submission version of the Local Plan seeks to provide sufficient social infrastructure needed to match the quantum and location of proposed new development.</p>
Reg18.56	S.D. Olney	<p>In Rainham, for instance, a multi practice doctor's clinic has been tabled for approaching 13 years but as yet no development has ever been agreed – why?</p>	<p>The policy in the Proposed Submission version of the Local Plan for the Rainham and Beam Park Strategic Development Area includes reference to the provision of a new health centre in this area.</p> <p>The Local Plan itself cannot require the provision of such a facility by its health service partners.</p>
Reg18.57	Sheila Clements	<p>There isn't any money for any of this if the Conservatives get in again as we are told we are again going into more austerity measures.</p>	<p>Noted. It is recognised that the funding climate for many matters including social and community infrastructure is challenging.</p> <p>The Proposed Submission version of the Local Plan seeks to provide sufficient social infrastructure needed to match the</p>

Response Number	Respondent Name	Response to Q7	Council's response
			<p>quantum of proposed new development. It is likely that this will encompass exploring options for funding from a wide range of potential sources.</p>
Reg18.66	Trinity Hall (Bidwells)	<p>The Council should address the need for community infrastructure arising from new development via a combination of the Community Infrastructure Levy and site specific planning obligations. The biggest opportunities in this respect are likely to arise from the development of greenfield sites which are likely to be subject to significantly fewer abnormal costs compromising viability.</p>	<p>Noted. The Council is in the early stages of preparing its Community Infrastructure Levy.</p> <p>The Infrastructure Delivery Plan which supports the Local Plan refers to funding for infrastructure facilities and sets out the various funding sources.</p> <p>The Proposed Submission version of the Local Plan seeks to ensure that sufficient community infrastructure facilities needed to match the quantum of proposed new development is provided.</p> <p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason, the Council will not be seeking development of greenfield sites to deliver community infrastructure facilities.</p>

Response Number	Respondent Name	Response to Q7	Council's response
POST18.1	V. Rajan and Associates	The respondent commented : 1. Schools based on demand 2.Hospitals	Noted. The Proposed Submission version of the Local Plan seeks to provide sufficient social infrastructure needed to match the quantum of proposed new development. The Infrastructure Delivery Plan sets out the quantity of community facilities planned for. This includes health and education facilities.

Question 8: How do you think the Plan should support the culture and leisure offer within Havering?

Response Number	Respondent Name	Response to Q8	Council's response
REG18.1	AECOM	We have no comment to make, only to suggest that a comprehensive approach to planning through the provision of a new garden village would have the potential to provide culture and leisure facilities as well as contributing towards improving current culture and leisure facilities.	Noted. The Proposed Submission version of the Local Plan supports the increase of culture and leisure facilities as well as the enhancement of existing facilities.
REG18.2	Adams Family (Bidwells)	<p>The Framework requires local planning authorities to plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land (para 81).</p> <p>Taking account of the important position of the Borough on the outer fringes of Greater London, the Plan should view the Green Belt as a cultural and leisure resource to be optimised for the benefit of the residents. To preserve the Green Belt in aspic would miss the opportunity to enhance its beneficial use.</p> <p>There are many areas of Green Belt which are inaccessible and of little value to residents of the Borough. The Local Plan process offers the opportunity to explore the potential to enhance these sites. We would urge the Council to take the opportunities presented to provide greater access to the Green Belt for recreation and to enable ecological enhancements, which would in turn improve prospects for healthier lifestyles and access to nature. This would significantly enhance the leisure and cultural offer within Havering.</p>	Noted. The Proposed Submission version of the Local Plan supports proposals that improve the quality of and access to existing open space, sports and recreation facilities in order to enhance the leisure and recreational beneficial use of the Green Belt within the borough.
REG18.3	Anonymous	Stop destroying what little culture we have in Havering.	Noted. The Proposed Submission version of the Local Plan sets out a positive strategy protecting culture and leisure facilities within Havering.
REG18.9	C. Cole	Must give extra support to Queens Theatre. I think sports centres are	Noted. The provision of extra support to

Response Number	Respondent Name	Response to Q8	Council's response
		under-used – close one?	Queens Theatre is outside the scope of the Proposed Submission version of the Local Plan. The Proposed Submission version of the Local Plan seeks to protect existing sports and recreation facilities unless it can be demonstrated that better or replacement provision will be made in a suitable location or the need for the development involves alternative sports and recreation provision which outweighs the loss of the existing facility.
REG18.12	D. Campbell	The Plan should support existing residents and relate to what would help with their planned lifestyle, gym leisure walk through a well-lit walkway through the marshes park exercise equipment.	Noted. The Proposed Submission version of the Local Plan sets out a positive strategy for the enhancement of leisure, sports, and recreational facilities.
REG18.13	D.K.Symes Associates	There is an increasing demand on leisure facilities and encouragement should be given to proposals that increase the range and facilities that can be provided. This includes facilities that may be located in the Green Belt.	Noted. The Proposed Submission version of the Local Plan sets out a positive strategy protecting culture and leisure facilities within Havering.
REG18.26	Ian Weatherley	Culture and leisure opportunities should be retained – but with council funding reduced to a minimum. These facilities will need to be funded by the people that use them – as these are not basic needs – such as schooling and healthcare.	The Proposed Submission version of the Local Plan sets out a positive strategy protecting culture and leisure facilities within Havering. Issues linked to the fees for the use of facilities are outside the scope of the Proposed Submission version of the Local Plan.
REG18.27	Janet Davy	By maintaining libraries and grants e.g. to the Queens Theatre. This is more important than spending on fancy street paving.	Noted. The decision on relative spending priorities is outside the scope of the Proposed Submission version of the Local plan. Notwithstanding that, the Local Plan seeks to ensure that Havering has a very

Response Number	Respondent Name	Response to Q8	Council's response
			high quality public realm as this can enhance the quality of life for residents and provide a more positive climate for business investment.
REG18.28	Joe Coogan	Opportunities to bring underused land up to a standard that can be used for recreational purposes should be considered. Planning obligation powers could release some Greenfield sites for new parks if other parts of sites are freed up for considerate development.	Noted. The Proposed Submission version of the Local Plan encourages developer contributions to enhance recreational facilities.
REG18.29	John Peterson	Do not charge for parking in parks	This matter is outside the scope of the Proposed Submission version of the Local Plan.
REG18.32	Lee Clements	By: preserving our parks and not allowing development to encroach on them; supporting the Queen's theatre, libraries and other cultural and arts facilities;	Noted. The Proposed Submission version of the Local Plan includes policies to protect parks. The Local Plan seeks to protect cultural facilities such as the Queen's Theatre and arts and facilities.
REG18.34	Margaret Whippy	Cultural and leisure facilities need to change according to local residents. Accessible gyms in town centres as well as sports centres; kiddies activity centre in town centre complexes; sporting centres in larger areas on the edge of towns. Encouragement of more physical activities in schools and ceasing the sale of school playing fields for development.	Noted. The Proposed Submission version of the Local Plan includes a policy to ensure the provision of a wide range of facilities for culture and recreation.
REG18.36	Moody Homes and Mr John Wakeling (Bidwells)	Please refer to our answer to Question 7 – the same principle applies; development on greenfield land offers greater opportunities than brownfield land to fund improvements to the cultural and leisure offer in the Borough.	Noted. See response to Question 7.
REG18.37	Mr Barrie Stone and Miss Eleanor Stone	More flexible approach required.	Noted. The Proposed Submission version of the Local Plan will be assessed by an Inspector to ensure that it provides a reasonable amount of flexibility to deal with changing circumstances over the Plan Period.
REG18.39	Mrs S J Ellis	The Framework requires local planning authorities to plan positively to	Noted. The Proposed Submission version

Response Number	Respondent Name	Response to Q8	Council's response
	(Bidwells)	<p>enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land (para 81).</p> <p>Taking account of the important position of the Borough on the outer fringes of Greater London, the Council should view the Green Belt as a cultural and leisure resource to be optimised for the benefit of the residents. To preserve the Green Belt in aspic would miss the opportunity to enhance its beneficial use.</p> <p>There are many areas of Green Belt which are inaccessible and of little value to residents of the Borough. The Local Plan process offers the opportunity to explore the potential to enhance these sites. We would urge the Council to take the opportunities presented to provide greater access to the Green Belt for recreation and to enable ecological enhancements, which would in turn improve prospects for healthier lifestyles and access to nature. This would significantly enhance the leisure and cultural offer within Havering.</p>	<p>of the Local Plan supports proposals that improve the quality of and access to existing open space, sports and recreation facilities in order to enhance the leisure and recreational beneficial use of the Green Belt within the borough, in line with the NPPF.</p>
REG18.40	Ms M Blackman	<p>See Q2 & Q7. If there are plenty of businesses where people can live and work, they will make use of local facilities, and will drive demand for better facilities. If there is demand then entrepreneurs can be encouraged to service this demand. All of this ultimately contributes to the local economy, and helps fund wider services.</p>	<p>Noted. The Proposed Submission version of the Local Plan supports increase of culture and leisure facilities as well as the enhancement of existing facilities to support sustainable development.</p>
REG18.43	Omega After Alpha Ltd (Bidwells)	<p>The Framework requires local planning authorities to plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land (para 81).</p> <p>Taking account of the important position of the Borough on the outer fringes of Greater London, the Council should view the Green Belt as a cultural and leisure resource to be optimised for the benefit of the</p>	<p>Noted. The Proposed Submission version of the Local Plan supports proposals that improve the quality of, and access to, existing open space, sports and recreation facilities in order to enhance the leisure and recreational beneficial use of the Green Belt within the borough, in line with the NPPF.</p>

Response Number	Respondent Name	Response to Q8	Council's response
		<p>residents. To preserve the Green Belt in aspic would miss the opportunity to enhance its beneficial use.</p> <p>There are many areas of Green Belt which are vacant, degraded, inaccessible and of little value to residents of the Borough. The Local Plan process offers the opportunity to explore the potential to enhance these sites. We would urge the Council to take the opportunities presented to provide greater access to the Green Belt for recreation and to enable ecological enhancements, which would in turn improve prospects for healthier lifestyles and access to nature. This would significantly enhance the leisure and cultural offer within Havering.</p>	
REG18.47	R. Watt and Partners (Phillips Planning Services)	Cultural/Leisure facilities should be supported/promoted in accessible locations and open spaces should be reviewed to ensure that they facilitate the purposes behind their designation.	Noted. The Proposed Submission version of the Local Plan sets out a positive strategy promoting cultural/leisure facilities in accessible locations. The preparation of the Local Plan has encompassed a review of all open spaces.
REG18.48	R.A.Montague	By preserving the green belt and open spaces and by supporting organisations such as Scouts/Cadets.	Noted. The Proposed Submission version of the Local Plan sets out a positive strategy to protect Green Belt and Open Spaces. Supporting organisations such as Scouts/Cadets is outside the scope of the Proposed Submission version of the Local plan.
REG18.50	Rainham Preservation Society	We need sailing facilities and a yacht club at Rainham Riverside. The boroughs greatest asset, the River Thames, should be used to its fullest potential.	Noted. The provision of sailing facilities and a yacht club is outside the scope of the Proposed Submission version of the Local plan. The Proposed Submission version of the Local plan sets out a positive strategy for river corridors.
REG18.51	Ray	Make them more accessible without having to have a membership. It is	The Proposed Submission version of the

Response Number	Respondent Name	Response to Q8	Council's response
	Whitehouse	just not Havering but sports centres and leisure centres to me are not very inviting. They all seem to consist of a reception desk (which always has a queue) and then a barrier to facilities which could be made available free. By this I mean, for example, that Harrow lodge could open its doors to the cafe and toilets to all comers to make it more inviting and then have the barrier between that and the sports facilities which need paying for. Think how great it would be if these facilities could be used by everyone who just want a walk and a cup of tea. So make them more accessible to the public as a whole.	Local Plan requires developments to enable inclusive access for all in the community.
REG18.52	Romford Civic Society	Current LDF policies CP57 and DC1725 should be retained and transferred into the new Local Plan. CIL money should be used to support cultural infrastructure.	Noted. The preparation of the Proposed Submission version of the Local Plan has encompassed reviewing current planning policies as set out in the Local Development Framework. Where necessary and appropriate, the thrust of these policies is included within the new policies in the Local Plan. The preparation and delivery of the Havering Community Infrastructure Levy will be the appropriate mechanism to consider if cultural infrastructure should be funded through these monies.
REG18.53	Romford Golf Club (Joe Coogan)	Opportunities to bring underused land up to a standard that can be used for recreational purposes should be considered. Planning obligation powers could release some Greenfield sites for new parks if other parts of sites are freed up for considerate development.	Noted. The Proposed Submission version of the Local Plan sets out a positive strategy protecting or enhancing existing culture and leisure facilities and providing new facilities within Havering.
REG18.56	S.D. Olney	Overall culture and leisure is at present catered for.	Noted.
REG18.57	Sheila Clements	It won't. After The Queens Theatre got a grant last year, the Council took away their support. Apparently there isn't any money.	Noted. Decisions on financial support for the Queens Theatre is outside the scope of this Proposed Submission version of the Local plan.
REG18.58	Sport England	The Plan should support sports facilities by according with paragraph 70	Noted. The Proposed Submission version

Response Number	Respondent Name	Response to Q8	Council's response
		<p>of the NPPF which states:</p> <p>To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:</p> <ul style="list-style-type: none"> - Plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments; - Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to day needs; - Ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community; and - Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services. <p>The Plan should set out clearly what the sporting needs of the Borough are and how they are to be delivered, allocating land as appropriate and being explicit about where new provision should be delivered in kind onsite as part of housing development and where S106 contributions and CIL will be sought.</p>	<p>of the Local Plan has been prepared in accordance with the National Planning Policy Framework including paragraph 70.</p>
REG18.62	Theatres Trust	<p>Under the title 'Culture and Leisure Facilities', the Local Plan document should include policies that protect and enhance existing facilities as well as encourage new ones. We therefore recommend policy wording along the lines of:</p> <ol style="list-style-type: none"> 1. The council will safeguard existing cultural and leisure facilities by resisting their loss or change of use unless replacement facilities are provided on site or within the vicinity which meets the need of the local population, or it has been demonstrated that there is no demand for another similar use on site. 	<p>Noted. The Proposed Submission version of the Local Plan sets out a positive strategy to protect and enhance access to existing culture and leisure facilities and encourages the provision of new facilities within Havering.</p>

Response Number	Respondent Name	Response to Q8	Council's response
		<p>2. Developments that result in additional need for cultural and leisure facilities will be required to contribute towards enhancing existing facilities, or provide/contribute towards new facilities. This contribution will be addressed through CIL and/or section 106 obligations, as appropriate.</p> <p>3. The council will encourage the provision of new cultural and leisure facilities in appropriate locations which are convenient to the communities they serve and accessible by a range of sustainable transport modes, including walking, cycling and public transport, and buildings that are inclusive, accessible, flexible and sited to maximise shared use of the facility.</p> <p>This reflects guidance in item 70 in the NPPF states that to deliver the social, recreational and cultural facilities and services that the community needs, planning policies and decisions should plan for the use of shared space and guard against unnecessary loss of valued facilities. Also to ensure that established facilities and services are retained and able to develop for the benefit of the community.</p>	
REG18.66	Trinity Hall (Bidwells)	Please refer to our answer to Question 7 – the same principle applies; development on greenfield land offers greater opportunities than brownfield land to fund improvements to the cultural and leisure offer in the Borough.	Noted. See response to Question7.
REG18.67	Veolia ES (UK) Ltd	We support the development of cultural and leisure activities within the Borough. However, this should not be to the detriment of the needs of local businesses and the economic wellbeing of the area.	Support noted. The Proposed Submission version of the Local Plan sets out a balanced strategy to achieve sustainable development in Havering without detriment to a particular land use type.
POST18.4	V. Rajan and Associates	The respondent commented : 1. Sports Complex	Noted. The Local Plan sets a positive strategy for sport and leisure including a policy for open space, sports and leisure. It identifies support for improvements to

Response Number	Respondent Name	Response to Q8	Council's response
			several sports facilities such as Chaffords and Hornchurch.

Question 9: How do you think the Local Plan should protect and enhance the Borough's green belt?

Response Number	Respondent Name	Response to Q9	Council's response
REG18.1	AECOM	We believe that the Council should actively manage its Green Belt land and identify areas within it which serve its intended purpose and should be retained, as well as those areas where development would be suitable to meet the borough's housing need.	The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason the Council will protect Green Belt and consider applications in the Green Belt in accordance with NPPF and London Plan policies.
REG18.2	Adams Family (Bidwells)	The Local Plan process provides the opportunity to review the Green Belt boundary and determine whether the targeted release of sites which do not serve any of the five Green Belt purposes would be appropriate. Specifically as part of this process, the development of some Green Belt	The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a

Response Number	Respondent Name	Response to Q9	Council's response
		<p>sites offers the prospect of enabling the enhancement and beneficial use of other land that serves a more valuable Green Belt function, as encouraged by the Framework. Such opportunities for Green Belt enhancement include accessibility, outdoor sport and recreation and the enhancement of landscapes, visual amenity and biodiversity. Providing new or extended Country Parks or enhancements to the Thames Chase Community Forest are examples of the opportunities presented by greater access to Green Belt land, funded by the release of sites that no longer serve Green Belt purposes.</p> <p>In light of our serious concerns in respect of the deliverability of the Borough's housing requirement on brownfield sites alone (as explained in our response to Question 3), we would seek to reassure the Council that <i>Hundal v South Buckinghamshire DC [2012]</i> demonstrates that housing need is capable of justifying a change in the Green Belt boundaries. This approach is in accordance with the most recent update to relevant National Planning Practice Guidance (PPG) guidance. Taking this point into practice, St Albans City and District Council (another Green Belt authority) is preparing its Local Plan to meet its housing requirements including Green Belt release on the basis that 'exceptional circumstances' do exist because there is likely to be insufficient brownfield capacity and no alternative locations beyond the Green Belt.</p> <p>In conclusion, development of some Green Belt land offers the prospect of funding the enhancement for the beneficial use of other parts of the Green Belt that serves a more important function. This Local Plan review process should be seen as an opportunity to enable this to happen. The release of some Green Belt land for residential development, in light of exceptional circumstances, is in accordance with the Framework and PPG guidance</p>	<p>contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p> <p>For this reason the Council will protect the Green Belt and consider applications in Green Belt in accordance with NPPF and London Plan policies.</p>
REG18.3	Anonymous	Protect the green belt, including stopping road and pedestrian traffic increases.	Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that

Response Number	Respondent Name	Response to Q9	Council's response
			<p>all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p> <p>For this reason the Council will protect Green Belt and consider applications in the Green Belt in accordance with NPPF and London Plan policies.</p>
REG18.8	Brett Aggregates Limited (MJCA)	<p>The new Local Plan should, in line with the aims and objectives of the NPPF recognise that certain types of development such as mineral extraction are not inappropriate in the Green Belt. Minerals can only be worked where they occur and can be accessed which can often include land in Green Belt surrounding urban areas.</p> <p>The ancillary facilities such as mineral processing plant, offices and weighbridges are essential to facilitate the extraction and processing of minerals and so should also not be considered inappropriate in the Green Belt. Minerals development and ancillary facilities are considered as temporary development, with full restoration schemes for such sites required as a prerequisite of planning permission.</p> <p>To reduce the distance over which mineral is transported it is common to locate ancillary production facilities such as a concrete batching plant to make use of the aggregate at quarries where the mineral arises.</p> <p>The permitted life of these facilities is often linked to the permitted life of the quarry and should not be considered inappropriate development in the</p>	<p>The Proposed Submission version of the Proposed Submission version of the Local Plan contains a positive policy on mineral extraction which requires proposals to be environmentally suitable, sustainable and consistent with other relevant policies. Mineral extraction are recognised as not inappropriate in the Green Belt providing they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. All applications for mineral extraction will be assessed in accordance with the NPPF and the London Plan.</p>

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		<p>Green Belt where the facility does not contravene the purpose and objectives of the Green Belt.</p> <p>In some cases it is necessary to make use of imported waste to restore a quarry to original ground levels in order to return the land to a beneficial after use. As a result waste disposal should also not be considered to be inappropriate in the Green Belt.</p> <p>To minimise the use of raw materials and maximise the use of secondary aggregate, aggregate production plants at mineral extraction sites which treat suitable materials to recover and generate secondary aggregate should be considered as not inappropriate in the Green Belt where the purpose and objectives of the Green Belt are not compromised. Furthermore, where quarry sites are being restored using imported material, in order to minimise the disposal of waste which could be put to a more beneficial use, it is in accordance with the principles of sustainability to allow processing including the crushing and screening of waste prior to deposit in the quarry void to recover usable materials which can be used to produce secondary aggregates. The activities and plant involved are similar to the activities and plant associated with mineral extraction and processing and result in the recovery of materials which can be reused with only residual wastes being subject to final disposal to achieve restoration of the quarry void. This accords with the principles of the waste hierarchy set out in the Waste Framework Directive as well as the principles of sustainability which are embedded throughout national planning policy in the NPPF.</p> <p>The appropriate restoration of quarries can enhance the Green Belt by returning land to productive agricultural use and also by providing enhanced biodiversity or areas of public amenity such as allotments and footpaths around new lakes.</p>	
REG18.9	C. Cole	Continue the good work with parks. Well Done.	Support noted.
REG18.12	D. Campbell	Do not build too many new builds on the green and do build homes for	Noted. The Council has undertaken a

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		working families.	<p>Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p> <p>For this reason the Council will protect Green Belt and consider applications in the Green Belt in accordance with NPPF and London Plan policies.</p> <p>Nonetheless, the Proposed Submission version of the Proposed Submission version of the Local Plan supports the delivery of a range of dwelling types, sizes and tenures to meet the housing needs of local people including working families, and will assess applications in Green Belt in accordance with the NPPF.</p>
REG18.13	D.K.Symes Associates	There are areas within the Green Belt that have been damaged or degraded by past activities. There needs to be positive encouragement for these areas to be improved so that they can play their full role in contributing to the Green Belt objectives. This will include public access, increased leisure / access opportunities, linked greenways, etc.	The Proposed Submission version of the Local Plan supports and encourages improvements to the accessibility and beneficial use of the Green Belt where proposals are compliant with national policy.
REG18.14	Edward Gittins & Associates	In association with housing sites requiring the release of Green Belt land, provision should be made for a better use or improved appearance of the	The Council has undertaken a Green Belt study as part of the evidence base for the

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		adjoining Green Belt via S106 Agreements.	Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason the Council will not be seeking to release Green Belt land for housing development. So there would be no need for provision to be made for a better use or improved appearance of the adjoining Green Belt via s106 Agreements.
REG18.18	Essex County Council	ECC is committed to working closely with local authorities who adjoin Essex to ensure housing and infrastructure requirements meet the needs of residents, drive economic prosperity, and protect and enhance the local environment. ECC's preference is for any implications of development on the Metropolitan Green Belt to be progressed through the local plan process. This will ensure a consistent, sound and robust approach in accordance with the National Planning Policy Framework (NPPF). It is recommended that the LB Havering ensure engagement and consultation through the duty to cooperate takes place with the adjoining Essex authorities of Epping Forest and Brentwood which contain significant areas of Green Belt land.	The Council has been committed in working closely with all neighbouring authorities on Green Belt matters and other strategic issues. The Duty to Co-operate statement sets out in detail how engagement has taken place to fulfil the Duty to Co-operate.
REG18.21	Havering College of Further and Higher Education	HCFHE recognises the importance of the Green Belt in the Borough and the requirement to protect the Green Belt from inappropriate development. However, HCFHE encourages LBH to review certain areas of land within the Green Belt which are no longer performing the five key functions of the Green Belt as defined by the National Planning Policy Framework. As	The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a

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	(Iceni Projects)	such, areas of the Green Belt that have been previously developed and now comprise large areas of hardstanding should be considered for potential development to assist the Borough in delivering its necessary housing targets. Sites such as this should be considered as part of an independent Green Belt Assessment as the Local Plan preparation evolves – in accordance with the National Planning Policy Framework.	contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. The opportunity for potential development at the Quarles Campus in Harold Hill is acknowledged in the Local Plan in the policy on housing supply and in the Housing Position Paper supporting the Local Plan.
REG18.23	Heine Planning	There is an urgent need to identify sites for Travellers. This should consider inseting existing sites from the Green Belt, making better use of existing sites and granting permanent consent for the many sites with temporary consent so that the general appearance and living conditions can be addressed by meaningful conditions.	The Council has undertaken a Gypsy and Traveller Needs Assessment to support the preparation of the Proposed Submission version of the Local Plan. It identifies a need for 33 pitches over the Plan Period for gypsies and travellers who meet the planning definition set out in the Government policy. No need was identified for pitches for travelling show people. The Proposed Submission version of the Local Plan has allocated 33 pitches.
REG18.24	Higgins Homes (Nathaniel Lichfield & Partners)	The Borough should protect and enhance the Green belt by proactively releasing the parts of it which do not contribute to its five purposes. By releasing development pressure at selected locations the council will be able to better focus on the protection and enhancement of the more defensible areas of the Green Belt, which serve the five purposes of the Green Belt and make a vital contribution to the health and well-being of the	The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes

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		Borough.	of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason the Council will protect Green Belt and consider applications in Green Belt in accordance with NPPF and London Plan policies.
REG18.26	Ian Weatherley	Some encroachment of the Green Belt should be allowed for careful planning and development for high-quality housing developments.	The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason the Council will protect Green Belt and consider applications in Green Belt in accordance with NPPF and London Plan policies.
REG18.27	Janet Davy	By not building on it.	Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version

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			of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason the Council will protect Green Belt and consider applications in Green Belt in accordance with NPPF and London Plan policies.
REG18.28	Joe Coogan	High quality greenbelt land that is useable for recreation or farming should be protected. Land classified as greenbelt that is in effect 'waste land' should not be protected. Other uses should be considered that help improve Havering through better homes, recreation space or schools/infrastructure.	The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.
REG18.29	John Peterson	Improve facilities in green belt	Noted. The Proposed Submission version of the Local Plan supports and encourages improvements to the accessibility and beneficial use of the Green Belt where

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			proposals are compliant with the NPPF.
REG18.30	London Borough of Barking and Dagenham	Barking and Dagenham will be undertaking a Green Belt review as part of its Local Plan review. Since we share the Dagenham Corridor we would welcome early engagement around any significant changes to the Green Belt that Havering intend to make.	Havering Council has engaged with the London Borough of Barking and Dagenham on the preparation of Havering's Green Belt study. The Proposed Submission version of the Local Plan does not propose any significant changes to the Green Belt.
REG18.32	Lee Clements	By NOT allowing ANY development in the Green Belt. It is there to stop urban sprawl and allow residents relatively easy access to nature.	Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason the Council will protect Green Belt and consider applications in Green Belt in accordance with NPPF and London Plan policies.
REG18.33	Mr Leslie Budge (Andrew Martin Planning)	Paragraphs 79 and 80 outline the fundamental purposes for including land within the Green Belt, which includes: 1)to check the unrestricted sprawl of large built-up areas; 2)to prevent neighbouring towns merging into one another;	The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF

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		<p>3)to assist in safeguarding the countryside from encroachment;</p> <p>4)to preserve the setting and special character of historic towns; and</p> <p>5)to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</p> <p>The NPPF directs, at paragraph 83 that once established Green Belt boundaries should only be altered in exceptional circumstances and these alterations should take place in conjunction with a review, or preparation of, a new Local Plan. When reviewing, altering or defining Green Belt boundaries, in accordance with paragraph 85 of the NPPF, local planning authorities should:</p> <ul style="list-style-type: none"> – ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development; – not include land which is unnecessary to keep permanently open; – where necessary, identify in their plans areas of 'safeguard land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period; – make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development; 	<p>and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason the Council will protect Green Belt and consider applications in Green Belt in accordance with NPPF and London Plan policies.</p>

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		<ul style="list-style-type: none"> - satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and - define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. <p>A review of Green Belt boundaries is necessary where sufficient land cannot be identified within the existing urban areas to accommodate the required level of housing. This Green Belt review will secure a justified balance between meeting housing need and protecting the Green Belt.</p>	
REG18.34	Margaret Whippy	Ad hoc protection of green belt land without consideration of local housing needs is not sensible. People must come first. Green belt that people cannot access or grow crops on is of little use, so more consideration needs to be directed to a joined-up policy that upholds beautiful areas of countryside for leisure and/or agricultural use, but allows for pockets of housing for local people.	The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason the Council will protect Green Belt and consider applications in Green Belt in accordance with NPPF and London Plan policies.
REG18.36	Moody Homes	The Local Plan process provides the opportunity to review the Green Belt	The Council has undertaken a Green Belt

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	and Mr John Wakeling (Bidwells)	<p>boundary and determine whether the targeted release of sites which do not serve any of the five Green Belt purposes would be appropriate.</p> <p>Specifically as part of this process, the development of some Green Belt sites offers the prospect of enabling the enhancement and beneficial use of other land that serves a more valuable Green Belt function, as encouraged by the Framework. Such opportunities for Green Belt enhancement include accessibility, outdoor sport and recreation, retention and enhancement of landscapes, visual amenity and biodiversity. Providing new or extended Country Parks or enhancements to the Thames Chase Community Forest are examples of the opportunities presented by greater access to Green Belt land, funded by the release of sites that no longer serve Green Belt purposes.</p> <p>In light of our serious concerns in respect of the deliverability of the Borough's housing requirement on brownfield sites alone (as explained in our response to Question 3), we would seek to reassure the Council that <i>Hundal v South Buckinghamshire DC [2012]</i> demonstrates that housing need is capable of justifying a change in the Green Belt boundaries. This approach is in accordance with the most recent update to relevant National Planning Practice Guidance (PPG) guidance. Taking this point into practice, St Albans City and District Council (another Green Belt authority) is preparing its Local Plan to meet its housing requirements including Green Belt release on the basis that 'exceptional circumstances' do exist because there is likely to be insufficient brownfield capacity and no alternative locations beyond the Green Belt.</p> <p>In conclusion, development of some Green Belt land offers the prospect of funding the enhancement for the beneficial use of other parts of the Green Belt that serves a more important function. This Local Plan review process should be seen as an opportunity to enable this to happen. The release of some Green Belt land for residential development, in light of exceptional circumstances, is in accordance with the Framework and PPG guidance.</p>	<p>study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason the Council will protect Green Belt and consider applications in Green Belt in accordance with NPPF and London Plan policies.</p>

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REG18.37	Mr Barrie Stone and Miss Eleanor Stone	Revalue the Green Belt/remove or exchange poor or less desirable areas brownfield and previously used sites.	The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason the Council will protect Green Belt and consider applications in Green Belt in accordance with NPPF and London Plan policies.
REG18.38	Mr T Clemence (DHA Planning)	Protect high quality Greenfield land and protect land that prevents urban sprawl and the merging of two settlements; however also ensure land is not included in the Green Belt that is unnecessary. If there are areas of land within the Green Belt that are located in sustainable locations which could contribute to the Boroughs housing need, it should not be retained and unnecessarily included in the Green Belt.	The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason the Council will protect Green Belt and

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			consider applications in Green Belt in accordance with NPPF and London Plan policies.
REG18.39	Mrs S J Ellis (Bidwells)	<p>The Local Plan process provides the opportunity to review the Green Belt boundary and determine whether the targeted release of sites which do not serve any of the five Green Belt purposes would be appropriate.</p> <p>Specifically as part of this process, the development of some Green Belt sites offers the prospect of enabling the enhancement and beneficial use of other land that serves a more valuable Green Belt function, as encouraged by the Framework. Such opportunities for Green Belt enhancement include accessibility, outdoor sport and recreation, retention and enhancement of landscapes, visual amenity and biodiversity. Providing new or extended Country Parks or enhancements to the Thames Chase Community Forest are examples of the opportunities presented by greater access to Green Belt land, funded by the release of sites that no longer serve Green Belt purposes.</p> <p>In light of our serious concerns in respect of the deliverability of the Borough's housing requirement on brownfield sites alone (as explained in our response to Question 3), we would seek to reassure the Council that <i>Hundal v South Buckinghamshire DC [2012]</i> demonstrates that housing need is capable of justifying a change in the Green Belt boundaries. This approach is in accordance with the most recent update to relevant National Planning Practice Guidance (PPG) guidance. Taking this point into practice, St Albans City and District Council (another Green Belt authority) is preparing its Local Plan to meet its housing requirements including Green Belt release on the basis that 'exceptional circumstances' do exist because there is likely to be insufficient brownfield capacity and no alternative locations beyond the Green Belt.</p> <p>In conclusion, development of some Green Belt land offers the prospect of funding the enhancement for the beneficial use of other parts of the Green</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason the Council will protect Green Belt and consider applications in Green Belt in accordance with NPPF and London Plan policies.</p>

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		Belt that serves a more important function. This Local Plan review process should be seen as an opportunity to enable this to happen. The release of some Green Belt land for residential development, in light of exceptional circumstances, is in accordance with the Framework and PPG guidance.	
REG18.40	Ms M Blackman	<p>NPPF is clear, however local authorities are required to make balanced judgements. There are pockets or isolated plots which serve no purpose as defined in policy and yet because these were never properly assessed or challenged when green belt boundaries introduced, remain unnecessarily redundant.</p> <p>More accurate and objective designation and assessment of greenbelt and the specific areas within it should be undertaken rather than a blanket approach.</p>	The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason the Council will protect Green Belt and consider applications in Green Belt in accordance with NPPF and London Plan policies.
REG18.42	Natural England	<p>We confirm the importance of the protection and enhancement of Green Belt areas and are only in favour of such revisions to the Green Belt which increase its recreational usage and access to it. The NPPF Para 81 states that:</p> <p>“ ... local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land” (NPPF para 81).</p>	Support noted. The Proposed Submission version of the Local Plan supports and encourages improvements to the accessibility and beneficial use of the Green Belt.
REG18.43	Omega After	The Local Plan process provides the opportunity to review the Green Belt	The Council has undertaken a Green Belt

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	Alpha Ltd (Bidwells)	<p>boundary and determine whether the targeted release of sites which do not serve any of the five Green Belt purposes would be appropriate.</p> <p>Specifically as part of this process, the development of some Green Belt sites offers the prospect of enabling the enhancement and beneficial use of other land that serves a more valuable Green Belt function, as encouraged by the Framework. Such opportunities for Green Belt enhancement include accessibility, outdoor sport and recreation, retention and enhancement of landscapes, visual amenity and biodiversity. Providing new or extended Country Parks or enhancements to the Thames Chase Community Forest are examples of the opportunities presented by greater access to Green Belt land, funded by the release of sites that no longer serve Green Belt purposes.</p> <p>In light of our serious concerns in respect of the deliverability of the Borough's housing requirement on brownfield sites alone (as explained in our response to Question 3), we would seek to reassure the Council that <i>Hundal v South Buckinghamshire DC</i> [2012] demonstrates that housing need is capable of justifying a change in the Green Belt boundaries. This approach is in accordance with the most recent update to relevant National Planning Practice Guidance (PPG) guidance. Taking this point into practice, St Albans City and District Council (another Green Belt authority) is preparing its Local Plan to meet its housing requirements including Green Belt release on the basis that 'exceptional circumstances' do exist because there is likely to be insufficient brownfield capacity and no alternative locations beyond the Green Belt.</p> <p>In conclusion, development of some Green Belt land offers the prospect of funding the enhancement for the beneficial use of other parts of the Green Belt that serves a more important function. This Local Plan review process should be seen as an opportunity to enable this to happen. The release of some Green Belt land for residential development, in light of exceptional circumstances, is in accordance with the Framework and PPG guidance.</p>	<p>study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason the Council will protect Green Belt and consider applications in Green Belt in accordance with NPPF and London Plan policies.</p>

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REG18.44	Persimmon Homes Essex	<p>Havering Borough Council do not appear to have undertaken a Green Belt Review when preparing their Core Strategy. Therefore Persimmon Homes would argue that there is no substantial evidence to support the areas designated as Green Belt, and the functions that they play, in the adopted Core Strategy. It is recommended that the council carry out a Green Belt review as part of the new Local Plan process to ensure that the rights sites are protected and those not fulfilling a number of the functions of Green Belt land are released for development. It should also be noted that in some circumstances the release of this land for development can help to enhance the function of the Green Belt through the provision of usable open space.</p> <p>The creation of definitive boundaries or use of existing physical characteristics such as rivers and transport networks can provide defensible boundaries to prevent urban sprawl.</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason the Council will protect Green Belt and consider applications in Green Belt in accordance with NPPF and London Plan policies.</p>
REG18.47	R. Watt and Partners (Phillips Planning Services)	<p>As part of the preparation of the new Local Plan and in accordance with the National Planning Policy Framework, it is considered that the borough's Green Belt should be carefully reviewed to ensure that all land subject to the designation is effective and required to fulfil the objective of preventing urban sprawl.</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason the Council will protect Green Belt and</p>

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			consider applications in Green Belt in accordance with NPPF and London Plan policies.
REG18.48	R.A.Montague	<p>By supporting local communities in their efforts to enhance Green Belt facilities and restore unattractive green belt to attractive open space as a community recreational facility and a wildlife habitat.</p> <p>This can be done by protecting rather than threatening the green belt with continuous revisions and by supporting local groups to achieve these goals.</p>	<p>Noted. The Proposed Submission version of the Local Plan supports and encourages improvements to the accessibility and beneficial use of the Green Belt where proposals are compliant with national policy.</p> <p>Furthermore, the Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason the Council will protect Green Belt and consider applications in Green Belt in accordance with NPPF and London Plan policies.</p>
REG18.50	Rainham Preservation Society	It can't be enhanced while Havering continue to grant permission for the rape of our green belt by gravel extraction and landfill.	Noted. The Proposed Submission Local Plan recognises the importance of minerals and that they can only be worked where they occur. It has been prepared in line with the NPPF and the London Plan and, as such, sets out areas to be safeguarded

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			for mineral extraction subject to the detailed requirements of the Plan..
REG18.51	Ray Whitehouse	Don't use it for anything else but look into providing more facilities such as refreshments and toilets.	Noted. Provision of more facilities such as refreshments and toilets is outside the scope of the Proposed Submission version of the Local Plan.
REG18.52	Romford Civic Society	There should be strict adherence to Green Belt policy.	Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason the Council will protect Green Belt and consider applications in Green Belt in accordance with NPPF and London Plan policies.
REG18.53	Romford Golf Club (Joe Coogan)	High quality greenbelt land that is useable for recreation or farming should be protected. Land classified as greenbelt that is in effect 'waste land' should not be protected. Other uses should be considered that help improve Havering through better homes, recreation space or schools/infrastructure.	The Council has undertaken a Green Belt study as part of the evidence base for the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any

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			<p>modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason the Council will protect Green Belt and consider applications in Green Belt in accordance with NPPF and London Plan policies.</p>
REG18.56	S.D. Olney	Agreed otherwise the borough will become an urban jungle.	<p>Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason the Council will protect Green Belt and consider applications in Green Belt in accordance with NPPF and London Plan policies.</p>
REG18.57	Sheila Clements	By not building on it.	<p>Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the</p>

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			NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason the Council will protect Green Belt and consider applications in Green Belt in accordance with NPPF and London Plan policies.
REG18.58	Sport England	<p>The role of the Green belt in delivering sporting opportunities where other form of development would be considered inappropriate should be acknowledged. The NPPF is much more positive the now superseded PPG2 in that it advocates that local planning authorities should:</p> <p>“...plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”</p>	Noted. The Proposed Submission version of the Local Plan supports and encourages improvements to the accessibility and beneficial use of the Green Belt in line with the NPPF.
REG18.61	The Crown Estate (Amec Foster Wheeler)	<p>In order for the new Local Plan to provide a sustainable development strategy, the desire to protect the Green Belt will need to be balanced against the need to deliver homes. NPPF requires that Local Plans are prepared to deliver the three dimensions of sustainable development outlined in paragraph 7 (these include meeting housing and economic development needs). In addition, paragraph 158 of NPPF requires that Local Plans are prepared on the basis of an ‘adequate, up-to-date, and relevant evidence base about the economic, social and environmental characteristics and prospects of the area.’</p> <p>The current Green Belt boundaries were defined in the 2008 Core Strategy and are afforded protection from development by current development plan policies. Whilst, Paragraph 83 of NPPF states that Green Belt</p>	The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the

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		<p>Boundaries “should only be altered in exceptional circumstances through the preparations and review of the Local Plan”, in order to accommodate sustainable development needs, the Council will need to consider some release of Green Belt land to provide for the requisite housing growth over the Plan Period. It is considered in light of the significant housing need in the Borough over the plan period and beyond that evidence justifies ‘exceptional circumstances’ for revisions to the Green Belt (as noted above Further Alterations to the London Plan identify a minimum 10 year target of 11,701 dwellings to be delivered in Havering between 2015 and 2025).</p> <p>Accordingly, in line with paragraph 85 of NPPF, Green Belt boundaries should be reviewed with a consideration of how sustainable development needs will be met (see our response to questions 3 and 4). Given the extent of the Green Belt in the District (around half of the Borough’s land area), an assessment of Green Belt boundaries is an essential piece of evidence to support the Local Plan preparation. This assessment will need to identify areas that make less of a contribution than others to the five purposes of including land within the Green Belt. It is likely that the release of land in the Green Belt will be required and priority should be given to areas which are less significant in Green Belt terms (see also our response to question 10 below).</p> <p>The need for a Green Belt review is supported by the recent publication of ‘The Green Belt: A Place for Londoners’ 1 which recommends that local planning authorities should review their Green Belt and consider how land within it can be used most effectively. The report argues that brownfield sites alone will not be able to meet the housing need and land will be need to be released from the Green Belt. The findings of this report echoes a recent recommendation by the Communities and Local Government Committee report2 which states “we encourage all Councils, as part of the local planning process to review the size and boundaries of their green belts.”</p>	<p>NPPF and London Plan. For this reason the Council will protect Green Belt and consider applications in Green Belt in accordance with NPPF and London Plan policies.</p>

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REG18.63	Thomas Bates and Son Ltd. (Andrew Martin Planning)	<p>Paragraphs 79 and 80 of the NPPF outline the fundamental purposes for including land within the Green Belt. These include:</p> <ol style="list-style-type: none"> 1. to check the unrestricted sprawl of large built-up areas; 2. to prevent neighbouring towns merging into one another; 3. to assist in safeguarding the countryside from encroachment; 4. to preserve the setting and special character of historic towns; and 5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. <p>The NPPF directs, at paragraph 83, that once established Green Belt boundaries should only be altered in exceptional circumstances and these alterations should take place in conjunction with a review, or preparation of, a new Local Plan. When reviewing, altering or defining Green Belt boundaries, in accordance with paragraph 85 of the NPPF, local planning authorities should:</p> <ul style="list-style-type: none"> – ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development; – not include land which is unnecessary to keep permanently open; – where necessary, identify in their plans areas of ‘safeguard land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period; 	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason the Council will protect Green Belt and consider applications in Green Belt in accordance with NPPF and London Plan policies.</p>

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		<ul style="list-style-type: none"> - make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development; - satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and - define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. <p>A review of Green Belt boundaries is necessary where sufficient land cannot be identified within the existing urban areas to accommodate the required level of housing. This Green Belt review will secure a justified balance between meeting housing need and protecting the Green Belt.</p>	
REG18.64	Thurrock Council	<p>It is recognised that Havering Council seek to protect and enhance the Green Belt from inappropriate development and Thurrock supports this approach. National policy also states Green Belt boundaries should only be altered in exceptional The London Plan continues to support the current extent of the Green Belt with no review or proposed alterations to the boundary proposed.</p> <p>It is noted that Havering council propose to review the current Green Belt boundary as part of the preparation of the new Local Plan to determine if any changes are needed. Thurrock Council supports the aim to review the current Green Belt Boundary as part of the local plan preparation and requests to be consulted and engage with Havering Council on this review and in particular to consider any cross boundary implications.</p>	<p>The Council has worked closely with Thurrock Council on the preparation of the Green Belt Study, as detailed in the report and in the Duty to Co-operate Statement. The Council will continue to engage with Thurrock Council on Green Belt matters and other strategic issues.</p>

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		<p>Thurrock Council will be undertaking its own Green Belt review in the future as part of the emerging local plan process and would wish to engage with Havering to ensure that both reviews are coordinated and protect and enhance the purposed of the Green Belt in accordance with national policy.</p> <p>Both Councils together with other local authorities will also have to consider the commencement of the full review of the London Plan and any implications this may possibly have on the function and role of the Green Belt in this area.</p>	
REG18.65	Transport for London	<p>With respect to any revisions of the Green Belt boundary, TfL would have concerns on transport grounds if parcels of green belt were to be developed and which were not mitigated accordingly, in particular given lack of public transport provision and a potential reliance on the private motor vehicle. TfL would welcome further discussions in this regard.</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason the Council will protect Green Belt and consider applications in Green Belt in accordance with NPPF policies.</p>
REG18.66	Trinity Hall (Bidwells)	<p>The Local Plan process provides the opportunity to review the Green Belt boundary and determine whether the targeted release of sites which do not serve any of the five Green Belt purposes would be appropriate.</p> <p>Specifically as part of this process, the development of some Green Belt</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a</p>

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		<p>sites offers the prospect of enabling the enhancement and beneficial use of other land that serves a more valuable Green Belt function, as encouraged by the Framework. Such opportunities for Green Belt enhancement include accessibility, outdoor sport and recreation, retention and enhancement of landscapes, visual amenity and biodiversity. Providing new or extended Country Parks or enhancements to the Thames Chase Community Forest are examples of the opportunities presented by greater access to Green Belt land, funded by the release of sites that no longer serve Green Belt purposes.</p> <p>In light of our serious concerns in respect of the deliverability of the Borough's housing requirement on brownfield sites alone (as explained in our response to Question 3), we would seek to reassure the Council that <i>Hundal v South Buckinghamshire DC [2012]</i> demonstrates that housing need is capable of justifying a change in the Green Belt boundaries. This approach is in accordance with the most recent update to relevant National Planning Practice Guidance (PPG) guidance. Taking this point into practice, St Albans City and District Council (another Green Belt authority) is preparing its Local Plan to meet its housing requirements including Green Belt release on the basis that 'exceptional circumstances' do exist because there is likely to be insufficient brownfield capacity and no alternative locations beyond the Green Belt.</p> <p>In conclusion, development of some Green Belt land offers the prospect of funding the enhancement for the beneficial use of other parts of the Green Belt that serves a more important function. This Local Plan review process should be seen as an opportunity to enable this to happen. The release of some Green Belt land for residential development, in light of exceptional circumstances, is in accordance with the Framework and PPG guidance.</p>	<p>contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason the Council will protect Green Belt and consider applications in Green Belt in accordance with NPPF and London Plan policies.</p>
REG18.68	Woodland Trust	<p>All new site allocations should seek to enhance Green Infrastructure provision and well used local community green assets. New development opportunities should continue to be focussed within existing settlements, where they can contribute a lot to local characters and distinctiveness,</p>	<p>The Proposed Submission version of the Local Plan contains a set of monitoring indicators that seek to cover all of the Local Plan's strategic objectives.</p>

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		<p>whilst also achieving sustainable patterns of development across Havering Borough.</p> <p>Currently, your Local Plan consultation does not acknowledge the value of monitoring. As a Local Planning Authority you are required to publish an Annual Monitoring Report (AMR) to assess the effectiveness of policies and guidance that forms part of the local development plan.</p> <p>The National Planning Policy Framework (NPPF) supports the need for more habitat creation by stating that: <i>'Local planning authorities should: set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure'</i>, (DCLG, March 2012, para 114). Also para 117 states that: <i>'To minimise impacts on biodiversity and geodiversity, planning policies should:....promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan'</i>.</p> <p>Whilst monitoring is being taken into account with your adopted Core Strategy and Development Control Policies (2008), effective monitoring also needs to be put in place with your new Local Plan so as to highlight any effective delivery. Maintaining a high quality natural environment should be defined as a measurable objective of your SPD, and currently there is no proposed indicator of biodiversity, or any other environmental targets such as woods and trees and canopy cover. Local Planning Authorities should identify suitable indicators for monitoring the plan, but 'net gain' is not identified as something that should be measured.</p> <p>Therefore, measuring indicators such as: development within the Green Belt; planning decisions that affect climate change; and the impact of a development on the landscape; should also be taken into account with the</p>	

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		<p>monitoring of your planning policy guidance relating to sustainable building and places in Havering Borough.</p> <p>Maintaining a high quality natural environment should be defined as a measurable objective of your SPD, and currently there is no proposed indicator of biodiversity, or any other environmental targets such as woods and trees and canopy cover. Local Planning Authorities should identify suitable indicators for monitoring the plan, but 'net gain' is not identified as something that should be measured. Therefore, creating sustainable buildings and place in Havering London Borough and measuring development proposed, created, restored or managed as a result of local planning decision, against the area of habitat lost, damaged or declining as result of a planning decision, should also be taken into account with more effectively with the Monitoring of your detailed guidance on the implementation of policies in your Local Plan.</p>	
REG18.69	Wyevale Garden Centres (Gregory Gray Associates)	The Green Belt will be protected provided that maximum use is made of brownfield sites which can be developed in accordance with Green Belt policy. By meeting local housing and employment requirements on such sites, the pressure to develop on existing greenfield Green Belt land will be reduced.	Noted. The Proposed Submission version of the Local Plan seeks to optimise development on brownfield sites consistent with ensuring that new development meets the design requirements set out in the Local Plan.
POST18.1	V. Rajan and Associates	Trees. Plant more trees	Noted. The Local Plan sets out a positive strategy towards trees and biodiversity.

Question 10: Do you have any suggestions for revisions to the green belt boundary?

Response Number	Respondent Name	Response to Q10	Council's response
REG18.1	AECOM	<p>Havering's previous housing, as set out in the Core Strategy (2008) was 535 dwellings per year which has only been met by the delivery of 2,717 units at a rate of 453 dwellings per year under the Core Strategy and Development Control Policies DPD, Site Specific Allocations DPD and Romford Area Action Plan. The London Plan (2011) included a housing target of 970 units over a ten year period (2011 – 2021). Since the adoption of the FALP Havering's new yearly target has increased to 1,170 units. Havering's current five year supply, as identified in the 2012-2013 AMR, is 5,093 units (which includes an additional 5% buffer to ensure choice and competition in the market for land). As Havering are unable to demonstrate a sufficient 5 year supply they should increase the buffer to 20% to provide a realistic prospect of achieving the planned supply.</p> <p>When reviewing Havering's expected delivery of homes within the next five years, it is clear that their assumptions around the 5 year supply are incorrect and out of date. Their five year supply should amount to 7,513 to sufficiently meet their yearly FALP target (including 20%), plus their backlog from 2008.</p> <p>The above suggests that Havering has a chronic land supply issue with uncertain deliverability. Paragraph 47 of the NPPF stipulates that new Local Plans must allocate land both for a five year supply of 'deliverable sites' and enough 'developable' sites for years 6-15. Within this context Havering's emerging Local Plan will need to be tested for viability to ascertain they have a robust five year supply and are not promoting unviable brownfield sites.</p> <p>We would encourage Havering to share their latest SHMA findings and wonder whether they have yet considered how the new household</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason the Council will protect Green Belt and consider applications in Green Belt in accordance with NPPF policies.</p>

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		<p>projections have impacted their full OAHN and by how far they diverge from the FALP target.</p> <p>If Havering's neighbouring boroughs are unable or unwilling to commit to taking any of Havering's residual OAHN then they must look within their own boundary to identify sufficient supply, through a review of Green Belt. Case law stipulates that the review of Green Belt must follow a two-step process:</p> <ol style="list-style-type: none"> 1) Review the need for housing and employment land; and 2) Review supply including Green Belt land where supply cannot be met on brownfield land. <p>Paragraph 83 of the NPPF states that once established, Green Belt boundaries should only be altered in 'exceptional circumstances', through the preparation of the Local Plan. It is evident that these circumstances exist to alter the Green Belt boundaries in Havering due to chronic housing need and the limited capacity and viability of brownfield sites in the borough.</p> <p>Having regard to Havering's Employment Land Review (2006) and employment land identified in Havering's current Local Plan it is considered that the majority of brownfield sites are clustered in distinct areas, with a large clustering in Rainham. We would suggest that a significant number of these sites would be unsuitable for a housing allocation given their designation for employment use (SIL or Secondary Employment Area), likely contamination and incompatible adjacent land uses that would create bad neighbour issues. We acknowledge that a portion of the borough's housing delivery can be accommodated on brownfield land, however the scale of the borough's housing need will require a strategic housing allocation on Green Belt land.</p> <p>We believe that this justifies a review of Havering's Green Belt at the earliest opportunity, especially as their current SHLAA cannot demonstrate</p>	

Response Number	Respondent Name	Response to Q10	Council's response
		<p>a healthy supply of deliverable and developable sites to meet their new London Plan target.</p> <p><u>The case for Green Belt release at Bush Farm</u></p> <p>This parcel of land forms a square site divided by Sunnings Lane. Logically, and based on the shortfall in identified capacity across the borough against the targets set out in the London Plan (2015), it would be suitable for the red-line boundary in Figure 1 to form a housing allocation in the emerging Plan. The site is capable of delivering 1,186 dwellings with the potential to maximise community benefit by including a new school and/or other community facilities.</p> <p>As such, our representation proposes using the red-line boundary as a basis for considering the portion of land that could be released from the Green Belt. This boundary, which encompasses 79.74 hectares in total, is under the single ownership of our client and is readily available should the land be released from the Green Belt.</p> <p>The site currently comprises a collection of underused agricultural fields with several ancillary farm buildings. The surrounding land uses include:</p> <ul style="list-style-type: none"> - To the east, Stubbers Adventure Centre and lake; - To the north, Sullens Farm and residential properties along Sunnings Lane; - To the west, Delta Force paintballing facility and agricultural fields; - To the south, agricultural fields. <p>We would recommend the assessment of Bush Farm against nationally-applicable Green Belt criteria as listed in paragraph 80 of the NPPF:</p> <ul style="list-style-type: none"> - To check the unrestricted sprawl of large built-up areas; - To prevent neighbouring towns merging into one another; - To assist in safeguarding the countryside from encroachment; 	

Response Number	Respondent Name	Response to Q10	Council's response
		<ul style="list-style-type: none"> - To preserve the setting and special character of historic towns; and - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. <p><u>Criterion 1: To check the unrestricted sprawl of large built-up areas</u></p> <p>Through review of historical mapping it is difficult to see how Bush Farm can be said to meet this criterion, as there is significant urbanisation of the area despite Green Belt being designated here after the Second World War, particularly northwards of the site's boundary. It is noted that Green Belt designation has not stopped the following developments taking place, all of which could be said to contribute to the unrestricted sprawl of a large built-up area (i.e. Greater London):</p> <ul style="list-style-type: none"> - Extensive housing development of 100-120 units forming the present day southern edge of Corbets Tey (the whole of Huntsmans Drive, The Glade, Ockenden Road, Meadowside Road, Londons Close and partial development of Corbets Tey Road); - The construction of Corbets Tey School; - The Derham House care home facility has been developed, including a car park; - Corbets Tey Crematorium (while this is in itself acceptable development in the Green Belt, the cumulative impact of this with other development on the Green Belt should be acknowledged); and - New blocks being added to the buildings at Oakfields Montessori School. <p>We have reproduced, in Figure 2 below, the historic map from 1951 next to the present day to allow for easy comparison between the two. This shows the extent of the incursion into the Green Belt in this location over the last sixty years.</p> <p>Figure 2 demonstrates that if the first Green Belt criterion had been strictly</p>	

Response Number	Respondent Name	Response to Q10	Council's response
		<p>applied in this location, the aerial view would be identical to the historical map.</p> <p>It is considered that removing this site from the Green Belt in favour of a housing allocation would not affect in any way the performance of remaining Green Belt land on this criterion. Development at this location would effectively comprise a sustainable extension to Corbets Tey, with a strongly defensible boundary of Dennises Lane to the south. The nearest settlement south of Corbets Tey is South Ockenden, some 2km south east of the site, and so development here would have little or no impact on the risk of coalescence between settlements.</p> <p>Building on the land at Bush Farm would likely reduce the pressure to build on alternative sites elsewhere in the Green Belt that may not perform as well on this criterion.</p> <p><u>Criterion 3: To assist in safeguarding the countryside from encroachment</u></p> <p>We consider that the site is currently failing on this criterion on the basis of the extensive development that has taken place since the designation of the Green Belt, as detailed under Criterion 1 above. Encroachment on the Green Belt can be defined as the visual impact and the footprint of the development. The combined visual impact of the series of development schemes as listed under Criterion 1 contributes to the failure of Bush Farm to meet this criterion.</p> <p><u>Criterion 4: To preserve the setting and special character of historic towns</u></p> <p>This criterion is not applicable in the context of the site as no historical towns exist in this location.</p> <p><u>Criterion 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land</u></p>	

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		<p>It is acknowledged that the site itself remains largely undeveloped and that the Green Belt designation can be assumed to have been a factor in this lack of development. As a result, the site has likely made a contribution to encouraging the recycling of derelict and other urban land and assisting urban regeneration by directing development into the existing urban area. However, the previously mentioned urban sprawl that has occurred since Green Belt designation means that its performance on this criterion, though effective to an extent, has been relatively ineffective.</p> <p><u>Conclusions on performance of site against Green Belt criteria</u></p> <p>Of the five purposes for which land is designated as or retained as Green Belt, Bush Farm appears to be failing completely on Criteria 1 and 3, partially failing on Criterion 5, and Criteria 2 and 4 are not relevant. It is therefore very difficult to see how this site could be considered as meeting the five criteria for which it should be retained as Green Belt.</p>	
REG18.2	Adams Family (Bidwells)	<p>Yes. The owners of Land North of New Road, Rainham, strongly believe that it represents a suitable option to assist the Council to achieve their demanding London Plan housing delivery target and to address objectively assessed housing needs whilst providing new opportunities for ecological enhancement, outdoor recreation, public open space and beneficial use of Green Belt land.</p> <p>The owners of the site recognise the importance of the beneficial use of Green Belt land and of maintaining the openness of land adjacent to the Ingrebourne River. As a consequence, it is proposed to leave a large proportion of the site undeveloped and use it to create publically accessible open space managed to support biodiversity. The site currently falls within private ownership and is not subject to any public rights of way. Partial development for housing would enable the restoration of the remaining land, which is subject to limited areas of contamination, and the creation of a new area of public open space in Rainham. This would offer new opportunities for increased access to open space for outdoor recreation</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land including Land North of New Road, Rainham will be released for housing development.</p>

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		<p>and to enhance the landscape features, visual amenity and biodiversity value of the site, entirely in accordance with the objectives of paragraph 81 of the Framework.</p> <p>The undeveloped portion of the site could lend itself to the creation of a new country park, or an enhancement to the existing Hornchurch Country Park which sits to the north. It may also provide the opportunity to extend the Thames Chase Community Forest, a project which aims to develop a connected network of links and accessible, vibrant greenspaces throughout the Borough, further supporting the objectives of the Framework.</p> <p>The site includes wetlands which form part of the Ingrebourne Marshes SSSI, a 78ha site extending to the north and west. It is noted for its importance as one of the largest and most diverse areas of freshwater marshland in Greater London. The variety of habitat within the SSSI includes extensive areas of reed sweet-grass <i>Glyceria maxima</i> and common reed <i>Phragmites australis</i> swamp; wet neutral grassland, and tall fen. These wetland habitats support a rich assemblage of associated invertebrates and breeding birds but none of the land within the site is in any way managed to support biodiversity. The majority of the site has a ground level significantly higher than the adjoining wetlands and is predominantly scrubland of considerably less ecological value. The site is of such a scale that the development of some of the higher land would present the opportunity to facilitate enhancements to the habitats within and adjacent to the SSSI and support their ongoing management – delivering significant biodiversity gain. Appropriate enhancement of the retained open space and the provision of public access to it, if managed to avoid compromising the integrity of the adjoining habitats, may also increase opportunities for education and community involvement in the management of the SSSI.</p> <p>The broad extent of the area proposed for removal for the Green Belt is shown on the Site Location Plan at Appendix 1. This area is located</p>	

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		<p>between existing development to the north and south and broadly seeks to join up the existing building line in either direction, recognising that this would have a limited impact of the openness of the Green Belt or the Ingrebourne Marshes. The Adams Family is willing to discuss proposals for the site in more detail with the Council to seek to agree an appropriate redefinition of the Green Belt boundary in this location as the Local Plan process progresses, taking account of the constraints of the site.</p> <p>The proposals for the site have been assessed against the five purposes of the Green Belt, as set out in paragraph 80 of the Framework. The assessment suggests that the release of land adjacent to the existing built-up area for residential development and the creation and protection of public open space on the remainder of the site, adjacent to the Ingrebourne River, would be consistent with these objectives, as described below:</p> <ul style="list-style-type: none"> - To check the unrestricted sprawl of large built up areas: <ul style="list-style-type: none"> • The development of a proportion of the site as indicated on the Site Location Plan would fill a gap between two areas of existing development and not extend any further into the Ingrebourne Valley than existing housing. A large proportion of the site would remain undeveloped and uncontrolled urban sprawl will not occur. The site is capable of delivering much needed new homes whilst securing public access to new public open space within the Green Belt and biodiversity gain. The public open space could be designated and protected in the Local Plan. This will create a new physical, defensible boundary for the Green Belt. - To prevent neighbouring towns from merging into one another: <ul style="list-style-type: none"> • The development of a proportion of the site would allow an existing sustainable neighbourhood to grow in a controlled manner but the provision a new area of publicly accessible open space alongside the Ingrebourne River valley would maintain and protect a substantial gap between South Hornchurch and Rainham. Further 	

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		<p>separation will always be provided by Hornchurch Country Park and the flood plain to the north.</p> <ul style="list-style-type: none"> - To assist in safeguarding the countryside from encroachment: <ul style="list-style-type: none"> • The site occupies part of a wider gap within the existing built up area – it is not located in the open countryside. The delivery of a publicly accessible open space or country park will ensure that the open space is maintained and safeguarded. The River Ingrebourne and its associated marshes provide a further barrier to encroachment, - To preserve the setting and special character of historic towns: <ul style="list-style-type: none"> • The nearest development to the site is relatively modern and there are few (if any) designated heritage assets in the surrounding area. The site serves no purpose in preserving the setting and special character of historic towns. - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land: <ul style="list-style-type: none"> • The site is currently derelict, inaccessible scrub land. The development of a proportion of the site will deliver much needed new homes adjacent to an existing urban area and enable the restoration and beneficial use of the remainder for outdoor recreation. The demanding housing delivery target stipulated by the London Plan and the scale of objectively assessed housing needs in London indicate that the release of a small portion of the site is unlikely to inhibit the recycling of brownfield sites elsewhere in the Borough. <p>The assessment establishes that the careful development of the site will not materially impact on the Green Belt nor will it impede its purposes and functionality. It can therefore be considered reasonable to remove a portion of the site from the Green Belt for inclusion in Havering's housing land</p>	

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		<p>supply.</p> <p>The Framework states that when defining boundaries, local planning authorities should ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development. Development of a proportion of the site ensure Havering's Green Belt boundaries are altered in a sensitive manner that will ensure that the new boundary:</p> <ul style="list-style-type: none"> - Is consistent with the Local Plan's wider strategy; - Does not include land which is unnecessary to keep permanently open; - Meets longer-term development needs; - Will not need to be altered at the end of the plan period; and - Is defined using physical features that are readily recognisable and likely to be permanent. 	
REG18.3	Anonymous	Keep it.	<p>Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land will be released for housing development.</p>
REG18.9	C. Cole	In general I am happy for lots of green in suburbs to be swapped for land on the edge and built on – in filling.	<p>Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded</p>

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			that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the green in suburbs or Green Belt land will be swapped for land on the edge and built on for housing development.
REG18.14	Edward Gittins & Associates	Land to the south of Squirrels Heath Road, Harold Hill has been put forward earlier for residential development associated with open space to the east and north within the Ingrebourne Valley. We confirm the continuing availability of all of this land.	Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land including Land to the south of Squirrels Heath Road, Harold Hill will be released for housing development.
REG18.21	Havering College of	HCFHE believe that there are areas within the Borough that require revisions to the Green Belt boundary, specifically in relation to its	The Council has undertaken a Green Belt study as part of the evidence base for the

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	Further and Higher Education (Iceni Projects)	<p>landholding at the Quarles Campus on Tring Gardens, Harold Hill. The site measures approximately 3.8 hectares (9.3 acres) and is located within the Havering Metropolitan Green Belt (Policy DC46), however the full extent of the Site is allocated as a 'Major Developed site in the Green Belt' ('MDS') (Policy DC45). The MDS status relates to Annex C of Planning Policy Guidance Note 2; however we appreciate that this policy document was replaced in March 2012 by the publication of the National Planning Policy Framework ('NPPF'), this does not include any reference to MDS. For reference, a site location plan is enclosed at Appendix A1.</p> <p>It is proposed that the existing facilities at the Quarles campus will eventually be relocated to alternative locations in Harold Hill or elsewhere in Havering. The site currently comprises large areas of hardstanding and built form, as such it should be considered as a previously developed site in the Green Belt. Its former allocation as a Major Developed Site in the Green Belt also supports future development at the site.</p> <p>HCFHE therefore encourages LBH to review the Green Belt boundary in this location and to release the land from the Green Belt for future residential development. Any capital secured through the future sale of this site with enable the development of a new college facility.</p> <p>HCFHE and Iceni met with senior officers at Havering Council (incl. Patrick Keyes and Martyn Knowles) in mid-September to discuss the potential future role of the Quarles campus. HCFHE also responded to the LBH Call for Sites consultation on 6th October 2014 in relation to its landholding at the Quarles Campus on Tring Gardens, Harold Hill. HCFHE highlighted that it wished to promote the site for residential development following the future relocation of activities from the Quarles Campus to their new location in Havering.</p> <p>At this stage, detailed Masterplanning has not yet been carried out for the site; however, on initial review of the site we believe that the land has</p>	<p>Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason the Council will not release from Green Belt the Quarles Campus on Tring Gardens, Harold Hill site.</p> <p>The opportunity for potential development at the Quarles Campus in Harold Hill is acknowledged in the Local Plan in the policy on housing supply and in the Housing Position Paper supporting the Local Plan.</p>

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		potential to accommodate c.125 residential dwellings.	
REG18.23	Heine Planning	As above. Need to consider inseting Traveller sites in accordance with guidance in NPPG for defensible boundaries.	Noted. The Proposed Submission version of the Local Plan proposes to make provision for the needs identified in the GTAA (33 pitches) at the existing sites. It is considered inappropriate to 'inset' traveller sites.
REG18.24	Higgins Homes (Nathaniel Lichfield & Partners)	<p>We have previously submitted a letter (dated 15 January 2015) outlining a site which satisfies the criteria referred to above and which sets out case for its removal from the Green Belt. A copy of this letter is attached at Appendix 1 for your consideration in allocating sites.</p> <p><u>Appendix 1 – Proposed site for removal from the Green Belt: Land north of Ockenden Road, Upminster, RM14 2DJ</u></p> <p><u>Site and Surrounding Area</u></p> <p>The site, as identified on the attached Site Location Plan, comprises an area of 4.97ha to the north of Ockenden Road between Huntsmans Drive and Upminster Cemetery. At present the site is owned by Dagenham Landscapes who use the land for growing trees and plants for private sale.</p> <p>The site adjoins the defined urban area of Upminster. It is bounded to the north by the Gaynes Secondary School and residential uses beyond and to the east by the Upminster Cemetery and Crematorium. It is abutted to the west by a residential area and buildings associated with Dagenham Landscapes. The southern boundary of the site comprises a 92m frontage onto Ockenden Road with site specific vehicular access.</p> <p>The site is located in a sustainable location within walking distance of a range of services and facilities:</p> <ul style="list-style-type: none"> – Neighbourhood shops and post office – 250m; – Corbets Tey Primary School – 0.53km and Gaynes Secondary School 	The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land including Land north of Ockenden Road, Upminster, RM14 2DJ will be released for housing development.

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		<p>– 1.18km; and – Bus Stop on primary frontage (Rail/Tube Station – 2.25km/2.5km) – Upminster Town Centre is 1.95km from the site which is accessible by cycle and bus.</p> <p><u>Proposal – Green Belt Change and Housing Allocation</u></p> <p>We consider that the site should be removed from the Green Belt and allocated for housing to assist in meeting the Borough's housing requirement. In the Further Alterations to the London Plan this has increased from 970 to 1170 pa. Further, the Inspector considering the FALP has stated that</p> <p><i>“The evidence before me strongly suggests that the existing London Plan strategy will not deliver sufficient homes to meet objectively assessed need. The Mayor has committed to a review of the London Plan in 2016 but I do not consider that London can afford to wait until then and recommend that a review commences as soon as the FALP is adopted in 2015. In my view, the Mayor needs to explore options beyond the existing philosophy of the London Plan.</i></p> <p><i>Non adoption of the FALP would result in the retention of the existing housing targets in the London Plan (32,210 dpa39) which are woefully short of what is needed”.</i></p> <p>It is, therefore, inevitable that the Borough will need to find and deliver more housing sites to meet requirements.</p> <p>Paragraph 83 of the NPPF states that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. It adds, in paragraph 84, that when reviewing Green Belt boundaries local planning authorities should take account of the need to</p>	

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		<p>promote sustainable patterns of development and that when defining boundaries you should:</p> <p><i>Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development (paragraph 85 of NPPF).</i></p> <p>The purposes of the Green Belt are to:</p> <ul style="list-style-type: none"> – to check the unrestricted sprawl of large built-up areas; – to prevent neighbouring towns merging into one another; – to assist in safeguarding the countryside from encroachment; – to preserve the setting and special character of historic towns; and – to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. <p>The entirety of the site is located within the Metropolitan Green Belt, but importantly is located on the border with the defined urban area of Upminster and as such is abutted by residential uses to the west. Both the school site to the north and the cemetery to the east of the site, whilst partially preserving the openness of the Green Belt, cannot be considered as open sites due to the presence of buildings and fences and do not possess the character or appearance of open countryside. Given this context, and the high level of sustainability offered by the site, we do not consider that the site fulfils a meaningful Green Belt role and there are clearly defined physical boundaries for any revised Green belt boundary.</p> <p>The above is considered to be a robust case to justify its removal from the Green Belt to provide additional housing in the Borough. We are, therefore, proposing that the site be removed from the Green Belt and that the site be identified for residential development. The site has the potential to accommodate approximately 175 dwellings at a density of 35 dwellings per hectare (in keeping with the surrounding residential area).</p> <p><u>Site Suitability</u></p>	

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		<p>As stated above the site is in a sustainable location. It is not located within an area of flood risk and there is not considered to be any overriding contamination being present. The site is relatively flat and has an existing vehicular access off a main road. It is not adjacent to any 'bad neighbour' uses.</p> <p>There are existing commercially grown trees on the site but these would need to be 'harvested' prior to the commencement of works on site. Given that Dagenham Landscapes cultivated these with the intention that they would be felled and sold privately this does not present an issue to the deliverability of the site.</p> <p><u>Site Availability</u></p> <p>There are no legal/ownership constraints that might prohibit or delay development of the site. The current owners/occupiers have indicated a willingness to leave the site when required. The site would therefore be available in the short term.</p> <p><u>Site achievability</u></p> <p>Given the positive context, suitability and availability of the site for residential development it is considered that there is a good prospect that the site would come forward for residential use. There are not considered to be any significant abnormal development costs associated with any development and the site would not require any significant new infrastructure investment.</p> <p><u>Planning Policy Context</u></p> <p>The site is located within a Minerals Safeguarding Area but it is not</p>	

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		<p>considered that it is sufficiently large to provide a viable reserve of sand and gravel. This could, however, potentially provide some on site construction material.</p> <p>The North West corner of the site is designated as a Site of Nature Conservation Importance and as such the proposals will be designed to ensure that the impact on the site is appropriately mitigated.</p>	
REG18.26	Ian Weatherley	Nil.	Noted.
REG18.28	Joe Coogan	<p>Site at Moor Lane in Cranham. The landowner is willing to consider any scenario that can bring this waste land into use.</p> <p>This includes use for a new school to meet need in the area, housing (including affordable housing), high quality family homes or a mixed use. This could generate a significant planning obligation/sct 106 windfall for the council, depending on the details of scheme.</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land including Site at Moor Lane in Cranham will be released for a new school or mixed use or housing development.</p>
REG18.29	John Peterson	Keep as is.	<p>Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough</p>

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			<p>makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason Green Belt land will be kept as it is.</p>
REG18.32	Lee Clements	The Green Belt boundary should NOT be revised.	<p>Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land will be released for housing development and the Green Belt boundary will not be revised.</p>
REG18.33	Mr Leslie Budge (Andrew Martin Planning)	Land at Little Paddocks Farm, Shepherds Hill, Harold Wood currently forms part of the Metropolitan Green Belt. With existing vegetation and established field boundaries to the east, the site is well contained and could be released from the Green Belt without compromising the five purposes of including land within the Green Belt – as set out in paragraph 80 of the National Planning Policy Framework. In particular the release of	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes</p>

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		<p>the site would:</p> <ul style="list-style-type: none"> – prevent unrestricted sprawl of a large built-up area – the site is bound on three sides by existing development and the railway line. The established field boundaries to the east and the existing Harold Court Woods to the north-east would form a clear boundary against further urban development; – prevent neighbouring towns merging into one another – existing ribbon housing along Shepherds Hill already extends further towards Great Warley (to the east) than development at the site would, as does existing residential development north of the railway line that borders this site; – safeguard against encroachment into the countryside – the site is well contained and as stated existing housing extends further into the countryside than development at the site would; – preserve the setting and special character of historic towns – there is no particular historic urban setting to maintain in this area, but new public green space and / or an extension to the adjoining Harold Court Woods recreating area would enhance the wider rural setting and character of the area; and – assist in urban regeneration – by accommodating new residents who will bring additional expenditure to the local economy (including at Harold Wood neighbourhood centre). 	<p>of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land including Land at Little Paddocks Farm, Shepherds Hill, Harrow Wood will be released for housing development.</p>

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		<p>The potential for sensitive design and screening could ensure that housing development here does not detract from the character of appearance of the wider Green Belt to the east. As mentioned above, only a finite amount of previously developed land exists and it is inevitable that some greenfield releases will be required to accommodate the Borough's housing needs over the plan period. Little Paddocks Farm is situated on the western edge of the Green Belt, is in close proximity to community infrastructure, services and facilities and is bound by existing residential development on two sides and by the London Liverpool Street to Ipswich / Norwich railway line to the north. With this in mind, the site is well suited to being one of the first greenfield sites in Havering to be released from its Green Belt designation.</p>	
REG18.34	Margaret Whippy	<p>The present boundaries have historically remained unchanged, even though through two world wars local agriculture lives and modern day lives are no longer the same. Farms no longer dot the countryside. Local green belt boundaries NEED expanding; London is encroaching as never before. New local housing for local people between Harold Wood and Hornchurch would address this problem. Cross Hatched site for 2 homes attached on unused land.</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land including land for new local housing for local people between Harold Wood and Hornchurch will be released for housing development.</p>
REG18.36	Moody Homes and Mr John Wakeling	<p>My clients' are willing to enable the release of Land at Lincoln Close from Green Belt to assist the Council to address the housing objectives that the new Local Plan will need to deliver.</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local</p>

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	(Bidwells)	<p>The characteristics of the site and the surrounding area illustrate that it no longer serves any of the purposes of including land within the Green Belt. As a consequence, a new Green Belt boundary should be redrawn along the southern and eastern boundaries of the site, as shown on the plan above.</p> <p>Alternatively, the Council could also remove the proliferation of existing development which has built up over recent years to the south and north by redefining the boundary along the route of Hubbards Close to join up with the A127 to the north. The amount of existing development within this area and its location adjacent to the wider urban extent of Hornchurch clearly justifies re-designation of the Green Belt boundary in this part of the Borough.</p> <p>The following points are pertinent to the consideration of the merits of my clients' site:</p> <ul style="list-style-type: none"> - The land is available for development now. - Access could be achieved via Lincoln Close. - The site is currently vacant scrubland, enclosed by the A127 (Southend Arterial Road) and existing residential development on Hubbards Close, Lincoln Close and Berkshire Way. Thick established hedgerows around the site provide further separation from the wider countryside and Green Belt. - The site is situated within close proximity to a range of local amenities including schools, shops and excellent transport links. The site is in a sustainable location and therefore the development and delivery of the site for housing would represent sustainable development. - The site is not subject to any statutory environmental designations (except being a nitrate vulnerable zone which is irrelevant to its consideration for development). The site is in a low risk flood zone (Flood Zone 1). - The site lies at the western extremity of an area identified by the current 	<p>Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land including Land at Lincoln Close will be released for housing development.</p>

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		<p>Having Local Development Framework as safeguarded for minerals extraction but initial investigations by the land owners suggest that it does not contain significant mineral deposits.</p> <ul style="list-style-type: none"> - The Council's adopted Proposals Map (2008) suggests that the site is of nature conservation importance but the site owners are not aware of any evidence supporting this contention. It is anticipated that the biodiversity value of the site could be maintained and enhanced as part of a carefully planned development. <p>This site has been assessed against the five purposes of the Green Belt, as set out in paragraph 80 of the Framework. The assessment, as set out below, shows that the site currently serves none of the purposes of including land within the Green Belt and is well placed for release.</p> <ol style="list-style-type: none"> 1. To check the unrestricted sprawl of large built up areas: This site is surrounded by existing development in all directions, as shown below. It is limited in size and serves no function in preventing unrestricted sprawl. 2. To prevent neighbouring towns from merging into one another: As above, the site is surrounded by existing development in all directions. It does not serve to separate neighbouring towns or settlements. 3. To assist in safeguarding the countryside from encroachment: The countryside surrounding this site has already been encroached upon by existing development. The site is surrounded by existing residential and commercial uses. It is derelict scrub land and does not serve to protect the wider countryside. 4. To preserve the setting and special character of historic towns: Development surrounding the site is all relatively modern. The land does not form part of the setting of any historic towns. 5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land: The site is currently derelict scrub land but it is capable of delivering 	

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		<p>much needed new homes in an area that is already surrounded by existing residential and commercial development. The demanding housing delivery targets stipulated by the London Plan and the acute ongoing need for new housing across London mean that the release of the site is unlikely to inhibit the recycling of brownfield sites elsewhere in the Borough that will also be required to deliver much needed housing.</p> <p>Taking account of above, we would urge the Council to consider the benefits of releasing the land from the Green Belt as part of the emerging Local Plan process.</p>	
REG18.37	Mr Barrie Stone and Miss Eleanor Stone	<p>Bush Farm, Corbets Tey. 200 acres 223omford. Damians Air Strip etc. 120 acres 223omford. 5000 homes + together.</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land including Bush Farm, Corbets Tey, 200 acres 223omford.. land or Damians Air Strip 120 acres 223omford. site will be released for housing development.</p>
REG18.38	Mr T Clemence (DHA	LONDON BOROUGH OF HAVERING LOCAL PLAN REPRESENTATION FOR LAND AT COPTHORNE GARDENS, WINGLETYE LANE, HORNCHURCH, RM11 3DL.	The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local

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	Planning)	<p>I write in response to the consultation of the new London Borough of Havering Local Plan which will plan for and manage development in Havering until 2031. Question 10 of the London Borough of Havering Local Plan Representation questionnaire states: do you have any suggestions for revisions to the green belt boundary?</p> <p>In light of the local plan consultation and in accordance with question 10 of the local plan questionnaire; we take this opportunity to suggest a revision to the Green Belt boundary and for reasons sets out in this letter promote land at Copthorne Gardens, Hornchurch on behalf of our client Mr T Clemence as being a sustainable and appropriate site for additional residential development within the Borough.</p> <p>The site in question is currently a Greenfield site enclosed by a boundary of mature trees located within the Metropolitan Green Belt. It is a relatively rectangular shaped parcel of land, approximately 1.56 hectares, situated to the south of Copthorne Gardens and to the east of Tyrsal Close on the urban periphery of Hornchurch.</p> <p>The site frontage comprises the as yet undeveloped section of Copthorne Gardens, a residential street comprising 2 storey semi-detached properties. To the east and south the site borders agricultural fields with a farm located to the southeast of the site. The western boundary of the site lies on the settlement confines boundary backing on to residential development along Tyrsal Close.</p> <p>In terms of topography the site is relatively flat and according to the Environment Agency flood risk map the site does not lie within a flood risk zone.</p> <p>Figure 1: Aerial View of Site Courtesy of Google Maps Figure 2: Site Location Plan showing Public Open Space area (green)</p>	<p>Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land including land at Copthorne Gardens, Hornchurch will be released for housing development.</p>

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		<p>Although the site is currently located in the Green Belt, paragraph 84 of the NPPF states Green belt boundaries can be revised during the Local Plan process to 'take account of the need to promote sustainable patterns of development' and 'not to include land which is unnecessary to keep permanently open.'</p> <p>Paragraph 85 of the NPPF states when defining boundaries, local planning authorities should:</p> <ul style="list-style-type: none"> - Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development; - Not include land which it is unnecessary to keep permanently open; - Where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period; - Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development; - Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and - Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. <p>This site is a prime candidate for development and an obvious extension to residential development to the north and west. The site has an unbuilt and incomplete road frontage and is well defined by a strong line of boundary vegetation clearly separating it from open land to the east and south.</p> <p>At a density of 30 dwelling per hectare it is envisaged that the site could accommodate approximately 30 – 40 dwellings. In the wider view of the site in its local context residential development surrounds the site to the</p>	

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		<p>north and west, north of the site is a linear development of residential development along Essex Gardens, curving along Hubbards Chase. Essex Gardens residential development visually continues through the site following a tree boundary. New development would reflect the surrounding grain and layout of development in Copthorne Gardens and Tyrsal Close, creating a development that would not be intrusive or out of character.</p> <p>A combination of residential development and public open space is proposed – 0.87 hectares to the west allocated for residential and the remaining 0.69 hectares to the east dedicated for public open space. Public open space would maintain the openness nature of green belt land, whilst the residential aspect of the site would reflect the surrounding residential character. As an enclosed site, with 0.69 hectares dedicated as public open space, the development would have a minimal adverse impact in openness, landscape and visual terms.</p> <p><u>Sustainability</u></p> <p>The NPPF contains a presumption in the favour of sustainable development. It identifies this as meeting the development needs of an area and achieving development in sustainable locations.</p> <p>The proposed site is located on the edge of Hornchurch, immediately adjacent to residential development along Copthorne Gardens. Hornchurch has been identified as a Major District, offering a diverse mix of uses with a high quality retail offer and convenient local services. We concur with this view given the provision of local shops, post office, bank, schools and healthcare services.</p> <p>The site is well serviced in terms of public transport and community infrastructure. Hubbards Chase bus stop is located on Wingletye Lane adjacent to the site, bus number 193 passes through this regularly providing access to Hornchurch and Romford. Emerson Park Railway</p>	

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		<p>Station, Harold Wood Railway Station, and Upminster Railway Station are all located within walking distance from the site (all within 1.2 miles), providing easy access to London.</p> <p>The site has an unbuilt and incomplete road frontage and is well defined by a strong line of boundary vegetation clearly separating it from open land to the east and south.</p> <p>Development on site is a logical extension of residential development to the north, that if continued would follow an existing boundary. The resultant development would provide 30 to 40 new homes in an obvious and sustainable location that would be energy efficient and attractive, respecting the context, pattern and density of surrounding development. It would also provide public open space, which in line with paragraph 73 of the NPPF can make an important contribution to health and wellbeing of communities.</p> <p>In addition to being sustainable and developable the site is also considered to be deliverable; it is in a single ownership with an intention by the owners to develop the land and with no viability issues, legal or third party constraints present.</p> <p>In terms of constraints, apart for the location within the Green Belt, the site is not protected for any conservation, heritage or agricultural reasons. There are no statutory listed buildings on site or within the locality, the site is relatively level and does not fall within a flood risk area.</p> <p>Given this context it is a prime site for the adjustment of the green belt so as to incorporate the site in the urban area using the strong outer boundary feature as the new MGB boundary.</p> <p>For the above reasons it is recommended to you that the site be considered and included within any further local plan draft, to assist with</p>	

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		not only meeting the quantitative need within the District, but also the qualitative need.	
REG18.39	Mrs S J Ellis (Bidwells)	<p>The acute housing need and demanding housing targets that the Borough must address represent exceptional circumstances justifying and requiring the Council to undertake a review of Green Belt boundaries as part of the emerging Local Plan review process. The owners of the Site would be willing to enable its release for development to assist the Council to address its Local Plan objectives.</p> <p>The following points are pertinent to the consideration of the merits of the land:</p> <ul style="list-style-type: none"> – The land is available for development now. – Access could be achieved from Wingletye Lane. – Sites 1, 2 and 3 (shown at Appendix 1) from part of a single landholding east of Wingletye Lane. They are currently in use as agricultural grazing land and believed to be of low ecological value. All three sites are bordered to some extent by existing hedgerows and woodland that provide enclosure from the wider countryside and Green Belt. – It is recognised that site 3, to the east of Lillyputts Farm and west of the River Ingrebourne, has more sensitive landscape, environmental and Green Belt constraints. It is anticipated that this land could be released for largely recreational or other uses that would maintain the openness of the Green Belt and provide for its beneficial use – as specifically encouraged by the Framework. This would complement a predominantly residential development of sites 1 and 2. – Sites 1 and 2 are enclosed by existing residential development to the north (Cophorne Gardens), south (Wych Elm Road) and west (Wingletye Lane) and a residential care home complex to the east (Lillyputts Farm). The development of this land would have little impact on the openness of the Green Belt. – The owners of the submitted sites and the adjacent third party land at 	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt will be released for housing development.</p>

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		<p>Lillyputts Farm are willing to co-operate with the Council to bring their respective land forward for development.</p> <ul style="list-style-type: none"> - All three sites are available for development now and have a realistic prospect of coming forward for development within the next five years to assist the Council in meeting its demanding housing development targets. - The three sites are situated within close proximity to a range of local amenities including schools, shops and excellent transport links. This is a sustainable location and the development and delivery of new housing and recreational uses would represent sustainable development. - None of the sites are subject to any statutory environmental designations (except a nitrate vulnerable zone which is irrelevant to its consideration for development). Sites 1 and 2 are in a low risk flood zone (Flood Zone 1). The majority of site 3 is also at low risk of flooding (Flood Zone 1) however the eastern boundary borders the River Ingrebourne which is partly within EA Flood Zone 3. - All three sites lie at the western extremity of an area identified by the current Havering Local Development Framework as safeguarded for minerals extraction but investigations by the land owner suggests that it does not contain significant mineral deposits. <p><u>Controlled release from the Green Belt</u></p> <p>The sites have been assessed against the five purposes of including land within the Green Belt (set out at paragraph 80 of the Framework). We would strongly contend that they are well placed for release, as described below.</p> <p><u>1) To check the unrestricted sprawl of large built up areas:</u></p> <p>The development of sites 1 and 2 for predominantly residential use would represent a natural infill of the existing residential areas to the north, south</p>	

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		<p>and west. In addition, both sites are well contained by established woodland and hedgerows. Their development would not lead to urban sprawl or indeed the eastward extension of existing development beyond the current building line to the north and south.</p> <p>Indeed, we would contend that the pattern of existing development to the east of Wingletye Lane means that the release of a broader area of land between Copthorne Gardens and Hubbards Close (to the north) and Wych Elm Road (to the south) could be enabled to deliver Local Plan requirements without compromising the principal objectives for the Green Belt, as illustrated below.</p> <p>This area includes land promoted by adjoining land owners and could come forward for comprehensive development.</p> <p>Site 3, further to the east, is more sensitive but it is anticipated that the majority could be retained as Green Belt and used for recreation or other beneficial uses to compliment the development of sites 1 and 2 and other land to the west.</p> <p><u>2) To prevent neighbouring towns from merging into one another:</u></p> <p>As previously highlighted the development of sites 1 and 2 would provide a logical infill of existing residential development to the north, south and west. Sensitively planned development would not lead to the existing built up areas either side of the Ingrebourne Valley merging or, potentially, the gap between them becoming any narrower.</p> <p><u>3) To assist in safeguarding the countryside from encroachment:</u></p> <p>The same considerations apply in this respect – sites 1 and 2 are enclosed by existing development and their development could enable a predominantly recreational use of site 3. In addition, the established</p>	

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		<p>woodland and hedgerows surrounding all three sites will act as a natural buffer between future uses and the surrounding countryside.</p> <p><u>4) To preserve the setting and special character of historic towns:</u></p> <p>Development surrounding the site is all relatively modern. The land does not form part of the setting of any historic towns.</p> <p><u>5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land:</u></p> <p>The demanding housing delivery targets stipulated by the London Plan mean that the release of the site is unlikely to inhibit the recycling of brownfield sites elsewhere in the Borough that will also be required to deliver much needed housing.</p> <p>The assessment establishes that the careful development of the sites would not unduly impact on the purposes of the Green Belt allocated in the Borough. It is therefore reasonable to consider the release of some or all of the land to enable a valuable contribution towards the Council's housing land supply and enhanced recreational opportunities within the Borough.</p>	
REG18.40	Ms M Blackman	<p>A perfect example is in Rainham, on the north side Wennington Road, between no's 296 and 312 – adjacent to the junction with Eastwood Drive – see site map attached. The greenbelt boundary ends at Eastwood Drive. This strip of land fronting Wennington Road is in greenbelt, yet is developed with detached and semi-detached housing, leaving one small plot of vacant land, suitable for a modest size house.</p> <p>All the houses back on to farmland which rightly is in greenbelt – as is the farm opposite. There is public transport directly in front of the plot, and a range of facilities nearby, therefore the relevant infrastructure is already in place, the impact of 1 household on this is minimal and the development therefore sustainable. The size of the plot precludes any major development.</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local</p>

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		<p>I propose the boundary in this location is re-assessed and re-arranged so this strip of housing can be removed from greenbelt, so that for example a self-builder can build a home – a policy the Government is actively encouraging. There are other more appropriate planning mechanisms available to control/limit development on isolated sites like on this strip, such as Conservation Area or Article 4 status. Further, a review is undertaken across the borough of areas within greenbelt but which are developed.</p>	<p>Plan following the approach set out in the NPPF and London Plan. The strip of land fronting Wennington Road with detached and semi-detached housing including the small plot of vacant land is part of the Green Belt. No modifications will be made to the Green Belt in the Local Plan following the approach set out in the NPPF and London Plan to release land for housing. For these reasons the Council will not release this strip of Green Belt land for housing, but will retain the Green Belt boundary in its current state in line with advice contained in the NPPF.</p>
REG18.43	Omega After Alpha Ltd (Bidwells)	<p>The owners of the Site are willing to enable its release for development to assist the Council to meet its Local Plan objectives, including the delivery of housing to meet London Plan targets and objectively assessed local housing needs.</p> <p>The following points are pertinent to the consideration of the merits of the site:</p> <ul style="list-style-type: none"> – The land is available for development now. – There is an existing care home complex accommodated in the former farm house and farm yard buildings. It is the landowner's intention to retain the care home complex and associated buildings on site but also to enable residential development on surplus land to the north and south. Access to the existing care home complex on the site is achieved via Wingletye Lane – This land lies at the centre of a three other parcels of land owned by a third party (Mrs S J Ellis) which has also been put forward for development. Both landowners are willing to work co-operatively with the Council to put forward the wider land areas for development. 	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For these reasons the Council will not be seeking to release any Green Belt land for housing, but will retain the Green Belt boundary in its current state in line with</p>

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		<ul style="list-style-type: none"> – The site is situated within close proximity to a range of local amenities including schools, shops and excellent transport links. The site is considered to be situated in a sustainable location, therefore the development and delivery of the site for housing represents sustainable development. – The site is not subject to any statutory environmental designations (except being a nitrate vulnerable zone which is irrelevant to its consideration for development). – The site lies at the western extremity of an area identified by the current Havering Local Development Framework as safeguarded for minerals extraction but on-site investigations suggest that it does not contain significant mineral deposits. – Taking into account its location and characteristics in respect of the five purposes of including land within the Green Belt, established by paragraph 80 of the National Planning Policy Framework, the site is considered to be a favourable option for Green Belt release to address the objectively assessed housing needs of London and the Borough of Havering. <p>The acute housing need and demanding housing targets that the Borough must address represent exceptional circumstances justifying and requiring the Council to undertake a review of Green Belt boundaries as part of the emerging Local Plan review process.</p> <p>This site has been assessed against the five purposes of the Green Belt, as set out in paragraph 80 of the Framework, and can be found below. The assessment shows that the site currently serves none of the purposes of including land within the Green Belt and is well placed for release.</p> <p>1) To check the unrestricted sprawl of large built up areas:</p> <p>The site is already partially developed and is operating as a residential care home complex. This community facility is to be retained in full and the</p>	<p>advice contained in the NPPF.</p>

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		<p>surrounding land area to the north and south is put forward for residential development. Due to the close proximity of the site to existing residential development east of Wingletye Lane and south of Hubbards Close, this land would act as a natural extension to existing development and the development of land to the west put forward by the adjoining landowner (Mrs S J Ellis) but would be contained so as not to produce urban sprawl.</p> <p>Indeed, we would contend that the pattern of existing development to the east of Wingletye Lane means that the release of a broader area of land between Copthorne Gardens and Hubbards Close (to the north) and Wych Elm Road (to the south) could be enabled to deliver Local Plan objectives without compromising the purpose of the Green Belt, as illustrated below. This area includes land promoted by adjoining land owners and could come forward for comprehensive development.</p> <p>2) To prevent neighbouring towns from merging into one another:</p> <p>The development of the site would provide a logical extension to an already urban residential area and is well contained. The site is not within close proximity of other towns to the east. Development would not lead to the eastward extension of existing development beyond the current building line to the south and north. Sensitively masterplanned development would not lead to the existing built up areas either side of the Ingrebourne Valley merging or, potentially, the gap between them becoming any narrower.</p> <p>3) To assist in safeguarding the countryside from encroachment:</p> <p>The site is well contained by an established tree buffer and is located between by existing residential and commercial uses. Therefore it would not represent significant encroachment into the countryside. The properties who face onto the proposed site are screened by an extensive tree buffer which would further assist in containing any residential development thus</p>	

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		<p>safeguarding the countryside from encroachment.</p> <p>4) To preserve the setting and special character of historic towns:</p> <p>Development surrounding the site is all relatively modern. The land does not form part of the setting of any historic towns.</p> <p>5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land:</p> <p>The demanding housing delivery targets stipulated by the London Plan mean that the release of the site is unlikely to inhibit the recycling of brownfield sites elsewhere in the Borough that will also be required to deliver much needed housing.</p> <p>The assessment establishes that the careful development of the site would not unduly impact on the purposes of the Green Belt allocated in the Borough. It is therefore reasonable to consider the release of some or all of the land to enable a valuable contribution towards the London Borough of Havering's housing land supply.</p>	
REG18.44	Persimmon Homes Essex	<p>As previously discussed in Question 4 and 9, development should be allocated to the most sustainable locations. A Green Belt review will determine if land is suitable for development, and therefore should be released through the Local Plan process or should continue to be protected.</p>	<p>Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the</p>

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			NPPF and London Plan. For this reason no parts of the Green Belt land will be released for housing development.
REG18.46	Planning Potential Rep 2.	<p>We reiterate our comments made under Question 4, which support this particular response. In addition paragraph 84 of the NPPF states that “When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development toward urban areas inside the Green Belt boundary, toward towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary”. Paragraph 85 continues that “When defining boundaries, local planning authorities should:</p> <ul style="list-style-type: none"> – Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development; – Not include land which it is unnecessary to keep permanently open; – Where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period; – Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development; – Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and – Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.” <p>We attach details of Land at Risebridge Chase, Romford to be considered as a potential allocation for residential development. The Site is located to the north of Romford, approximately 4km from Romford Town Centre. The site is 5.175ha in size and is located in Flood Zone 1, albeit it is located</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land including Land at Risebridge Chase, Romford will be released for housing development.</p>

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		<p>adjacent to a water course (east) and an area contained within Flood Zone 3. The site is designated as Green Belt (GB) and is located between a golf course and existing housing.</p> <p>Should the Council discover that in order to meet their housing targets and demonstrate a five year housing land supply, revisions to the Green Belt are needed, we consider that the redevelopment of Land at Risebridge Chase would constitute sustainable development and is an obvious extension to Romford. The site currently has some building on it, being two residential properties and associated out-buildings located in the east and north east corner. The site is contained, by means of the golf course to the east, residential properties to the west and the Lower Bedfords Road to the north (containing ribbon development of housing along the site's northern boundary to the road). On the basis that this site is a contained entity, we would consider that it should be identified as a suitable site for release from the Green Belt.</p> <p>In addition, it is considered that the site does not meet the five purposes of the Green Belt. Its removal from the Green Belt would not result in the unrestricted sprawl of large built-up areas; it would not lead to towns merging into one another; it does not assist in safeguarding the countryside from encroachment and is not included within the Green Belt to preserve the setting and special character of historic towns. As such, its removal from the Green Belt should be supported.</p> <p>Land at Risebridge Chase provides a real opportunity to deliver much needed private and affordable housing, and is of a size capable of providing a suitable mix, whilst meeting the policy requirements for private and public amenity space. We therefore urge the Council to review the Green Belt boundary in this area and remove the site from its current designation.</p>	
REG18.47	R. Watt and Partners	Although the council's current consultation is purely seeking initial views on the potential priorities for the new plan and that a 'formal' strategy has yet	The Council has undertaken a Green Belt study as part of the evidence base for the

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	(Phillips Planning Services)	<p>to be defined, our clients wish to promote the inclusion and consideration of their land for development through the Local Plan preparation process.</p> <p>Our clients' site is comprised of Land at Hill Farm, Noak Hill on both the northern and southern sides of Church Road. It covers an area of approximately 68.3 hectares is predominately formed of arable agricultural land. The land effectively sits around the existing built form of the village of Noak Hill which itself is directly to the north of Romford (Please see submitted Site Location Plan).</p> <p>It is noted that the current Development Plan identifies that Noak Hill is entirely washed over by the 'Green Belt' and that parts of our clients' land are also subject to the landscape designations; 'Havering Ridge Area of Special Character' and 'Countryside Conservation Area'. Although it is accepted that such designations would generally preclude development, it is considered that the site's location directly adjacent to north of Romford would provide an opportunity for a strategic expansion of the town should a release of 'Green Belt' land be required by the Local Plan to deliver its required provision of housing and employment land.</p> <p>Accordingly, we would be grateful for your consideration of the promoted site, should such a strategy be progressed. Our clients would also be happy to promote smaller parcels of the wider site, should the council identify that this be preferable and reflect the ultimately progressed development strategy.</p>	<p>Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land including Land at Hill Farm, Noak Hill will be released for housing development.</p>
REG18.48	R.A.Montague	<p>Yes – to stop threatening the permanence of the green belt. For example, the boundaries were reviewed in 2007 and now less than 7 years on they are being reviewed again and then in a few years the Mayor will want more houses and there will be yet another Local Plan and another review and so it will go on.</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF</p>

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			and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land will be released for housing development.
REG18.50	Rainham Preservation Society	No further encroachment on the green belt and continue the use of allotments.	Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt will be released for housing development. The Proposed Submission version of the Local Plan supports the continued use and expansion of allotments.
REG18.53	Romford Golf Club (Joe Coogan)	Please see the attachment detailing a site between the A12 and Romford Golf Club. The land in question is shaded in orange on the plan. The site is waste ground that is classified as greenbelt. The site has no recreational value and become a problem to the local community and has been used by	The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a

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		<p>criminal gangs as a hideaway. Links to two newspaper articles can be found below that highlight the extent of the problems. Many more minor issues have gone unreported in the press but it presents a security risk to lone golfers or those jogging/walking along the A12.</p> <p>http://www.romfordrecorder.co.uk/news/crimecourt/240omford240_robbery_gang_who_stole_1m_lived_rough_in_romford_wods_1_2000470</p> <p>http://www.romfordrecorder.co.uk/news/body_found_in_romford_1_1068700</p> <p>The land is owned by Romford Golf Club and could be accessed by the popular cul-de-sac Links Avenue. Romford Golf Club would like to see the land brought into a positive use, preferably as high quality family homes. It is estimated that the land could accommodate 30-40 high quality 3 or 4 bedroom homes. Any income from developing the land would be used to improve the golf club/course and secure its future as a premier golf club that provides an excellent resource and recreational space for local people (both golfers and dog walkers).</p> <p>Romford Golf Club is a not for profit organisation owned by its members.</p> <p>The golf club are open to discussions about any usage that can bring the land back into use and meet the needs of local people (for housing, education, employment etc). The site may also generate a significant sct 106/Planning Obligation income for the Council in these times of austerity.</p>	<p>contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land including the site between the A12 and Romford Golf Club will be released for housing, education, employment, etc. development.</p>
REG18.54	Romford YMCA	<p>Whilst it is understandable for the need to focus on brownfield sites, there is a compelling need to review the Green Belt boundary, to allow for sustainable development. This is not to create an inferior Green Belt, but to address the changing needs of the borough.</p> <p>As indicated previously and in our site submission to the council, Romford</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes</p>

Response Number	Respondent Name	Response to Q10	Council's response
		<p>YMCA has land on Upper Rainham Road, which is close to other residential properties.</p>	<p>of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land including Land on Upper Rainham Road will be released for housing development.</p>
REG18.55	Rowley Cardrome Ltd (Montagu Evans)	<p>The fundamental aim of Green Belt policy, as set out in Chapter 9 of the NPPF, is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. To protect the openness of the Green Belt, LBH should ensure they have sufficient land allocated for housing within existing residential areas and on previously developed land.</p> <p>In particular, paragraph 80 of the NPPF states that the Green Belt serves five purposes:</p> <ul style="list-style-type: none"> - to check the unrestricted sprawl of large built up areas; - to prevent neighbouring towns merging into one another; - to assist in safeguarding the countryside from encroachment; - to preserve the setting and special character of historic towns; and - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. <p>We consider that the Site contributes very little to the function and purposes of including land within the Green Belt as set out above for the following reasons:</p> <ul style="list-style-type: none"> - The site borders a modern residential housing development to the north, and is bounded by the River Beam to the west; the A125 (Upper 	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land will be released for housing development.</p>

Response Number	Respondent Name	Response to Q10	Council's response
		<p>Rainham Road) to the east; and a private road to the south. These physical boundaries mean there would be no subsequent encroachment into the countryside;</p> <ul style="list-style-type: none"> - The thick vegetation that runs along the western border separates the site from the undeveloped Green Belt land to the west, therefore already naturally limiting any potential impact arising from the residential development of the site; - The Chase Nature Reserve is located to the west, across the River Beam, consequently, the release of the site from the Green Belt would not result in the merging of neighbouring towns; and - The site is brownfield land and already benefits from a designation as a Major Developed Site in the Green Belt within the LBH Core Strategy and Development Control Policies Development Plan Document (2008). This status indicates that is already envisaged that some development will occur onsite and would therefore be classed as the redevelopment of brownfield land, a national, regional and local policy objective. <p>In considering the above, we consider that the Site, already allocated as a Major Developed Site should be released from the Green Belt as such release will not harm the remaining Green Belt.</p> <p>As noted above, Formation Architects have produced an initial masterplan for the residential development of the site (Annex 2). Importantly, whilst maximising the development potential of the site, the masterplan also allows for the provision of a defendable Green Belt boundary. An additional benefit of the site is the ability to enhance public linkages into the adjoining Green Belt land for the wider public benefit.</p>	
REG18.56	S.D. Olney	Not knowing the full extent of the green belt land. I cannot make a sensible response to the question asked.	Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough

Response Number	Respondent Name	Response to Q10	Council's response
			<p>makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land will be released for housing development.</p>
REG18.57	Sheila Clements	It will not matter what I think, the Council will do what it wants.	<p>Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt will be released for housing development.</p>
REG18.59	Stephen Siggers	<p>The proposal is to have the residential properties and gardens of Gaynesborough and The Lodge, Little Gaynes Lane, redesignated out of the Green Belt. The exceptional circumstances in this case are as follows:</p> <p>Gaynesborough is a modest 3 bedroom residential bungalow situated in Little Gaynes Lane, a suburban road in Upminster. Of the 95 properties</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes</p>

Response Number	Respondent Name	Response to Q10	Council's response
		<p>situated in Little Gaynes Lane, only Gaynesborough and the next door property, The Lodge, are located within the Green Belt.</p> <p>The properties are both situated on a busy stretch of the main road, opposite The Optimist public house and back onto open green space (also designated as Greenbelt land). To the SouthEast of the properties in the neighbouring roads the Grove and Parkland Avenue there are a further 80 residential properties that back onto the same open Green Belt land however none of these properties fall within the Green Belt boundary themselves. To have a consistent approach to how suburban residential properties which back onto the same open Greenbelt land are designated in relation to the Green Belt and to have a logical defensible Green Belt boundary, these two properties should be taken out of the Green Belt. This same consideration was given previously by Havering Council when altering the Green Belt boundary to take out the gardens of two residential properties in Tay Way.</p> <p>In addition to the need to have a logical and defensible Green Belt boundary there are other clear reasons why Gaynesborough, should not fall within a Green Belt boundary relative to the aims of the Green Belt as defined in section 9 of the National Planning Policy Framework. These reasons are as follows:</p> <ul style="list-style-type: none"> - NPPF 79 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence Gaynesborough has since construction in 1957, been a residential property with a fenced garden and has never been open and. As a residential property with permitted development rights, approximately half of the rear garden could be covered with outbuildings so being in the Green Belt offers no protection to the gardens openness and there is no permanence to its openness. - NPPF80 Green Belt serves five purposes: 	<p>of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land including the residential properties and gardens of Gaynesborough and The Lodge, Little Gaynes Lane will be released for housing development.</p>

Response Number	Respondent Name	Response to Q10	Council's response
		<ul style="list-style-type: none"> ○ to check the unrestricted sprawl of large builtup areas; ○ to prevent neighbouring towns merging into one another; ○ to assist in safeguarding the countryside from encroachment; ○ to preserve the setting and special character of historic towns; and ○ to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. <p>Having Gaynesborough in the Greenbelt does nothing to contribute to the five purposes listed</p> <ul style="list-style-type: none"> - NPPF81 Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land – As a residential property Gaynesborough can never be enhanced as per the policy directive. - NPPF85 When defining boundaries, local planning authorities should: <ul style="list-style-type: none"> ○ not include land which it is unnecessary to keep permanently open; <p>Gaynesborough has since construction in 1957, been a residential property with a fenced garden and has never been open land. As a residential property with permitted development rights, approximately half of the rear garden could be covered with outbuildings so being in the Green Belt offers no protection to the gardens openness and there is no permanence to its openness.</p> <p>As per NPPF 83, when considering the potential alteration of</p> 	

Response Number	Respondent Name	Response to Q10	Council's response
		<p>Green Belt boundaries; "authorities should consider the Green Belt boundaries having regard to their intended permanence". Given the above, it is clear that even if the property could be considered "open" there is no permanence due to permitted development rights.</p> <p>This clearly demonstrates the exceptional circumstance as to why the Green Belt boundary should be altered to remove the property.</p> <p>Appendix Gaynesborough.1 shows the proposed Green Belt boundary revision having the boundary behind the gardens of Gaynesborough and The Lodge.</p>	
REG18.61	The Crown Estate (Amec Foster Wheeler)	<p>When reviewing which areas of land around the settlement edges to release, the Local Plan will need to be consistent with guidance in the NPPF. The basis of a Green Belt review is to assess the contribution made by land to the purposes of including land within the Green Belt. The degree to which land makes a contribution to the Green Belt will influence whether it should be considered for release. The Crown Estate submitted four sites in response to the Council's Call for Sites in October 2014, these include:</p> <ul style="list-style-type: none"> - Land at Gobions Farm, Collier Row Road; - Land between Collier Row Road and Hog Hill Road; - Land between Marlborough Road and the A12, Mawneys; and - Land between London Road and the A12, Mawneys <p>A site location plan for each of these sites is attached in Appendix A. The Crown Estate considers each of these locations should be considered as a revision to the Green Belt boundary as part of a wider review. A review of the Green Belt will demonstrate that these areas of land perform well against NPPF criteria and are not important to the function and purposes of the Green Belt and subsequently should be considered for release. This point is emphasised when considering the sites against the five purposes</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land including Land at Gobions Farm, Collier Row Road, Land between Collier Row Road and Hog Hill Road, Land between Marlborough Road and the A12 Mawneys and Land between London Road and the A12 Mawneys will</p>

Response Number	Respondent Name	Response to Q10	Council's response
		<p>of Green Belts included in NPPF, Paragraph 80:</p> <ul style="list-style-type: none"> - To check the unrestricted sprawl of large built up areas <p>The sites have a limited function in this respect as all have clear containing boundaries in the form established hedgerows and roads (including the A12). The sites would essentially infill gaps to round off the settlement boundaries.</p> <ul style="list-style-type: none"> - To prevent neighbouring towns merging into one another <p>The sites have no real function in this respect given that they would essentially round off the settlement edges and would not lead to the encroachment towards neighbouring settlements.</p> <ul style="list-style-type: none"> - To assist in safeguarding the countryside from encroachment <p>Although development would extend the limits of the settlement(s), visually their impact would be modest because of the existing landscape framework and boundaries such as strategic roads. Development would be visually well contained by the existing landscape framework/development and would not therefore significantly encroach into open countryside.</p> <ul style="list-style-type: none"> - To preserve the setting and special character of historic towns <p>There are no environmental assets on or adjacent to the sites that might be impacted on by development in these locations.</p> <ul style="list-style-type: none"> - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. <p>Gobions Farm provides a brownfield opportunity with potential to</p>	<p>be released for housing development.</p>

Response Number	Respondent Name	Response to Q10	Council's response
		<p>enhance the openness and appearance of this Green Belt location. Other Brownfield options are limited. It is likely that growth will require greenfield land and the revision of Green Belt boundaries. The sites are well located to local amenities and provide highly sustainable locations for development.</p> <p>Paragraph 83 of NPPF states that through a review of a Local Plan, regard should be given to Green Belt boundaries and “their intended permanence in the long term so that they are capable of endurance beyond the plan period.” As noted above, The Crown Estate’s sites have strong boundaries and provide a natural infill to accommodate housing growth. These would provide defensible boundaries on which to revise the Green Belt. These sites make a limited contribution to Green Belt purposes and therefore should be considered for Green Belt release as part of a wider Green Belt Review to assist in meeting the substantial housing needs across Havering and the wider London region.</p>	
REG18.63	Thomas Bates and Son Ltd. (Andrew Martin Planning)	<p>The land off Wingletye Lane, Hornchurch currently forms part of the Metropolitan Green Belt. The site is located on the western fringe of the Green Belt and is bound on two sides by existing residential areas – to the south and west. The previously overgrown orchard was cleared more than 55 years ago and the land has remained barren and unfarmed ever since.</p> <p>The site is well contained by virtue of the mature tree lined field boundaries to the north and east and could be released from the Green Belt without compromising the five purposes of including land within a Green Belt – as identified above. In particular the release of this site for residential development would:</p> <ul style="list-style-type: none"> – prevent unrestricted sprawl of a large built-up area – the mature field boundaries to the north and east would form a clear boundary against further urban development; – prevent neighbouring towns merging into one another – existing 	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land including the Land off Wingletye Lane, Hornchurch will be released for housing development.</p>

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		<p>housing off Wych Elm Road already extends further towards Upminster (to the east) than development at the site would;</p> <ul style="list-style-type: none"> – safeguard against encroachment into the countryside – the site is well contained and as stated existing housing extends further into the countryside than development at the site would; – preserve the setting and special character of historic towns – there is no particular historic setting or character to maintain in this area; – assist in urban regeneration – by accommodating new residents who will bring additional expenditure to the local economy (including the shops in Hornchurch town centre). <p>Development along and south of Wych Elm Road / Wych Elm Close / Bourne End extends far beyond the boundary of the submission site. In particular the Emerson Park School buildings are located some 200 metres beyond the eastern boundary of the site. Moreover, agricultural buildings associated with Lillyputts Farm, which adjoins the submission site to the north, extend beyond the eastern boundary of the submission site. Therefore the site is largely enclosed by existing development that extends further to the east than any proposed residential development should this site be allocated, and in comparison this site could not be considered as an encroachment into the countryside.</p> <p>Given that the site is currently enclosed on three sides by existing development, land off Wingletye Lane would represent an appropriate and natural stop line for development.</p>	

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REG18.66	Trinity Hall (Bidwells)	<p>Yes. The owners of the submitted land, Trinity Hall, are willing to enable its release for development to assist the London Borough of Havering to address objectively assessed local housing needs and the demanding housing delivery targets stipulated by the London Plan.</p> <p>The following points are pertinent to the consideration of the merits of the land:</p> <ul style="list-style-type: none"> – The land would be available for development within five years. – The landowner is willing to work co-operatively with the Council when considering possible uses and the particular parcels of land which may come forward. – Access could be achieved via Hall Lane, Bird Lane, Tomkyns Lane or, potentially, the A127 Southend Arterial Road. – The site lies within the Green Belt. It is predominantly agricultural land and of relatively low ecological value. It is comprised of several parcels which are enclosed by thick established hedgerows, adjoining areas of woodland and existing roads, including Bird Lane, Tomkyns Lane and the A127 Southend Arterial Road. These features provide separation from the wider countryside and Green Belt. – The land to the south of the A127 adjoins north Upminster and appears particularly well suited to the provision of new housing. A significant tree buffer is provided between existing dwellings and this site which would serve to protect the amenity and outlook of existing residents in the event of development coming forward. – 1.8ha of the land to the west of Hall Lane benefits from a Certificate of Lawful Use for a commercial horse livery yard comprising stables, indoor school, storage in association with the livery business and land used as outdoor exercise arenas (planning ref: E0001.14). The Site Location Plan at Appendix 3 identifies the extent and location of this land. It is located opposite existing residential development on the opposite side of Hall Lane and a range of commercial buildings and a yard which comprises previously developed land. 	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land including Trinity Hall will be released for housing development.</p>

Response Number	Respondent Name	Response to Q10	Council's response
		<ul style="list-style-type: none"> - All of the land is situated within close proximity to a range of local amenities including schools, shops and excellent transport links. The site is situated in a sustainable location. - The site is not subject to any statutory environmental designations (except being a nitrate vulnerable zone which is irrelevant to its consideration for development).The vast majority of the land is at low risk from flooding (EA Flood Zone 1). - Taking into account its location and characteristics in respect of the five purposes of including land within the Green Belt, established by paragraph 80 of the National Planning Policy Framework, the site is considered to be a potential option for Green Belt release to address London Plan targets and objectively assessed housing needs. <p>The characteristics of the site have been assessed against the five purposes of the Green Belt, as set out in paragraph 80 of the Framework. The assessment and can be found below.</p> <ul style="list-style-type: none"> - To check the unrestricted sprawl of large built up areas: <ul style="list-style-type: none"> o The distinct parcels of land comprised within this site are contained by a variety of existing physical features, including existing trees and woodland, the A127, Bird Lane and existing residential development. Land to the south of the A127, east of Hall Lane is particularly well enclosed by existing development, roads and planting. Development of some or all of the land would not represent uncontrolled sprawl. - To prevent neighbouring towns from merging into one another: <ul style="list-style-type: none"> o As highlighted above, the site is contained and its development would not lead to coalescence of any existing settlements. - To assist in safeguarding the countryside from encroachment: <ul style="list-style-type: none"> o All of the land is contained by established trees and hedges, existing development and the A127. Development of some or all 	

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		<p>of the parcels would not encroach into otherwise entirely undeveloped areas of countryside.</p> <ul style="list-style-type: none"> - To preserve the setting and special character of historic towns: <ul style="list-style-type: none"> o Development surrounding the site is all relatively modern. The land does not form part of the setting of any historic towns. - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land: <ul style="list-style-type: none"> o The demanding housing delivery targets stipulated by the London Plan and the need for a continuing housing land supply mean that the release of land at Chapman's Farm is unlikely to inhibit the recycling of brownfield sites elsewhere in the Borough that will also be required to deliver much needed housing. <p>The assessment helps to establish that the careful development of this site may not unduly impact on the purposes of the Green Belt allocated in the Borough. It is therefore reasonable to consider the release of some or all of the land to enable a valuable contribution towards the London Borough of Havering's housing land supply or other development needs.</p>	
POST18.1	V. Rajan and Associates	Green Belt environment should be protected.	Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the

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			NPPF and London Plan. For this reason no parts of the Green Belt will be released for housing development.

Question 11: How do you think the Local Plan should seek to address climate change and sustainability?

Response Number	Respondent Name	Response to Q11	Council's response
REG18.2	Adams Family (Bidwells)	<p>Sustainability, and in particular “sustainable development” balances a number of different and often competing aims and objectives. It is the role of the planning system – and in this context the role of the Local Plan, to balance environmental protection with economic growth and the needs of the community. This should ensure that a sufficient variety of land is available to support the Borough’s growth needs.</p> <p>The Council should take into account the benefits of releasing Green Belt land that no longer serves a Green Belt function in the context of the need to balance competing demands for land in the Borough in a sustainable manner.</p>	Noted. The Proposed Submission version of the Local Plan supports sustainable development as defined in the NPPF.
REG18.3	Anonymous	Only allow solar panels on non-houses, not private residences. Return buses to be used by everyone. Return to near 100% ban on Sunday and bank holiday trading.	Noted. This is outside the scope of the Proposed Submission version of the Local Plan.
REG18.8	Brett Aggregates Limited (MJCA)	<p>Minerals and aggregates should be sourced locally where possible to reduce the distance over which these materials are transported for use. The London Plan acknowledges that most aggregates used in the capital come from outside London and the Plan supports the supply of locally sourced land won aggregate.</p> <p>Sources of land won aggregate available should be safeguarded for future use in the Borough and the Capital to reduce the distance over which</p>	Noted. The Proposed Submission version of the Local Plan contains policies that safeguard and manage minerals, consistent with the London Plan and NPPF. This includes the safeguarding of land and making sure transport impacts are mitigated.

Response Number	Respondent Name	Response to Q11	Council's response
		<p>aggregate is transported and the associated emissions.</p> <p>To further reduce the transportation of aggregates, mineral processing plants or bagging plants should be located in or directly adjacent to the quarry. Where there is already an established mineral processing plant located in close proximity to a new quarry and where that plant is in a suitable location the Plan should specify that mineral from surrounding extraction areas should be taken to the existing processing plant site to make use of the existing plant, infrastructure and mitigation such as established landscaping and screening instead of erecting new plant. Facilities such as concrete batching plants which make use of the aggregate should also be located at mineral producing sites to reduce transportation distances.</p> <p>As explained in the response to Question 9, during the restoration of a quarry with imported materials such as inert waste, there are sustainability benefits associated with locating waste recycling facilities at the quarry to recover the usable portion of the waste to produce secondary aggregates for use in construction projects and to reduce the consumption of primary aggregates. This approach also ensures that only residual materials with no other form of beneficial use are deposited to restore quarry voids. This can commonly involve the use of a mobile crusher and screen to recover secondary aggregates from inert waste. Such plant and machinery and material processing is not dissimilar to the activities that take place during mineral extraction.</p>	
REG18.9	C. Cole	Encourage wind and sun power I can't be bothered with recycling. It's a big thing!	The Proposed Submission version of the Local Plan supports renewable energy developments.
REG18.12	D. Campbell	More recycling points glass plastic etc. old clothes sites more cycle lanes.	The Proposed Submission version of the Local Plan contains policies to manage waste. It requires developments to include facilities to separate, store and recycle waste. It seeks to encourage active travel

Response Number	Respondent Name	Response to Q11	Council's response
			including cycling as part of a balanced approach to travel and transport in Havering.
REG18.14	Edward Gittins & Associates	The valley land at Squirrels Heath Road is important for its biodiversity and provision for the management of the areas north and south of Cockabourne Bridge can be secured via the release of the proposed housing land.	Noted. The Proposed Submission version of the Local Plan sets out a positive strategy for biodiversity.
REG18.22	Havering Friends of the Earth	<p>More diverse/extended measurement of air pollution needed – for example outside schools near to busy roads. This information should be publicised to parents.</p> <p>More energy conservation in public buildings. Staff training on how to conserve energy in public places.</p> <p>Solar panels in schools to be a targeted focus. Make this easier to implement.</p>	<p>The Council is preparing an Air Quality Action Plan and this is identified in the Proposed Submission version of the Local Plan.</p> <p>The Council will promote energy efficiency in public buildings. This will encompass its own premises (including schools).</p>
REG18.24	Higgins Homes (Nathaniel Lichfield & Partners)	By seeking to allocate new sites for residential development in sustainable locations in order to reduce the reliance on transport by private car and to consider sustainable drainage strategies.	Noted. The strategy of the Proposed Submission version of the Local Plan seeks to direct development towards sustainable locations. The Proposed Submission version of the Local Plan contains policies which support the use of sustainable drainage.
REG18.26	Ian Weatherley	By re-enforcing and enhancing the borough's sea defences to protect the communities from the rising sea levels and also to review the clearance of debris and weeds from the boroughs rivers to ensure a fast egress of rain water to controlled river outlets.	The Proposed Submission version of the Local Plan contains policies to protect development against flooding in line with the recommendations from the Strategic Flood risk Assessment.
REG18.28	Joe Coogan	New developments should be as sustainable as possible and planning obligations should be used to secure investment in other schemes that will make a positive contribution.	The Proposed Submission version of the Local Plan sets out policies to optimise the sustainability of development including energy efficiency.
REG18.29	John Peterson	Improve movement of traffic	The Proposed Submission version of the Local Plan contains a balanced suite of

Response Number	Respondent Name	Response to Q11	Council's response
			policies for transport. These include measures to address traffic movement including tackling congestion. The policies include specific items to address traffic movements at key locations such as Gallows Corner and the Romford Ring Road. Additionally, the Local Plan includes proposals for major new transport infrastructure such as better north-south connectivity which have the potential to assist traffic movements across Havering.
REG18.32	Lee Clements	By: encouraging low energy homes and ensuring all new housing is as sustainable as possible through use of planning regulations; reducing traffic congestion; planting more trees and not removing existing ones except where absolutely necessary (not just because a new pavement is being put in); putting solar panels on all council buildings where possible.	The Proposed Submission version of the Local Plan contains policies on energy efficiency, optimising transport and green infrastructure to optimise sustainability.
REG18.34	Margaret Whippy	It is hard to believe in climate change given recent research. Sustainable development also needs to cover local needs, which must be explained to meet local families' requirements, not just developers. Flooding would not be an issue in the area marked.	The effects of climate change are widely accepted and the Proposed Submission version of the Local Plan seeks to address these in a Havering context. The Local Plan is intended to provide guidance on development to all in the community including local families (not just developers). The Local Plan includes policies to ensure that development is located appropriately in regard to flood risk.
REG18.36	Moody Homes and Mr John Wakeling (Bidwells)	Sustainability, and in particular "sustainable development" balances a number of different and often competing aims and objectives. It is the role of the planning system – and in this context the role of the Local Plan, to balance environmental protection with economic growth and the needs of the community. This should ensure that a sufficient variety of land is available to support the Borough's growth needs. The Council should take into account the benefits of releasing Green Belt land that no longer serves	The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF

Response Number	Respondent Name	Response to Q11	Council's response
		a Green Belt function in the context of the need to balance competing demands for land in the Borough in a substantial manner.	and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no part of the Green Belt land will be released in the context of the need to balance competing demands for land in the Borough.
REG18.37	Mr Barrie Stone and Miss Eleanor Stone	New development should be low carbon. More tree planting etc.	The Proposed Submission version of the Local Plan promotes low carbon design and expects development to meet London Plan energy efficiency standards. Policies to secure landscaping and green infrastructure are included.
REG18.39	Mrs S J Ellis (Bidwells)	Sustainability, and in particular "sustainable development" balances a number of different and often competing aims and objectives. It is the role of the planning system – and in this context the role of the Local Plan, to balance environmental protection with economic growth and the needs of the community. This should ensure that a sufficient variety of land is available to support the Borough's growth needs. The Council should take into account the benefits of releasing Green Belt land that no longer serves a Green Belt function in the context of the need to balance competing demands for land in the Borough in a sustainable manner.	The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no part of the Green Belt land will be released

Response Number	Respondent Name	Response to Q11	Council's response
			in the context of the need to balance competing demands for land in the Borough.
REG18.40	Ms M Blackman	The London Plan, Code for Sustainable Homes, BREAAAM and Building Regulations already address this comprehensively for new development, particularly for developers. Any further requirements should be proportionate and add value, rather than just tick a box. More importantly, however it is the residents and occupiers (particularly older generation) that need to be educated further/encouraged to modify their habits and their mind-set. It is the existing older properties which emit the greater proportion of greenhouse gas emissions. It is the people who insist on driving rather than walking to the shop at the top of the road, and who don't recycle. It's people's appetite for 'stuff' with a limited lifecycle that contributes most to the problem. More needs to be done to educate better, and to facilitate change (people are lazy). Check out video called the Story of Stuff - http://storyofstuff.org/	Noted. The Proposed Submission version of the Local Plan will have an important role in the promotion and delivery of good sustainable development in Havering including opportunities for more active travel choices and the promotion of good practice linked to energy strategy and conservation.
REG18.41	National Grid Property (Carter Jones)	The Local Plan must recognise that whilst sustainable development and energy consumption is important, growth and the provision of new homes is also important. Therefore, the Local Plan must be sufficiently flexible to balance conflicting priorities.	The Proposed Submission version of the Local Plan sets out a balanced suite of policies to address land use planning issues in Havering. Ensuring the development and provision of new homes is a key priority. The Examination into the 'soundness' of the Local Plan will consider its flexibility to address different circumstances and priorities.
REG18.42	Natural England	We agree that development should be carried out in a sustainable way. The NPPF paragraph 94 states that: “Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations” (para 94).	Noted. The Proposed Submission version of the Local Plan has been prepared to be consistent with the NPPF. It includes policies to address climate change, flooding and water supply. The Local Plan is underpinned by a robust Infrastructure Delivery Plan.
REG18.43	Omega After	Sustainability, and in particular “sustainable development” balances a	The Council has undertaken a Green Belt

Response Number	Respondent Name	Response to Q11	Council's response
	Alpha Ltd (Bidwells)	number of different and often competing aims and objectives. It is the role of the planning system – and in this context the role of the Local Plan, to balance environmental protection with economic growth and the needs of the community. This should ensure that a sufficient variety of land is available to support the Borough's growth needs. The Council should take into account the benefits of releasing Green Belt land that no longer serves a Green Belt function in the context of the need to balance competing demands for land in the Borough in a sustainable manner.	study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no part of the Green Belt land will be released in the context of the need to balance competing demands for land in the Borough.
REG18.44	Persimmon Homes Essex	The consultation document stipulates that the Local Plan will set out standards and expectations the Council has on developers. The council must ensure that these standards do not render sites unviable as higher standards often entail higher costs to deliver them. This can be achieved through on-going discussion with landowners, agents and developers.	The Proposed Submission version of the Local Plan has been tested in regard to viability. The delivery and implementation of the Local Plan will include engagement with developers and their advisers.
REG18.47	R. Watt and Partners (Phillips Planning Services)	Support the provision of sustainable renewable energy production resources.	The Proposed Submission version of the Local Plan supports renewable energy provision.
REG18.48	R.A.Montague	Equilibrium is the only route to long term sustainability and indefinite continuous growth at the pace currently proposed is unsustainable and bound to destroy the quality of life, the environment and the climate.	Noted. The Proposed Submission version of the Local Plan aims to ensure the delivery of sustainable development in line with the NPPF.
REG18.50	Rainham Preservation	No further incinerators, auto-cla and bio-mrf's should be permitted.	The Council's strategy for waste is set out in the Joint Waste Development Plan for

Response Number	Respondent Name	Response to Q11	Council's response
	Society		the East London Waste Authority Boroughs (2012).
REG18.51	Ray Whitehouse	Yes, but that's part of your job	Noted.
REG18.52	Romford Civic Society	Reduce emissions. Particularly focus on improving air quality in central Romford and on reducing emissions in central Romford.	The Proposed Submission version of the Local Plan contains policies to manage and improve air quality.
REG18.53	Romford Golf Club (Joe Coogan)	New developments should be as sustainable as possible and planning obligations should be used to secure investment in other schemes that will make a positive contribution.	The Proposed Submission version of the Local Plan sets out policies to optimise the sustainability of development including energy efficiency.
REG18.56	S.D. Olney	Yes, definitely, and stop fly tipping with heavier fines.	This is beyond the remit of the Local Plan.
REG18.57	Sheila Clements	Well, knowing the Councillors views that Climate Change does not exist, I don't think anything will be done.	The Proposed Submission version of the Local Plan contains policies to address climate change.
REG18.60	Thames Water Utilities Ltd (Savills)	<p>Thames Water is concerned about any increase in surface water flows resulting from development and the effect of such flows further down the sewerage catchment, particularly with respect areas where there is a known risk of sewer flooding. It is the responsibility of the developer to make proper provision for drainage to ground or a watercourse. It is important to minimise the quantity of surface water entering the wastewater system in order to maximise the capacity for foul sewage and to reduce the risk of sewer flooding.</p> <p>Thames Water supports the approach in the London Plan Section 5.13 (Sustainable Drainage) and the Mayor's sequential approach to surface water run-off. When all other options set out in the drainage hierarchy have been exhausted and discharge to surface water sewer is the only option for disposal of surface water developers should aim to achieve greenfield run-off rates.</p> <p>Thames Water recognises the environmental and economic benefits of surface water source control, and encourages its appropriate application,</p>	The Proposed Submission version of the Local Plan is consistent with London Plan policies and promotes the use of sustainable drainage. The Council has engaged with Thames Water during the preparation of the Infrastructure Delivery Plan to make sure appropriate infrastructure is in place to support the development envisaged in the Local Plan.

Response Number	Respondent Name	Response to Q11	Council's response
		<p>where it is to the overall benefit of our customers.</p> <p>Accordingly, in the disposal of surface water, Thames Water will:</p> <ul style="list-style-type: none"> – Seek to ensure that new connections to the public wastewater network does not pose an unacceptable threat of surcharge, flooding or pollution; – Check the proposals are in line with industry best practice which encourages, wherever practicable, disposal 'on site' without recourse to the public wastewater network; for example in the form of soakaways or infiltration areas on free draining soils; and – Require the separation of foul water and surface water on all new development. <p>The water companies investment programmes are based on a 5 year cycle known as the Asset Management Plan (AMP) process. The AMP6 period will begin on 31st March 2015 and cover the period up to 31st March 2020. As part of our five year business plan Thames Water advise OFWAT on the funding required to accommodate growth in our networks and at all our treatment works. As a result Thames Water bases its investment programmes on development plan allocations, which form the clearest picture of the shape of the community.</p> <p>Where the infrastructure is not available we may require an 18-month to three-year lead in time for provision of extra capacity to drain new development sites. If any large engineering works are needed to upgrade infrastructure the lead in time could be up to five years. Implementing new technologies and the construction of new treatment works could take up to ten years.</p>	
REG18.66	Trinity Hall (Bidwells)	Sustainability, and in particular “sustainable development” balances a number of different and often competing aims and objectives. It is the role of the planning system – and in this context the role of the Local Plan, to balance environmental protection with economic growth and the needs of	The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the

Response Number	Respondent Name	Response to Q11	Council's response
		<p>the community. This should ensure that a sufficient variety of land is available to support the Borough's growth needs. The Council should take into account the benefits of releasing Green Belt land that no longer serves a Green Belt function in the context of the need to balance competing demands for land in the Borough in a substantial manner.</p>	<p>Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no part of the Green Belt land will be released in the context of the need to balance competing demands for land in the Borough.</p>
REG18.67	Veolia ES (UK) Ltd	<p>Existing and proposed development which reduces our reliance on fossil fuels or recovers materials for reuse and recycling, and industries which manufacture new products from recycled materials should be supported and encouraged. New development should adopt the principles of sustainable design and use of recovered and recycled materials wherever possible.</p>	<p>The Proposed Submission version of the Local Plan contains policies to make sure future development is energy efficient and sustainably designed.</p>
REG18.68	Woodland Trust	<p>Whilst your 2008 adopted Core Strategy does take flood risk into account with environmental management, and how it needs to be addressed when planning new development, currently flooding is only acknowledged once as a key priority for your Local Plan, with climate change and sustainability. Therefore, as your Local Plan is being developed, all of the development sites being put forward should take this into account as this would enable tree planting to be specifically highlighted as a green infrastructure option to reduce the rate of surface water discharge from new proposed development across your Borough.</p> <p>The Woodland Trust believes that trees and woodlands can also deliver a major contribution to resolving a range of water management issues, particularly those resulting from climate change like flooding and the water</p>	<p>The Proposed Submission version of the Local Plan contains policies on flooding. The benefits of Green Infrastructure are recognised including climate change adaptation, flooding and improving air quality. The landscaping policy specifically encourages the use of trees in schemes.</p>

Response Number	Respondent Name	Response to Q11	Council's response
		<p>quality implications caused by extreme weather events. They offer opportunities to make positive water use change whilst also contributing to other objectives, such as biodiversity, timber & green infrastructure – see the Woodland Trust publication <i>Stemming the flow</i> – the role of trees and woods in flood protection – https://www.woodlandtrust.org.uk/publications/2014/05/stemming-the-flow/.</p> <p>Trees are very important elements, greatly contributing to the value of green infrastructure regarding landscape quality, amenity and the environment. Retention of trees and tree planting, together with other green space, can help to combat climate change and flooding, by absorbing CO2 and moisture and reducing excessive run off.</p> <p>Trees and woodlands offer opportunities to make positive water use change whilst also contributing to other objectives, such as biodiversity, timber & green infrastructure – see the Woodland Trust publication <i>Woodland actions for biodiversity and their role in water management</i> (pdf) – https://www.woodlandtrust.org.uk/mediafile/100263208/rr-wt-71014-woodland-actions-for-biodiversity-and-their-role-in-water-management.pdf?cb=001108c3a78944299140a996b2cd7ee8.</p> <p>In addition, a joint Environment Agency/Forestry Commission publication <i>Woodland for Water: Woodland measures for meeting Water Framework objectives</i> states clearly that: <i>'There is strong evidence to support woodland creation in appropriate locations to achieve water management and water quality objectives'</i> (Environment Agency, July 2011 http://www.forestry.gov.uk/fr/woodlandforwater).</p> <p>The Government's Independent Panel on Forestry (Defra, Final Report, July 2012) has emphasised these benefits by stating that: <i>'One of the many benefits of woods and trees is their ability to help us respond to a changing climate, better enabling us to adapt to future temperature increases. We know that trees, in the right places, help us to</i></p>	

Response Number	Respondent Name	Response to Q11	Council's response
		<p><i>adapt to climate change by reducing surface water flooding; reducing ambient temperature through direct shade and evapo-transpiration; and by reducing building heating and air-conditioning demands. A landscape with more trees will also help increase the resilience of our rural areas, by reducing soil erosion and soil moisture loss. Improving the condition of existing woodlands, and the creation of a more resilient ecological network of associated habitats, will help wildlife adapt to climate change and other pressures'. This has been endorsed by the response in the Government Forestry Policy Statement (Defra Jan 2013) with the key objective (p.23) 'Work with other organisations and initiatives to support the further development of markets in forest carbon and other ecosystem services such as water and biodiversity', together with a Cumbria case study (p.22 – ScaMP) on water benefits from woodland creation.</i></p> <p>Woodland can help adaptation strategies cope with the high profile threats to water quality and volume resulting from climate change. The Forestry Commission's publication, <i>The Case for Trees in development and the urban environment</i> (Forestry Commission, July 2010), explains how: <i>'the capacity of trees to attenuate water flow reduces the impact of heavy rain and floods and can improve the effectiveness of Sustainable Urban Drainage Systems'.</i></p> <p>Trees can reduce the likelihood of surface water flooding in urban situations too, when rain water overwhelms the local drainage system, by regulating the rate at which rainfall reaches the ground and contributes to run off. There is a positive role here for the use of trees with SuDS initiatives (Measure 4.9, p.42). Slowing the flow increases the possibility of infiltration and the ability of engineered drains to take away any excess water. This is particularly the case with large crowned trees. Research by the University of Manchester has shown that increasing tree cover in urban areas by 10 % reduces surface water run-off by almost 6%. (<i>Using green infrastructure to alleviate flood risk, Sustainable Cities – www.sustainablecities.org.uk/water/surface-water/using-gi/</i>). The Woodland</p>	

Response Number	Respondent Name	Response to Q11	Council's response
		<p>Trust has also produced a policy paper illustrating the benefits of trees for urban flooding – <i>Trees in Our Towns – the role of trees and woods in managing urban water quality and quantity</i> (https://www.woodlandtrust.org.uk/mediafile/100083915/Trees-in-our-towns.pdf).</p> <p>The Woodland Trust has produced a further paper – <i>Planting Trees to Protect Water – The role of trees and woods on farms in managing water quality and quantity</i> – that shows how trees and woodland can help mitigate peak flood flows. The report is available at – https://www.woodlandtrust.org.uk/mediafile/100083903/Planting-trees-to-protect-water-RBC-Bluewater-farming-report-evidence.pdf.</p> <p>Also, the Woodland Trust has carried out a number of partnership riparian planting projects across the country, particularly along the Rivers Frome & Piddle in Dorset. Examples of using trees for flood mitigation can be found in our <i>WoodWise</i> publication – https://www.woodlandtrust.org.uk/mediafile/100091022/9-Wood-Wise-Winter-2013.pdf.</p> <p>The Government's new agri-environment Countryside Stewardship scheme specifically targets woodland creation towards water benefits and it is therefore likely that this will represent a new funding resource for flood mitigation. The National Flood Forum too (http://www.nationalfloodforum.org.uk/about-us/.) is supporting community action for flooding that can link in to community tree planting schemes.</p> <p>Finally, we note that the Environment Agency's published – <i>Flood and Coastal erosion risk management – Long Term Investment Scenarios (LTIS) 2014</i> (Environment Agency 2014) specifically states – "10.2 Other options to reduce risk There is scope for alternative approaches to reducing risk in areas where community level defences are not available, although we are not yet able to quantify their potential</p>	

Response Number	Respondent Name	Response to Q11	Council's response
		<p><i>benefits within the LTIS analysis. Some examples are:</i></p> <ul style="list-style-type: none"> <li data-bbox="521 336 1518 807">– <i>Natural flood management. The risk of flooding and coastal erosion cannot be managed solely by hard defences due to cost and sustainability. Alternative approaches, working with natural processes and rural land-use options can contribute to a more sustainable approach. We work with natural processes to reduce flood risk by protecting, restoring and emulating the natural regulating function of catchments, rivers, flood plains and coasts. These can reduce the risk of flooding by reducing run-off from catchments, and natural sediment behaviour can provide resilience to coastal flooding and erosion. These measures are usually used together with hard-engineering measures. They can also provide wider benefits to people and wildlife by making traditional defences more resilient to climate change, creating or restoring habitats, improving biodiversity, capturing and storing carbon, reducing sedimentation and improving water quality’.</i> <li data-bbox="521 815 1518 1142">– Therefore, the Woodland Trust would like to see trees and woodland, which have been proven to have a significant effect on flood amelioration, acknowledged accordingly in your new Local Plan for Havering. Whilst the risk of flooding is acknowledged as a strategic priority which has to be taken into account with your Local Plan, as various themes where development can address climate change issues are going to be taken into account, for example, with green infrastructure, trees specifically as well as other green space, should also be acknowledged with your Local Plan as being able to help combat climate change and flooding. 	

Question 12: How do you think the Local Plan should manage the natural environment?

Response Number	Respondent Name	Response to Q12	Council's response
REG18.2	Adams Family (Bidwells)	The Local Plan should manage the natural environment by ensuring that new development supports the on-going management and maintenance of open spaces and natural environments. The Local Plan should also explore opportunities for new development to deliver ecological enhancements within the Borough. Limited release of derelict Green Belt sites without beneficial use offers particularly promising opportunities in this respect.	Noted. The Proposed Submission version of the Local Plan contains policies that seek to ensure adequate management and maintenance of open spaces and natural environment. Regarding limited release of derelict Green Belt sites, the Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason there is no part of the Green Belt land that is considered derelict without beneficial use that could be released for other development.
REG18.3	Anonymous	Protect what we have, clean up waterways. Declare war on private motor cars. Better foot paths. Return buses to way they were before. Stop crowds of new people coming.	Noted. The Proposed Submission version of the Local Plan contains policies that safeguard and manage the natural environment consistent with the NPPF. The Proposed Submission version of the

Response Number	Respondent Name	Response to Q12	Council's response
			Local Plan contains a balanced suite of transport policies encouraging provision of safe paths for pedestrians and cyclists and transport measure to promote active travel. 'Stopping crowds of new people coming into Havering and declaring war on private cars' is outside the scope of the Proposed Submission version of the Local Plan.
REG18.8	Brett Aggregates Limited (MJCA)	<p>The policies, aims and objectives of the new Local Plan should set out to preserve and enhance the natural environment but also to recognise that certain types of development such as mineral extraction can only take place where minerals occur and through high quality restoration can benefit the natural environment by improving biodiversity, enhancing the landscape or improving the agricultural quality of land.</p> <p>The restoration of a quarry provides an opportunity to create new water bodies and carry out planting to create new or improved habitats to enhance the biodiversity of the land. Such restoration schemes have the potential to improve the landscape and visual appearance of the land and can provide new areas of public amenity or outdoor recreation.</p>	Noted. The Proposed Submission version of the Local Plan contains policies that safeguard and manage minerals including requirement for high quality restoration works consistent with the London Plan and NPPF.
REG18.9	C. Cole	Let nature care for itself. Focus on animal welfare, kindness to foxes, squirrels and pets.	Noted, Focusing on animal welfare and kindness to animals is outside the scope of the Proposed Submission version of the Local Plan.
REG18.12	D. Campbell	To have regular litter picking along the new road	Noted. Regular litter picking is outside the scope of the Proposed Submission version of the Local plan.
REG18.13	D.K.Symes Associates	<p>Much of the Natural Environment is within the Green Belt so the comments at Q.9 are relevant to this question.</p> <p>There should be positive encouragement to improve the Natural Environment, which may require some temporary short-term impacts to achieve permanent benefits (i.e. the repair of damaged land).</p>	Noted. The Proposed Submission version of the Proposed Submission version of the Local Plan supports and encourages improvements to the accessibility and beneficial use of the Green Belt where proposals are compliant with national

Response Number	Respondent Name	Response to Q12	Council's response
			policy.
REG18.18	Essex County Council	<p>ECC as a neighbouring Lead Local Flood Authority and notes the preparation of a LB Havering Strategic Flood Risk Assessment (2014) and the Havering Flood Risk Management Strategy (2015). ECC acknowledges and supports the following statement within the Havering Flood Risk Management Strategy 2015, 'Additional liaison with the Essex areas of Brentwood and the Unitary Authority of Thurrock is essential in order to maintain a 'joined up' approach to flood risk management and this strategy. It is recommended that further consideration and evidence should be given to the 'context' of these documents with regard to any cross boundary issues.</p> <p>ECC as a Lead Local Flood Authority welcome the opportunity to explore cross boundary issues and to provide advice should any sites in the borough come forward where there may be opportunities to alleviate existing flooding.</p>	The Council has engaged with Essex County Council on strategic issues as detailed in the Duty to Co-operate statement.
REG18.21	Havering College of Further and Higher Education (Iceni Projects)	HCFHE is supported of LBH's objective to seek to protect and enhance existing open space and biodiversity.	Support noted.
REG18.22	Havering Friends of the Earth	<p>Water quality. Pursue the polluters of our waterways.</p> <p>Plant native species of trees and wildflowers in our parks.</p> <p>Reduce pesticide use.</p> <p>Protect the Green Belt from industrial exploitation in Havering.</p>	Noted. The Proposed Submission version of the Local Plan contains policies that safeguard and manage water quality. The landscaping policy specifically encourages the use of trees in schemes. The Proposed Submission version of the Local Plan supports the protection of the Green Belt in line with national policy.
REG18.26	Ian Weatherley	By careful and planned management of all the boroughs parks, open spaces and waterways – to avoid retention and 'pooling' of rainwater and	Noted. Flood risk is addressed in the Proposed Submission version of the Local

Response Number	Respondent Name	Response to Q12	Council's response
		thus ensure effective drainage and so avoid flooding.	Plan.
REG18.27	Janet Davy	By supporting (financially if possible) local conservation volunteer groups.	The Proposed Submission version of the Local Plan and the Green Infrastructure Strategy support partnership working to deliver green infrastructure.
REG18.28	Joe Coogan	Land inside the M25 is at a premium, under used Greenfield sites that offer no recreational benefit should be considered for sensitive development.	Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no part of the Green Belt land is considered to be of no recreation value for release to uses.
REG18.32	Lee Clements	By: not allowing development or mineral extraction to encroach on natural areas; recognising the importance of nature everywhere, not just in parks and in the Green Belt; ensuring landscaping schemes in new developments are beneficial to pollinators and other wildlife and also that current habitats are sufficiently protected; ensuring greater protection for sites from which minerals are extracted (e.g. by use of bonds).	Noted. The Proposed Submission version of the Local Plan recognises that minerals can only be worked where they are found. It safeguards minerals reserves from other forms of development that would sterilise them. The impact of mineral working on the natural, built and historic will be taken into account. Appropriate measures such as planning conditions and legal agreements will be used to safeguard sites.

Response Number	Respondent Name	Response to Q12	Council's response
			The Landscaping policy specifically encourages the use of trees in schemes.
REG18.34	Margaret Whippy	There are many open spaces and parks already, Havering is well served by them.	Noted. Havering's parks and open spaces are an essential part of its character and appearance. The Proposed Submission version of the Local Plan contains policies that safeguard and manage open spaces and enhance access to them.
REG18.36	Moody Homes and Mr John Wakeling (Bidwells)	The Local Plan should manage the natural environment by ensuring that new development supports the on-going management and maintenance of open spaces and natural environments. The Local Plan should also explore opportunities for new development to deliver ecological enhancements within the Borough. Limited release of derelict Green Belt sites without beneficial use offers particularly promising opportunities in this respect	Noted. The Proposed Submission version of the Local Plan contains policies that safeguard and manage the natural environment in line with the NPPF. With regard to limited release of derelict Green Belt sites, the Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no part of the Green Belt land is considered to be without beneficial use for release to other uses.
REG18.37	Mr Barrie Stone and	Make available allotment space and improve the natural environment.	The Proposed Submission version of the Local Plan contains policies to enhance the

Response Number	Respondent Name	Response to Q12	Council's response
	Miss Eleanor Stone		natural environment and supports the provision of allotments.
REG18.39	Mrs S J Ellis (Bidwells)	The Local Plan should manage the natural environment by ensuring that new development supports the on-going management and maintenance of open spaces and natural environments. The Local Plan should also explore opportunities for new development to deliver ecological enhancements within the Borough limited release of derelict Green Belt sites without beneficial use offers particularly promising opportunities in this respect.	Noted. The Proposed Submission version of the Local Plan contains policies that safeguard and manage the natural environment in line with national policy. With regard to limited release of derelict Green Belt sites, the Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no part of the Green Belt land is considered to be without beneficial use for release to other uses.
REG18.40	Ms M Blackman	No comment other than needs to be considered alongside the above	Noted.
REG18.42	Natural England	We agree that the Local Plan should seek to protect and enhance the natural environment, including open spaces and waterways. However, please note our comments above concerning SSSIs.	The Proposed Submission version of the Local Plan contains policies to protect and enhance the Natural Environment in line with the NPPF and the London Plan. The Council has engaged with Natural England in the preparation of the Local Plan.

Response Number	Respondent Name	Response to Q12	Council's response
REG18.43	Omega After Alpha Ltd (Bidwells)	The Local Plan should manage the natural environment by ensuring that new development supports the on-going management and maintenance of open spaces and natural environments. The Local Plan should also explore opportunities for new development to deliver ecological enhancements within the Borough limited release of derelict Green Belt sites without beneficial use offers particularly promising opportunities in this respect.	Noted. The Proposed Submission version of the Local Plan contains policies that safeguard and manage the natural environment in line with national policy. With regard to limited release of derelict Green Belt sites, the Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no part of the Green Belt land is considered to be without beneficial use for release to other uses.
REG18.47	R. Watt and Partners (Phillips Planning Services)	Provide policy framework which provides adequate protection for important habitats and protected species.	The Proposed Submission version of the Local Plan contains policies to protect and enhance biodiversity and the natural environment.
REG18.48	R.A.Montague	By standing firm and positively promoting the quality of life in the Borough through enhancing natural habitat, open space and waterways.	The Proposed Submission version of the Local Plan contains policies to protect and enhance biodiversity and the natural environment.
REG18.50	Rainham	By ensuring the duty bodies maintain the boroughs progress to the highest	The Council is working in partnership with

Response Number	Respondent Name	Response to Q12	Council's response
	Preservation Society	possible standard.	neighbouring local authorities and other organisations to assure the natural environment is protected and enhanced.
REG18.51	Ray Whitehouse	Yes, but that's part of your job	Noted.
REG18.52	Romford Civic Society	Romford town centre should be identified as a priority area for the strengthening and enriching of the natural environment, to improve the environment of the town, improve health outcomes in the town, strengthen nature corridors and prevent to urban area having a detrimental impact on the quality of ecosystems.	The Proposed Submission version of the Local Plan requires the inclusion of Green Infrastructure in all developments and contains specific proposals for Romford town centre. The Local Plan includes measures to enhance the River Rom and to ensure it is incorporated in development schemes.
REG18.53	Romford Golf Club (Joe Coogan)	Land inside the M25 is at a premium, under used Greenfield sites that offer no recreational benefit should be considered for sensitive development.	Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no part of the Green Belt land is considered to offer no recreation benefit that warrants its release for other uses.
REG18.56	S.D. Olney	Keep creating woodlands in areas where land has been neglected.	Noted. The Proposed Submission version of the Local Plan contains policies that safeguard and manage the natural

Response Number	Respondent Name	Response to Q12	Council's response
			environment in line with national policy.
REG18.57	Sheila Clements	By not building or encroaching on it in the future.	Noted. The Proposed Submission version of the Local Plan contains policies that safeguard and manage the natural environment in line with national policy.
REG18.64	Thurrock Council	<p>Thurrock Council supports the development of the London Green Infrastructure Networks and Strategy and this approach should continue to be reflected in the Havering new Local Plan through with enhancement and protection of existing sites and proposed new schemes and sites. Thurrock has developed its own Green Infrastructure Strategy and Green Grid network as part of the adopted Core Strategy of 2011 and would welcome further discussion with Havering Council and other stakeholders on this matter.</p> <p>It is recognised that the Land of the Fann Landscape Partnership is a successful Heritage lottery fund pilot project which is being led by Thames Chase Community Forest. This partnership seeks to enhance the understanding and quality of the landscape which crosses the boundary between Havering and Thurrock.</p> <p>Thurrock Council would wish to consider with Havering Council any Cross boundary benefits or implications of the project and wider context in respect of:</p> <ul style="list-style-type: none"> - Better connections to the Mardyke River; - The fens and coastal marsh landscape enhancement; - extending woodland coverage as part of the Aveley forest - Strategic Green links. 	The Council will continue to engage with Thurrock Council as part of the Land of the Fanns Landscape Partnership to deliver Green Infrastructure initiatives across borough boundaries.
REG18.66	Trinity Hall (Bidwells)	The Local Plan should manage the natural environment by ensuring that new development supports the ongoing management and maintenance of open spaces and natural environments. The Local Plan should also explore opportunities for new development to deliver ecological enhancements within the Borough limited release of derelict Green Belt sites without beneficial use offers particularly promising opportunities in this respect.	The Proposed Submission version of the Local Plan contains policies that safeguard and manage the natural environment in line with the NPPF. With regard to limited release of derelict Green Belt sites, the Council has

Response Number	Respondent Name	Response to Q12	Council's response
			<p>undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no part of the Green Belt land is considered to be without beneficial use for release to other uses.</p>
REG18.67	Veolia ES (UK) Ltd	<p>The Local Plan should identify those areas of importance requiring protection from development.</p>	<p>The Proposed Submission version of the Local Plan includes a policy to protect Havering's rich biodiversity and geodiversity.</p>
REG18.68	Woodland Trust	<p>The natural environment is currently acknowledged as being a significant network in Havering Borough, however, currently trees and woods are not acknowledged as being an asset which can be used to help deliver the natural environment. Failure to cover this effectively within your Local Plan is against one of the central principles of the NPPF's approach to biodiversity.</p> <p>Also, we are pleased to see the references to 'Biodiversity', 'Green Belt' being taken into account as strategic priorities for Havering Borough. However, trees & hedges, as well as ancient woodland and ancient trees should also be acknowledged as being part of your natural environment.</p>	<p>The Proposed Submission version of the Local Plan contains policies related to trees in development.</p>

Response Number	Respondent Name	Response to Q12	Council's response
		<p>The Woodland Trust supports the work, and is a member of, the Trees and Design Action Group – a unique multi-disciplinary group of professionals and organisations from both the private and public sectors that is seeking to promote the benefits of trees within the built environment. A South West TDAG group published 'Trees in Townscape' (TDAG June 2012) – which contains 12 principles of best practice aimed at designers, developers and planners to encourage integrated, joined up thinking, strategies, policies and implementation relating to trees in the urban realm. 'Trees in Townscape' is endorsed by a number of local authorities; therefore, we recommend that Havering Borough Council considers this guidance in developing its Local Plan.</p> <p>The <i>England Biodiversity Strategy</i> which makes it clear that expansion of priority habitats like native woodland remains a key aim - '<i>Priority action: Bring a greater proportion of our existing woodlands into sustainable management and expand the area of woodland in England</i>', (<i>Biodiversity 2020: A strategy for England's wildlife and ecosystems services</i>, DEFRA 2011, p.26).</p> <p>A reading of policies in the NPPF together with the Trees and Design Action Group and the England Biodiversity Strategy indicates that habitat expansion, like native woodland creation, should form a high priority for your Local Plan and the natural environment.</p>	
POST18.4	V. Rajan and Associates	Plant more trees/create forests	Noted. The Proposed Submission version of the Local Plan sets out a positive strategy towards green infrastructure.

Question 13: How do you think the Local Plan should seek to address the production and management of waste?

Response Number	Respondent Name	Response to Q13	Council's response
REG18.3	Anonymous	Should pay heavy tax on people who produce or sell very environmentally disgusting products. More recycling points.	Noted. Tax rates and the manufacture of products are outside of the scope of the Proposed Submission version of the Local Plan. The Plan includes a policy that requires developments to include suitable facilities for managing, storing and sorting waste for recycling.
REG18.8	Brett Aggregates Limited (MJCA)	<p>The production of waste should be minimised where possible and waste that is produced should be managed at the highest possible level in the waste hierarchy as set out in the Waste Framework Directive and national policy.</p> <p>The new Local Plan should recognise that the importation and deposit of waste is a suitable means for restoring back to ground level the void space following mineral extraction. Inert waste such as soil and rubble is often used for the purpose of restoring quarries which should not be considered inappropriate at mineral sites including those in the Green Belt.</p> <p>As explained in the response to Question 9, during the restoration of a quarry with imported materials such as inert waste, there are sustainability benefits associated with locating waste recycling facilities at the quarry to recover the usable portion of the waste to produce secondary aggregates for use in construction projects and to reduce the consumption of primary aggregates. This can commonly involve the use of a mobile crusher and screen to recover secondary aggregates from inert waste. Such plant and machinery and material processing is not dissimilar to the activities that take place during mineral extraction. This approach also ensures that only</p>	<p>Noted. The Joint Waste Plan addresses waste management and the waste hierarchy.</p> <p>The Proposed Submission version of the Local Plan will require proposals to provide high quality restoration of sites worked for minerals.</p> <p>The Proposed Submission version of the Local Plan includes a policy on secondary aggregates. It addresses the scope for temporary aggregate recycling facilities at quarries.</p>

Response Number	Respondent Name	Response to Q13	Council's response
		<p>residual materials with no other form of beneficial use are deposited to restore quarry voids.</p> <p>The Plan should recognise that suitably located mineral extraction sites can be restored by backfilling with suitable materials to specified standards to recover the land to a form suitable for subsequent built development including housing.</p>	
REG18.9	C. Cole	I would be happy to incinerate my waste.	Noted.
REG18.12	D. Campbell	More information of managing and disposing of waste. No building on the green.	Noted. The Council's recycling strategy is outlined in the Joint Waste Plan.
REG18.13	D.K.Symes Associates	<p>It is very important to recognise that there are major differences between municipal / commercial waste (i.e. biodegradable) and inert waste. There is a consistent high volume of inert material that is very suitable to be used for land / mineral reclamation. This waste stream is divided into material principally suitable for recycling (to make construction aggregate) and that principally for reclamation (i.e. has a very limited quantity of material that can be recovered).</p> <p>The use of this latter waste stream should be encouraged where improvement can be achieved (i.e. restoring mineral workings, repairing damaged land).</p>	Noted. The Council's waste strategy is outlined in the Joint Waste Plan. The Proposed Submission version of the Local Plan promotes high quality restoration.
REG18.18	Essex County Council	<p>ECC as Waste Planning Authority will continue to work with LB of Havering under the duty to co-operate on strategic waste planning matters. ECC recommend further consideration and evidence should be given to exploring the potential to integrate the need for waste management with other spatial concerns in the preparation of Local Plan, in accordance with the National Planning Policy for Waste (October 2014); the NPPF and the Further Alterations of the London Plan (2015).</p> <p>ECC as Waste Planning Authority is currently reviewing the timetable for the preparation of the Joint Essex and Southend on Sea Replacement Waste Local Plan. The next key stage will be a Further Preferred Approach consultation to reflect changes in national policy and evidence since the</p>	Noted. Havering welcomes the opportunity to continue to engage with Essex County Council on strategic waste planning matters under the Duty to Co-operate.

Response Number	Respondent Name	Response to Q13	Council's response
		2011 Preferred Approach consultation.	
REG18.22	Havering Friends of the Earth	More plastics can, and should, be recycled. Initiate Food Waste schemes like most other boroughs have now.	Noted.
REG18.26	Ian Weatherley	By finding other boroughs to find open areas to take their own rubbish and waste. Stop using Rainham and the south of the borough as a dumping ground for London's waste.	Noted. The Council's waste strategy is outlined in the Joint Waste Plan. The Rainham landfill site is currently being operated under planning permission reference: P1566.12. Under this permission landfill operations, including restoration, are required to be completed by the end of 2026
REG18.27	Janet Davy	Start with the supermarkets – address the issue of unnecessary packaging. Organise recycling better: - at present we use orange sacks (paper, cardboard, plastic bottles, cans) Sainsbury's car park (glass, plastic pots, drinks cartons) Sainsbury's shop (batteries and plastic bags) and Gerpins Lane Recycling Centre (garden waste, foil, wood, metal, electrical items, books, textiles/shoes).	Noted.
REG18.29	John Peterson	Introduce wheelie bins	Noted. This falls outside of the scope of the Proposed Submission version of the Local Plan
REG18.32	Lee Clements	By: encouraging a greater level of recycling both by residents and businesses; introducing separate food waste collection; not allowing landfill of any kind in parks.	The Proposed Submission version of the Local Plan has a policy on waste management which seeks to ensure adequate provision of storage space for waste and recycling facilities. The introduction of food waste collection is outside the remit of the Proposed Submission version of the Local Plan. The Joint Waste Plan and the Local Plan will provide the planning policy context waste for considering proposals for waste

Response Number	Respondent Name	Response to Q13	Council's response
			disposal.
REG18.34	Margaret Whippy	Waste management centres already available.	Noted.
REG18.37	Mr Barrie Stone and Miss Eleanor Stone	Improve recycling and reduce landfill.	Noted. The Proposed Submission version of the Local Plan has a policy for waste and recycling facilities.
REG18.42	Natural England	As regards the allocation of sites for new waste and mineral extraction facilities, please note our comments above, Question 4 Housing concerning development on or near to SSSI's.	Noted. The Proposed Submission version of the Local Plan includes a policy to protect sites of nature conservation importance.
REG18.47	R. Watt and Partners (Phillips Planning Services)	Allocation of sufficient waste management facilities well linked into the existing transport network. Facilities should also be carefully sited to ensure protection of the amenity of the borough's residents (e.g. not harmed by way of noise, odour etc.).	Noted. The Joint Waste Plan sets out a strategy for sustainable waste management until 2021. It identifies sites for waste management facilities.
REG18.48	R.A.Montague	Mainly by managing our own waste and not importing waste from other areas.	Noted. The Council's waste strategy is in the Joint Waste Plan
REG18.50	Rainham Preservation Society	No further mineral/landfill sites should be allowed in Rainham as much of our farmland is flooding due to rainwater run-off from the many hills created by unauthorised and unmonitored landfill.	Noted. The London Plan apportions sand and gravel requirements to those boroughs in London with sand and gravel reserves including Havering. The Proposed Submission version of the Local Plan identifies those areas in Havering where minerals are located. The Plan has a policy to ensure that proposals do not have unacceptable impacts
REG18.51	Ray Whitehouse	Yes, but that's part of your job	Noted
REG18.56	S.D. Olney	When the management plant in Rainham is fully operational it will be capable of dealing with the disposal of waste.	Rainham landfill is currently operated under planning permission reference: P1566.12.

Response Number	Respondent Name	Response to Q13	Council's response
			The waste management site at Frog Island does handle/treat/recycle municipal waste from Havering residents but it is not an energy from waste facility (incinerator). Refer to the Joint Waste Plan and the Council's Annual Monitoring Reports for further information and update on current recycling rates and end destinations for waste.
REG18.57	Sheila Clements	Leave it alone.	Noted.
REG18.64	Thurrock Council	<p>Thurrock Council supports the London Plan alterations which seek the management with London of equivalent of 100% of its waste and with no London Waste apportioned for export after 2026. The London Waste Policies require Local Plans to provide capacity to manage waste apportioned to boroughs in the London plan and identify and protect existing sites.</p> <p>It is noted that the London Plan identified waste arisings in Havering rising from 2019,000 tonnes per annum in 2015 to 240,000 tonnes by 2036 but with an apportionment for Havering being higher at 329,000 tonnes per annum by 2036. However it is also recognised that the tonnages are lower than previous London Plan estimates.</p> <p>The New Havering Local Plan should set out the strategic approach to waste management for Havering and take into account the changes in the alterations in the London plan in terms of targets for waste appointment and time periods. Revisions will also be required to the East London Waste Plan in terms of waste management and sites identified to meet capacity.</p> <p>Waste matters will be an issue under Duty to Cooperate that Thurrock will wish engage with the Mayor for London and London Boroughs through the London Plan review, but also Local Plan reviews including waste plans.</p>	Noted. The Council's waste strategy is outlined within the Joint Waste Plan. The London Borough of Havering welcomes the opportunity to continue to engage with Thurrock on strategic waste matters under the duty to co-operate.
REG18.67	Veolia ES	The protection of existing waste management capacity, particularly that	

Response Number	Respondent Name	Response to Q13	Council's response
	(UK) Ltd	which increases the recovery and recycling of waste, should be protected from loss to other uses. Where capacity is to be lost the Plan should clearly identify how that capacity is to be replaced.	The Council's waste strategy is outlined within the Joint Waste Plan.
POST18.1	V. Rajan and Associates	Burn the waste required	Noted. The Council's current waste strategy is outlined within the Joint Waste Plan.

Question 14: How do you think the Local Plan should address the provision of minerals?

Response Number	Respondent Name	Response to Q14	Council's response
REG18.3	Anonymous	Tighter controls on speed and volume of lorries going to and coming from sites.	Noted. The Proposed Submission version of the Local Plan has a policy to assess the impacts of potential mineral working proposals including those aspects linked to transport.
REG18.8	Brett Aggregates Limited (MJCA)	<p>The London Plan (2011) acknowledges that the capital needs a reliable supply of construction materials to support continued growth and this includes land-won sand and gravel.</p> <p>The London Plan also recognises that most aggregates used in the capital come from outside London, including marine sand and gravel and land-won aggregates, principally crushed rock from other regions. The London Plan supports the objective of achieving an essential level of supply in the most sustainable fashion, which includes the provision of a good supply of locally sourced land-won aggregates.</p> <p>The new Local Plan should continue the Minerals Safeguarding Areas and associated policies from the adopted Local Plan. These policies and areas should be maintained and carried through to the new Local Plan to safeguard areas for future mineral extraction in the Borough to provide local sources of land won aggregate. Through the plan development process information should be sought and obtained actively to identify any further areas or mineral reserves which should be subject to safeguarding.</p> <p>This approach will assist Havering Borough Council to provide a sufficient level of permitted reserves of aggregate to meet the minimum apportionment of 250,000 tonnes per annum set out in the London Plan (2011). The new Local Plan should recognise that the apportionment is a minimum level for permitted reserves, and that permitting reserves in</p>	<p>Noted. The Proposed Submission version of the Local Plan recognises the planning policy context provided by the London Plan including the apportionment figures. The Plan identifies Minerals Safeguarding Areas.</p> <p>The Plan includes criteria regarding the siting of processing plant.</p> <p>The Plan supports temporary aggregate recycling facilities at development.</p> <p>The Plan seeks to ensure quality restoration and beneficial after-uses that secure long lasting community and environmental benefits.</p>

Response Number	Respondent Name	Response to Q14	Council's response
		<p>excess of the minimum apportionment may provide reserves that are distributed throughout the Borough.</p> <p>To further reduce the transportation of aggregates, mineral processing plants or bagging plants should be located in or directly adjacent to the quarry. Where there is already an established mineral processing plant located in close proximity to a new quarry and where that plant is in a suitable location the Plan should specify that mineral from surrounding extraction areas should be taken to the existing processing plant site to make use of the existing plant, infrastructure and mitigation such as established landscaping and screening instead of erecting new plant.</p> <p>Mineral reserves in the south of the Borough are located in close proximity and in some cases on adjacent land. Existing infrastructure such as the mineral processing plant at Rainham already benefits from suitable vehicular access, established screening and management controls for noise and dust. Therefore consideration should be given to the need and sustainability associated with the installation of new infrastructure such as mineral processing</p> <p>BGL_HALp17132 response to local plan consultation 7 plant at new quarries compared with the use of established suitable plant located in close proximity.</p> <p>Facilities such as concrete batching plants which make use of the aggregate should also be located at mineral producing sites to reduce transportation distances.</p> <p>In keeping with the NPPF, the new Local Plan should recognise that mineral extraction is not inappropriate development in the Green Belt. In keeping with the aim of achieving sustainable development set out in the NPPF the new Local Plan should recognise that it is beneficial to locate ancillary facilities such as concrete batching plants and secondary aggregate recycling facilities at quarries.</p>	

Response Number	Respondent Name	Response to Q14	Council's response
		<p>The new Local Plan should recognise that the restoration of a quarry can enhance the productivity, biodiversity, landscape and amenity value of the land. The Plan should recognise that suitably located mineral extraction sites can be restored by backfilling with suitable materials to specified standards to recover the land to a form suitable for subsequent built development including housing.</p> <p>The new Local Plan should recognise that mineral extraction and subsequent restoration can diversify the local economy, provide employment opportunities and demand for local goods and services and as a result can result in a positive socio economics impact.</p>	
REG18.9	C. Cole	Eh?	Noted.
REG18.12	D. Campbell	No building on the green belt.	Noted. Mineral extraction is not an inappropriate form of development in the Green Belt.
REG18.13	D.K.Symes Associates	Minerals can only be worked where they occur. The Government places 'Great Weight' on the economic benefits of mineral extraction. Mineral development is deemed not inappropriate development in the Green Belt. Havering needs to recognise the important role that it will continue to play in ensuring a steady and adequate supply of minerals continues to be made available to the local and wider markets including London. In line with NPPF, the availability of minerals must be 'competitive' and the reserve should not be in the control of one operator.	Noted. The Proposed Submission version of the Local Plan recognises the planning policy context provided by the London Plan including the apportionment figures. The Plan identifies Minerals Safeguarding Areas.
REG18.18	Essex County Council	ECC as Minerals Planning Authority will continue to work with the LB of Havering under the duty to co-operate on strategic minerals planning matters. It is noted that the LB Havering Local Aggregate Assessment (LAA) was published in October 2014. It is recommended that a relevant evidence base for minerals planning is prepared in accordance with the NPPF. For your information ECC has produced two LAA's to date, and adopted the Essex Minerals Local Plan in July 2014.	<p>Noted. The London Borough of Havering last produced a Local Aggregate Assessment (LAA) in 2014. Updated positions on the land-bank have been prepared alongside reports on planning applications for mineral working..</p> <p>A London-wide LAA for 2015 is expected to be published in 2017.</p>

Response Number	Respondent Name	Response to Q14	Council's response
REG18.22	Havering Friends of the Earth	<p>Campaign against the London Plan for mineral extraction targets for Havering.</p> <p>More rigorous monitoring of land restoration when minerals have been extracted. Prosecute those who break agreements and insist on suitable escrow accounts for all mineral extraction schemes.</p>	<p>Noted. A revised London Plan is expected to be published in late 2017 / early 2018. It is expected to include updated minerals apportionment figures.</p> <p>The Proposed Submission version of the Local Plan addresses restoration of minerals sites.</p>
REG18.26	Ian Weatherley	<p>If the mineral extraction is really required then this should be priced at as such a rate so as to be beneficial to the borough and its residents. Careful control should be taken over the vehicle management and control in/out of these sites – in relation to traffic levels and mud on the road etc. Wheel washes are not enough!</p>	<p>Noted. The pricing of minerals is beyond the scope of the Local Plan.</p> <p>The Proposed Submission version of the Local Plan addresses transport issues linked to mineral working.</p>
REG18.32	Lee Clements	<p>By: not allowing mineral extraction unless absolutely necessary and not subjecting local residents to simultaneous mineral extraction from more than one site; ensuring greater protection for sites from which minerals are extracted (e.g. by use of bonds).</p>	<p>Noted. The Proposed Submission version of the Local Plan addresses the cumulative impacts of mineral working.</p>
REG18.34	Margaret Whippy	<p>Sites not known in this area.</p>	<p>Noted. The Proposed Submission version of the Local Plan designates Mineral Safeguarding Areas and includes policies on mineral extraction and land restoration.</p>
REG18.37	Mr Barrie Stone and Miss Eleanor Stone	<p>Maximise extraction over short periods and ensure reinstatement/development of high quality.</p>	<p>Noted. The Proposed Submission version of the Local Plan addresses the implications of mineral working including restoration. The detailed arrangements for working will be addressed through development management.</p>
REG18.47	R. Watt and Partners (Phillips Planning Services)	<p>It is considered that in accordance with London Plan, that the borough should identify sufficient land to achieve the London Plan mineral extraction targets. As with waste facilities, the amenity of residents should be ensured protection from factors such as noise and dust.</p>	<p>Noted. The Proposed Submission version of the Local Plan recognises the planning policy context provided by the London Plan including the apportionment figures. The Plan identifies Minerals Safeguarding Areas. The Plan addresses the environmental implications of mineral</p>

Response Number	Respondent Name	Response to Q14	Council's response
			working.
REG18.48	R.A.Montague	By ensuring that anyone extracting minerals has a viable and phased restoration plan.	Noted. The Proposed Submission version of the Local Plan addresses restoration.
REG18.50	Rainham Preservation Society	See Question 13.	Noted.
REG18.51	Ray Whitehouse	Yes, but that's part of your job	Noted.
REG18.56	S.D. Olney	No more creating sand and gravel pits as this blight the borough.	Noted. The Proposed Submission version of the Local Plan recognises the planning policy context provided by the London Plan including the apportionment figures. The Plan will identify Minerals Safeguarding Areas. The Plan will address the environmental implications of mineral working.
REG18.57	Sheila Clements	Leave it alone.	Noted.
REG18.64	Thurrock Council	<p>The London Plan sets out the current apportionment of minerals for London Boroughs. Havering is identified as one of four London Boroughs to provide part of the London landbank of land won aggregates to 2031. Havering has an apportionment of at least 1.75 million tonnes. The figure for Havering is higher than set out in the current adopted Havering Local Plan and the new local plan will need to include mineral policy that sets out the approach borough intends to take on this matter. Thurrock Council has a LAA with Essex County Council that set out an agreed mineral apportionment as part of the wider East of England apportionment.</p> <p>Thurrock Council has no detailed comments to make regarding mineral extraction within Havering Borough at this stage.</p>	Noted. The Proposed Submission version of the Local Plan recognises the planning policy context provided by the London Plan including the apportionment figures. The Plan will identify Minerals Safeguarding Areas. The Plan addresses the environmental implications of mineral working.
POST18.4	Rajan and Associates	There should be a separate area for mineral extraction	Noted. The Proposed Submission version of the Local Plan recognises the planning policy context provided by the London Plan

Response Number	Respondent Name	Response to Q14	Council's response
			including the apportionment figures. The Plan identifies Minerals Safeguarding Areas. The Plan addresses the environmental implications of mineral working.

Question 15: How do you think the Local Plan should ensure high quality design?

Response Number	Respondent Name	Response to Q15	Council's response
REG18.1	AECOM	We agree that planning policy should set requirements for housing density, affordable housing provision, standards and sizes. However, where the Plan contains strategic growth areas which are going to deliver a large proportion of housing over the life of the plan period, we suggest a more flexible policy approach is taken. Where this is the case, there is the potential for new developments to be design led setting their own density criteria therefore, delivering an increased amount of housing. This specific policy should be considered for the Council's growth areas, e.g. a garden village at Bush Farm could adopt this policy approach.	<p>Noted. The Proposed Submission version of the Local Plan adopts the London Plan density requirements. It includes criteria to ensure development in the borough is of high quality design and responds to local character.</p> <p>In regard to the comment about Bush Farm, the Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason there is no opportunity for the Council to consider release of Green Belt land for a garden village at Bush Farm.</p>
REG18.3	Anonymous	Don't re-design places that are O.K already. Don't waste money on environmental waste.	Noted. The Proposed Submission version of the Local Plan seeks to ensure that new developments respect and enhance local character and are of high quality design.

Response Number	Respondent Name	Response to Q15	Council's response
			The Proposed Submission version of the Local Plan supports the waste hierarchy approach.
REG18.9	C. Cole	No concrete brutalism, stick to brick. I like post-modern and annex designs.	Noted. The Proposed Submission version of the Local Plan seeks to ensure that new developments respect and enhance local character and are of high quality design.
REG18.12	D. Campbell	To liaise with existing residents face to face, letter through the door.	Noted. The Council's approach to engagement on planning matters is set out in the Statement of Community Involvement.
REG18.19	Gidea Park and District Civil Society	High quality design is important with due regard taken of surroundings and setting, so that any new buildings or alterations fit in and harmonise with the existing, otherwise the character of an area can change either dramatically or slowly over a period of time.	Noted. The Proposed Submission version of the Local Plan seeks to ensure that new developments respect and enhance local character and are of high quality design.
REG18.24	Higgins Homes (Nathaniel Lichfield & Partners)	Design considerations, in particular the density of residential developments, should be site-specific and subject to the constraints and opportunities presented by the location, character and surroundings of each site.	Noted. The Proposed Submission version of the Local Plan seeks to ensure that new developments respect and enhance local character and are of high quality design.
REG18.26	Ian Weatherley	Plan for high quality houses – not rabbit hutches! Make homes/houses with rooms that exceed the minimum spaces – and give people a house they will be pleased to make their home – in a community they WANT to live in with social and health and transport support for all.	Noted. The Proposed Submission version of the Local Plan seeks to deliver homes across a range of sizes and tenures along appropriate infrastructure to make sure strong and healthy communities.
REG18.28	Joe Coogan	It is important that any new development enhances the area and that developments are reasonable in appearance and density.	Noted. The Proposed Submission version of the Local Plan seeks to ensure that new developments respect and enhance local character and are of high quality design.
REG18.29	John Peterson	Stop allowing development building not in keeping with local area i.e. Emerson park	Noted. The Proposed Submission version of the Local Plan seeks to ensure that new developments respect and enhance local character and are of high quality design.

Response Number	Respondent Name	Response to Q15	Council's response
			The importance of areas of special townscape and landscape character is recognised.
REG18.32	Lee Clements	By: putting conditions in planning approvals and ensuring they are stuck to; not allowing overdevelopment of sites; ensuring new developments include green spaces and habitats beneficial to nature.	Noted. The Proposed Submission version of the Local Plan will optimise development capacity while providing for community facilities and green infrastructure. Enforcement of planning conditions is beyond the scope of the Local Plan.
REG18.34	Margaret Whippy	Design should not only be high quality but be adequate for modern family life. Gardens that fit with existing sizes would be of benefit, rather than squashing too many houses into a space.	Noted. The Proposed Submission version of the Local Plan will optimise development capacity while providing for community facilities and green infrastructure.
REG18.37	Mr Barrie Stone and Miss Eleanor Stone	Be sensitive to local areas style with mixed and varied styles of development.	Noted. The Proposed Submission version of the Local Plan seeks to ensure that new developments respect and enhance local character and are of high quality design.
REG18.38	Mr T Clemence (DHA Planning)	Ensure new development adds to the overall quality of the area, responds to local character by respecting the form, pattern, density and appearance of existing development.	Noted. The Proposed Submission version of the Local Plan seeks to ensure that new developments respect and enhance local character and are of high quality design.
REG18.40	Ms M Blackman	Encourage originality rather than conformity. Development, for example, is a speculative business – most design is created to reduce risk – particularly at the planning stage as this is currently the most unstable stage of any development process. Invest time with developers at the very early stages – make resources available to enable collaborative working rather than a ‘them and us’ attitude.	Noted. The Proposed Submission version of the Local Plan seeks to ensure that new developments respect and enhance local character and are of high quality design. The Council will encourage developers to liaise with the Council as early as possible in the development process.
REG18.44	Persimmon Homes Essex	Persimmon Homes accepts that a high quality design should be adopted. However, this should not prevent the delivery of housing with unrealistic requirements that may deem a site unviable. Again active discussions with landowner's, agents and developers will enable that sites that take account of council policy can be delivered.	Noted. The Proposed Submission version of the Local Plan seeks to ensure that new developments respect and enhance local character and are of high quality design. The Council will encourage developers to

Response Number	Respondent Name	Response to Q15	Council's response
			liaise with the Council as early as possible in the development process. A viability assessment has been prepared to accompany the Local Plan.
REG18.47	R. Watt and Partners (Phillips Planning Services)	Relevant planning policy on design should be supported by 'up-to-date' and regularly reviewed design guidance documents.	Noted. The Proposed Submission version of the Local Plan seeks to ensure that new developments respect and enhance local character and are of high quality design. The Council will monitor and review the Plan and this will include its requirements regarding design to ensure that it remains up to date and appropriate.
REG18.48	R.A.Montague	Market forces dictate that high quality will always be a premium product that comes at a higher price than something which is more 'affordable'. So you would need to limit quantity in favour of quality.	Noted. The Proposed Submission version of the Local Plan seeks to ensure that new developments respect and enhance local character and are of high quality design. A viability assessment has been prepared to accompany the Local Plan.
REG18.50	Rainham Preservation Society	No further high rise developments and including play areas and quality communal space within all future developments.	Noted. The Proposed Submission version of the Local Plan seeks to ensure that new developments respect and enhance local character and are of high quality design. The Proposed Submission version of the Local Plan requires the appropriate provision of play and amenity space.
REG18.51	Ray Whitehouse	Yes, but that's part of your job	Noted.
REG18.52	Romford Civic Society	The central Romford environment in large part depends upon the quality and interest of building and spatial design and on the quality of building materials used. Design policies in the existing LDF should be retained and transferred to the new Local Plan. Policy DC50 (Sustainable Design and Construction) should be retained from the current LDF and transferred to the new Local Plan. The Mayor of London's Design Guide should be	Noted. The Proposed Submission version of the Local Plan includes a Strategic Development Area Policy for Romford. It addresses design and heritage issues. Policies from the Local Development Framework and more recent work have

Response Number	Respondent Name	Response to Q15	Council's response
		applied in Havering. The appearance of shops has a major impact on the quality of the environment in central Romford. The current Shop Fronts SPD should be retained and transferred over to the new Local Plan.	informed the preparation of the policy. The Council will review the current Supplementary Planning Documents supporting the Local Development Framework as it brings forward further items to support the Local Plan. If appropriate it will consider the preparation of further guidance.
REG18.53	Romford Golf Club (Joe Coogan)	It is important that any new development enhances the area and that developments are reasonable in appearance and density.	Noted. The Proposed Submission version of the Local Plan seeks to ensure that new developments respect and enhance local character and are of high quality design. The Plan addresses density issues.
REG18.56	S.D. Olney	By ensuring that any development is not crammed together as some older schemes seemed to ignore. All properties to have off street parking.	Noted. The Proposed Submission version of the Local Plan seeks to ensure that new developments respect and enhance local character and are of high quality design. The Local Plan sets out the parking standards.
REG18.57	Sheila Clements	Leave it alone.	Noted.

Question 16: How do you think the Local Plan should protect and enhance Havering's heritage assets?

Response Number	Respondent Name	Response to Q16	Council's response
REG18.3	Anonymous	Should protect what have and buildings approximately 1920c or before should be protected. Don't build new Mill House by Upminster Windmill. Any heritage sites should only be restored at a fraction of the cost that you waste.	Noted. The Proposed Submission version of the Local Plan contains policies to conserve and enhance the significance of Havering's heritage assets.
REG18.9	C. Cole	More strongly than now, we don't have much heritage left – we must enhance what we've got and attract tourists.	Noted. The Proposed Submission version of the Local Plan contains policies which conserve and enhance the significance of Havering's heritage assets.
REG18.19	Gidea Park and District Civil Society	<p>We support the main objectives of the statements on Havering's Heritage Assets and in furtherance of such would suggest the following having substantial experience of working in this area and within the borough and being aware of the practicalities of achieving the stated aims.</p> <p>Conservation Areas – In isolation these afford only limited protection "Article 4 directions" give the power to adequately control development therefore much greater use should be made of them.</p> <p>There should be periodic reviews to consider the creating additional Conservation Area and to enhance protection is required for existing.</p> <p>In furtherance of this SPD's should be produced for individual C.A.'s together with clear simple directions to assist applicants and planning officers. This is essential with the shortage and high turnover of Planning Officers very few having specialist knowledge of Heritage. It is therefore essential to have the services of highly experience specialist Conservation Officer and adequate data bases.</p> <p>Conservation Area Appraisals (Listed Buildings) –</p>	<p>Noted.</p> <p>Noted. 'Article 4 directions' give the power to adequately control development but instigating its use is outside the scope of the Proposed Submission version of the Local Plan.</p> <p>The Proposed Submission version of the Local Plan supports the maintenance of up to date Conservation Area Appraisals and Management Plans.</p> <p>Noted. Whilst SPDs could be prepared for individual CAs the work stream for their production is outside the scope of the preparation of the proposed Submission version of the Local Plan.</p>

Response Number	Respondent Name	Response to Q16	Council's response
		<p>Appraisals all incorporate Management Plans together with Havering council responses. For the Gidea Park CA in 2007 the response was "request E.H. To review statutory list throughout the C.A and provide additional/supporting information" "Action to be taken by (ES)" (The necessary information is readily available from the Civic Society but we have never been asked and assume that no action was taken).</p> <p>Listed Buildings – There should be periodic surveys to update the list and where appropriate extending, as recommended for both Rainham and Gidea Park in the 2007 appraisals.</p> <p>Monitoring – There should be regular monitoring of planning control in respect of Heritage Assets to ensure policies are being followed and also whether further guidance, amendment, additions to policy is required. Such monitoring should be undertaken by an independent party.</p> <p>Development Briefs – These are helpful as appropriate in heritage area providing much needed guidance for prospective developers and existing owners encouraging/prompting them to undertake works/development of unsatisfactory land/property that will enhance not only it but its surrounding area.</p>	<p>Noted.</p> <p>Noted. Whilst periodic surveys should be undertaken to update the list of Listed Buildings and where appropriate extend them, the work stream for the survey is outside the scope of the Proposed Submission version of the Local Plan. Regular monitoring of planning control is outside the scope of the Proposed Submission version of the Local Plan.</p> <p>The process and work stream for the preparation of Development Briefs is outside the scope of the preparation of the Proposed Submission version of the Local Plan.</p>
REG18.21	Havering College of Further and Higher Education (Iceni Projects)	HCFHE is aware of the wealth of heritage in Havering including listed buildings, Conservation Areas and scheduled monuments. As such, HCFHE is supportive of LBH's objective to identify and understand the Borough's heritage assets, and to ensure that new development is appropriate within the historic context of the Borough.	Noted.
REG18.26	Ian Weatherley	By publicising these attractions and managing them to encourage visits by schools/colleges etc. and so to allow the community to have pride in these	Noted. Publicising heritage assets and managing them as attractions to

Response Number	Respondent Name	Response to Q16	Council's response
		locations and hopefully to increase visitors and so wealth into the area/borough.	encourage visits by schools/colleges etc. and so to allow the community to have pride in these locations is outside the scope of the Proposed Submission version of the Local Plan.
REG18.32	Lee Clements	By: not allowing inappropriate development close to or of heritage assets and ensuring nearby developments are in-keeping with their surroundings; putting conditions in planning approvals and making sure these are met.	Noted. The Proposed Submission version of the Local Plan contains policies which do not support inappropriate development close to heritage assets.
REG18.34	Margaret Whippy	All existing heritage sites need protecting, especially against neglect and decay.	Noted. The Proposed Submission version of the Local Plan contains policies which conserve and enhance the significance of Havering's heritage assets.
REG18.37	Mr Barrie Stone and Miss Eleanor Stone	Reinforce education links with local heritage through schools. Local history sense of place.	Noted. Reinforcing education links with local heritage through schools is outside the scope of the Proposed Submission version of the Local Plan.
REG18.40	Ms M Blackman	See Q15. Also need to engage local communities to assist & feel a connection. Possibly more awareness via school curriculum – history/geography/biology classes.	Noted. Engaging local communities to assist and feel a connection through possibly more awareness via school curriculum – history/geography/biology classes is outside the scope of the Proposed Submission version of the Local Plan.
REG18.48	R.A.Montague	By encouraging them to be self-sufficient through community activity and involvement.	Noted. Encouraging them to be self-sufficient through community activity and involvement is outside the scope of the Proposed Submission version of the Local Plan.
REG18.50	Rainham Preservation Society	By making all listed buildings within the borough open to the community at weekends and offering fetes and historic/cultural activities free of charge.	Noted. Making all listed buildings within the borough open to the community at weekends and offering fetes and historic/cultural activities free of charge is

Response Number	Respondent Name	Response to Q16	Council's response
			outside the scope of the Proposed Submission version of the Local Plan.
REG18.51	Ray Whitehouse	Identify them, improve them and then make sure they are accessible. Move the museum to a heritage site such as something similar to the Golden Lion. What a great place to talk about Brewing. I understand it is currently in the Brewery but that is now more like a modern block of flats.	Noted. The Proposed Submission version of the Local Plan contains policies that support the identification and maintenance of local heritage assets. Moving the museum to a heritage site is outside the scope of the Proposed Submission version of the Local Plan.
REG18.52	Romford Civic Society	Current LDF Heritage policies should be retained and transferred over to the new Local Plan. The Heritage SPD should be retained and transferred over to the new Local Plan. Conservation Area Appraisals and Management Plans should be retained and transferred over to the new Local Plan. Buildings on the Havering Local List of Buildings of Local Heritage Interest in the current Havering Heritage SPD should be given maximum protection. In centre of Romford the setting of the historic environment is in large part formed by shop fronts. The current Shop Front SPD should be retained and transferred over to the new Local Plan.	Noted. The Proposed Submission version of the Local Plan is a new plan that sets out its own new policies backed up by new robust evidence. The opportunity will be taken in due course to review the suite of Supplementary Planning Documents linked to the Local Development Framework and to assess the extent to which these need to be revised to complement the Local Plan.
REG18.55	Rowley Cardrome Ltd (Montagu Evans)	<p>The NPPF requires LPA's to plan positively for the conservation and enjoyment of the historic environment, conserving heritage assets in a manner appropriate to their significance. In doing so, the contribution to wider social, cultural and environmental benefits as well as local character and distinctiveness should be considered. In addition, securing a viable use of listed buildings should be sought to continue the long term preservation. As noted above the site has a recently listed Grade II listed asset – this being the Rom Skatepark, located towards to the south eastern boundary. RCL have grave concerns that this listing has arisen without proper consideration of the long term maintenance if this asset.</p> <p>The Rom Skatepark is currently run as an independent business that has not in the past nor is it likely to in the future operate as a financially viable business. It is only with the goodwill of RCL that the current skatepark operation has been allowed to continue its presence on the site.</p>	Noted.

Response Number	Respondent Name	Response to Q16	Council's response
		<p>The listing that has now been imposed on my clients brings with it an on-going maintenance liability with no viable means of funding to pay for its upkeep at a level commensurate with its listing. This is particularly important given that it is clear from the listing that the concrete finished shaped surface of the skate park was considered an important part of why the listing was confirmed.</p> <p>By its very nature concrete has a limited life span and maintenance is very difficult and costly. RCL are currently having a concrete specialist assess the skatepark to establish what maintenance is required and we will be pleased to share this with the Council. What is clear however is that this will be a significant on-going liability. Revenue receipt from alternative forms of development across the site will therefore help ensure the long term protection of his recently designated heritage asset.</p> <p>The masterplan shows how the listed skate-park can be an intrinsic part of the residential redevelopment of the Site. In addition to all the other planning, community and sustainability benefits such development would bring it also affords opportunity for securing the skate park's long term future, together with its setting and usage being enhanced.</p> <p>We are in on-going discussions with both Havering Council and English Heritage on this issue and consider the outcome of such discussions to be highly material to the on-going Local Plan process. However, it is essential to understand that failure to take the opportunity afforded by the site now and its release can only serve to frustrate the best way of maximising the benefit and long term maintenance of this recently designated heritage asset.</p>	
REG18.56	S.D. Olney	Yes, must be foremost when developing future building proposals.	Noted. The Proposed Submission version of the Local Plan contains policies supporting well designed and maintained

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			buildings within Conversation Areas, a Registered Park or Garden of Historic Interest, Historic Park or Garden of Local Interest, Area of Special Townscape or Landscape Character, or within their setting.
REG18.57	Sheila Clements	Leave it alone.	Noted. The Council recognises the significance and value of Havering's heritage assets and supports proposals that seek to sustain or enhance the significance of heritage assets at risk.
REG18.68	Woodland Trust	<p>Areas and landscapes of special architectural or historic importance should be preserved and enhanced, and this was acknowledged specifically with Policy CP18 (Heritage) with your adopted 2008 Core Strategy and should therefore also be taken forward with your new Local Plan as well.</p> <p>Ancient woodland around Upminster, Granham, Harold Hill and Belhus Woods Country Park are all designated Sites of Interest for Nature Conservation (SINC). There are also substantial areas of scrub, while on the Ingrebourne River there is a large concentration of Willow Carr in the area at Berwick Woods. Such important historical woodland landscapes should be considered with planning policy, so that it can be acknowledged specifically that ancient woodland and aged or veteran trees should be protected from development.</p> <p>Natural England note it is not possible to mitigate the damage to or destruction of ancient woodland and ancient trees. For example, in terms of compensatory measures, it is impossible to "replace" ancient woodland as it is impossible to replicate hundreds of years of ecological evolution by planting a new site or attempting to translocate it.</p> <p>Ancient woodland, together with ancient/veteran trees, represents an irreplaceable semi natural habitat that still does not benefit from full</p>	<p>Noted. The Proposed Submission version of the Local Plan is a new plan that sets out its own new policies backed up by new robust evidence. The opportunity will be taken in due course to review the suite of Supplementary Planning Documents linked to the Local Development Framework and to assess the extent to which these need to be revised to complement the Local Plan.</p> <p>The Proposed Submission version of the Local Plan recognises the valuable contribution 'veteran' trees and ancient woodland outside designated areas make to the quality of life in Havering and contains policies to preserve 'veteran' trees and ancient woodlands outside protected areas.</p>

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		<p>statutory protection This is particularly relevant as ancient woodland is still facing considerable threats – research for instance confirms 86% of ancient woodland in England has no statutory protection and therefore the planning system must provide this (Making Space for Nature: A review of England's Wildlife Sites and Ecological Network, John Lawton Review, 2010). Research from the Woodland Trust also shows that in the last decade, 100 square miles (26,000 hectares or 5% of the total amount of ancient woodland remaining in the UK) of ancient woodland in the UK has come under threat from destruction or degradation. Also, <i>Trees in the Hard Landscape</i> is a guide for the delivery of adequate Green Infrastructure as it can offer multiple benefits and enhance public realm if applied to policy development effectively. http://www.tdag.org.uk/uploads/4/2/8/0/4280686/tdag_trees-in-hard-landscapes_september_2014_colour.pdf</p> <ul style="list-style-type: none"> – The Government's Natural Environment White Paper – The Natural Choice: securing the value of nature (HM Government, July 2011, para 2.56) states that: 'The Government is committed to providing appropriate protection to ancient woodlands....' – The 'UK Forestry Standard' sets out the UK Government's approach to sustainable forestry. It states: "ancient semi-natural woods...are of special value." The Standard has a series of UK-wide aims for semi-natural woodland and clearly states: "the area occupied by semi-natural woodland should not be reduced." (Forestry Authority, 1998, UK Forestry Standard: Standard Note 5, pp.41-43). – Under section 74 of the Countryside and Rights of Way Act 2000, the Government has a statutory duty to publish lists of priority conservation habitats. Under section 40 of the Natural Environment and Rural Communities Act 2006, all public authorities now have a statutory duty to conserve biodiversity. The UK BAP targets includes a Habitat Action 	

Response Number	Respondent Name	Response to Q16	Council's response
		<p>Plan for Native Woodland which specifies a clear 'maintenance' target of no more loss of ancient woodland – http://www.ukbap.org.uk/BAPGroupPage.aspx?id=98. It is therefore axiomatic that Havering Borough has a statutory obligation to protect ancient woodland.</p> <ul style="list-style-type: none"> – Whilst the National Planning Practice Framework paragraph 118 states that: – <i>'planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss;'</i> – Emerging national policy is increasingly supportive of absolute protection of ancient woodland and ancient trees. The Communities and Local Government (CLG) Select Committee published its report following its June 2014 inquiry into the 'Operation of the National Planning Policy Framework (NPPF)', in which it has specifically recognised the need for better protection for ancient woodland (Tues 16th Dec 2014). The CLG Select Committee report states: <i>'We agree that ancient woodland should be protected by the planning system. Woodland that is over 400 years old cannot be replaced and should be awarded the same level of protection as our built heritage. We recommend that the Government amend paragraph 118 of the NPPF to state that any loss of ancient woodland should be "wholly exceptional". We further recommend that the Government initiate work with Natural England and the Woodland Trust to establish whether more ancient woodland could be designated as sites of special scientific interest and to consider what the barriers to designation might be.'</i> http://www.publications.parliament.uk/pa/cm201415/cmselect/cmcomlo 	

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		<p>c/190/190.pdf .</p> <p>This shows a clear direction of travel, recognising that the NPPF does not currently provide sufficient protection for ancient woodland. Until the NPPF is amended there is a clear role for Local Plans and associated documents to provide this improved level of protection and to ensure that irreplaceable habitats get the same level of protection as heritage assets enjoy under the NPPF.</p> <p>Therefore, we would like to see this being taken into account effectively again with the Havering Local Plan, with ancient woodland and ancient trees fully protected from development.</p>	
POST18.4	V. Rajan and associates	<p>The respondent commented : Protection of Historical monuments/ heritage buildings</p>	<p>Noted. The Council recognises the significance and value of Havering's heritage assets and includes policies to protect and enhance heritage assets in Havering.</p>

Question 17: Do you have any additional comments?

Response Number	Respondent Name	Response to Q17	Council's response
REG18.1	AECOM	<p>It is clear from the case presented above that the Council cannot adopt a 'do nothing' approach in terms of dealing with the pressure of housing growth and accommodating additional housing across the borough over the plan period. Our main issues can be summarised as follows:</p> <ul style="list-style-type: none"> – Based on the requirement for Havering to deliver 11,700 net new homes between 2015-2025, and based on the capacity identified thus far by Havering in the 2012-2013 AMR, the borough is unable to sufficiently supply enough homes to meet its OAHN. – In order to meet even its minimum housing obligations, the borough will have to release some Green Belt land for housing in the emerging Plan. – In terms of Green Belt designation as set out in National Planning Policy Guidance, Bush Farm does not meet its intended purpose within the Green Belt. <p>We are looking forward to working with the Council and its partners to secure the most appropriate and sustainable solution, and consider that Bush Farm will contribute towards meeting the borough's housing shortfall, for the reasons presented in this representation.</p>	<p>Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. It concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no part of the Green Belt land including Bush Farm will be released for housing development.</p>
REG18.2	Adams Family (Bidwells)	<p>This Report provides our consolidated response to the questions in the Council's Local Plan questionnaire.</p> <p>Fundamentally, we consider that the Local Plan should take a balanced approach to new development, having regard to the need to accommodate acute and competing demands on a limited land resource. We believe that a review of Green Belt is essential to help the Council to ensure that the new Local Plan can deliver sufficient housing to meet the Borough's London Plan targets, address objectively housing needs and enable a range of house types to come forward to support mixed and balanced</p>	<p>Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any</p>

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		<p>communities.</p> <p>A review of Green Belt boundaries may also help to ensure existing employment sites are not unnecessarily lost to residential use in a period of strong economic growth, it would help to avoid an imbalance of high density residential development and other commercial uses in town centres and the development of greenfield land offers the best opportunity of delivering the infrastructure required to support new development. Targeted development of some Green Belt land can also enable the enhancement for the beneficial use of other land serving a more important Green Belt function.</p> <p>The Council will need to identify through its evidence base how the Plan can deliver its development requirements in a way that does not compromise interlinked sustainability objectives. Failure to this would result in a Plan which is unsound.</p> <p>In light of this the Council should not make any decisions on the proposed location of new development until there is a clear understanding of the following, as yet unpublished, evidence base documents:</p> <ul style="list-style-type: none"> – An Employment Land Review – in order to identify the extent of demand for employment land, to ensure that any changes of use to residential do not adversely affect economic growth; – A Havering Borough SHLAA Viability Appraisal – to quantify and validate the assumptions of the London Plan Viability Appraisal to provide a more robust assessment of the deliverability of the Borough's brownfield housing land supply. – An East London SHMA – to identify the likely mix, type and tenure of dwellings needed in the Borough, and linked to this, the range of site types (including Green Belt land) needed to viably deliver such a range; and – A Green Belt Review – to have, as a minimum, an understanding of the 	<p>modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no part of the Green Belt land including Land at New Road, Rainham within the Green Belt will be released for housing development.</p>

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		<p>Green Belt function offered by the sites promoted for development in the Local Plan and the potential benefits their development could bring.</p> <p>Alongside this evidence gathering, we would urge the Council to have full regard to the opportunities presented by Land at New Road, Rainham, which could deliver much needed new homes on derelict, vacant land which does not serve an important Green Belt function whilst enabling the beneficial use of other vacant, inaccessible Green Belt land adjacent to the Ingrebourne River and enhancements to the Ingrebourne Marshes SSSI.</p>	
REG18.3	Anonymous	Should be proper local democracy. We don't trust Havering Council.	Noted.
REG18.4	Barratt London (GVA)	Refer to separate document	Noted.
REG18.5	Basildon Borough Council	<p>Firstly, thank you for inviting Basildon Borough Council to provide comments as part of London Borough of Havering's consultation on its New Local Plan. Whilst Basildon Borough Council is not a neighbouring local planning authority (LPA) to Havering, there are a number of strategic issues, such as housing and infrastructure, which operate at levels greater than a single LPA area and which concern both Boroughs. It is important that such issues are addressed through collaborative working and meaningful discussions in accordance with legislation, the National Planning Policy Framework (NPPF), and the Planning Practice Guidance (PPG).</p> <p>Basildon Borough Council acknowledges that this consultation only seeks to identify the future issues for Havering and what priorities the Local Plan should address. It is acknowledged that the Local Plan consultation document does not identify options, in terms of policies and strategic growth areas, or identify the Borough's housing and employment needs. In view of this, Basildon Borough Council wishes to make a series of observations which Havering should take into consideration when it prepares the draft version of its Local Plan.</p>	<p>Noted. The Council has worked closely with Basildon Council regarding the strategic issues identified to fulfil the Duty to Co-operate and will continue to do so.</p> <p>An Outer north east SHMA has been undertaken in collaboration with the London Boroughs of Redbridge and Barking and Dagenham. The SHMA indicated that Havering's full Objectively Assessed Market Assessment Need is for 30,052 new homes over the period 2011 – 2033 or 1,366 homes per annum which is greater than the London Plan allocated housing target to Havering.</p> <p>The Council has undertaken a Local Needs Accommodation Assessment (LNAA) for its own Gypsy, Traveller and Travelling Show-people which identified the need for 33</p>

Response Number	Respondent Name	Response to Q17	Council's response
		<p><u>Housing Delivery and Meeting Need</u></p> <p>Whilst the London Plan (March 2015) sets a minimum annual housing target for each London Borough, every LPA should still plan to meet their own full objectively assessed need (OAN) for market and affordable housing in accordance with paragraph 47 of the NPPF. To be consistent with paragraph 47 of the NPPF, Havering should first look to meet this need within its own housing market area which is the Outer North East London Housing Market Area before looking beyond this, and engaging in discussions with LPAs in neighbouring strategic housing market areas to determine if they are able to meet any unmet need.</p> <p>It is noted that whilst the minimum annual housing target of 1,170 units has been set in the London Plan (March 2015), the evidence for identifying the Borough's OAN, namely the Strategic Housing Market Assessment is still forthcoming. Therefore, it is not known at this stage whether Havering's Local Plan will need to plan for a housing provision over and above what was set by the London Plan (March 2015).</p> <p>Furthermore, the Council feels it is important to note that there is already an assumption built into the trends that have informed Basildon Borough's OAN that annual net migration from Havering to Basildon Borough will continue and it has therefore already been built into Basildon Borough's OAN of 800 units per annum. The Council refers Havering to the Basildon Borough Housing Growth Topic Paper 2013 for the details as to how this has been derived, as well as the Thames Gateway South Essex Strategic Housing Market Assessment 2013 and the 2015 update currently underway.</p> <p>Basildon Borough Council understands that Havering is currently able to meet its minimum annual housing target over the next 10 year period on brownfield land. However, it is unclear how Havering will look to accommodate further housing provision across the remaining proposed</p>	<p>itches for the Gypsy and Traveller community and no plot for the Travelling Show-people over the Proposed Submission version of the Local Plan period. Havering will meet current and future accommodation needs of its Gypsies and Travellers and Travelling Show-people by formalising existing private sites providing a maximum of 33 pitches for Gypsies and Travellers and by retaining and protecting the existing Travelling Show-people plot at Fairoakes, St Mary's Lane.</p>

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		<p>plan period or plan to meet its OAN across the whole plan period should this be higher than the London Plan target. Paragraph 47 of the NPPF states that <i>“local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements [... and] identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”</i>.</p> <p>During an officer led workshop within the consultation period London Borough of Havering proposed undertaking a Green Belt Review to inform the Local Plan preparation which Basildon Borough Council welcomes. As well as identifying land which is important to maintain the permanent openness of the Metropolitan Green Belt, the review may identify land that no longer serves the five Green Belt purposes, or is necessary to keep permanently open, which could potentially accommodate sustainable development. This could assist Havering in meeting its OAN locally and must be explored fully first.</p> <p><u>Gypsy & Traveller Provision</u></p> <p>During the preparation of the Basildon Borough Gypsy, Traveller and Travelling Showpeople Local Needs Accommodation Assessment 2014, the Mayor of London was invited to participate in the study, but declined and provided the following explanation</p> <p><i>“Whilst the Mayor recognises that provision for Gypsies and Travellers is a strategic issues (see London Plan Policy 3.8 Bi, [then] Draft Revised Early Modifications to the London Plan paragraphs 3.56-3.57a), he considers that it is addressed most effectively by the boroughs. These are best placed to come to the view on how to accommodate what are individually small scale developments in light of local circumstances and national policy requirements.”</i></p>	<p>The Council has undertaken a Local Needs Accommodation Assessment (LNAA) for its own Gypsy, Traveller and Travelling Showpeople which identified the need for 33 pitches for the Gypsy and Traveller community and no plot for the Travelling Showpeople over the Proposed Submission version of the Local Plan period. Havering will meet current and future accommodation needs of Gypsies and Travellers and Travelling Showpeople by formalising existing private sites</p>

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		<p>Basildon Borough Council is currently undertaking a Site Study to determine if it can meet the needs set out in its Local Needs Accommodation Assessment (LNAA), which is due to conclude in Summer 2015. Given the recognition that the Mayor has determined that boroughs are best placed to plan to meet the need for Gypsies and Travellers, the Council expects the London Borough of Havering to prepare alone, or jointly with others, its own LNAA as required by the NPPF and, through its Local Plan, safeguard existing local provision and identify new sites which will meet those additional needs. In addition, if it is unable to meet all of its own needs, Basildon Borough Council will seek the cooperation of other LPAs in Essex and London to help meet those needs.</p> <p><u>Transport Infrastructure</u></p> <p>Basildon Borough Council is aware that the radial highways, particularly the A127, and rail networks which serve the area between London and the South Essex area, which includes Basildon Borough, are already considered to be at or close to capacity, particularly at peak times. Whilst Transport for London is the primary agency managing London's transport infrastructure and not Havering, it is essential that meaningful collaborative engagement and continual working between local planning authorities, highway authorities relevant agencies and transport providers occurs to ensure that strategic transport links, termini, nodes and their respective transport services into London and South Essex are capable of accommodating the additional service pressures that are likely to arise as a result of future population growth in London and South Essex.</p> <p><u>Evidence Base</u></p> <p>Much of the evidence base which will inform and support the emerging Local Plan is noted to still be forthcoming. In the absence of this evidence, and in view of the light touch approach used in the Local Plan consultation document, it is not possible for the Council to comment on whether the</p>	<p>providing a maximum of 33 pitches for Gypsies and Travellers and by retaining and protecting the existing Travelling Showpeople plot at Fairoakes, St Mary's Lane.</p> <p>The Proposed Submission version of the Local Plan sets out policies for the key strategic transport aspirations for the borough and for improved public transport including the aspiration for longer and more frequent trains stopping at Romford station (particular service provision during the morning and evening peaks), and increasing capacity on services along the Essex Thameside line.</p> <p>Havering recognises the capacity constraints along the A127 and discussions have been taking place between Havering and neighbouring boroughs on tackling such issues along this key growth corridor.</p>

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		<p>forthcoming evidence will be comprehensive and appropriate for what the Local Plan will cover. It is important that Havering identifies options, strategic growth areas and policies informed by up-to-date evidence including those which have been mentioned in this consultation response and through publication of a draft Local Plan invite further representations from LPAs.</p> <p>At examination Havering would need to show that the Local Plan has been prepared in accordance with the Duty to Cooperate, and other legal and procedural requirements, and that it complies with the test of soundness at examination. As stipulated in paragraph 182 of the NPPF, for a Local Plan to be found "sound" it should have been positively prepared, be effective including the plan's deliverability, be consistent with national policy and be justified insofar as being the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</p> <p>Basildon Borough Council welcomes further engagement with the London Borough of Havering to ensure that the observations raised in this response are duly considered and to continue working together on strategic planning priorities through the Duty to Cooperate.</p>	<p>The Duty to Co-operate Statement sets out in greater detail how this co-operation has been taking place to address emerging strategic issues.</p> <p>Havering continues to lobby and work collaboratively with Transport for London, the Highway Agency, the DfT and other relevant agencies for better transport services within the borough and between the borough and other adjoining local authorities.</p> <p>The evidence base underpinning the policies of the Proposed Submission version of the Local Plan is comprehensive and appropriate and is in line with advice set out in NPPF. The Proposed Submission version of the Local Plan identifies reasonable alternatives which were subjected to Sustainability Appraisal with the most appropriate alternative chosen as the preferred option.</p> <p>The Council considers that the Proposed Submission version of the Local Plan has been prepared in accordance with the Duty to Cooperate, and other legal and procedural requirements, and that it will comply with the test of soundness as set out at paragraph 182 of the NPPF.</p>
			Noted. The Council has provided members

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REG18.6	Bill England	<p>I am surprised but pleased that the residents of Havering are to be given the chance to have their opinions considered and published by the Havering Council.</p> <p>The developments which have evolved over the past twenty years have in my opinion lacked any regard for attractive design, or preserving green spaces, or gardens. The rule in assessing a planning application that "views do not count" is an indication of the philistinism of our time.</p> <p>The drive for increased building developments are in order of priority the following:-</p> <ol style="list-style-type: none"> 1. Market forces, which in this case are influenced by population expansion 2. Property developers influences on local council decisions. (Top companies contribute millions to the Conservative Party) 3. Central Government acceptance of increased building density. Nick Boles has earned the (Nick) name "bulldozer") <p>The detrimental effects of this system which has already occurred in Havering are as follows:-</p> <ol style="list-style-type: none"> 1. The building of high rise flats particularly in Romford. 2. The purchase of houses by developers in order to replace them with apartment buildings which are extended into the gardens. This has been a practice in Hornchurch and Upminster. 3. The sale of school playing fields to developers. 4. The sale and potential sale of green spaces to developers which have already happened around the borough 5. The resultant need for increased services due to increased population density. <p>The planning systems around the country have all been under fire in a</p>	<p>of the public, organisations and other stakeholders opportunities to throughout the various stages in the preparation of the Proposed Submission version of the Local Plan.</p> <p>The Proposed Submission version of the Local Plan contains policies promoting attractive high design quality for developments including provision of usable amenity spaces or preservation of green spaces.</p>

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		<p>similar fashion, and the last government changed some of the planning procedures in order to speed up decisions. The changing of our gardens to brownfield areas by the Blair government was an absolute travesty. Although the present government reversed this policy, developers are selecting houses which have relatively large garden spaces and offering the owners above market value payments to sell, in order to build flats over the whole area.</p> <p>One of the worst features of the whole system, is that councils do not declare openly to the population their overall future plans. So we have a system where redevelopment is performed on a gradual basis.</p> <p>It would be more democratic if central and local governments declared to their electorates that due to the rate of population expansion, occupation densities must be increased and therefore green spaces and gardens will be sacrificed.</p> <p>Would it be too optimistic to expect the council to publish an article in the Living magazine, signed by the Council Leader, stating that “despite population expansion <i>we will never allow</i> any further erosion of our green spaces”, and to indicate which areas will never be allowed to be demolished and replaced by flats.</p> <p>I have observed that new developments in Colchester have no gardens, - just tiny back yards. Developers must look at Garden Suburbs such as Upminster and wonder how they can get to occupy all those large garden spaces.</p> <p>We live in a democracy. We should make the planning system more democratic.</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no part of the Green Belt land will be released for housing development.</p>
REG18.7	Brentwood Borough Council	<p>– Brentwood Borough Council welcomes the opportunity to comment on the key issues and priorities for the London Borough of Havering as the Council prepares its emerging Local Plan.</p>	<p>The Council has constructively engaged with Brentwood Borough Council throughout the various stages in the</p>

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	(Officer response)	<ul style="list-style-type: none"> – Brentwood Borough Council supports the London Borough of Havering's commitment to progressing a Local Plan informed by a robust evidence base. The Council would support a Local Plan which seeks to meet the development needs of its area, as is consistent with the National Planning Policy Framework and Planning Practice Guidance. – As a neighbouring authority Brentwood Borough Council emphasises the importance of working together on cross boundary issues, such as potential development adjacent to Junction 28 & 29 of the M25, and will continue to engage with the London Borough, including in relation to the Outer North East London Strategic Housing Market Assessment. 	preparation of the Proposed Submission version of the Local Plan and is looking forward to continuing this engagement.
REG18.9	C. Cole	I get a bit anxious about Junction Road. Litter strewn slumminess.	Noted. The Proposed Submission version of the Local Plan contains policies to tackle traffic congestion generally. The issue about litter being strewn is outside the scope of the Proposed Submission version of the Local Plan.
REG18.10	Chelmsford City Council	Thank you for consulting Chelmsford City Council (CCC) on a new Local Plan for Havering. CCC has no specific comments on the consultation document but would wish to maintain a constructive dialogue under the 'Duty to Co-operate' in respect to your emerging SHMA. CCC would welcome a Havering Local Plan that sought to meet its housing needs in full within its Borough	The Council has constructively engaged with Chelmsford City Council throughout the various stages of the Proposed Submission version of the Local Plan and is looking forward to continue this engagement.
REG18.12	D. Campbell	To modernise the buildings but not to change the ethnicity too much.	Noted. The Proposed Submission version of the Local Plan contains policies which support renewal and transformation of buildings including twelve Council estates. However, 'not to change the ethnicity too much' is outside the scope of the Proposed Submission version of the Local Plan.
REG18.14	Edward Gittins & Associates	We consider that the Local Plan presents the right opportunity to review the Green Belt boundary.	The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local

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			<p>Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land will be released for housing or any other type of development.</p>
REG18.16	English Heritage (now Historic England)	<p>Thank you for your consultation on the New Local Plan for Havering.</p> <p>As the Government's adviser on the historic environment English Heritage is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. English Heritage welcomes the opportunity to comment upon this key planning document.</p> <p>Having considered the details of the New Local Plan we have the following headline comments to make:</p> <p>We support the inclusion of strategic priority that addresses management of the Borough's heritage. However, this priority should form the basis of the Council's approach to managing the historic environment in line with the National planning Policy Framework (NPPF) paragraph 126. This places an expectation upon local planning authorities to set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment. Details of what should be included in that strategy is set out further in the NPPF – such as sustaining and enhancing the</p>	<p>The Council has taken these comments on board in the preparation of the heritage policies in the Proposed Submission version of the Local Plan. Further engagement has also taken place with Historic England under the Duty to Co-operate to make sure strategic issues are dealt with.</p>

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		<p>significance of heritage assets, recognising the benefits that conservation of the historic environment can bring in terms of wider social, cultural, economic and environmental gains, and ensuring new developments make a positive contribution to the local character and distinctiveness of a place by understanding what is important to conserve and enhance.</p> <p>In short the strategic priority for the conservation of the historic environment should not be a passive exercise. As further explained in the National Planning Policy Guidance (NPPG) paragraph 004, local planning authorities should identify specific opportunities within their area for the conservation and enhancement of heritage assets. This could include the following issues:</p> <ul style="list-style-type: none"> – Protect, enhance, manage and where possible, better reveal the character and appearance of landscapes, townscape by maintaining and strengthening their local distinctiveness and sense of place. – Improve and broaden access to and understanding of local heritage, archaeology, historic sites, areas and buildings. – Foster heritage-led regeneration <p>To support the development of a robust strategy for the conservation of the Borough's heritage, Local Plans need to be based on adequate, up-to-date and relevant evidence about the historic environment. When gathering evidence, it is important to bear in mind that this is not simply an exercise in setting out known sites but, understanding their value to society (i.e. their significance). Without this understanding some of the subtle qualities of the local distinctiveness and character of a local area could be easily lost.</p> <p>In addition we would advise that the details of the other subject areas such as Housing, Town Centres, Transport, Design, Green Belt, and Culture and Leisure, should consider how the proactive management of the historic environment can contribute towards the delivery of these priorities. For example, many of the Borough's town centres contain heritage assets or features of historic interest. Evidence shows that successful management</p>	

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		<p>of heritage assets, including direct investment in its fabric, can help contribute towards improvements in the performance and attractiveness of town centres.</p> <p>To help in the further development of the New Local Plan we would advise you to consider English Heritage's draft Good Practice Advice Note 1: The Historic Environment in Local Plans (Please see the link: http://www.english-heritage.org.uk/content/imported-docs/f-j/gpa1-he-local-plans-consultation.pdf). This was consulted upon in July 2014, and is now in the closing stages of being finalised and published.</p> <p>In the meantime, we look forward to being engaged further in the next iteration of the New Local Plan, where we could offer further advice to help ensure a positive strategy for the management of the historic environment is embedded in the Plan. In the meantime we would strongly advise that the Borough's own conservation staff are closely involved throughout the preparation of the emerging new Local Plan and associated Sustainability Appraisal, as they are often best placed to advise on: local historic environment issues and priorities, sources of data and consideration of options relating to the historic environment.</p> <p>Finally, we should like to stress that this opinion is based on the information provided by you. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment. However once you have considered our comments we would welcome a meeting to discuss any points raised.</p>	
REG18.17	Epping Forest District Council	Thank you for consulting this Council on the above strategic document. This is an officer level response to meet the deadline of 23 rd March. The comments are similarly strategic or general and are not therefore directly related to any of the specific questions, and are intended to be constructive. It is hoped that they will be of use when the next stages of the	The Council has engaged constructively with Epping Forest District Council and other strategic bodies in the preparation of the Proposed Submission version of the Local Plan. The Duty to Co-operate

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		<p>Local Plan are prepared for consultation.</p> <p>Mention is obviously made of the London Plan and, in relation to the Waste Plan, co-operation with adjoining London Boroughs. There is, however, no direct mention of Member and officer-level co-operation with adjoining Essex authorities on other strategic cross-boundary issues. It is increasingly apparent from the outcomes of several Examinations in Public throughout the country that a large number of authorities' Local Plans are being judged unsound because of a failure to meet Duty to Co-operate requirements. It may therefore be helpful if the next consultation stage included a more direct reference to such co-operation as one of the key priorities.</p> <p>The section on housing provision makes no mention of meeting the need for provision of sites or pitches for the travelling community. This is increasingly an issue of concern for this authority as the most recent GTAA for Essex identified a very challenging target for this Council, partly because of Green Belt constraints (the district is currently 92% Green Belt). One of the options that will be pursued by this Council in an attempt to meet the target is to seek some provision of sites and pitches within adjoining authorities, in line with para 9 I of Planning policy for traveller sites. This is likely to become a standing agenda item in future meetings with neighbouring authorities concerning Duty to Co-operate and other related issues.</p>	<p>statement sets out in detail how engagement has taken place and how this has influenced the Proposed Submission version of the Local Plan.</p> <p>The Council has been engaging with other local authorities on this issue, and like other neighbouring authorities, is looking to meet its own need.</p> <p>The Council has undertaken a Local Needs Accommodation Assessment (LNAA) for its own Gypsy, Traveller and Travelling Showpeople which identified the need for 33 pitches for the Gypsy and Traveller community and no plot for the Travelling Showpeople over the Proposed Submission version of the Local Plan period. Havering will meet current and future accommodation needs of its Gypsies and Travellers and Travelling Showpeople by formalising existing private sites providing a maximum of 33 pitches for Gypsies and Travellers and by retaining and protecting the existing Travelling Showpeople plot at Fairoakes, St Mary's Lane.</p>

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REG18.18	Essex County Council	<p><u>1. Introduction</u></p> <p>Thank you for seeking Essex County Council (ECC) comments on the first consultation into the preparation of the Havering New Local Plan 'Issues and Priorities' consultation. In responding to this consultation, ECC acknowledges the need for the London Borough of Havering (LB Havering) as the Local Planning Authority to explore opportunities to meet its future economic growth, housing and infrastructure requirements. As an adjoining authority ECC will identify and assess impacts to ensure local plans provide a reliable basis for the provision of services and infrastructure for which it is responsible. ECC will use its best endeavours to assist cross-boundary matters under the duty to cooperate, including engagement and co-operation with other organisations for which those issues may have relevance.</p> <p>In accordance with the duty to cooperate, as established in the Localism Act 2011, ECC will contribute cooperatively to this consultation, and separately to the on-going preparation of the new local plan, particularly within the following broad areas,</p> <ul style="list-style-type: none"> - <u>ECC assets and services</u>. Where relevant, advice on current status of assets and services and the likely impact and implications of proposals in emerging Local Plans for the future operation and delivery of ECC services. - <u>Evidence base</u>. Guidance with assembly and interpretation of the evidence base both for strategic/cross-boundary projects, for example, education provision and transport studies and modelling. - <u>Policy development</u>. Contributions on the relationship of the evidence base to structure and content of emerging policies and proposals. - <u>Sub-regional and broader context</u>. Assistance with identification of relevant information and its fit with broader strategic initiatives, for example, the Economic Plan for Essex, and the A127 Corridor for Growth, and assessments of how emerging proposals for the borough may impact on areas beyond and vice-versa. - <u>Inter-relationship between Local Plans</u>. Including the Essex Minerals 	<p>The Council has engaged constructively with Essex County Council on several strategic issues during the preparation of the Proposed Submission version of the Local Plan and will continue to do so.</p> <p>The Council has regularly updated a list of evidence base on its website, and informed stakeholders when evidence came available. The Council has also worked closely together with Essex County Council and other neighbouring local authorities during the production of several evidence base documents. The Duty to Co-operate statement sets out in detail how engagement has taken place with neighbouring authorities and other organisations.</p> <p>The Council considers that the SA Scoping Report forms an appropriate basis and is in line with the SA/SEA regulations. The Regulation 19 Local Plan is accompanied by a SA/SEA report.</p>

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		<p>Local Plan and Essex and Southend-on-Sea Waste Local Plan.</p> <p>ECC is keen to inform and shape future spatial development strategies and policies delivered by adjoining Local Planning Authorities which could influence and affect economic growth and development throughout Essex. ECC also aims to ensure that local strategies and policies will provide the greatest benefit to deliver a buoyant economy for existing and future persons that live, work, visit and invest in Essex. Involvement is necessary because of the ECC role as,</p> <ul style="list-style-type: none"> - a key partner within Essex promoting economic development, regeneration, infrastructure delivery and new development throughout the County; and - its functional role as the strategic highway and transport authority, including responsibility for the delivery of the Essex Local Transport Plan and as the local highway authority; local education authority; Minerals and Waste Planning Authority and local lead flood authority; and major provider of a wide range of local government services throughout the county of Essex. <p><u>1A. Strategic context and strategies</u></p> <p>A range of strategies produced solely by ECC or in collaboration with the Essex borough, city and district councils, and Greater Essex unitary authorities Thurrock and Southend-on-Sea, provide the strategic context for our response to the Local Plan consultation. Relevant strategies are listed below and are referred to within section 2.</p> <ul style="list-style-type: none"> • ECC Vision for Essex 2013 – 2017 • ECC Corporate Outcomes Framework 2014 – 2018, February 2014 • Economic Plan for Essex 2014 • ECC Sustainable Economic Growth for Essex Communities and Businesses, 2014 • ECC Economic Growth Strategy, 2014 • Essex Transport Strategy the Local Transport Plan for Essex, June 2011 	

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		<ul style="list-style-type: none"> • A127 Corridor for Growth – An Economic Plan, 2014 • ECC Developer's Guide to Infrastructure Contributions, 2015 Revision Consultation <p>2. <u>ECC RESPONSE TO THE ISSUES AND PRIORITIES CONSULTATION</u></p> <p>The consultation is of relevance to ECC as the LB Havering adjoins Essex. There are potential impacts through highways, transport infrastructure, education, flooding and surface water management, and minerals and waste planning. ECC is the highway authority (and has responsibility for the delivery of the Essex Local Transport Plan); local education authority; Minerals and Waste Planning Authority; Local Lead Flood Authority; and a major provider of a wide range of local government services throughout the county of Essex, many of which are accessed by those who reside in adjoining authorities.</p> <p>ECC acknowledge the consultation but intends to hold back its support until key evidence is available to inform and shape the new Local Plan as indicated within the specific comments below. In addition there are procedural concerns with the consultation, and on-going local plan preparation as proposed by LB Havering.</p> <ul style="list-style-type: none"> – There is a lack of supporting evidence to enable informed responses to be made to the consultation issues and questions. – Due to the high level nature of this consultation, ECC is concerned that it is not evident if, how or when we would be engaged under the duty to co-operate in an ongoing manner to inform the preparation of the new local plan. It is of particular concern how the preparation of the plan is to progress directly from this high level Regulation 18 'Issues and Priorities' consultation to the Proposed Submission Version (Regulation 19) scheduled for the end of 2015, especially given the absence of evidence and options at this stage. It is unclear how ECC will be able to comment and inform any reasonable options and emerging strategies between the proposed two consultation stages. 	

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		<p>This Regulation 18 consultation does not appear to be supported by a Sustainability Appraisal / Sustainable Environmental Assessment (SA/SEA) contrary to the SA/SEA regulations on the preparation of policies, plans and programmes and to the legal compliance requirements in preparing a sound local plan. It is of concern that within the SA Scoping Report February 2015, that the “baseline” under Task A1 only focusses on the LB of Havering and the London Plan. There appears to be a lack of a wider context given that the borough adjoins Essex County Council; Epping Forest DC, Brentwood BC and the unitary authority of Thurrock Council. For example the baseline does not acknowledge or refer to their respective local plans (including minerals and waste) or the wider joint strategies including the Economic Plan for Essex (March 2014); the A127 Corridor for Growth (March 2014) and the South East Local Enterprise Partnership.</p> <p><u>3. Conclusion</u> ECC will cooperate with the LB Havering in considering the potential implications of its new Local Plan for Essex, but at this stage we do not provide our support until the publication of an adequate evidence base in inform the identification of spatial strategy options and a preferred strategy. ECC seeks clarification on the proposed procedural approach to local plan preparation and engagement with ECC under the duty to co-operate.</p>	
REG18.20	Greater London Authority	<p>Thank you for your letter consulting the Mayor of London on the early stage of Havering Council's new Local Plan document and for providing the GLA the opportunity to comment on the emerging document. As you are aware all development plan documents have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004.</p> <p>Given the very early stage of consultation there is not currently sufficient information in order for officers to provide detailed comments as to whether the emerging policy document is in general conformity with the London</p>	<p>The Council has engaged constructively with the GLA during the preparation of the Proposed Submission version of the Local Plan. As the London Plan is part of the development plan for Havering the Proposed Submission version of the Local Plan has been sought to conform to the London Plan.</p>

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		<p>Plan. Notwithstanding this, in response to the opening question</p> <p>As a general guide at this early stage, the subsequent fifteen broad questions relating to each of the key priorities can be answered from a strategic planning policy perspective by referring to the relevant policies of the London Plan. Further engagement as the document progresses is strongly welcomed.</p> <p>The Mayor will issue his formal opinion on general conformity when requested at the proposed submission stage.</p>	
REG18.21	<p>Havering College of Further and Higher Education (Iceni Projects)</p>	<p>Iceni Projects Limited ('Iceni') is appointed by Havering College of Further and Higher Education ('HCFHE') to provide town planning advice relating to its land ownership and educational interests within the London Borough of Havering ('LBH'). HCFHE has four primary interests across the Borough, these include:</p> <ul style="list-style-type: none"> - The Quarles campus – located on Tring Gardens, Harold Hill; - The Rainham Construction campus – located on New Road, Rainham; - The Ardleigh Green campus – located on Ardleigh Green Road, Hornchurch; and, - The future Harold Hill Learning Village – located at Settle Road, Harold Hill. <p>In light of these educational facilities, and as a key stakeholder in the Borough, HCFHE welcome the opportunity to provide comments on the forthcoming LBH Local Plan. HCFHE note that this is the very early stages of the Borough's plan preparation and as such welcome the opportunity to comment on future stages of consultation.</p> <p>As a provider of further and higher education, and as a key stakeholder within the Borough, HCFHE is grateful of the opportunity to comment on the key objectives and strategic priorities of the emerging Local Plan for the Borough. HCFHE wish to continue to be involved the development of the</p>	<p>The Council has engaged constructively with HCFHE specifically for the preparation of the Infrastructure Delivery Plan, and looks forward to continued engagement.</p>

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		Local Plan.	
REG18.23	Heine Planning	Need to focus on what is special to Havering and let NPPF deal with the rest.	Noted. The Proposed Submission version of the Local Plan sets out policies which are specific to Havering with the NPPF / London Plan providing overarching policies and guidance on broad planning issues.
REG18.24	Higgins Homes (Nathaniel Lichfield & Partners)	<p>Given the need to satisfy the updated annual target for housing supply in Havering (as identified in the FALP) and the likely increase through the London Plan Review, it is considered that the Plan needs to allocate housing sites both within the urban area and in the Green Belt at sustainable locations. Sites within the urban area alone are not delivering the new homes required.</p> <p>We have proposed one such site that is currently in the Green Belt. This should be taken out of the Green Belt and allocated for housing, as it provides the opportunity to 'deliver' residential development, providing a range of dwelling sizes, in a sustainable location on the edge of the existing urban area.</p>	Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land will be released for housing development.
REG18.26	Ian Weatherley	Havering has long been a borough to be proud of, and for people to relish their quality of life due to the open spaces, parks and areas where families can play and relax. We MUST safeguard these open areas and guard against building on every piece of land – otherwise Havering faces being yet another densely populated London Borough and give rise to 'Ghetto' sites around the borough – which give rise to crime and ASB.	Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the

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			Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land will be released for housing development.
REG18.27	Janet Davy	Thank you for sending this questionnaire. I hope you will take note of these and other people's comments.	Noted. The Council has taken account of the representations made in the preparation of the Proposed Submission Version of the Local Plan.
REG18.28	Joe Coogan	Havering's population has grown significantly and this will continue. The local plan should be used to creatively meet the needs of the population in a sensitive way. Local people want access to quality housing and good schools, if the local plan can unlock sites that are currently underused to meet this need the changes will be successful.	Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land will be unlocked for housing development.
REG18.29	John Peterson	No more charity shops in towns to many already	Noted. Limiting the number of charity shops in towns is outside the scope of the Proposed Submission version of the Local Plan.
REG18.33	Mr Leslie Budge (Andrew Martin)	In September 2014 Andrew Martin – Planning (AM-P) submitted representations to a 'Call for Sites' by London Borough of Havering, in respect of Land at Little Paddocks Farm, Shepherds Hill, Harold Wood on behalf of the landowner, Mr Leslie Budge. We now submit our written	The Proposed Submission version of the Local Plan seeks to deliver the London Plan housing target as a minimum, and go beyond that where possible to meet the full

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	Planning)	<p>response to the latest consultation on the Local Plan that seeks to determine key strategic priorities for the Borough over the next 15 years. We attach a copy of the presentations and site location plan, submitted previously. In addition we have prepared an illustrative master plan to demonstrate that a form of residential-led development can be achieved on the site.</p> <p><u>The London Plan</u></p> <p>Mr Anthony Thickett, an independent planning inspector appointed by the Secretary of State, held an examination in public of the Draft Further Alterations to the London Plan from 1 September and 18 September 2014. The report setting out his findings and conclusions was published on 15 December 2014 and the Inspector's recommendations were adopted in early March 2015.</p> <p>The Further Alterations to the London Plan (FALP) document indicates that the London Boroughs collectively need to provide 49,000 dwellings per annum between 2015 and 2036 in order to meet both market and affordable housing needs for London. In terms of supply the FALP has provided minimum housing supply targets for each of the Boroughs, which in total equates to 420,000 additional homes over the period 2015 to 2025, or 42,000 dwellings per annum. London Borough of Havering should be aiming to provide a <u>minimum</u> of 11,701 dwellings between 2015-2025, an annual target of 1,170 dwellings. The FALP introduces a requirement for the London Boroughs to meet their own housing target, as set out in Table 3.1 (i.e. 1,170 dpa in the case of LB Havering) and address any gap between supply and need by seeking to exceed this target where possible. The Inspector's report goes on to state at paragraph 33:</p> <p><i>"However, in order to be in general conformity with Table 3.1, Boroughs need only meet their individual targets. In the absence of any clear guidance as to exactly how and where the additional 6,600 dpa will be</i></p>	<p>OAN in the borough. The Council therefore believes that it is in general conformity with the London Plan and has engaged with the GLA on this matter.</p>

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		<p><i>found it is difficult to see how a housing target in a local plan would not be in general conformity if it made provision for the figure in Table 3.1 and no more.</i></p> <p><i>There is no mechanism in the FALP to indicate how the 6,600 dpa would be apportioned or distributed. Without this I do not see how the Mayor can guarantee the delivery of the additional 6,600 dpa necessary to meet the identified need."</i></p> <p>On this basis, the Inspector has concluded that the housing targets in the FALP will not provide sufficient housing to meet the objectively assessed housing need in London and he is not convinced that the FALP ensures the additional 6,600 dpa, not allocated to specific Boroughs, will be delivered. On this evidence it is likely that the London Plan strategy will not deliver sufficient homes to meet housing needs, and so the Inspector has called for an early review of the Plan to commence once the FALP is adopted in 2015. Until this review is published, it is the responsibility of the London Boroughs and districts in the South East England to acknowledge this shortfall in supply and react to it by allowing new development in sustainable locations, in a bid to try and exceed their allocated housing targets and narrow the gap between need and supply. LB Havering should therefore be proactively seeking to exceed their target in the London Plan through the allocation of sustainable, deliverable and suitable sites for residential development. This may involve the strategic release of green belt land where it can be demonstrated, through a green belt review, that the five purposes of including land within the green belt are no longer being met.</p>	
REG18.34	Margaret Whippy	The land adjacent to my plot (Cross-Hatched) has been fenced off and/or used illegally since the 1960's by various people and not put to any sensible use. It is not prime agricultural land, has been used variously as a dumping ground over the years and therefore calling it 'green belt' is hypocrisy. It originally had consent in the 1920's for housing use, however	The Proposed Submission version of the Local Plan supports improvements to Green Belt and resists inappropriate development in the Green Belt consistent with the NPPF. However, discouraging

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		<p>the onset of the 2nd World War and the development of the A127 road altered its planning. In the meantime, people have fenced off areas for their own use, without legally owning it, then laying claim to it. Surely Havering should be discouraging this kind of squatting.</p>	<p>squatters on the land adjacent to yours is outside the scope of the Proposed Submission version of the Local Plan.</p>
REG18.35	Mobile Operators Association (Mono Consultants)	<p>We would take this opportunity to comment that we consider it important that there is a specific telecommunications policy within the emerging Local Plan. We consider that the vital role that telecommunications play in both the economic and social fabric of communities merit the inclusion of a policy which refers specifically to telecommunications developments.</p> <p>National guidance recognises this through Section 5: "Supporting high quality communications infrastructure" of National Planning Policy Framework (March 2012) which provides clear guidance as to the main issues surrounding telecommunications development.</p> <p>The National Planning Policy Framework (NPPF) at paragraph 42 confirms that; "advanced, high quality communications infrastructure is essential for sustainable economic growth and play a vital role in enhancing the provision of local community facilities and services."</p> <p>Paragraph 43 of NPPF confirms that; "in preparing local plans, local planning authorities should support the expansion of telecommunications networks", but should also; "aim to keep the numbers of radio telecommunications masts and sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified."</p> <p>As indicated above, the formulation of policy does not exist in isolation and there are numerous documents which will affect the formulation of any telecommunications policy, the most important of these being NPPF.</p> <p>On this basis we would suggest that a concise and flexible</p>	<p>Noted. The Proposed Submission version of the Local Plan contains policies promoting the enhanced connectivity of the borough through the expansion of electronic communications networks, including telecommunications and high speed broadband.</p>

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		<p>telecommunications policy should be included within the emerging Local Plan. Such a policy should give all stakeholders a clear indication of the issues that telecommunications development will be assessed against. We would suggest a policy which reads;</p> <p>“Proposals for telecommunications development will be permitted provided that the following criteria are met: -</p> <ul style="list-style-type: none"> i. the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area; ii. if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building; iii. if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority. iv. If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest. <p>When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology.”</p> <p>We would consider it appropriate to introduce the policy and we would suggest the following;</p> <p>“Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With the growth of services such as mobile internet access, demand for new</p>	

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		telecommunications infrastructure is continuing to grow. The authority is keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and siting equipment on existing tall structures and buildings.”	
REG18.36	Moody Homes and Mr John Wakeling (Bidwells)	<p>This Report provides our consolidated response to the questions in the Council's Local Plan questionnaire.</p> <p>Fundamentally, we consider that the Local Plan should take a balanced approach to new development, having regard to the need to accommodate acute and competing demands on a limited land resource. We believe that a review of Green Belt is essential to help the Council to ensure that the new Local Plan can deliver sufficient housing to meet the Borough's London Plan targets, address objectively housing needs and enable a range of house types to come forward to support mixed and balanced communities.</p> <p>A review of Green Belt boundaries may also help to ensure existing employment sites are not unnecessarily lost to residential use in a period of strong economic growth. It would help to avoid an imbalance of high density residential development and other commercial uses in town centres and the development of greenfield land offers the best opportunity of delivering the infrastructure required to support new development. Targeted development of some Green Belt land can also enable the enhancement for the beneficial use of other land serving a more important Green Belt function.</p> <p>The Council will need to identify through its evidence base how the Plan can deliver its development requirements in a way that does not compromise interlinked sustainability objectives. Failure to address this would result in a Plan which is unsound.</p>	Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land will be released for housing development.

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		<p>In light of this the Council should not make any decisions on the proposed location of new development until there is a clear understanding of the following, as yet unpublished, evidence base documents:</p> <ul style="list-style-type: none"> – An Employment Land Review – in order to identify the extent of demand for employment land, to ensure that any changes of use to residential do not adversely affect economic growth; – A Havering Borough SHLAA Viability Appraisal – to quantify and validate the assumptions of the London Plan Viability Appraisal to provide a more robust assessment of the deliverability of the Borough's brownfield housing land supply. – An East London SHMA – to identify the likely mix, type and tenure of dwellings needed in the Borough, and linked to this, the range of site types (including Green Belt land) needed to viably deliver such a range; and – A Green Belt Review – to have, as a minimum, an understanding of the Green Belt function offered by the sites promoted for development in the Local Plan and the potential benefits their development could bring. <p>Alongside this evidence gathering, we would urge the Council to have full regard to the opportunities presented by Land at Lincoln Close, Hornchurch. This land does not serve any of the five purposes of including land within the Green Belt and is of no beneficial use. It should therefore be removed from the Green Belt so that it can help in delivering wider Local Plan objectives.</p>	
REG18.39	Mrs S J Ellis (Bidwells)	<p>This Report provides our consolidated response to the questions in the Council's Local Plan questionnaire.</p> <p>Fundamentally, we consider that the Local Plan should take a balanced approach to new development, having regard to the need to accommodate acute and competing demands on a limited land resource. We believe that a review of Green Belt is essential to help the Council to ensure that the new Local Plan can deliver sufficient housing to meet the Borough's</p>	Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible

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		<p>London Plan targets, address objectively housing needs and enable a range of house types to come forward to support mixed and balanced communities.</p> <p>A review of Green Belt boundaries may also help to ensure existing employment sites are not unnecessarily lost to residential use in a period of strong economic growth. It would help to avoid an imbalance of high density residential development and other commercial uses in town centres and the development of greenfield land offers the best opportunity of delivering the infrastructure required to support new development. Targeted development of some Green Belt land can also enable the enhancement for the beneficial use of other land serving a more important Green Belt function.</p> <p>The Council will need to identify through its evidence base how the Plan can deliver its development requirements in a way that does not compromise interlinked sustainability objectives. Failure to address this would result in a Plan which is unsound.</p> <p>In light of this the Council should not make any decisions on the proposed location of new development until there is a clear understanding of the following, as yet unpublished, evidence base documents:</p> <ul style="list-style-type: none"> – An Employment Land Review – in order to identify the extent of demand for employment land, to ensure that any changes of use to residential do not adversely affect economic growth; – A Havering Borough SHLAA Viability Appraisal – to quantify and validate the assumptions of the London Plan Viability Appraisal to provide a more robust assessment of the deliverability of the Borough's brownfield housing land supply. – An East London SHMA – to identify the likely mix, type and tenure of dwellings needed in the Borough, and linked to this, the range of site types (including Green Belt land) needed to viably deliver such a range; 	<p>boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land will be released for housing development.</p>

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		<p>and</p> <ul style="list-style-type: none"> - A Green Belt Review – to have, as a minimum, an understanding of the Green Belt function offered by the sites promoted for development in the Local Plan and the potential benefits their development could bring. <p>Alongside this evidence gathering, we would urge the Council to have full regard to the opportunities presented by Land East of Wingletye Lane.</p>	
REG18.43	Omega After Alpha Ltd (Bidwells)	<p>This Report provides our consolidated response to the questions in the Council's Local Plan questionnaire.</p> <p>Fundamentally, we consider that the Local Plan should take a balanced approach to new development, having regard to the need to accommodate acute and competing demands on a limited land resource. We believe that a review of Green Belt is essential to help the Council to ensure that the new Local Plan can deliver sufficient housing to meet the Borough's London Plan targets, address objectively housing needs and enable a range of house types to come forward to support mixed and balanced communities.</p> <p>A review of Green Belt boundaries may also help to ensure existing employment sites are not unnecessarily lost to residential use in a period of strong economic growth, it would help to avoid an imbalance of high density residential development and other commercial uses in town centres and the development of greenfield land offers the best opportunity of delivering the infrastructure required to support new development. Targeted development of some Green Belt land can also enable the enhancement for the beneficial use of other land serving a more important Green Belt function.</p> <p>The Council will need to identify through its evidence base how the Plan can deliver its development requirements in a way that does not compromise interlinked sustainability objectives. Failure to this would result</p>	<p>Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land will be released for housing development.</p>

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		<p>in a Plan which is unsound.</p> <p>In light of this the Council should not make any decisions on the proposed location of new development until there is a clear understanding of the following, as yet unpublished, evidence base documents:</p> <ul style="list-style-type: none"> – An Employment Land Review – in order to identify the extent of demand for employment land, to ensure that any changes of use to residential do not adversely affect economic growth; – A Havering Borough SHLAA Viability Appraisal – to quantify and validate the assumptions of the London Plan Viability Appraisal to provide a more robust assessment of the deliverability of the Borough's brownfield housing land supply. – An East London SHMA – to identify the likely mix, type and tenure of dwellings needed in the Borough, and linked to this, the range of site types (including Green Belt land) needed to viably deliver such a range; and – A Green Belt Review – to have, as a minimum, an understanding of the Green Belt function offered by the sites promoted for development in the Local Plan and the potential benefits their development could bring. <p>Alongside this evidence gathering, we would urge the Council to have full regard to the opportunities presented by Land at Lillyputts Farm</p>	
REG18.44	Persimmon Homes Essex	Persimmon Homes has no further comments at this stage. As part of the next consultation, we would expect further details on the anticipated Local Plan period, housing numbers to be delivered and the potential opportunities and constraints as supported through the council's evidence base.	Noted. The Proposed Submission version of the Local Plan is a 15-year plan up to 2013 with a housing target of 17550 new dwellings to be delivered over the 15-year plan period.
REG18.45	Planning Potential	We understand that the Council is currently consulting on 'A New Local Plan for Havering', which includes a number of questions seeking to determine views on the key strategic priorities for the Borough over the next 15 years. This includes questions on where housing should be located	Noted. All sites submitted have been considered through the Proposed Submission version of the Local Plan process. Site allocations will be considered

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		<p>and suggestions for revisions to the Green Belt, including requesting the submission of sites that are suggested for release.</p> <p>Land at Crow Lane, Romford is not a Green Belt site. Notwithstanding this, we have been advised by the Council to submit the site through this process for consideration as a potential housing allocation. The details of the site are set out below.</p> <p>The site is located north of Crow Lane and is approximately 1.44 hectares in area as shown on the Site Location Plan enclosed. The site is a National Grid site with a section of land on the northern boundary currently occupied by Romford Self-Storage and is in B8 use. The remainder of the site is previously developed land and is currently vacant.</p> <p>The main access to the site is from Sandgate Close, which runs north from Crow Lane and along the eastern boundary of the site. There is also a second access directly off Crow Lane on the southern boundary of the site, which is currently overgrown and disused.</p> <p>The site is designated as a Secondary Employment Area and is identified as Safeguarded for Crossrail Land; however, we are of the understanding that the site is no longer safeguarded, by way of the Crossrail Safeguarding Directions issued in January 2008. The site is in Flood Zone 1 and is not considered to be at risk of flooding. It has a PTAL Rating of 1a.</p> <p>In terms of the site's context, to the north of Crow Lane the land use is a mixture of residential and industrial, and beyond is the railway line. To the south is Romford Cemetery, Romford and Gidea Park RFC, Crowlands Heath Golf Club, and Romford Football Club.</p>	<p>as part of the forthcoming Detailed Sites Local Plan.</p>
REG18.49	Rainham & South Hornchurch Green Belt	<p>We are a local community action group dedicated to the restoration and preservation of the Mardyke Farm and Mardyke Open Space Green Belt sites, and we played a significant role in the LDF Examination held in 2007.</p>	<p>Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded</p>

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	Action Group	<p>On Friday 27th February 2015 we had one of our regular meetings with Athorn consultants and Erith to review progress on the restoration of the Mardyke Farm Green Belt site, planning application P04432.10.</p> <p>We were informed that everything is going to schedule and the restoration of the site to form a public green open space amenity and nature habitat is on target to meet the “drop dead date” of April 2017.</p> <p>However we were also shocked at the meeting to learn from Athorn consultants that advisors to the Council had been in contact with them and had requested that they put forward the pros and cons for developing the site for housing.</p> <p>We checked on the Council websites and with our councillors to find out if anyone was aware that advisors were being used by the Council to determine the suitability of Green Belt sites for housing development but our Councillors were not aware and we could not find any information on the development planning website.</p> <p>As part of the 2015 Local Plan Consultation, we would like to express our strong support for keeping the existing Green Belt Boundaries in general, and the Mardyke Farm and Mardyke Open Space in particular.</p> <p><u>Reasoned Justification</u></p> <p>In 2007 the Council submitted their Core Strategy and Site Specific Allocations for examination by a Planning Inspector.</p> <p>The Core Strategy and SSAs contained proposals to remove the Mardyke Farm from the Green Belt and develop it for housing.</p> <p>These proposals had been kept confidential by the Council and the local community were not aware of them until the Examination stage. In</p>	<p>that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land including Land at the Mardyke Farm Green Belt site will be released for housing development.</p>

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		<p>particular they were not published at the preferred options stage.</p> <p>Consequently the Rainham and South Hornchurch Green Belt Action Group was formed at short notice to oppose the proposals and gained tremendous support within the local community. Meetings were held, demonstrations organised and newsletters published.</p> <p>An enormous amount of hard work was undertaken by the group which culminated in substantial submissions to the LDF Examining Inspector and the Council.</p> <p>We would like to submit our LDF submissions which are already in the Councils possession to inform the 2015 Local Plan Consultation. The LDF written submissions put forward to the Council and the Examination are:</p> <p>The Rainham and South Hornchurch Green Belt Action Group 051/155/156/CP14 Examination Statement and Appendix (Reasoned Justification) CP14 Mardyke Farm May 2007 The Rainham and South Hornchurch Green Belt Action Group 051/155/156/CP14 Response Statement and Response Appendix CP14 Mardyke Farm June 2007.</p> <p>We believe that these documents should form part of the consultation database as they inform the consultation about the history and local involvement in the Mardyke Farm and Mardyke Open Space Green Belt sites at the examination of the LDF and are relevant to the Local Plan consultation.</p> <p>They are also a testament to the enormous amount of work done by the action group in opposing the removal of Mardyke Farm and Mardyke Open Space from the Green Belt at the LDF examination.</p> <p>In this letter we shall not go into any LDF details relating to the site but will</p>	

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		<p>rely on our submissions above to inform the consultation.</p> <p>The decision reached by the Planning Inspector in her report on the soundness of the Core Strategy was that the Mardyke Farm and Mardyke Open Space sites should remain in the Green Belt. She did not consider that there were exceptional circumstances to remove the site from the Green Belt and we believe that the same is true today.</p> <p>However it is important to note that the group did not just oppose the removal of Mardyke from the Green Belt it also researched ways and means of remediating and restoring the site to public use as envisaged in the original 1993 plan P0186.93. In this regard the Response Statement and Response Appendix are very relevant.</p> <p>After the LDF, the group held numerous meetings with Council officials and the Environment Agency and a new restoration plan P0432.10 was submitted by Athorn consultants acting for the owners Ebbcliff in 2010,</p> <p>This demonstrates that the group is not just a protest group but a force for good in that it has achieved the restoration of the site for public use and demonstrated how local involvement can achieve an objective where the Council had previously given up.</p> <p>Regular meetings between Athorn consultants, Erith and the Group have taken place and the restoration of the Mardyke Farm is due to be completed by the "drop dead date" of April 2017. These meeting have always been cordial and held in a spirit of mutual cooperation.</p> <p>The aims and objectives of the restoration were summarised for the local community in our newsletter of January 2013 a copy of which is attached to inform the consultation.</p> <p>By the drop dead date of April 2017 the project will have taken seven years</p>	

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		<p>to reach fruition and this is a shining example of the local community getting involved in a long term Local Plan and seeing it through to completion.</p> <p>We hope that the Council advisors who have asked Athorn consultants to put forward the pros and cons of developing the site for housing will understand that the local community see the suggestion to develop the site for housing as a complete betrayal of all the hard work which the local community have demonstrably put into restoring the site.</p> <p>It would be a travesty of natural justice if this site is proposed to be taken out of the Green Belt just as the restoration which the local community have worked so hard to achieve is nearing completion.</p> <p>Local Plans should involve local people and no one can deny that the local community have not got behind this restoration. It would make a mockery of local planning involvement if this site was again proposed to be taken out of the Green Belt.</p> <p>The Havering LDF was adopted in 2008 and it is barely six years since the LDF Planning Inspector reported that the Mardyke Farm should remain in the Green Belt. The Core Strategy was supposed to run until 2020 by which time the restoration P0432.10 would be complete.</p> <p>As a result the local community supported P0432.10 particularly as the landfill contours respected the original plans P0186.93, and would result in a landscaped public green open space amenity and nature habitat.</p> <p>The restoration P00432.10 was not approved until 2010 and started in 2011. It was supposed to be completed in April 2015 but an extension to April 2017 was agreed as a drop dead date and the local community did not oppose this given the assurances from Athorn and Erith that it would be completed by then.</p>	

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		<p>It makes a mockery of long term planning and community involvement if another revision of Green Belt boundary is considered before the existing plans are even completed.</p> <p>The Mardyke Farm is a former quarry and toxic landfill site.</p> <p>The agreed remediation involves 330,000 cubic metres of landfill raising the level up to 9 metres higher than the surrounding properties. This remediation is suitable for a public open space and was not intended to be for housing.</p> <p>The site is effectively an artificial hill which is contoured for a public open space and not for housing. The local community would never have agreed to an artificial hill if it had been known that the site might be proposed for housing.</p> <p>The landfill contouring and capping was undertaken to cap toxic waste deposits dumped over many years at the site. While a nine metre hill and dale topology is suitable for green belt open space, it is unacceptable for a housing development and no community in its right mind would have agreed to such proposal and nor would the Planning Inspector at the Public enquiry.</p> <p>Indeed at an LDF consultation with Development Planning, the Head of Development Planning stated that the topography was unsuitable in its present form and would need to be sympathetic with the current lie of the land for surrounding neighbourhoods. This would require the waste area to be scoured out and capped with a protective layer to bring it in line with local topography.</p> <p>As mentioned in the newsletter Athorn consulting on behalf of the owner have given assurances that the restoration will be completed and that it will</p>	

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		<p>be managed properly with an included maintenance schedule through to at least 2027.</p> <p>When the question of building or development was raised at an earlier meeting, Athorn consultants reiterated that unrestricted public access to the space would be in perpetuity as agreed in the legally binding planning agreement entered into by the owners in the form a covenant on the land. The attached newsletter to the local community makes mention of this.</p> <p>At the public enquiry conducted by a Planning Inspector into the original plans for a public park P0186.93, the plans were opposed by the Council and by the Local Community on the basis that all previous landfill schemes had faltered and had been abandoned at some stage.</p> <p>The covenant for unrestricted public access was a unilateral proposal by Ebbcliff the site owners to win the Planning Inspectors approval for the site to be used for landfill and conversion to a public park.</p> <p>The covenant granting public access in perpetuity was submitted to allay the fears of the local community that the project would be abandoned. It was instrumental in the Inspector granting permission for the landfill to finance and produce a public park.</p> <p>Now that the current restoration is nearing completion in April 2017 no Court in the land would consider that the Local Community have been treated in a fair, ethical and just manner if the site was taken out of the Green Belt for housing development just at the point when the project is reaching fruition.</p> <p>The Mardyke Farm makes a valuable contribution to the Metropolitan Green Belt, forms an important part of the London Green Grid, the Dagenham Corridor and the Greening the Greenaway.</p>	

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		<p>It fulfils the Government policy on protection for the green belt as set out in chapter 9 of the National Planning Policy Framework (NPPF). The Government's fundamental aim of green belt policy is to prevent urban sprawl by keeping land permanently open. The NPPF states that that the construction of new buildings should be regarded as "inappropriate" for the green belt.</p> <p>When completed it will enhance the ecological value of the site and provide a high quality open green space amenity with unrestricted public access for the local community to enjoy. Much of the Green Belt does not have public access but this site is an exception which is why the local community have worked so hard to restore the site.</p> <p>When complete the site will contribute to national, regional, and local conservation objectives</p> <p>We hope that this short letter has given some insight into the bitter disappointment which the local community felt when the Council advisors approached Athorn consultants to assess the site for housing development.</p> <p>We urge you to respect the local community involvement and the legally binding planning agreement entered into by the owners Ebbcliff to restore this Green Belt site for public use.</p> <p>In 2010 the owners Ebbcliff and the Council acted honourably by proposing, implementing, and monitoring a long term restoration plan. It would be a betrayal of trust with the local community, and make a mockery of local long term planning and covenants, to put this site forward for housing development.</p> <p>We trust that the restored site which the local community have been involved with since 1994 will remain in the Green Belt for use as a nature habitat and public open space.</p>	

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REG18.50	Rainham Preservation Society	Careful wording of all legal, planning and development documents so we don't leave ourselves vulnerable to 'clever' development e.g. in the past by using the word 'should' instead of 'must' allowed future development at Dovers Corner to be above 3-storey. All section 106 agreements and planning gains must be spent in the areas where developments are permitted.	Noted. The Policies of the Proposed Submission version of the Local Plan are worded in compliance with NPPF advising that policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.
REG18.51	Ray Whitehouse	Development of Riverside is a major opportunity, do not overload the rest of Havering's Infrastructure when you have the space and opportunity to do something wonderful.	Noted. The Proposed Submission version of the Local Plan recognises that the development of London Riverside is a major regeneration opportunity. The area has been formally identified in the London Plan as an Opportunity Area. It is identified in the Local Plan as the Rainham and Beam Park Strategic Development Area. It is programmed to deliver a new green neighbourhood providing over 3,000 new homes, 3500 – 4,000sqm commercial floorspace, new supporting infrastructure of schools (primary, secondary and tertiary), improved sport and leisure facilities and health centre, and transforming the New Road (the A1306) from a traffic dominated corridor into an attractive high quality green street.
REG18.53	Romford Golf Club (Joe Coogan)	Havering's population has grown significantly and this will continue. The local plan should be used to creatively meet the needs of the population in a sensitive way. Local people want access to quality housing and good schools, if the local plan can unlock sites that are currently underused to meet this need the changes will be successful.	Noted. The Proposed Submission version of the Local Plan seeks to meet the various identified needs of the growing population in brownfield sites in sustainable location without the release of Green Belt land.
REG18.54	Romford YMCA	At the heart of the work of Romford YMCA are young people and they are the future small business owners, teachers, health workers of the borough. To that effect it is vital that the Local Plan addresses their needs, so we	The Council encourages involvement of all parts of the community in the process of preparing its Local Plan and has produced

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		<p>suggest that in stage two of the consultation, young people are invited to submit their opinions of the future. We are happy to facilitate this.</p>	<p>an Equalities Assessment to assure the needs of all groups have been considered in the Proposed Submission version of the Local Plan.</p>
REG18.55	Rowley Cardrome Ltd (Montagu Evans)	<p>We are instructed by Rowley Cardrome Ltd (RCL), to submit representations to the Local Plan Review Issues and Options Report, February 2015 in respect of their property interests at Upper Rainham Road, Hornchurch, RM12 4EU (hereafter referred to as The Site) as identified by the Plan at Appendix 1.</p> <p>RCL acquired the freehold of the site in late 1995/early 1996. From the site RCL operates a driving school and driving centre along with the letting of its own commercial property which makes up the rest of the site.</p> <p>This commercial property consists of several car sales lots, motor trade related workshops and units, offices/classrooms, telecommunications sites & Rom skatepark.</p> <p>The main objectives of these representations areas follows. Firstly to provide a response to specific questions outlined in the Council's report, and to highlight the contribution our client's site can make to achieving the overarching goals of the proposed local plan, such as delivering its housing targets over the Plan period; identifying locations to deliver residential development; and lastly, to ensure decisions are made that make the best use of land.</p> <p>The representations are accompanied by a Masterplan Studies Brochure (hereafter referred to as the Masterplan) dated 20 March 2015 (Appendix 2). This should be reviewed in conjunction with these representations.</p> <p><u>The Site</u> The site, extends to approximately 4.85 hectares and is currently designated as a Major Developed Site within the Green Belt by the London</p>	<p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land including land at Upper Rainham Road, Hornchurch will be released for housing or other development.</p>

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		<p>Borough of Havering Core Strategy and Development Control Policies Document (2008).</p> <p>The majority of the site is currently used as an off road learner driving centre as can be seen by the aerial photo at Page 3 of the Masterplan Studies document. This shows that a large are of the site is covered by hardsurfacing.</p> <p>Elsewhere within the site are a number of commercial uses mainly related to the motor trade plus three mobile phone masts. The commercial units are predominantly located around the Petrol Filling Station that fronts onto Upper Rainham Road.</p> <p>The site is located within Floodzone 1 but has no other site specific statutory or Local Plan designations upon it.</p> <p><u>Planning Policy Context</u></p> <p>In preparing these representations significant weight has been given to national planning policy set by the National Planning Policy Framework (NPPF) (March 2012) and the National Planning Practice Guidance (NPPG) (March 2014).</p> <p><u>Plan Making</u></p> <p>Given this is the first round of consultation on the new Local Plan we feel it is important that in answering the specific questions asked at this stage in the process proper regard is given to policy guidance at the national level. This is particularly important as ultimately the Plan will be required to pass the test of soundness (NPPF Para 182). To fail to fully understand what soundness means can only serve to heighten the risk of a Plan being found unsound at the point of examination.</p>	

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		<p>The first of seventeen core planning principles (NPPF Para 17) requires that planning should:</p> <p><i>“be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up to- date, and be based on joint working and co-operation to address larger than local issues. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency”</i></p> <p>At the heart of the NPPF is a presumption in favour of sustainable development. For plan making, paragraph 14 clarifies that this means that:</p> <ul style="list-style-type: none"> – <i>“local planning authorities should positively seek opportunities to meet the development needs of their area;</i> – <i>“Local Plans should objectively meet assessed needs, with sufficient flexibility to adapt to rapid change, unless:</i> – <i>“any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or</i> – <i>“specific policies in the Framework indicate development should be restricted.”</i> <p>Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon, and reflect, the presumption in favour of sustainable development with clear policies that will guide how the presumption should be applied locally (NPPF paragraph 15).</p> <p>Local authorities should be aspirational but realistic. They should address the spatial implications of economic, social and environmental change. Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that</p>	

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		<p>provide a clear indication of how a decision maker should react to a development proposal should be included in the plan (paragraph 154).</p> <p><u><i>Other Key Policy Considerations</i></u></p> <p>Having regard to the NPPF in its entirety in so far as RCL's interests we consider that it is essential to have in mind the following policy from within the NPPF.</p> <p><i>Delivering a wide choice of high quality homes</i></p> <p>To boost significantly the supply of housing, local planning authorities should use an evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the NPPF; including identifying key sites which are critical to the delivery of the housing strategy over the plan period (paragraph 47).</p> <p>Local plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in the NPPF including the presumption in favour of sustainable development (paragraph 151).</p> <p>The Local Plan should set out the strategic priorities for the area including the homes needed in the area (paragraph 156). Crucially paragraph 157 states that Local Plans should:</p> <ul style="list-style-type: none"> - <i>"be drawn over an appropriate time scale, preferably a 15 year time horizon, take account of longer term requirements, and be kept up to date;</i> - <i>"indicate broad locations for strategic development on a key diagram and land use designations on a proposals map; and</i> - <i>"allocate sites to promote development and flexible use of land,</i> 	

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		<p><i>bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate.”</i></p> <p>Paragraph 158 states that plans should be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated and that they take full account of relevant market and economic signals.</p> <p>For housing, local authorities are required to have a clear understanding of housing needs in their area through preparation of a Strategic Housing Market Assessment (SHMA) and a Strategic Housing Land Availability Assessment (SHLAA) (paragraph 159).</p> <p><u>Conclusions</u></p> <p>The NPPF provides very clear and up-to-date national policy guidance promoting a Plan led system in order to, amongst other things boost significantly the supply of housing and secure the long term future of heritage assets.</p> <p>The Site in question is a previously developed site, already identified for some redevelopment as a Major Developed Site in the Green Belt.</p> <p>There is a clear question mark over the contribution this site plays to the function and purpose of including land in the Green Belt. We conclude that its release will in no way harm the remaining Green Belt. To the contrary it could be enhanced through careful landscaping. Furthermore, enhance public access to the adjoining Green Belt could increase the local communities enjoyment of it.</p> <p>It therefore represents a unique opportunity for Green Belt release in order</p>	

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		<p>that other important planning objectives of the Local Plan can be met in a sustainable way.</p> <p>We appreciate that the Local Plan is at its earliest stage of formulation. It is however essential that this opportunity is taken and we welcome the opportunity of meeting with officers at the Council to discuss this further ahead of any further publication of Local Plan iterations. This would allow the full benefits from the site to be properly explored and ensure correct and fully informed decisions as to the Sites future are made.</p>	
REG18.56	S.D. Olney	By making the borough a place to be proud to live in.	Noted. The Proposed Submission version of the Local Plan contains policies promoting significant levels of growth in the form of infrastructure and high quality, well managed development that enhances the borough as a highly desirable, attractive, safe and clean place that residents will be proud to live in and work.
REG18.58	Sport England	<p>Sport England aims to ensure positive planning for sport, enabling the right facilities to be provided in the right places, based on robust and up-to-date assessments of need for all levels of sport and all sectors of the community. To achieve this our objectives are to seek to PROTECT sports facilities from loss as a result of redevelopment; to ENHANCE existing facilities through improving their quality, accessibility and management and to PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future.</p> <p>We work with the planning system to achieve these aims and objectives, seeking to ensure that they are reflected in local plan policies, and applied in development management.</p> <p>The Government's National Planning Policy Framework (NPPF) is clear about the role that sport plays in delivering sustainable communities through promoting health and wellbeing. Sport England, working with the</p>	In line with the requirements of paragraphs 73 and 74 of the NPPF the London Borough of Havering commissioned a study on the assessment of needs for open space, sports and recreation facilities and opportunities for new provision in the borough. The Findings of this study are contained in a series of Reports, the Open Space Assessment Report and Standards Paper, The Outdoor Playing Pitch Assessment Report and Playing Pitch Strategy, and the Indoor Sports and Leisure Facilities Assessment Report and the Indoor Sports and Leisure Facilities Strategy 2016. The various assessment

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		<p>provisions of the NPPF, wishes to see direct reference to sport in local planning policy to protect, enhance and provide sports facilities, as well as helping to realise the wider benefits that participation in sport can bring.</p> <p>Sound policy can only be developed in the context of objectively assessed needs, in turn used to inform the development of a strategy for sport and recreation. Policies which protect, enhance and provide for sports facilities should reflect this work, and be the basis for consistent application through development management. Sport England is not prescriptive on the precise form and wording of policies, but advises that a stronger plan will result from attention to taking a clearly justified and positive approach to planning for sport.</p> <p>Policies could be included in a separate chapter on sport and recreation or, following the NPPF, be part of a chapter on health and wellbeing. In all cases, however, policies for sport and active recreation must be properly justified, include criteria against which development proposals will be judged and be based on a robust and up-to-date assessment of need as required by paragraph 73 of the NPPF.</p> <p>In this way, planning authorities will be able to demonstrate that their plan has been positively prepared (based on objectively assessed needs), is consistent with national policy (reflecting the NPPF), is justified (having considered alternatives) and effective (being deliverable). Without such attention there is a risk that a local plan or other policy document could be considered unsound.</p> <p>The NPPF clearly recognises the role of sport and recreation as a fundamental part of sustainable development, and expects local authorities to plan positively for these needs and demands accordingly. The protection and provision of opportunities to participate in sport is seen as fundamental to the health and wellbeing of communities (NPPF, section 8), meaning</p>	<p>reports provide the quantitative and qualitative audit and analysis of the demand and supply assessment of the various types of facilities studied, whilst their Strategy reports set out actions and recommendations to be taken to protect, and enhance existing facilities or provide new ones and for the maintenance and management of facilities. The output of these studies underpins the emerging policies of the Proposed Submission version of the Local Plan. In light of this the Local Plan contains a policy which seeks to protect and enhance existing facilities and to provide new facilities including securing their maintenance and management regime.</p>

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		<p>that local authorities must plan and provide accordingly through policy and development management. Without a robust and up-to-date assessment of need (as required by paragraph 73 of the NPPF), there is a risk that a local plan document could be considered unsound.</p> <p>Sport contributes to many complementary agendas Sport England advocates that planning for sport in communities should be based on a clear strategy for sport which sets out the case to protect, enhance and provide facilities.</p> <p>In doing so, it can be demonstrated how sport is important both for its own sake, but also how it contributes to complementary agendas including those illustrated below:</p> <ul style="list-style-type: none"> - Improving the health of the Nation - Enhancing social and cultural wellbeing - Creating and supporting economic growth - Providing new opportunities for children and young people - Efficient use of resources - Improving Community safety 	
REG18.60	Thames Water (Savills)	<p>Thames Water is the statutory sewerage undertaker for most of London Borough of Havering and the following comments are made in this respect. Thames Water supports the preparation of the new Local Plan for Havering.</p> <p><u>General Comments</u></p> <p>A key sustainability objective for the preparation of the Local Development Framework / Local Plan should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the National Planning Policy Framework (NPPF), March 2012, states:</p>	The Council has prepared an Infrastructure Delivery Plan to provide an overview of the infrastructure requirements over the plan period. Thames Water has been involved in the preparation of the Infrastructure Delivery Plan.

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		<p><i>“Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver: ... the provision of infrastructure for water supply and wastewater...”</i></p> <p>Paragraph 162 of the NPPF relates to infrastructure and states:</p> <p><i>“Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment ... take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”</i></p> <p><u>Development Proposals – General</u></p> <p>As set out above, it is crucial that any necessary additional waste water infrastructure is provided in time to service new development to avoid unacceptable impacts on the environment, which can include sewer flooding of residential and commercial property.</p> <p>In order to ensure that the drainage requirements of development proposals are understood and that any upgrade requirements are identified, developers should be encouraged to contact Thames Water Developer Services in advance of the submission of planning applications. Thames Water Developer services can be contacted either:</p> <ul style="list-style-type: none"> – by post at: Thames Water Developer Services, Reading Mailroom, Rose Kiln Court, Rose Kiln Lane, Reading RG2 0BY; – by telephone on: 0845 850 2777; – by email: developer.services@thameswater.co.uk 	
REG18.61	The Crown Estate (Amec Foster Wheeler)	<p><u>Introduction</u></p> <p>On behalf of our client, The Crown Estate, Amec Foster Wheeler welcomes the opportunity to comment on ‘A new Local Plan for Havering.’ The Crown</p>	The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the

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		<p>Estate has significant land interest within the Borough and our response will focus on the questions posed relating to housing and the Green Belt. We present a number of options in the response to question 10 which should be considered as revisions to the Green Belt boundaries as part of a wider Green Belt review to assist in meeting the significant development needs in the Borough over the Plan Period.</p>	<p>Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land will be released for housing development.</p>
REG18.63	Thomas Bates and Son Ltd. (Andrew Martin Planning)	<p>In September 2014 Andrew Martin – Planning (AM-P) submitted representations to a ‘Call for Sites’ by London Borough of Havering, in respect of land off Wingletye Lane, Hornchurch (previously referred to as ‘Land at Lillyputts Farm’) on behalf of Mr Michael Bates of Thomas Bates and Son Ltd. We now submit our written response to the latest consultation on the Local Plan that seeks to determine key strategic priorities for the Borough over the next 15 years. In addition we have prepared an illustrative layout plan to demonstrate that a form of residential development can be achieved on the site.</p> <p><u>The London Plan</u></p> <p>Mr Anthony Thickett, an independent planning inspector appointed by the Secretary of State, held an examination in public of the Draft Further Alterations to the London Plan from 1 September and 18 September 2014. The report setting out his findings and conclusions was published on 15 December 2014 and the Inspector’s recommendations were adopted in early March 2015.</p> <p>The Further Alterations to the London Plan (FALP) document indicates that the London Boroughs collectively need to provide 49,000 dwellings per</p>	<p>The Proposed Submission version of the Local Plan seeks to deliver the London Plan housing target as a minimum, and go beyond that where possible to meet the full OAN in the borough.</p> <p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land will be</p>

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		<p>annum between 2015 and 2036 in order to meet both market and affordable housing needs for London. In terms of supply the FALP has provided minimum housing supply targets for each of the Boroughs, which in total equates to 420,000 additional homes over the period 2015 to 2025, or 42,000 dwellings per annum. London Borough of Havering should be aiming to provide a <u>minimum</u> of 11,701 dwellings between 2015-2025, an annual target of 1,170 dwellings. The FALP introduces a requirement for the London Boroughs to meet their own housing target, as set out in Table 3.1 (i.e. 1,170 dpa in the case of LB Havering) and address any gap between supply and need by seeking to exceed this target where possible. The Inspector's report goes on to state at paragraph 33:</p> <p><i>“However, in order to be in general conformity with Table 3.1, Boroughs need only meet their individual targets. In the absence of any clear guidance as to exactly how and where the additional 6,600 dpa will be found it is difficult to see how a housing target in a local plan would not be in general conformity if it made provision for the figure in Table 3.1 and no more.</i></p> <p><i>There is no mechanism in the FALP to indicate how the 6,600 dpa would be apportioned or distributed. Without this I do not see how the Mayor can guarantee the delivery of the additional 6,600 dpa necessary to meet the identified need.”</i></p> <p>On this basis, the Inspector has concluded that the housing targets in the FALP will not provide sufficient housing to meet the objectively assessed housing need in London and he is not convinced that the FALP ensures the additional 6,600 dpa, not allocated to specific Boroughs, will be delivered. On this evidence it is likely that the London Plan strategy will not deliver sufficient homes to meet housing needs, and so the Inspector has called for an early review of the Plan to commence once the FALP is adopted in 2015. Until this review is published, it is the responsibility of the London Boroughs and districts in the South East England to acknowledge this</p>	<p>released for housing development.</p>

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		<p>shortfall in supply and react to it by allowing new development in sustainable locations, in a bid to try and exceed their allocated housing targets and narrow the gap between need and supply. LB Havering should therefore be proactively seeking to exceed their target in the London Plan through the allocation of sustainable, deliverable and suitable sites for residential development. This may involve the strategic release of green belt land where it can be demonstrated, through a green belt review, that the five purposes of including land within the green belt are no longer being met.</p> <p><u>Master Plan</u></p> <p>The indicative master plan submitted with these representations demonstrates how residential development can be accommodated on site. The master plan comprises 68 dwellings at a density of 25 dwellings per hectare, including 1 x 4 bed dwelling, 26 x 3 bed dwellings and 41 x 2 bed dwellings. The mix of housing illustrated on the indicative drawing is derived from findings in the latest East London Strategic Housing Market Assessment (SHMA) (2010), which indicates a need within the Borough for smaller dwellings.</p> <p>Open space and the access road have been located along the eastern boundary with Wingletye Lane in order to respect the views from the existing properties to the west of Wingletye Lane.</p>	
REG18.64	Thurrock Council	<p><u>Havering Plan programme and timetable</u></p> <p>Thurrock Council supports the preparation of a new Local Plan for Havering in order to be consistent with the changes in the Government approach to planning set out in the National Planning Policy Framework (NPPF) and the National Planning Guidance (PPG). Furthermore it is recognised that the new Local Plan will need to take account of the requirements of, and be in conformity with, the London Plan and its Further</p>	The Council is working closely with the GLA on the preparation of the Proposed Submission version of the Local Plan and the new London Plan. At this point in time it is unclear if an early review would be necessary, as the Proposed Submission version of the Local Plan is being prepared in advance of the London Plan.

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		<p>Alterations. Included within the London Plan Further Alterations are new overall targets for London and specific minimum targets for the London Borough's including Havering.</p> <p>It is noted that Havering Council expect to adopt the new Local Plan in autumn 2016 and that the Mayor of London intends to undertake a full review of the London Plan with adoption anticipated in 2019/20. It is considered that both timetables for adoption are ambitious. On the basis of the proposed timetables the Havering new Local Plan will be adopted before the full review of the London Plan.</p> <p>However it is unclear at this stage as to how the emerging full review of the London Plan will impact on the new Havering Local Plan. Following adoption by the Mayor of the Full Review of the London Plan in 2019/20, is it the intention of Havering Council that the new Havering Local Plan would be the subject of an early review in order to ensure overall conformity of its Plan? Any delay or extension to the Havering Local Plan timetable may result in the requirements of the Full Review of the London Plan having to be taken into account. A change that increased the length of preparation of the Havering new Local Plan would also require the plan period for the Local Plan being extended beyond 2031 in order to maintain a fifteen year period for the Plan from the date of adoption.</p>	
REG18.66	Trinity Hall (Bidwells)	<p>These representations have been prepared on behalf of Trinity Hall in respect of land at Chapman's Farm, Upminster (the "Site"). Trinity Hall owns the Site as indicated by the Site Location Plan at Appendix 1 to this Report. This land was put forward for consideration to the 'Call for Sites' undertaken by the Council in 2014.</p> <p>This Report provides our consolidated response to the questions in the Local Plan questionnaire published for consultation. We provide responses to the questions of principal relevance to our clients' interests.</p> <p>Fundamentally, the premise of our representations is that the Plan should</p>	Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the

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		<p>build in sufficient flexibility to ensure certainty of delivery. To do so it must release Green Belt land for housing. Ignoring the potential contribution of many areas of Green Belt which do not perform a valuable function could have significant negative impacts upon the deliverability of the Plan's proposals and the achievement of its other objectives, most notably the need to support economic growth, support town centres and deliver environmental and wider sustainability objectives.</p> <p>This Report provides our consolidated response to the questions in the Council's Local Plan questionnaire.</p> <p>Fundamentally, we consider that the Local Plan should take a balanced approach to new development, having regard to the need to accommodate acute and competing demands on a limited land resource. We believe that a review of Green Belt is essential to help the Council to ensure that the new Local Plan can deliver sufficient housing to meet the Borough's London Plan targets, address objectively housing needs and enable a range of house types to come forward to support mixed and balanced communities.</p> <p>A review of Green Belt boundaries may also help to ensure existing employment sites are not unnecessarily lost to residential use in a period of strong economic growth, it would help to avoid an imbalance of high density residential development and other commercial uses in town centres and the development of greenfield land offers the best opportunity of delivering the infrastructure required to support new development. Targeted development of some Green Belt land can also enable the enhancement for the beneficial use of other land serving a more important Green Belt function.</p> <p>The Council will need to identify through its evidence base how the Plan can deliver its development requirements in a way that does not compromise interlinked sustainability objectives. Failure to this would result</p>	<p>Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. For this reason no parts of the Green Belt land including Land at Chapman's Farm, Upminster will be released for housing or other development types.</p>

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		<p>in a Plan which is unsound.</p> <p>In light of this the Council should not make any decisions on the proposed location of new development until there is a clear understanding of the following, as yet unpublished, evidence base documents:</p> <ul style="list-style-type: none"> – An Employment Land Review – in order to identify the extent of demand for employment land, to ensure that any changes of use to residential do not adversely affect economic growth; – A Havering Borough SHLAA Viability Appraisal – to quantify and validate the assumptions of the London Plan Viability Appraisal to provide a more robust assessment of the deliverability of the Borough's brownfield housing land supply. – An East London SHMA – to identify the likely mix, type and tenure of dwellings needed in the Borough, and linked to this, the range of site types (including Green Belt land) needed to viably deliver such a range; and – A Green Belt Review – to have, as a minimum, an understanding of the Green Belt function offered by the sites promoted for development in the Local Plan and the potential benefits their development could bring. <p>Alongside this evidence gathering, we would urge the Council to have full regard to the opportunities presented by Land at Chapman's Farm, Upminster.</p>	
POST18.1	Trevor Lawrence	<p>Romford Conservation Area Boundary:</p> <p>This currently includes the eastern half of the North Street precinct,</p>	<p>Noted. The Council has prepared an updated appraisal of the Romford Conservation Area.</p>

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		<p>between the relief road to where the precinct widens alongside Angel Way, opposite the pedestrian access to The Mews (between Nos 20 and 22 North Street). All the important buildings and character worthy of protection within this precinct are contained from there to the main junction with the High Road (ie. extending southwards). The remainder of the North Street precinct has, at best, an unprepossessing appearance; at worst, it forms a depressing entrance to the Town Centre on this main approach from the north.</p> <p>The buildings fronting both sides of this part of the precinct have little or no architectural or historical value; the precinct itself is dominated by North House, a bland 12-storey office block. Enclosing the western frontage (which is outside the Conservation Area), beyond the wider precinct alongside Angel Way, is a modern 6-storey block of flats, Rubicon Court, where a mechanised parking area now fronts this precinct at ground level. The older 2-storey frontage between it and the relief road has been demolished and replaced by the skeletal concrete frame of a potential 6- and 7-storey development. The demolished building was similar in appearance to the existing 2-storey terrace south of North House, enclosing the eastern frontage. This comprises two similar, but separate and abutting, 2-storey buildings, similar to those demolished on the western frontage but, according to English Heritage, who raised no objection to that demolition, the remaining eastern frontage buildings have even less value than those demolished. They are undistinguished and unremarkable – except for their particularly unattractive and depressing appearance at the rear, facing The Mews and forming part of the setting for the GII* listed Church of St. Edward the Confessor. Nor did English Heritage raise any objection when I contacted them in 2014 regarding the possible redevelopment of 22 – 28 North Street.</p> <p>The continued inclusion of this part of North Street within the Conservation Area discourages a comprehensive redevelopment of North Street, which could help create an attractive approach to the town from the north; make</p>	

Response Number	Respondent Name	Response to Q17	Council's response
		<p>the precinct more commercially successful and vibrant; encourage the formation of an attractive "square" alongside Angel Way as part of the precinct and improve the existing pedestrian linkage from there to the market place, through The Mews and alongside the Church; and improve the setting of the listed Church as well.</p> <p>Maintaining this part of North Street as part of the Conservation Area discourages such improvements.</p>	
POST18.2	Philip Bowden	<p>I am requesting that the land bordered by New Zealand Way, Queenstown Gardens and Gisborne Gardens,(Known as the Green) in South Hornchurch to be allocated the status of Local Green Space under the National Planning Framework paragraph 77</p> <p>Local Green Space criteria</p> <p>1. Reasonably close proximity to the community it serves There is no definition of this in the NPPF and it will be up to individual planning authorities to define. This may vary depending on the size of the community to which the green space relates, the size of the green space or the value placed on it by the community. The land must not be isolated from the community and would normally be within easy walking distance of the community served.</p> <p>We maintain that the land mentioned fulfils the criteria stipulated here and indeed is immediately surrounded by residents dwellings Further we say that this land fulfils the criteria of paragraph 2</p> <p>2. Demonstrably special to a local community Evidence must be provided of the land's value to and use by the local community to show the land holds a particular local significance. The land must fulfil one or more of the following criteria:</p>	A planning application has been submitted for residential development on this site and therefore it would not be appropriate to designate as a Local Green Space.

Response Number	Respondent Name	Response to Q17	Council's response
		<p>We believe that the land qualifies under paragraph 2 I Recreational value In respect that it is an important place for residents of Dovers Estate to socialise exercise, walk dogs, children playing. further we have historical evidence that the Council have organised events on the green.</p> <p>We are confident that the land also qualifies under paragraph 2 I Richness of wildlife.</p> <p>There are Bats that roost in certain trees surrounding the green. they have been identified as Crevice Roosting Bats. Bats are biodiversity indicators. Bats roosting in buildings or the surrounding area is a sign of a healthy green environment. Making space for Bats is an important conservation action. These same trees appear to support the growth of Lichen this is an indicator of the local air quality. Also every winter Canadian Geese visit the green.</p> <p>3. Local in character, not an extensive tract of land The criteria may differ between settlements depending on their physical size and population. The areas would normally be fairly self-contained with clearly-defined edges. Blanket designation of open countryside adjacent to settlements will not be appropriate. There is a no minimum size limit for LGS.</p> <p>Again we believe that the land in question fits the criteria of, 'Local in character'</p> <p>We would like you to allocate this land as Local Green Space and remove the spectre of development threatening this local amenity enjoyed by residents for over 60 years as a De-facto green space.</p>	

Response Number	Respondent Name	Response to Q17	Council's response
POST18.3	Nigel Teelan	I would just like to say I do not agree with the councils local plan for nowhere can I see any plans for gypsy and Traveller sites or accommodation of any kind in it	Noted. The Proposed Submission version of the Local Plan includes a policy dealing with gypsy and travellers. The Plan is supported by an up to date needs assessment.

4. Additional Material Submitted with representations

REG18.1 – AECOM

Figure 1 – Proposed red-line boundary for Green Belt release at Bush Farm

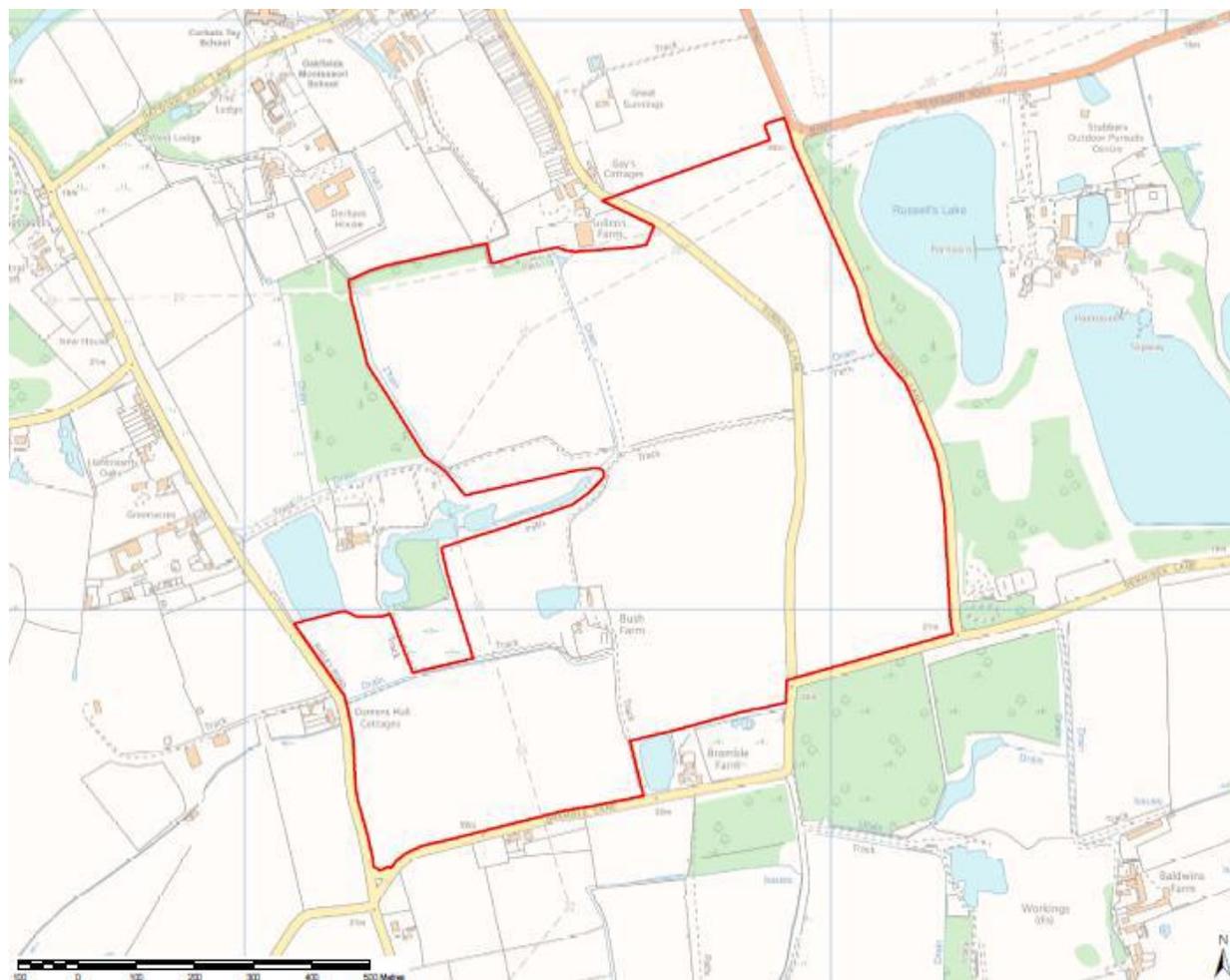
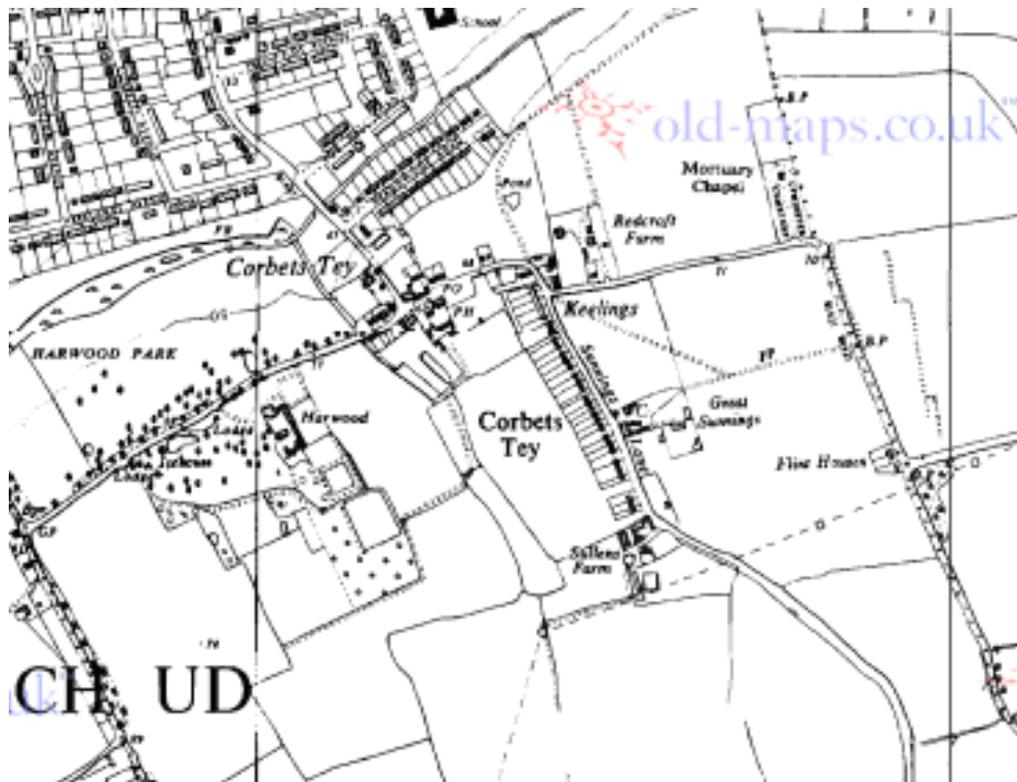
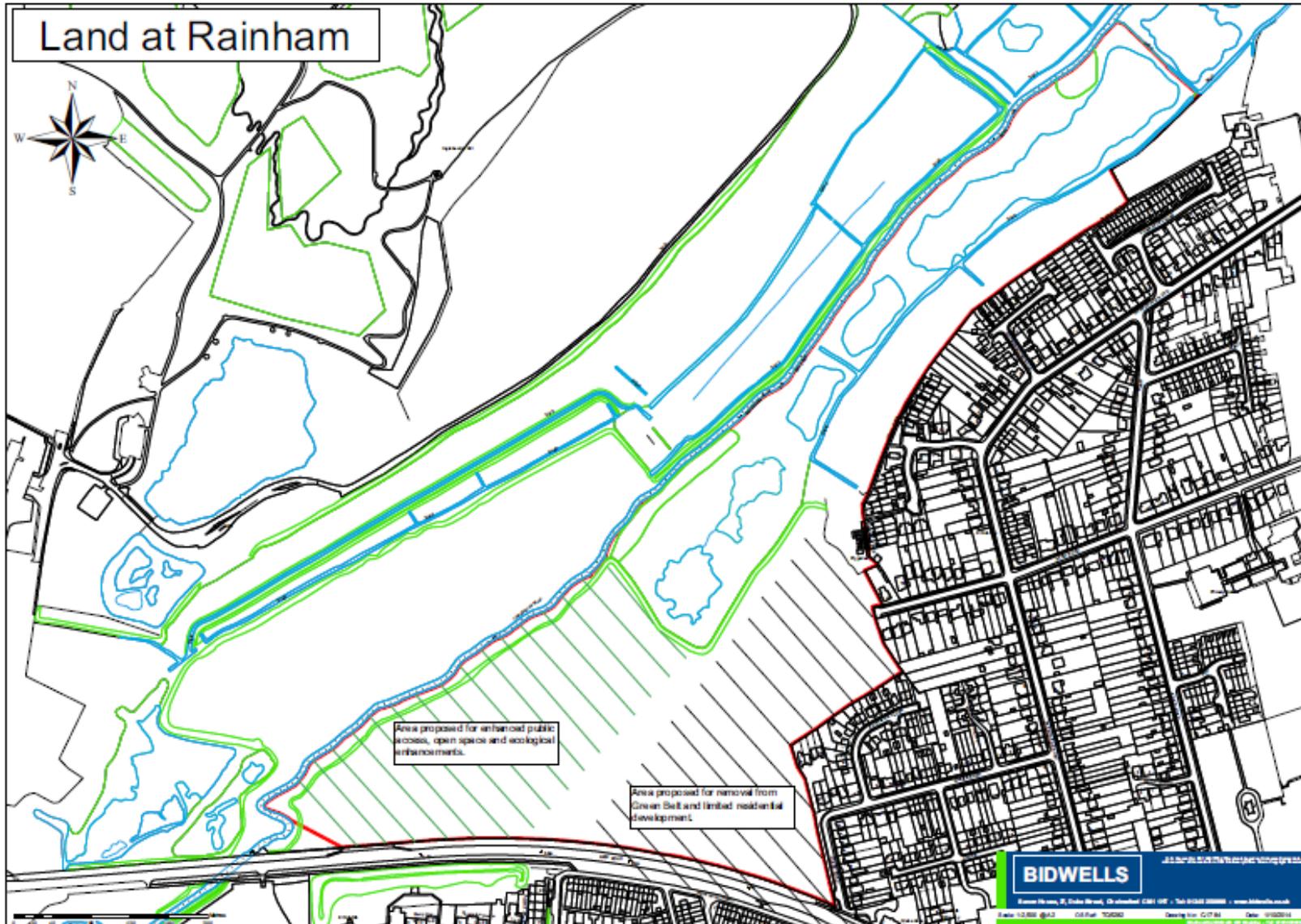


Figure 2 – Comparison of historical map with present-day aerial view



REG18.2 – Adams Family (Bidwells)

Site Location Plan



REG18.4 – Barratt London (GVA)

Refer to separate document

REG18.14 – Edward Gittens and Associates

Site Location Plans



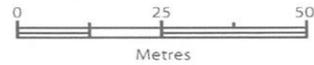
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The representation of features as lines is no evidence of a property boundary.

Scale 1:1250



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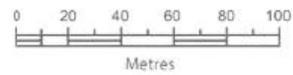
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The representation of a road, track or path is no evidence of a right of way.

The representation of features as lines is no evidence of a property boundary.

Scale 1:2500

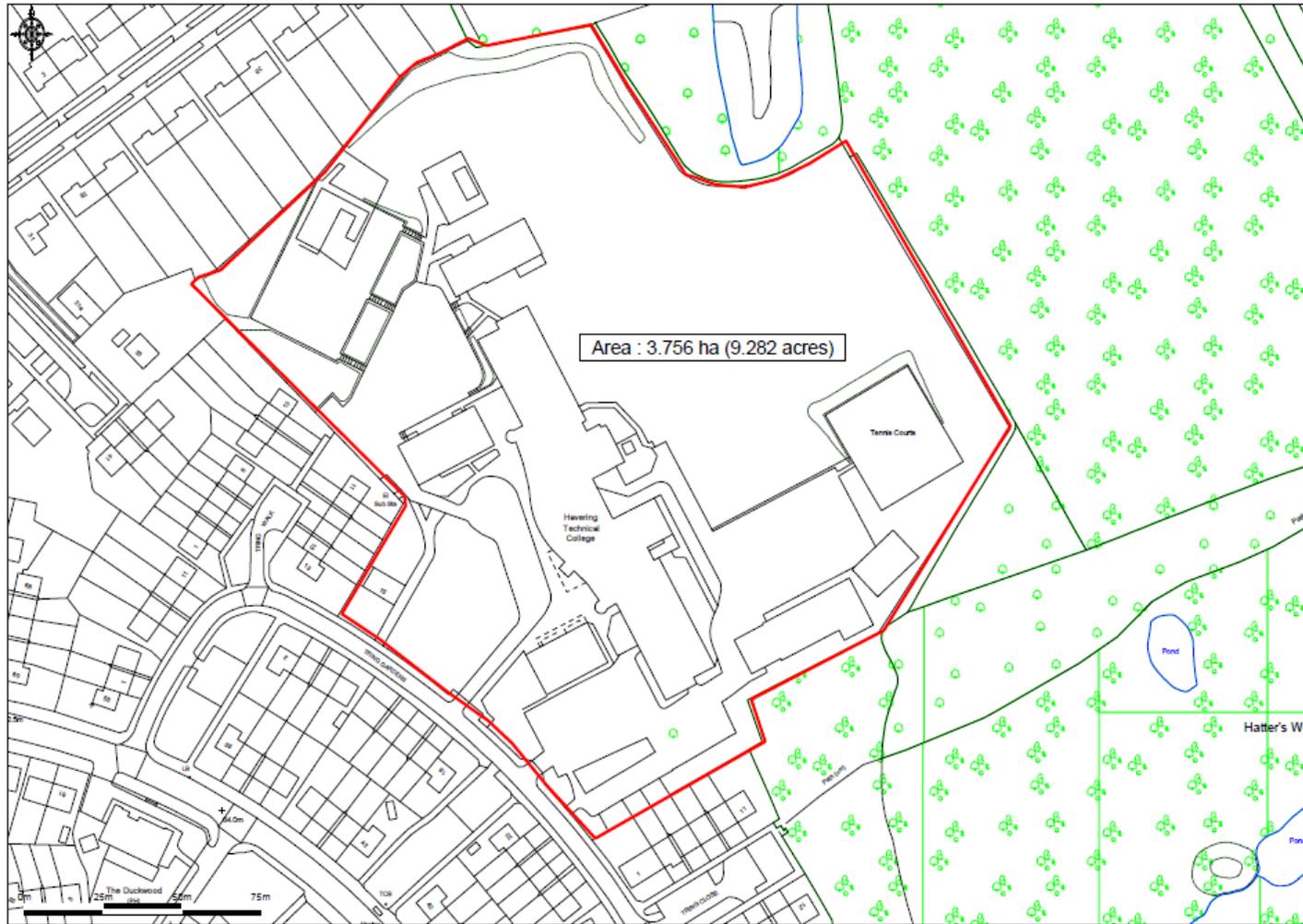


Supplied by: Getmapping
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REG18:21 Havering College of Further and Higher Education (Iceni Projects)

Site Location Plan

Havering College of Further & Higher Education
Quarles Campus, Tring Gardens, Romford, RM3 9ES



Site Location Plan 1:1250

REG18:24 Higgins Homes (Nathaniel Lichfield and Partners)

Site Location Plan



KEY
Location of Site



nlp Nathaniel Lichfield & Partners
Planning Design & Environment

Project: Chelmsford Road, Uppertonic, RM14 2DJ
Title: Site Location Plan

Client: Higgins Homes
Date: February 2015
Scale: 1:2500 @ A4
Drawn by: SW
Dwg No: 1514246001

03/12/2014
N

Information contained herein is subject to the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1987.

KEY
Existing Green Belt Boundary
Proposed Green Belt Boundary



nlp Nathaniel Lichfield & Partners
Planning Design & Environment

Project: Chelmsford Road, Uppertonic, RM14 2DJ
Title: Green Belt Boundary Revision

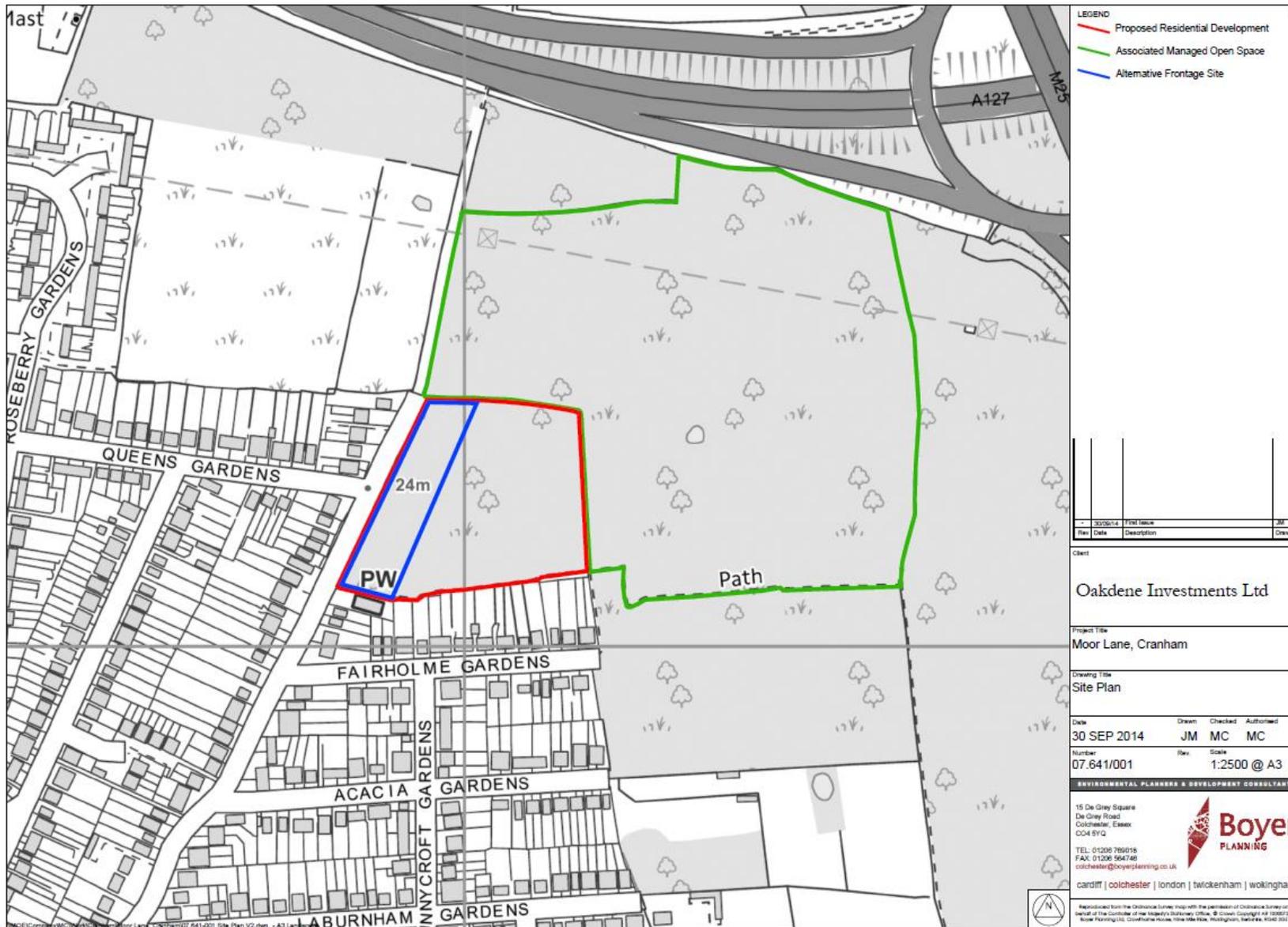
Client: Higgins Homes
Date: February 2015
Scale: 1:2500 @ A4
Drawn by: SW
Dwg No: 1514246002

03/12/2014
N

Information contained herein is subject to the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1987.

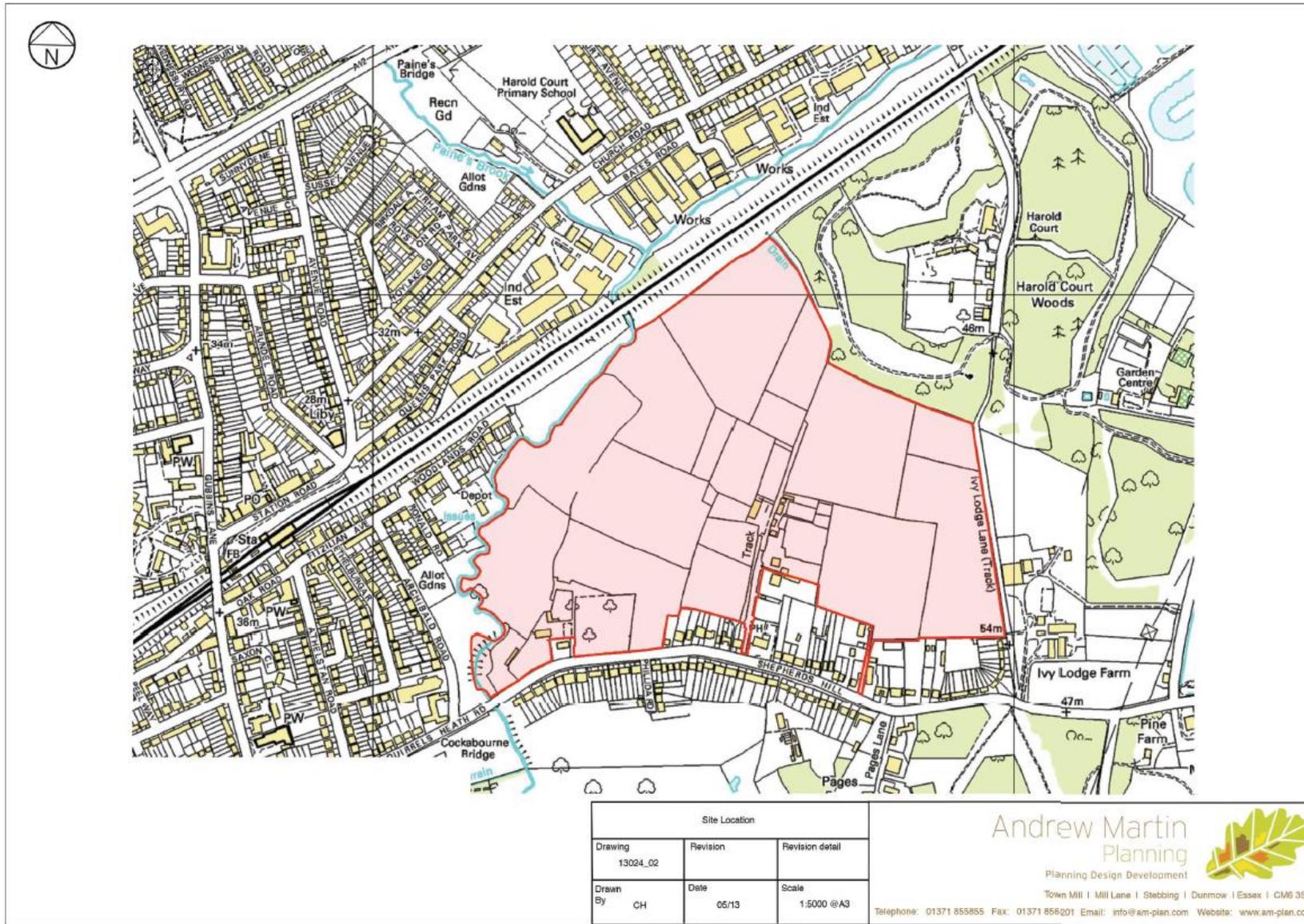
REG18.28 Joe Coogan

Site Location Plan



REG18.33 Mr Leslie Budge (Andrew Martin Planning)

Site Location Plan



Illustrative Layout



Local Facilities



Local Facilities		
Drawing 13024_04	Revision	Revision detail
Drawn By CH	Date 05/13	Scale 1:5000 @A3

Andrew Martin
Planning

Planning Design Development

Town Mill | Mill Lane | Stebbing | Dunmow | Essex | CM6 3SN

Telephone: 01371 855955 Fax: 01371 856201 Email: info@am-plan.com Website: www.am-plan.com



SA Objective	Key Questions	Yes/No	Comments
Retain and enhance and conserve the biodiversity and character of the landscape.	<p>Is the site within 100metres of any of the following sensitive receptors:</p> <ul style="list-style-type: none"> • SSSIs • NNR • LoWS • Ancient Woodland • Other sensitive designated <p>Will the development be located in areas noted for their high sensitivity to change (from Essex Landscape Character Assessment evaluations) or within 100metres?</p> <p>Will any Tree Preservation Orders (TPOs) be affected as a result of development?</p> <p>Is it a Greenfield site?</p> <p>Is the site located within the Greenbelt?</p> <p>Is the site located within the Countryside Protection Zone?</p> <p>Will the site result in a loss of high quality agricultural land?</p> <p>Will new development see a disruption in current field boundaries?</p>	<p>No</p> <p>No</p> <p>No</p> <p>No</p> <p>No</p> <p>No</p> <p>?</p> <p>Yes</p> <p>Yes</p> <p>No</p> <p>No</p> <p>No</p>	

SA Objective	Key Questions	Yes/No	Comments
To maintain and enhance the districts cultural heritage assets and their surroundings	<p>Is the site within 100metres of a (including its setting):</p> <p>Scheduled Monument?</p> <p>Listed Building?</p> <p>Conservation Area?</p> <p>Historic Park or Garden?</p> <p>Other historic or cultural feature?</p>	<p>No</p> <p>No</p> <p>No</p> <p>No</p> <p>No</p>	

SA Objective	Key Questions	Yes/No	Comments
Reduce and control pollution	<p>Is the site in or within 100 metres of any AQMA, or likely to exacerbate issues through access arrangements?</p> <p>Is the site within 100 metres of any vulnerable waterbodies?</p> <p>Is the site within a ground water protection zone?</p> <p>Will the site be affected by noise?</p> <p>Is the site on contaminated land?</p>	<p>No</p> <p>No</p> <p>No</p> <p>No</p> <p>No</p>	

SA Objective	Key Questions	Yes/No	Comments
To reduce the risk of flooding	<p>Is the site within flood risk zone2?</p> <p>flood risk zones 3 a/b?</p> <p>Is the site likely to increase flood risk elsewhere?</p> <p>Is the site at risk of flooding from other sources?</p> <p>Is there capacity on site for mitigation measures?</p> <p>Does the site contravene any recommendations made in the SFRA?</p>	<p>Yes</p> <p>Yes</p> <p>No</p> <p>Yes</p> <p>No</p>	<p>Edge of site boundary</p> <p>Edge of site boundary</p>

SA Objective	Key Questions	Yes/No	
To promote and encourage the use of sustainable methods of travel	Is the site within 800 metres of an existing public transport node?	Yes	Bus Service
	Is the site within walking and cycling distance (800m) of: a school (Residential allocations only)	No	Secondary School 1km
	convenience shopping (Residential allocations only)	Yes	800m Local shops Gubbins Lane
	primary health care facilities? (Residential allocations only)	Yes	Harold Wood Clinic
	residential areas? (not applicable to residential allocation proposals)	Yes	

SA Objective	Key Questions	Yes/No	
Promote accessibility	Is the site located in an area of high deprivation for Barriers to Services sub-domain?	No	
	Does the site provide safe highway access?	?	
	Is the site within a town centre?	No	

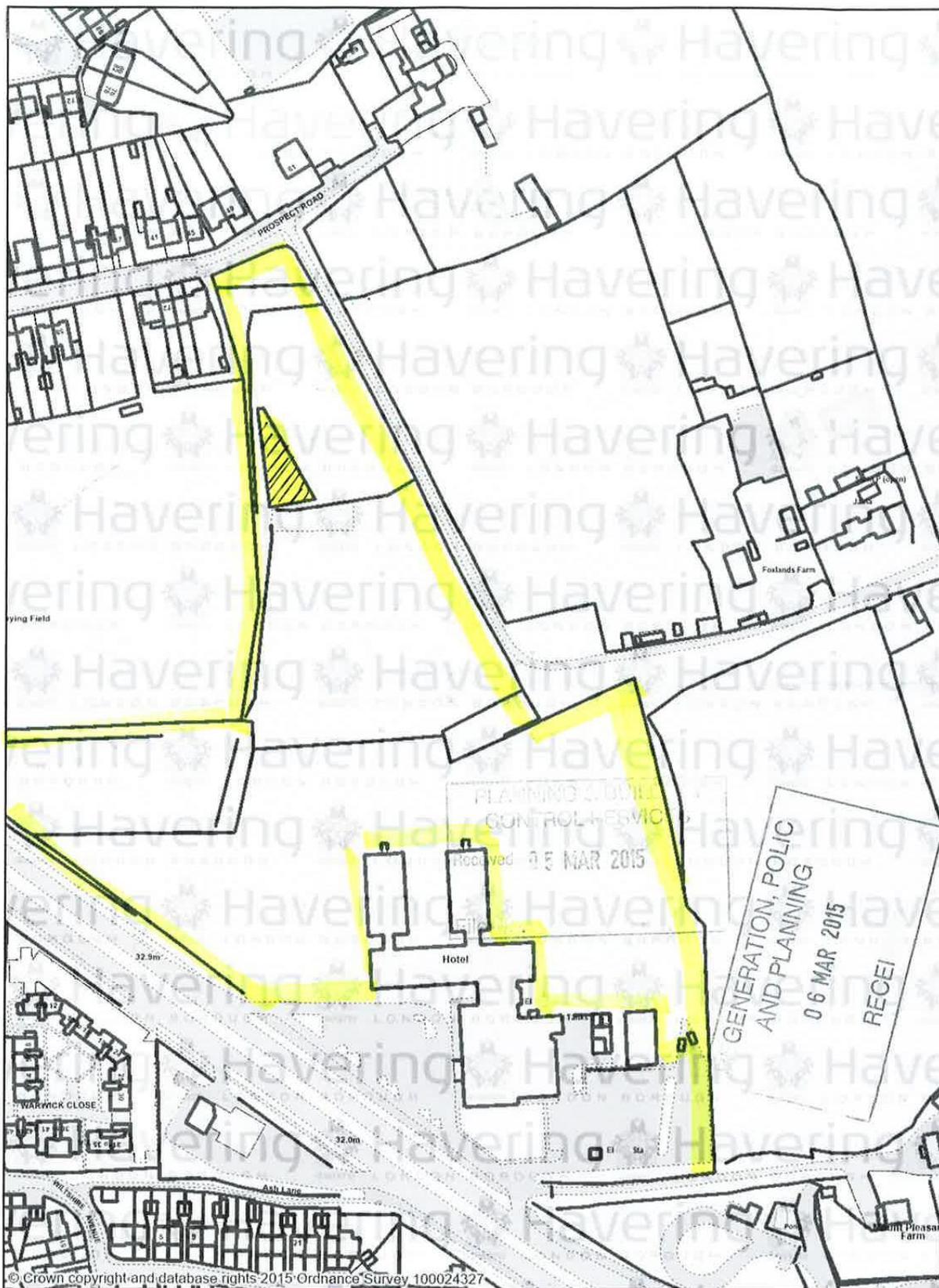
SA Objective	Key Questions	Yes/No	
To Improve the population's health and promote social inclusion	Will the site be located within 800 metres of healthcare facilities?	Yes	Harold Wood Clinic
	Will the site be within: 300m of accessible natural greenspace of at least 2ha in size?	No	Pages Wood 400m
	2km of a 20ha accessible natural greenspace?	Yes	
	5km of a 100ha accessible natural greenspace?	Yes	
	Will the site see a loss of recreation?	No	
	Is the site located within an area of high deprivation for the for the Health Deprivation and Disability IMD sub-domain?	No	
Will the site be readily accessible on foot or by bicycle?	Yes		

SA Objective	Key Questions	Yes/No	
To improve the education and skills of the population	Will the site be located within 800 metres of a primary school?	No	Harold Court Primary School 1.9 km
	Will the site be located within 4.8km of a secondary school?	Yes	Redden Court School

Site to	Railway Station	- 0.64miles	1km
	Retail Park	- 1.8 miles	2.8km
	Church Road	- 1.2 miles	1.9km
	M25	- 2.8 miles	4.4km
	A127	- 0.8 miles	1.2km
	A12	- 1.0 miles	1.6km
	Harold Hill Industrial Estate	- 2.0 miles	3.2km
	Gubbins Lane (Local Shops)	- 0.5 miles	0.8km
	Secondary School	- 0.7 miles	1km
	Primary School	- 1.2 miles	1.9km

REG18.34 Margaret Whippy

Site location plan

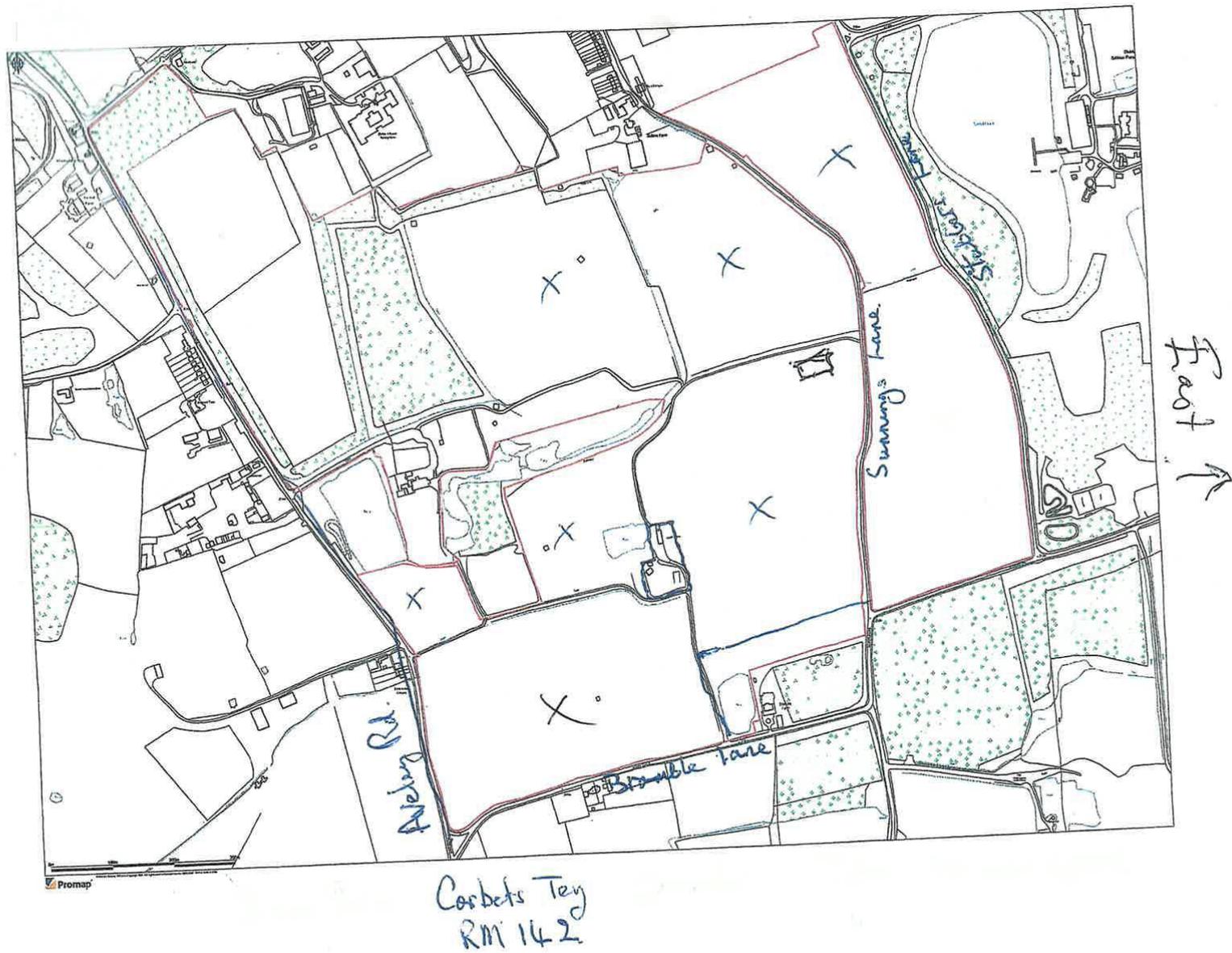


REG18. 36 Moody Homes and Mr John Wakeling (Bidwells)

Site Location Plan



REG18.37 Mr Barrie Stone and Miss Eleanor Stone

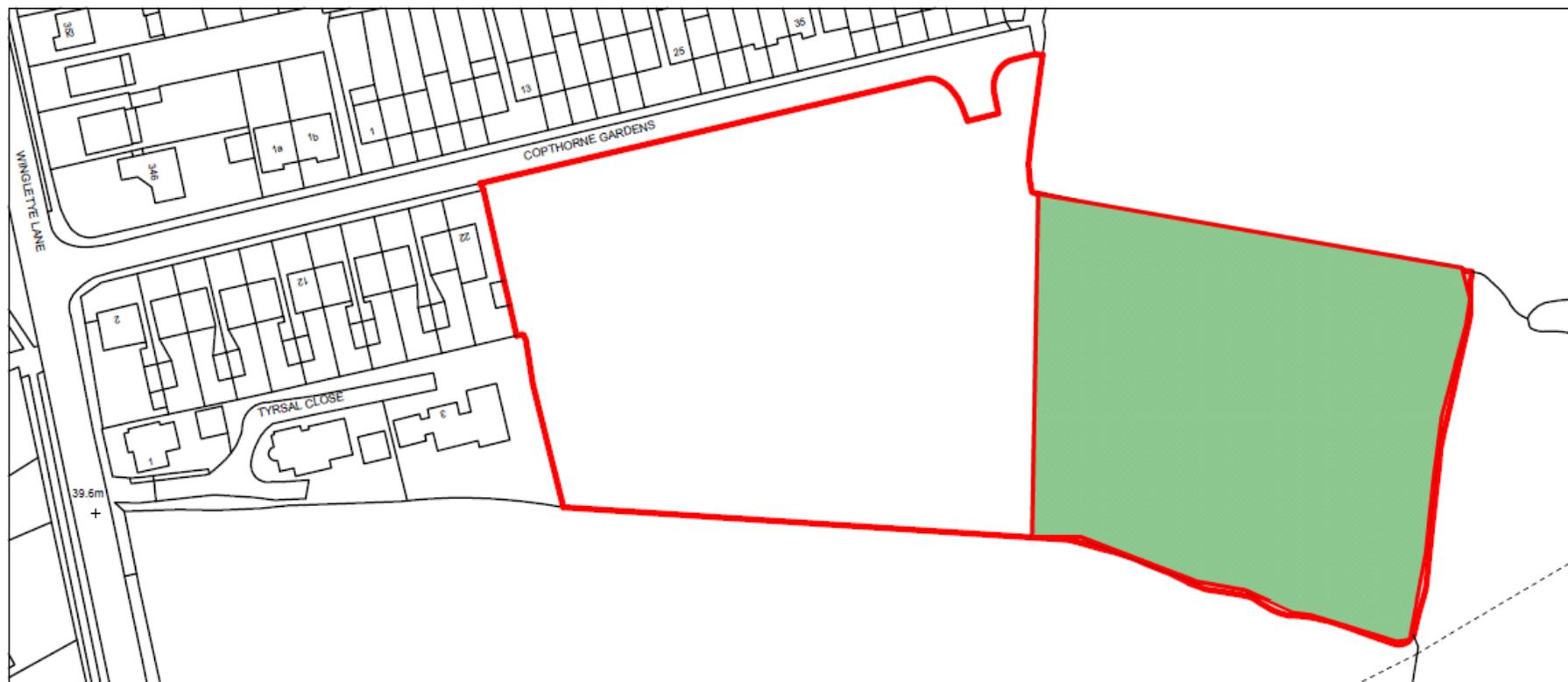


REG18.38 Mr T Clements (DHA Planning)

Figure 1 – Aerial View of site (courtesy of Google maps)



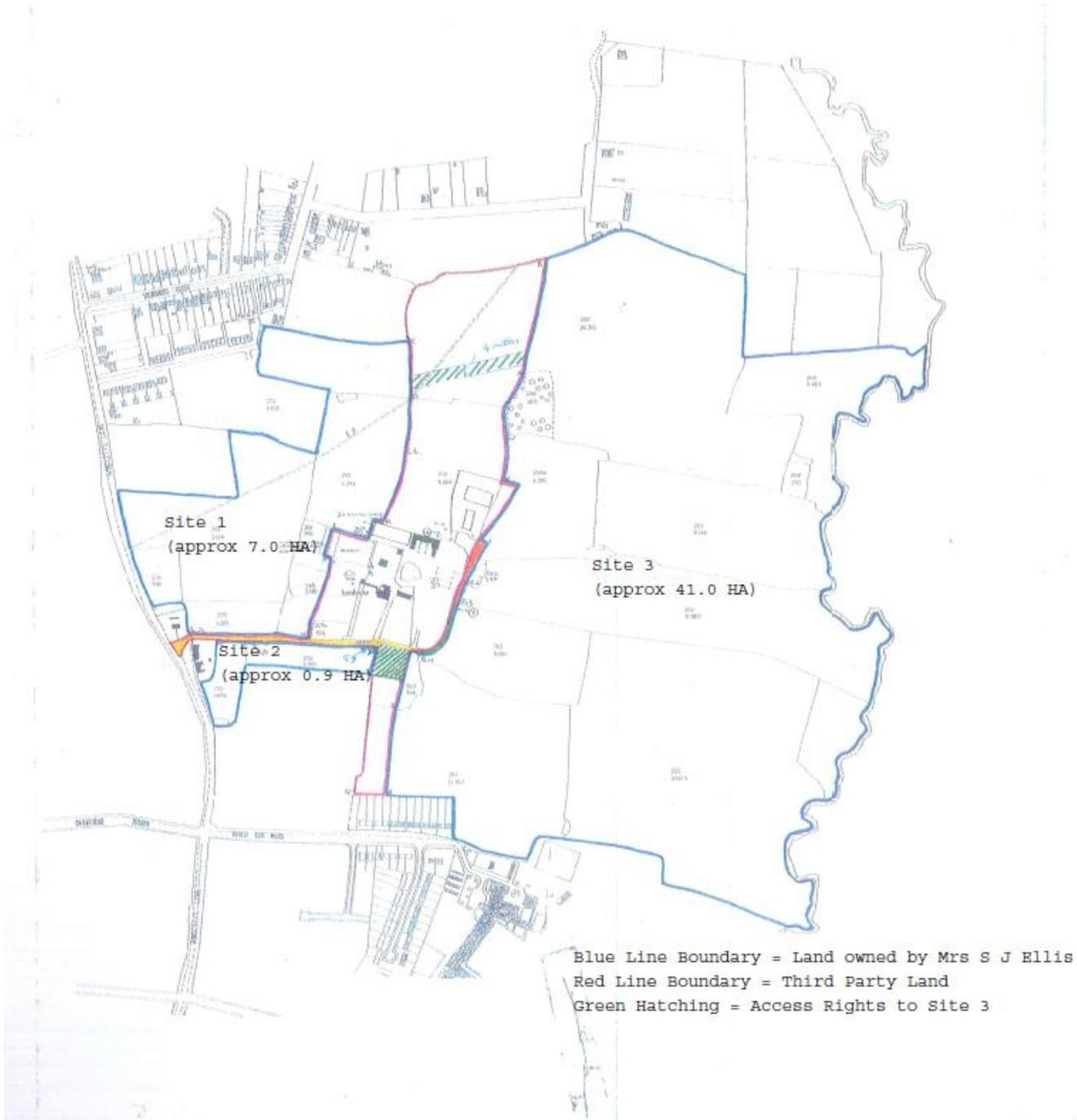
Figure 2 – Site Location Plan showing Public Open Space area (green)



REG18.39 Mrs S J Ellis (Bidwells)



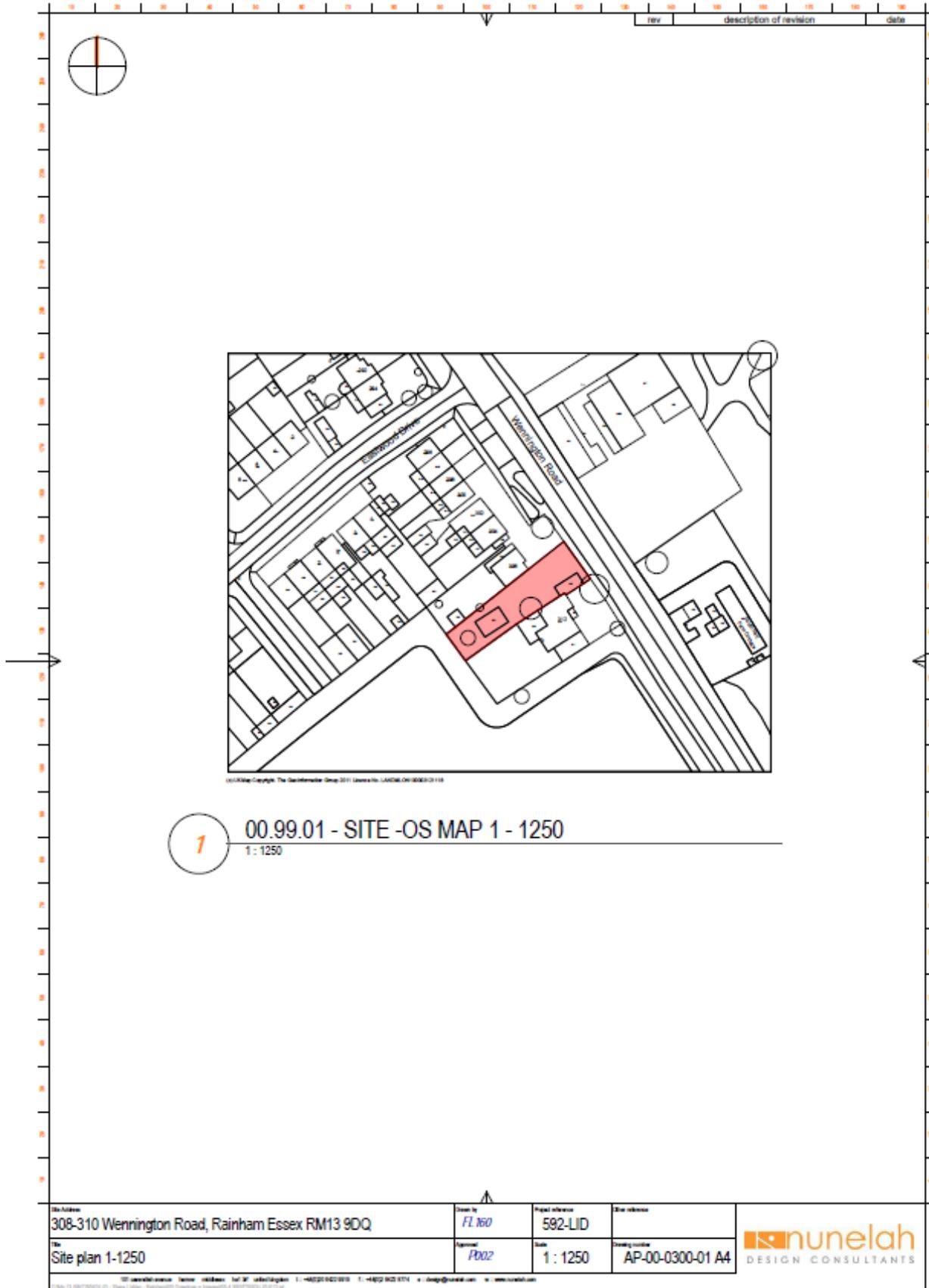
Broad area supported for release from Green Belt



DONALD MOODY LIMITED		
<small>ARCHITECTS AND SURVEYORS DEPARTMENT CORNER ANCHORAGE LINDALL DISTRICT</small>		
LEGAL PLAN 1000		

REG18.40 Ms M Blackman

Site location plan

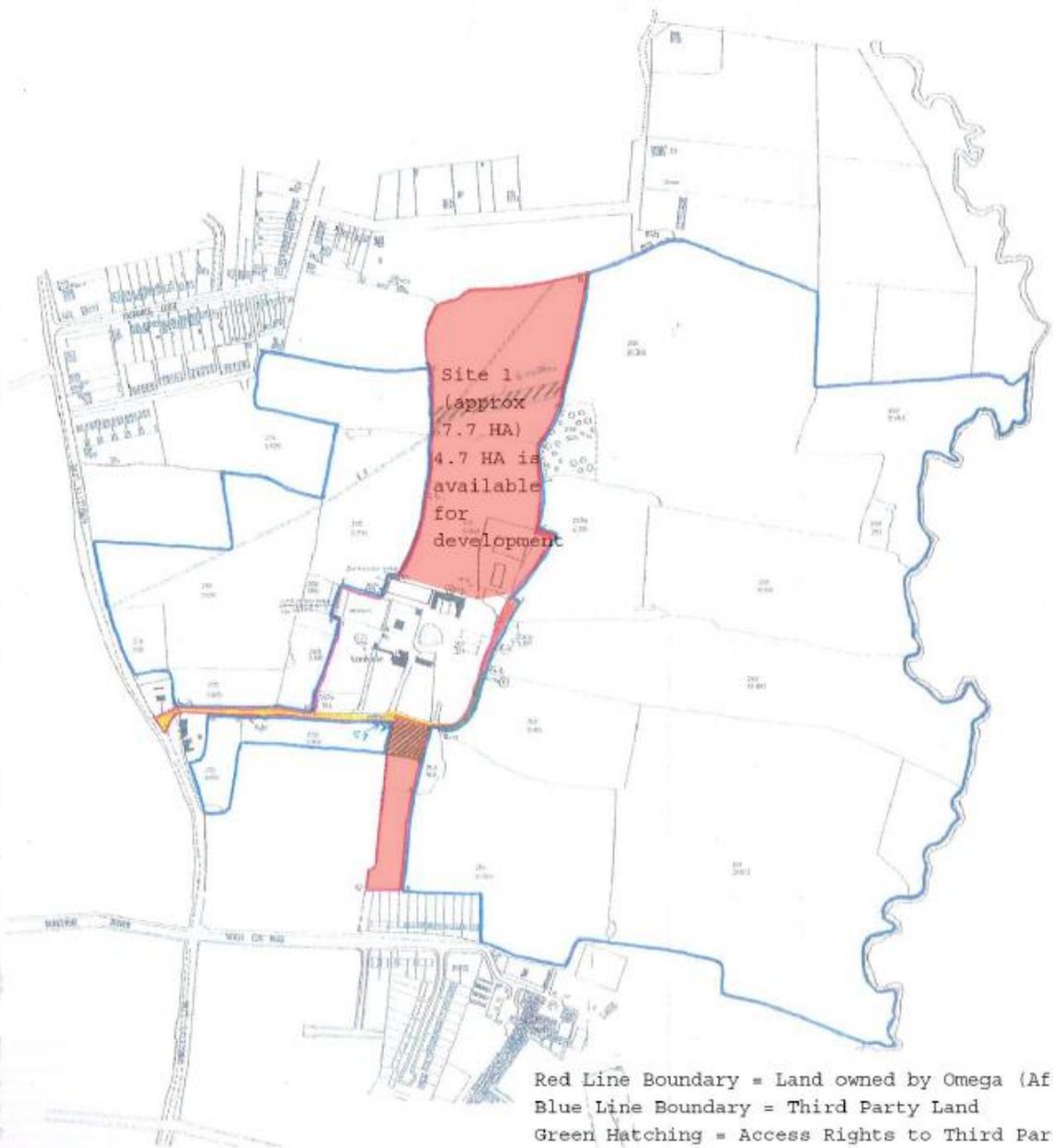


REG18.43 Omega After Alpha Ltd (Bidwells)

Site location plan



Broad area supported for release from Green Belt



Red Line Boundary = Land owned by Omega (After Alpha) Ltd
 Blue Line Boundary = Third Party Land
 Green Hatching = Access Rights to Third Party land to east

DONALD MOODY LIMITED
 10001 HURON AVENUE, SUITE 100, MISSISSAUGA, ONTARIO L4V 1P4
 TEL: (905) 277-8888 FAX: (905) 277-8889
 WWW.DONALDMOODY.COM

PROJECT: []
 SHEET: [] OF []
 DATE: []

LEGALLY BOUND

LEGAL PLAN 114

REG18.45 Planning Potential

Site location plan

Land at Crow Lane, Romford, RM7 0ED



REG18.46 Planning Potential Rep 2

Site location plan

Risebridge Chase, Romford





Rainham and South Hornchurch Green Belt Action Group

Newsletter

Issue No 9

January 2013



Open Spaces are Vibrant Places



First, we would like to wish all our members and supporters a very happy and prosperous New Year. Our last newsletter was in March 2010, in which we announced that a Restoration Plan P0432.10 for the Mardyke Farm had been submitted to the Council. The plan was subsequently approved and work on restoring the site commenced early in 2011.

In This Issue

**An Update On the Mardyke Farm Restoration Progress
A High Quality Open Green Space Amenity for Local People to Enjoy
The Cessation of Rubbish Tipping, Site Encroachment and Bonfires
Public Access Entry Points - Time to Have Your Say**

Meeting to Discuss Restoration Progress

In December 2012 the Committee met with :

- Mary-Lee Athorn of Athorn Consultants, representing the owners of the site, Ebbcliff. Mary-Lee has been responsible for the design, submission and monitoring of the restoration project.
- Steve Martin the Project Director and Raj Patel the site manager, representing Erith, who are the contractors implementing the restoration.

Once the Council had approved the restoration plan, extensive work was undertaken to safeguard wildlife on the site. You may have noticed the fencing made from wooden stakes and black polythene sheeting, which provides safe havens for wildlife, away from all the machinery and operations on site.



Wildlife Safe Haven

Landscaping work on the site commenced in 2011, and initially large quantities of boulders, rocks and other materials had to be crushed screened and graded. Some was to be used on site for lorry access and pathways and the rest were taken off site for use elsewhere.

It was explained that the Restoration Project would abide by the original landform contours which were agreed in the original Park Plan P0186.93

To do this 330,000 cubic metres of soil needs to be brought on site representing 34,550 lorry loads. This started around May of 2011 and to date 14,619 loads, or 42% of the total, have come onto the site. Figures and graphs showing the progress were presented to the meeting by Raj, who added that the avail-

ability of material was less than had been hoped for, so they were slightly behind target. The Olympics and depressed market conditions were the two main factors affecting availability.

On average, the level of the site will be raised by approximately one metre except at the site boundaries. The committee agreed that good progress was being made and some slippage was to be expected if material was not always available.



Caterpillar D9T Leveller

Once the lorries have brought material onto site the large Caterpillar D9T leveller is used to shape the material to achieve the correct contours.

When the final level of the contours has been reached graded topsoil which has been produced

using giant sieving and grading machines is brought to the finished area and placed in small mounds to await better weather.

The area adjacent to the new Orchard Village Development has been finished and a large number of topsoil mounds can be seen covering that area awaiting drier weather.



Top Soil Mounds

Once the top soil has been distributed planting of grass, flowers and meadow foliage will commence. The committee again requested that trees should be planted to replace those destroyed in the original landfill. The destruction of trees had been catered for in the original plans P0186.93 which showed

woodland areas and they are proposed in the new P0432.10.

A High Quality, Open, Green Space Amenity, for Local People to Enjoy

The objective of the restoration plan is to maintain and enhance the existing ecological value of the site while providing a high quality, open, green space, amenity for local people to enjoy.

Once contouring of the site and laying of topsoil is complete, habitats would be established comprising:

- Wildflower meadow
- Sparse grassland
- Mixed Native Scrub and wildflower grassland mosaic
- Mixed native scrub and trees
- Standing and running water

When complete, the site would contribute to national, regional, and local conservation objectives, by creating a Priority Habitat under the UK and Greater London Biodiversity Action Plan.

Provision is also being made for the establishment and maintenance of the created habitats through an initial Ten Year Conservation Management Plan.

The Cessation of Rubbish Tipping, Site Encroachment and Bonfires

The committee are aware that over the years local residents have seen the site change from industrial quarrying, to toxic waste dump, to abandoned derelict land.

In the past, the restoration of the site has been promised and plans have been approved several times, but they have always fallen by the wayside. As a consequence, local residents have become sceptical and not always treated the site with respect.

At the meeting, Mary-Lee acting for the owners, gave a firm assurance to the committee that the restoration will be completed and will be managed properly in the longer term. She also requested that local residents bordering the site should:

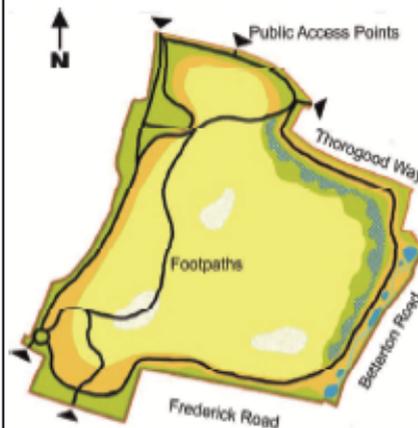
- Cease tipping rubbish, including garden waste, beyond their back fence onto the site. It is anti social, unsightly, and can encourage vermin.
- Stop extending their gardens onto the site, including the storage of equipment beyond their fence line. Regular surveys and photographs of site boundaries clearly show illegal encroachment onto the site.
- Refrain from having individual or communal bonfires on the site.



Mary-Lee added that with the residents support and help, the site can become a pleasant green space that is a haven for wildlife and a respected local amenity space. The committee fully agreed with her statement and look forward to your support.

Public Access Entry Points - Time to

Have Your Say



The approved footpaths and five public access points are shown in black on the adjacent site plan.

At the meeting a discussion took place on whether the number of access points should be reduced from five to two,

with one to the North and the other to the South side of the site.

It was felt that reducing the number of access points might help in controlling motorcycles, which have been a problem in the past. On the other hand access equipment similar to that used at the adjacent Beam Valley Country Park might be sufficient, as it is almost impossible to get a motorbike through them.

If you have a view on the number or type of access points, or anything else, have your say by email, text, letter, or phone, using the contact details at the bottom of the page.

The Public's Right of Access to the Mardyke Farm Open Space

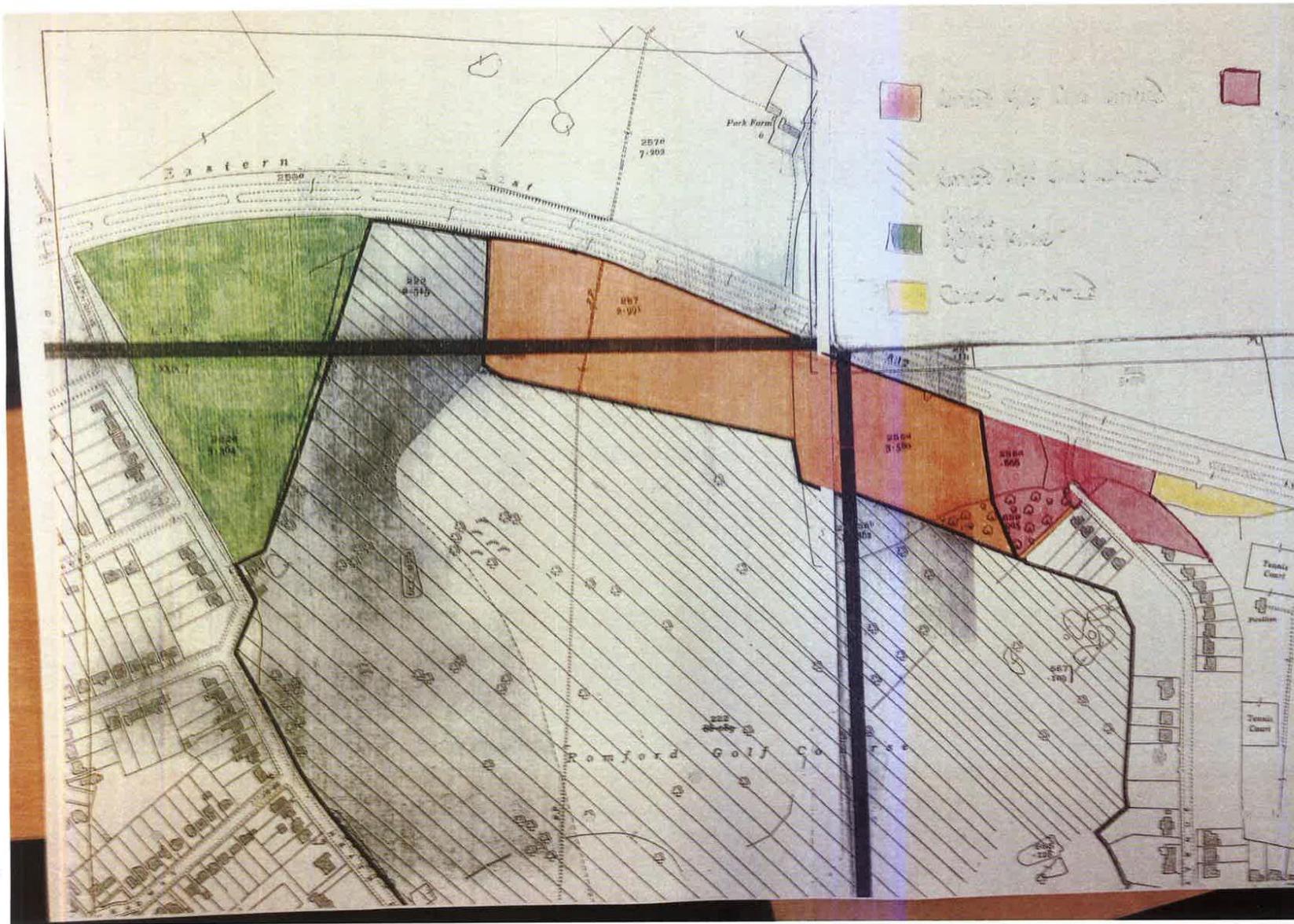
One question which keeps coming up is the possibility of the site being built on. This was raised at the meeting and in answer to the question, Mary-Lee confirmed that public access to the site, as open space, would be in perpetuity i.e. forever.

This is because the owners, Ebbcliff, voluntarily entered into a legally binding planning agreement with the Council to covenant the land, so that the public had unrestricted access, in perpetuity, to the majority of the Open Space created by the restoration. A small part of the restoration will be designated as protected areas for nature conservation and endangered species.

This covenant applies to the land, irrespective of who owns the land. This basically means that if the land was sold, the new owner would also be bound by the covenant, and the public would continue to enjoy unrestricted access, in perpetuity.

In addition the Mardyke Farm is designated as Green Belt Metropolitan Open Land, and forms an important part of the East London Green Grid, and the Dagenham Corridor. It is also part of the East London Greening the Gateway Initiative.

REG18.53 Romford Golf Club (Joe Coogan)



REG18.55 Rowley Cardrome Ltd (Montague Evans)

Refer to separate document

REG18.59 Stephen Siggers

Site location plan

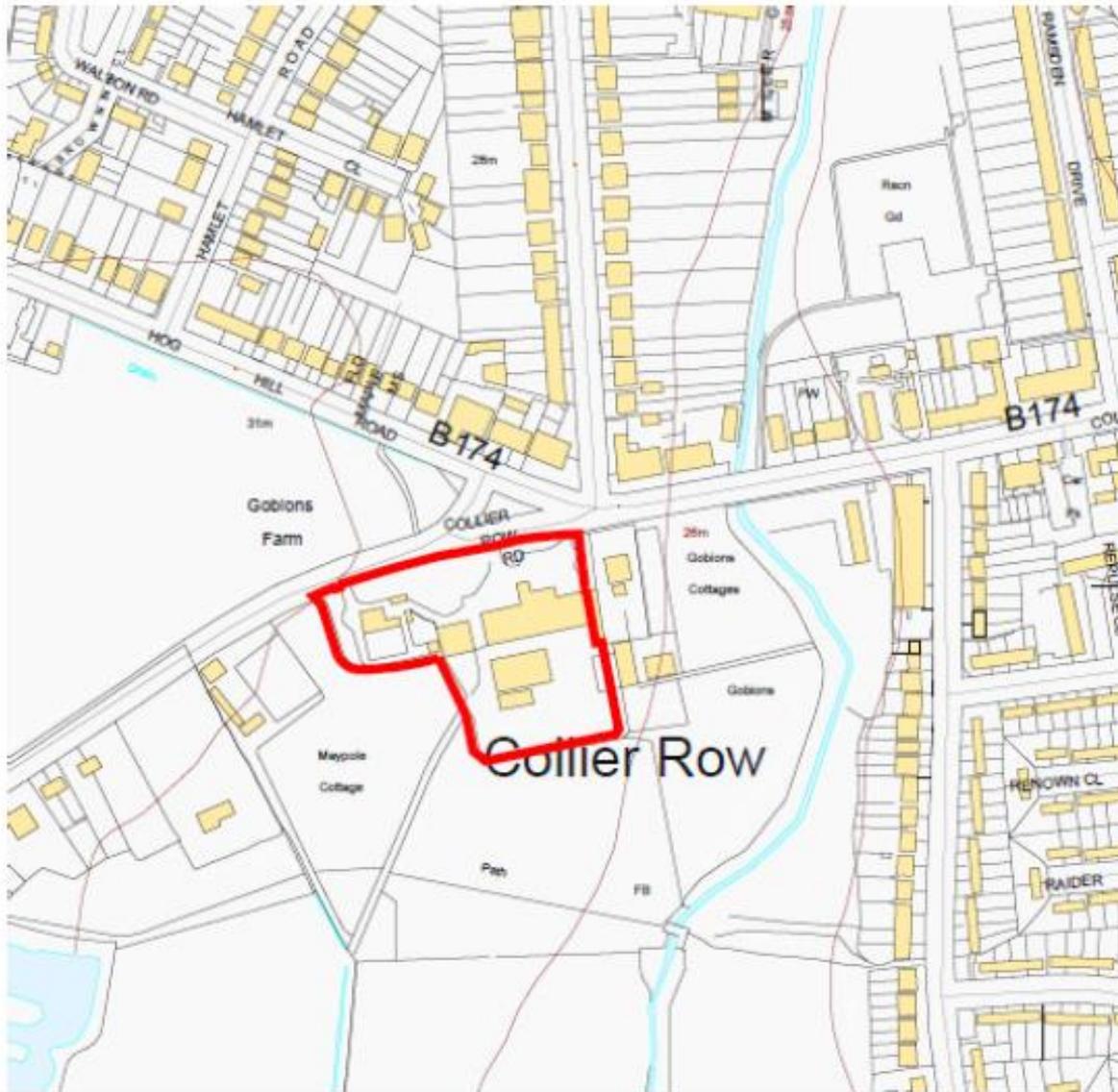


--- PROPOSED REVISED GREEN BELT BOUNDARY

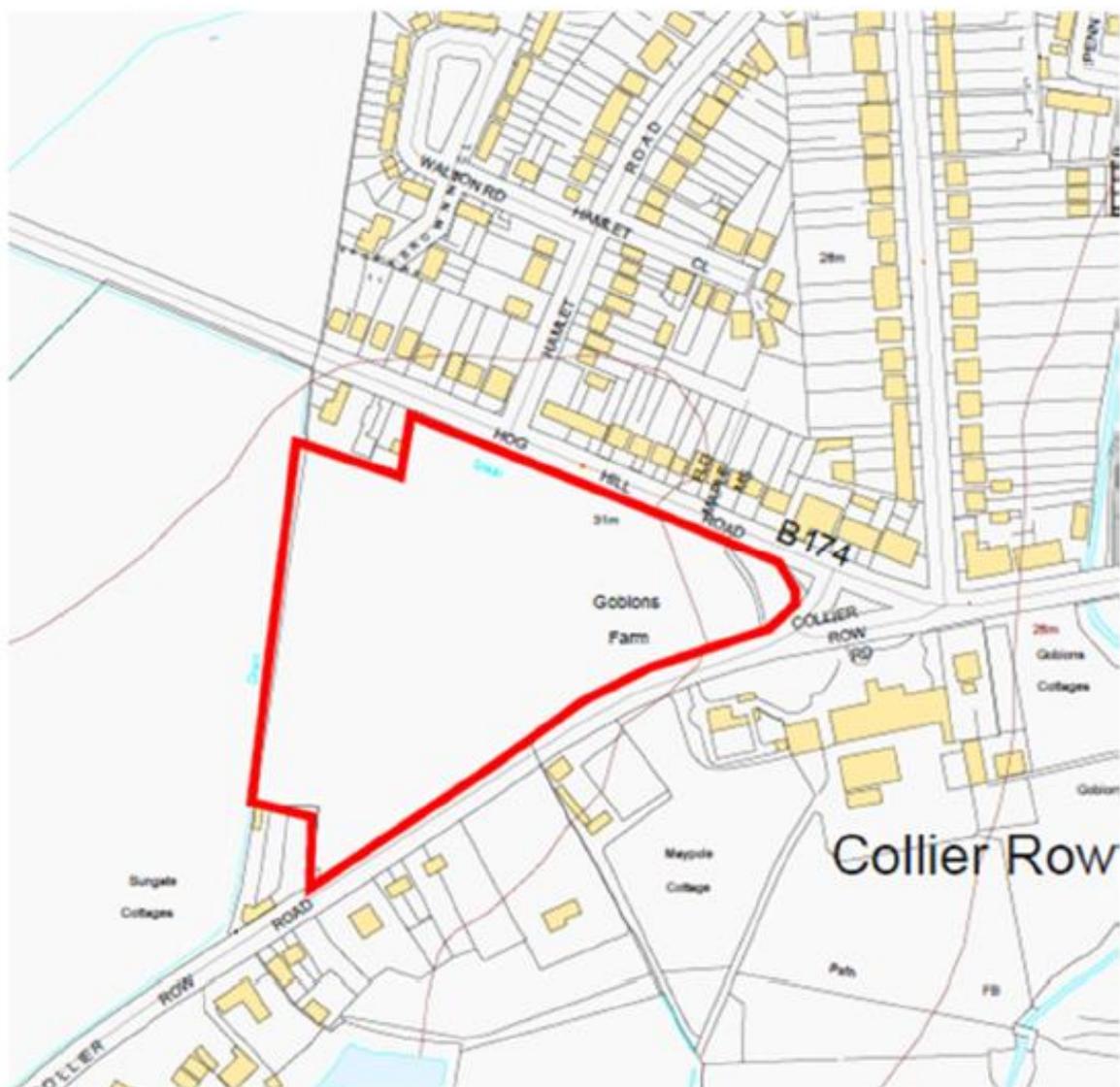
REG18.61 The Crown Estate (Amec Foster Wheeler)

Site location plans

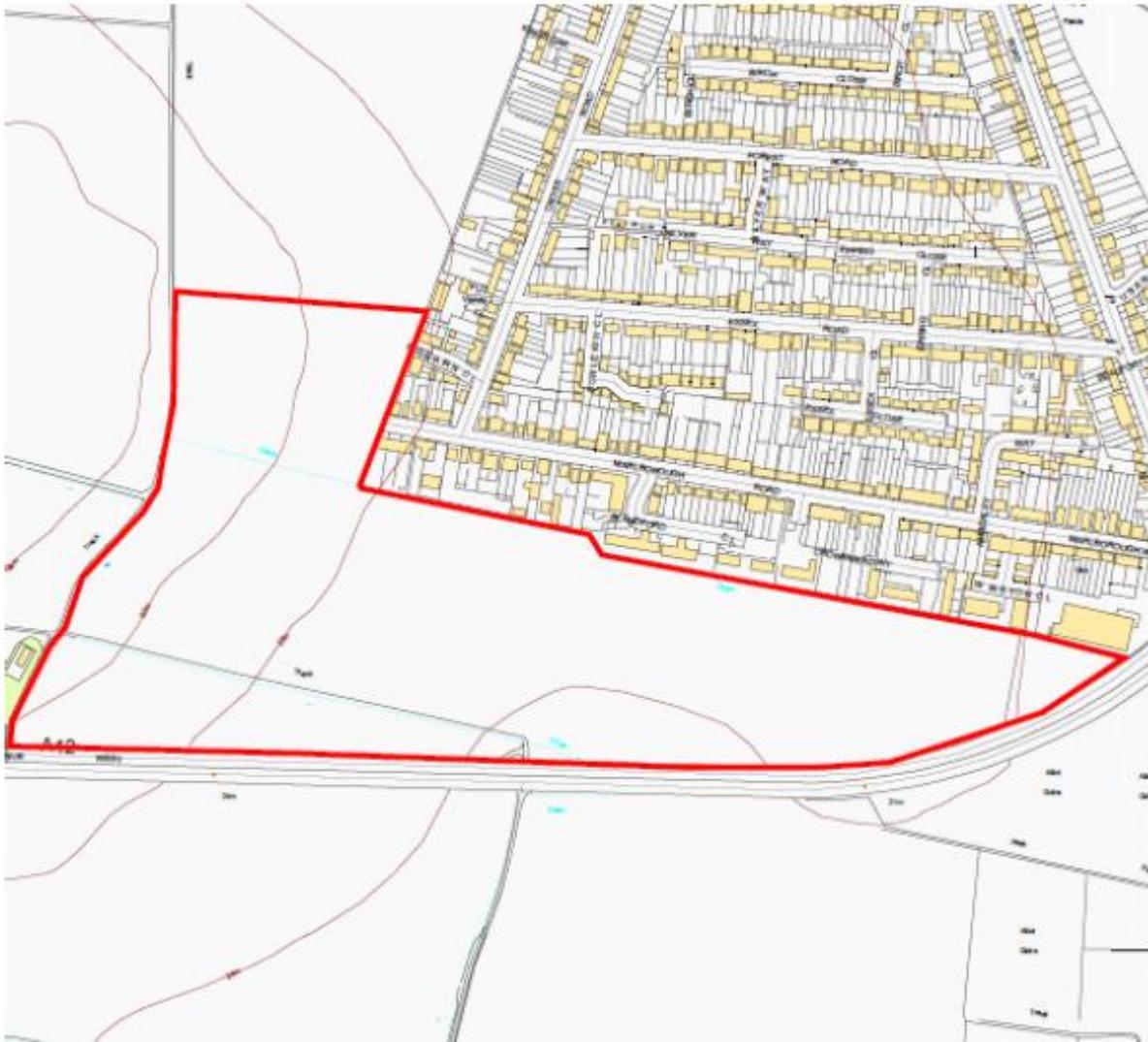
Site 1 Land at Gobions Farm, Collier Row Road



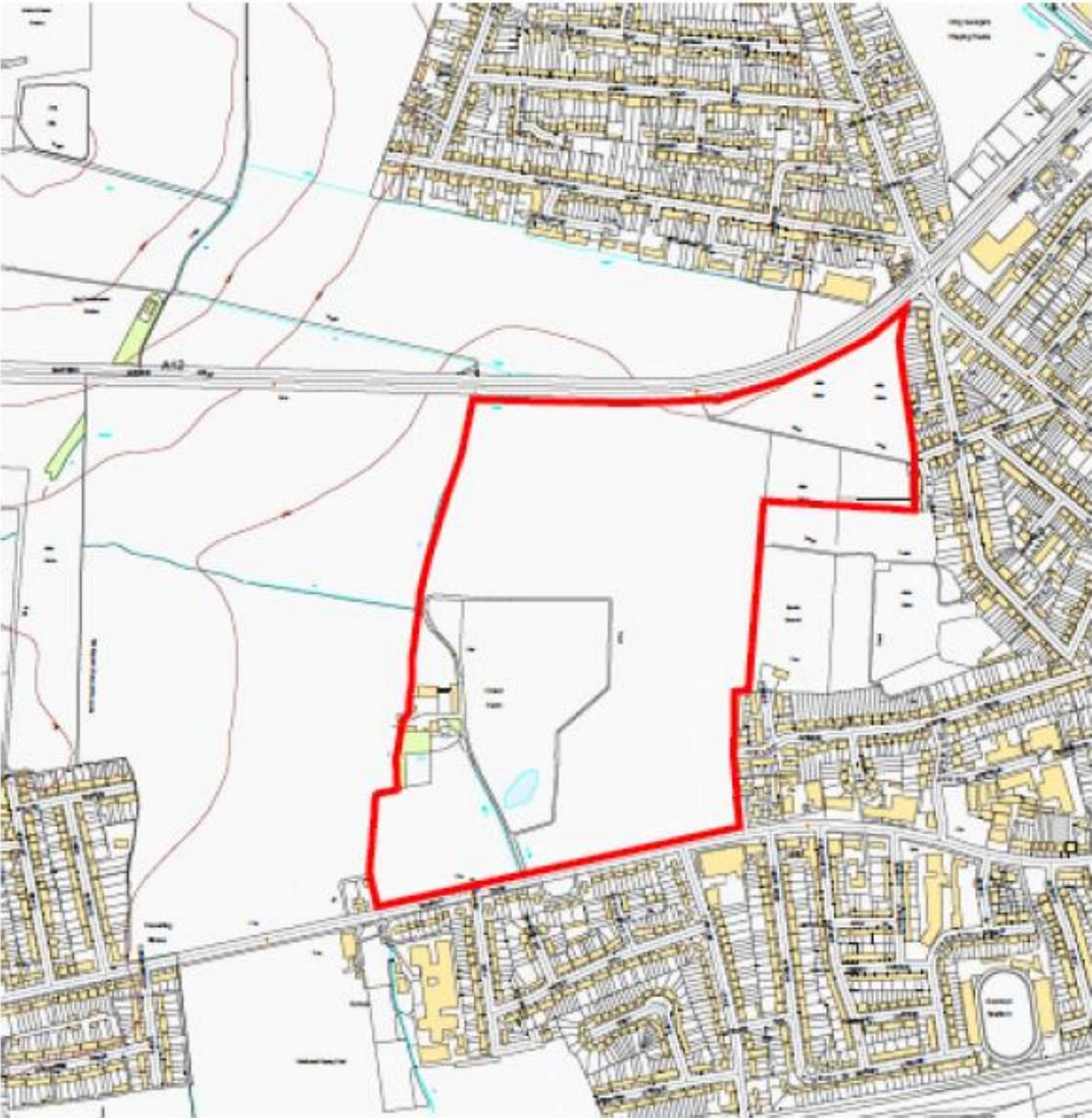
Site 2 Land between Collier Row Road and Hog Hill Road



Site 3 Land between Marlborough Road and the A12, Mawneys, Romford

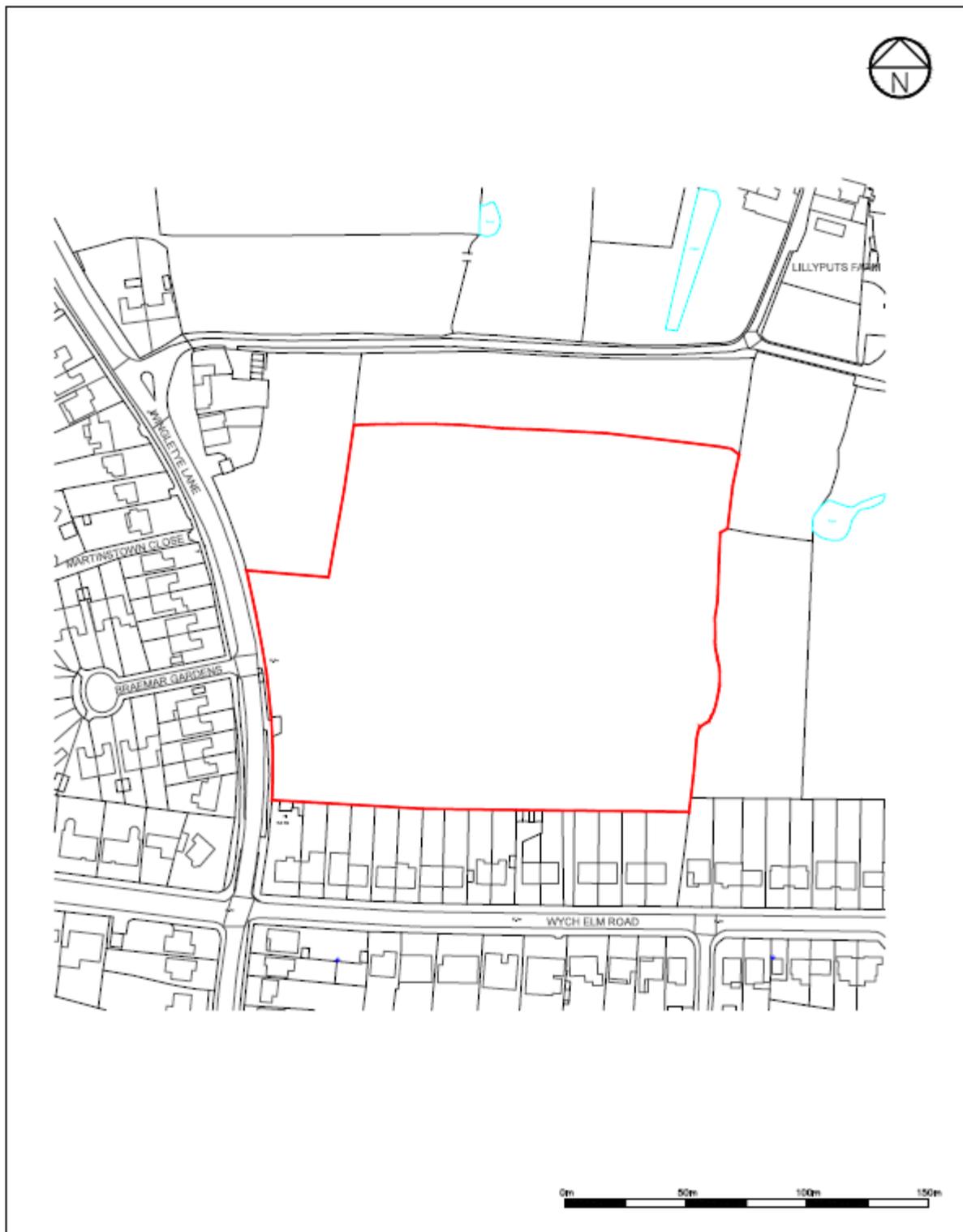


Site 4 Land between London Road and the A12, Mawneys, Romford



REG18.63 Thomas Bates and Sons Ltd (Andrew Martin Planning)

Site location plan



Title Site Location Land off Wingleye Lane, Homchurch		
Drawing Number 12026_01	Revision b	Revision Date
Drawn by 03/15	Date CH	Scale 1:2000@A4

Andrew Martin
Planning



Planning Design Development

Town Mill | Mill Lane | Stebbing | Dunmow | Essex | CM6 3SN

Telephone: 01371 855855 Fax: 01371 856201 Email: info@am-plan.com www.am-plan.com



Title Indicative Layout Land off Wingate Lane, Hamchurch		
Drawing Number 12026_03	Revision a	Revision Date
Drawn by 03/15	Date CH	Scale 1:2000@A4

Andrew Martin
Planning



Planning Design Development

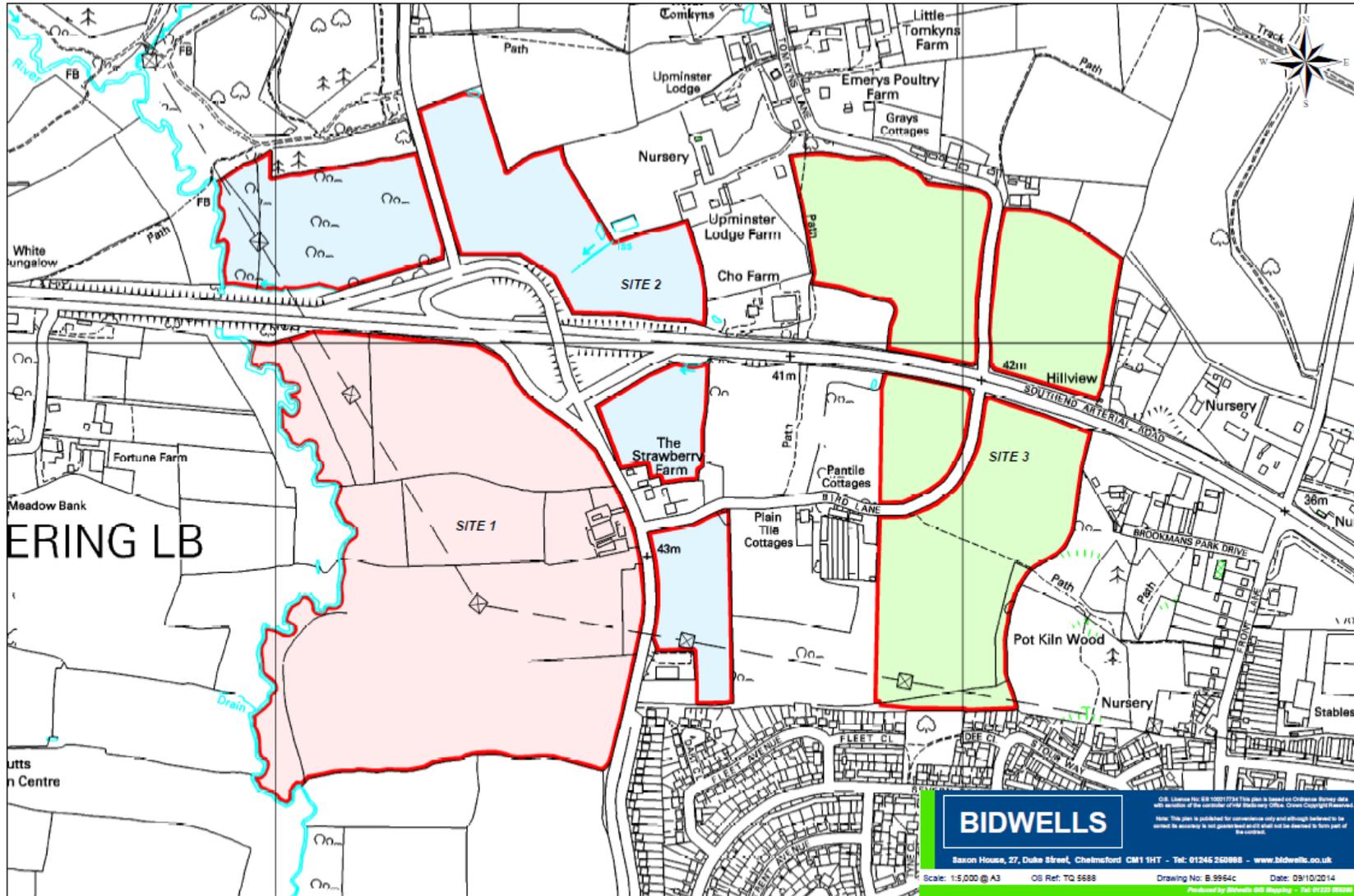
Town Hall | Mill Lane | Stabling | Currow | Essex | CM5 0SH

Telephone: 01371 858855 Fax: 01371 856201 Email: info@amplanning.com www.amplanning.com

REG18.66 Trinity Hall (Bidwells)

Site location plan

Trinity Hall, Upminster



5. Respondents by Question

	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10	Q11	Q12	Q13	Q14	Q15	Q16	Q17	Supplementary
REG18.1 AECOM	✓	✓	✓	✓		✓	✓	✓	✓	✓					✓		✓	✓
REG18.2 Adams Family (Bidwells)	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓					✓	✓
REG18.3 Anonymous	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
REG18.4 Barratt London (GVA)																	✓	✓
REG18.5 Basildon Borough Council																	✓	
REG18.6 Bill England																	✓	
REG18.7 Brentwood Borough Council																	✓	
REG18.8 Brett Aggregates Limited (MJCA)	✓	✓		✓					✓		✓	✓	✓	✓				
REG18.9 C.Cole	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
REG18.10 Chelmsford City Council																	✓	
REG18.11 Clive Narrainen	✓			✓		✓												

	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10	Q11	Q12	Q13	Q14	Q15	Q16	Q17	Supplementary
REG18.12 D. Campbell	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓		✓	
REG18.13 D.K. Symes Associates	✓		✓	✓		✓		✓	✓			✓	✓	✓				
REG18.14 Edward Gittins & Associates	✓	✓	✓	✓					✓	✓	✓						✓	✓
REG18.15 Ellandi (Savills)					✓													
REG18.16 English Heritage																	✓	
REG18.17 Epping Forest District Council																	✓	
REG18.18 Essex County Council		✓			✓	✓	✓		✓			✓	✓	✓			✓	
REG18.19 Gidea Park and District Civic Society	✓														✓	✓		
REG18.20 Greater London Authority	✓																✓	
REG18.21 Havering College of Further and Higher Education (Iceni	✓	✓	✓	✓	✓	✓	✓		✓	✓		✓				✓	✓	✓

	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10	Q11	Q12	Q13	Q14	Q15	Q16	Q17	Supplementary
Projects)																		
REG18.22 Havering Friends of the Earth (Ian Pirie)					✓	✓					✓	✓	✓	✓				
REG18.23 Heine Planning (Alison Heine)	✓		✓						✓	✓							✓	
REG18.24 Higgins Homes (Nathaniel Lichfield and Partners)	✓		✓	✓	✓	✓	✓		✓	✓	✓				✓		✓	✓
REG18.25 Highways Agency						✓												
REG18.26 Ian Weatherley	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
REG18.27 Janet Davy	✓	✓	✓	✓	✓	✓	✓	✓	✓			✓	✓				✓	
REG18.28 Joe Coogan	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓			✓		✓	✓
REG18.29 John Peterson	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓		✓		✓	
REG18.30 LB Barking and Dagenham	✓		✓	✓	✓	✓	✓		✓									
REG18.31 LB Bexley	✓	✓				✓												
REG18.32 Lee Clements	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		

	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10	Q11	Q12	Q13	Q14	Q15	Q16	Q17	Supplementary
REG18.33 Leslie Budge (Mr) (Andrew Martin Planning)			✓	✓		✓			✓	✓							✓	✓
REG18.34 Margaret Whippy	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
REG18.35 Mobile Operators Association (Mono Consultants)																	✓	
REG18.36 Moody Homes and Mr John Wakeling (Bidwells)	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓					✓	✓
REG18.37 Mr Barrie Stone and Miss Eleanor Stone	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
REG18.38 Mr T Clemence (DHA Planning)			✓	✓		✓			✓	✓					✓			✓
REG18.39 Mrs S J Ellis (Bidwells)	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓					✓	✓
REG18.40 Ms M Blackman	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓			✓	✓		✓
REG18.41	✓	✓	✓	✓	✓						✓							

	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10	Q11	Q12	Q13	Q14	Q15	Q16	Q17	Supplementary
National Grid Property (Carter Jones)																		
REG18.42 Natural England				✓		✓			✓		✓	✓	✓					
REG18.43 Omega After Alpha Ltd (Bidwells)	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓					✓	✓
REG18.44 Persimmon Homes Essex	✓		✓	✓	✓	✓	✓		✓	✓	✓				✓		✓	
REG18.45 Planning Potential																	✓	✓
REG18.46 Planning Potential Rep 2.			✓	✓						✓								✓
REG18.47 R. Watt and Partners (Phillips Planning Services)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓			✓
REG18.48 R.A.Montague	✓		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
REG18.49 Rainham & South Hornchurch Green Belt Action Group (R.A. Montague)																	✓	✓
REG18.50	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	

	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10	Q11	Q12	Q13	Q14	Q15	Q16	Q17	Supplementary
Rainham Preservation Society (Coral Jeffery)																		
REG18.51 Ray Whitehouse	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓	
REG18.52 Romford Civic Society (Andrew Curtin)	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓			✓	✓		
REG18.53 Romford Golf Club (Joe Coogan)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓			✓		✓	✓
REG18.54 Romford YMCA	✓	✓	✓	✓			✓			✓							✓	
REG18.55 Rowley Cardrome Ltd (Montague Evans)				✓						✓						✓	✓	✓
REG18.56 S.D. Olney	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
REG18.57 Sheila Clements	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
REG18.58 Sport England	✓			✓				✓	✓								✓	
REG18.59 Stephen Saggars										✓								✓
REG18.60 Thames Water Utilities	✓		✓	✓							✓						✓	

	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10	Q11	Q12	Q13	Q14	Q15	Q16	Q17	Supplementary
Ltd (Savills)																		
REG18.61 The Crown Estate (Amec Foster Wheeler)			✓	✓					✓	✓							✓	✓
REG18.62 Theatres Trust	✓							✓										
REG18.63 Thomas Bates and Son Ltd. (Andrew Martin Planning)			✓	✓		✓			✓	✓							✓	✓
REG18.64 Thurrock Council		✓	✓		✓	✓			✓			✓	✓	✓			✓	
REG18.65 Transport for London						✓			✓									
REG18.66 Trinity Hall (Bidwells)	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓					✓	✓
REG18.67 Veolia ES (UK) Ltd	✓	✓	✓			✓		✓			✓	✓	✓					
REG18.68 Woodland Trust	✓		✓						✓		✓	✓				✓		
REG18.69 Wyevale Garden Centres (Gregory Gray Associates)	✓	✓		✓	✓				✓									

	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10	Q11	Q12	Q13	Q14	Q15	Q16	Q17	Supplementary
POST18.1 Trevor Lawrence																	✓	
POST18.2 Phillip Bowen																	✓	
POST18.3 Nigel Teelan																	✓	
POST18.4 V. Rajan and Associates	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓		✓		

Local Plan Consultation Statement Appendix 7

Direction of Travel: Representations and Council Responses

DIRECTION OF TRAVEL RESPONSES:

Response number	Respondent Name	Response	Council's response
DOT1	Tracy Jennings/Dean Hudson	<p><i>We would like to suggest to the Council that they find a way to re-direct the heavy duty traffic and busses that pass our home (230 Upminster Road South, Rainham)</i></p> <p><i>The damage to the road resulting in rutting to the highway has caused cracks and damage to our property over the years, and will continue to do so if the problem is not dealt with.</i></p>	<p>Noted. TfL are responsible for setting bus routes. Any request for route changes would need to be considered by the Network Development Team at TfL. Regarding heavy duty traffic, the Council continues to monitor the carriageway network because it places a high priority on ensuring that the highways in Havering are in good condition. Resurfacing works are carried out based on the condition of the road network.</p> <p>Havering continues to lobby and work collaboratively with Transport for London, the Highway Agency, the DfT and other relevant agencies to mitigate adverse road transport impacts within the borough and between the borough and other adjoining local authorities.</p>
DOT2	Pauline Cockburn	<p><i>Havering should retain its green space and wildlife otherwise the health of residents will diminish.</i></p> <p><i>Havering should also increase its focus on the arts, again for well-being and develop unused commercial and office premises</i></p>	<p>Noted. The Proposed Submission version of the Local Plan contains a positive strategy towards open spaces, green infrastructure, arts and culture.</p>

		<p><i>into housing rather than selling off more public land, green and community space.</i></p> <p><i>New buildings should have underground parking, including residential and retail premises.</i></p>	<p>The conversion of offices into residential is covered by Permitted Development rights and the Proposed Submission version of the Local Plan contains additional policies regarding conversions.</p> <p>The Proposed Submission version of the Local Plan sets out requirements for the quantum and design of parking. The provision of underground parking is expensive. It adds to development costs and may impact on viability. As a result it may mitigate against other planning priorities being secured through development.</p>
DOT3	Nicky and Colin Gates	<p><i>I would like to object to the inclusion of the land in Havering-atte Bower being considered in any consultation for having its Green Belt status removed. This area is one of the few locations in the borough to have retained its beauty and environmental balance and should be left as is for future generations to enjoy.</i></p>	<p>Noted. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the</p>

			<p>approach set out in the NPPF and London Plan. The Proposed Submission version of the Local Plan strategy will maintain the Green Belt in its current extent.</p>
DOT4	David Mellows	<p><i>The Council's stated commitment to preserving the Green Belt is welcomed, but I note from earlier consultations that there have been numerous requests from developers to release areas of green belt for residential development.</i></p> <p><i>Whilst I can understand the pressure on the Council to provide the opportunity for increased residential developments in the borough to provide for the increasing population, it is essential that these developments are focused on the many brown field sites in the Borough which are large enough to accommodate the boroughs housing needs going forward and have the infrastructure to support such expansion.</i></p>	<p>Support noted. In line with national planning policy and the London Plan, the Proposed Submission version of the Local Plan seeks to address Havering's housing needs through the provision of new homes in the built up areas of the borough. In particular, development of new homes will be focussed in the two Strategic Development Areas of Romford Town Centre and Rainham and Beam Park and at other sustainable locations across the borough that have opportunities for housing development as well as the capacity to provide the necessary infrastructure.</p> <p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No</p>

			exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. The Proposed Submission version of the Local Plan strategy will maintain the Green Belt in its current extent.
DOT5	Philip Thompson	<p><i>I would like to see better public toilet facilities open 24/7 included in your plans.</i></p> <p><i>Upminster is particularly poor. Even the library has no public facilities and the Upminster Park toilets are frequently out of action and in need of an upgrade.</i></p> <p><i>Romford station has no facilities</i></p>	<p>Noted. Toilet provision and operation is outside the remit of the Proposed Submission version of the Local Plan.</p> <p>The Council is engaged in discussions with Network Rail and other stakeholders about securing improved facilities at Romford station commensurate with its important role in delivering Crossrail services.</p>
DOT6	Nigel Teelan	<p><i>I would just like to say that yet again there is very very little mention of sites for Travellers in the local plan. What are you going to do for travellers/gypsies as far as providing sites for us? Your last proposals were so out of touch the inspector advised you to withdraw it which I think was your goal. Havering council has done nothing the last 15 years plus in reference to providing sites for travellers and maybe that's the plan for the next 15. You have been offered numerous parcels of land for this kind of development and at no cost to the taxpayers and you ignored it, yet you will probably re-zone other green belt sites for housing- how ironic</i></p>	<p>The Council has undertaken a Local Needs Accommodation Assessment (LNAA) for its own Gypsy, Traveller and Travelling Showpeople which identified the need for 33 pitches for the Gypsy and Traveller community and no plots for the Travelling Showpeople in the Proposed Submission version of the Local Plan period. Havering will seek to meet current and future accommodation needs</p>

		<p><i>Please bring forward plans to accommodate our growing population of travellers/gypsies</i></p>	<p>of its Gypsies and Travellers and Travelling Showpeople by formalising existing private sites providing a maximum of 33 pitches for Gypsies and Travellers and by retaining and protecting the existing Travelling Showpeople plot at Fairoakes, St Mary's Lane.</p>
<p><i>DOT7</i></p>	<p><i>Carole Morrad</i></p>	<p><i>No to Mardyke Farm being removed from the Green Belt. We want our Green Belt Public Park as promised.</i></p> <p><i>We were promised this and have put up with all the dumping on our doorstep thinking it would be worth it in the end. Now you are trying to double cross us. Put it back to the park like you promised. We have been unable to access this park for ages and now we want it back.</i></p>	<p>Noted. There is no proposal in the Proposed Submission version of the Local Plan to delete the Mardyke Farm site from the Green Belt.</p> <p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. The Proposed Submission version of the Local Plan strategy will maintain the Green Belt in its current extent.</p>

<p>DOT8</p>	<p>Meghan Rossiter (Tetlow King Planning representing Rentplus)</p>	<p><i>We recommend that the Council seek to update the <u>housing evidence base</u> by assessing how Rentplus homes can improve supply in Havering.</i></p> <p><i>It would also be useful for the Council to consider incorporating Rentplus within individual strategic site assessments to consider how the inclusion of Rentplus homes can both speed up overall delivery and improve supply across the Borough. The inclusion of this innovative model at this stage of the consideration of the Plan would help plan more effectively for the Borough's long term strategic approach to delivery, and enable developers to consider the full breadth of options available to them to deliver high quality affordable homes for households aspiring to home ownership in Havering.</i></p>	<p>Noted. The Proposed Submission version of the Local Plan is underpinned by a robust Strategic Housing Market Assessment (SHMA). It establishes the Objectively Assessed Need for Housing in Havering to 2031, including the tenure, size mix and types of housing supply options for both market housing and affordable housing. This will provide an opportunity in which Rentplus will be able to operate to improve housing supply in Havering.</p>
<p>DOT9</p>	<p>Gidea Park & District Civic Society</p>	<p><u>Heritage and Design:</u> <i>We fully support your strong commitment to “Protect & Enhance” Heritage Assets as one of your priorities in the emerging vision and objectives for the Local Plan. Policies therefore should set this out in as clear and unambiguous a manner as possible with the form and wording of policies effectively guiding decision makers. The current LDF and accompanying documents unfortunately are less specific than previous guidance under UDP.</i></p> <p><i>There should also be a commitment to further enhance Heritage by additional/extensions to Conservation areas and listings of buildings where appropriate. For example the Council's consultants carrying out the “Character Appraisal and Management Proposals” for the Gidea Park Conservation Area advised that there were more houses worthy of listing this no doubt applies in other areas of the Borough.</i></p> <p><u>Landscape and Environment:</u> <i>The Green Belt is an essential</i></p>	<p>Noted. The Proposed Submission version of the Local Plan includes policies to protect and enhance heritage assets. The policy sets out that Conservation Areas will be kept under review through the preparation of up to date appraisals and management plans. The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No</p>

		<p><i>element in the character of Havering, any proposal to remove land from the Green Belt should be fiercely resisted. In addition, within the urban areas good quality open areas with plenty of greenery are essential to maintain an attractive area in which to live and work. Your commitment to “value and enhance” is welcome but perhaps you should be more positive in committing to additional open green spaces and planting, to counter the growing necessity for intensification of development. The Council’s proposals for several thousand high rise flats in and around Romford Town Centre will destroy its suburban character. There needs to be a counter balance in the form of more open green spaces to avoid a concrete jungle, recent developments are hardly impressive in this respect or in building design, this needs to be written clearly into policy.</i></p> <p><i>Transport and Car Parking:</i> <i>A strong commitment is required to improve the highway network as you accept that many people will continue to use private cars. The heavily congested Gallows Corner junction is a prime example where traffic avoiding the junction rat runs through surrounding residential areas are causing danger and disturbance. A firm commitment is needed to ensure there is a much upgraded public transport system to provide an alternative to the car. Primarily enhanced bus services, particularly on North -South routes. The North of the Borough not having a station needs better links to the Crossrail stations where currently commuters flood the areas around stations with their parked cars impacting upon quality of life for residents.</i></p> <p><i>Furthermore the Romford - Upminster railway line is grossly underused. In an increasingly congested Borough it affords a valuable congestion free, transport corridor across the centre of the Borough, passing through dense residential areas that</i></p>	<p>exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. The Proposed Submission version of the Local Plan strategy will maintain the Green Belt in its current extent. The Proposed Submission version of the Local Plan includes policies for landscaping and securing new green spaces.</p> <p>The Proposed Submission version of the Local Plan strategy seeks to enable a sustainable pattern of development that reduces the need to travel and offers a choice of transport modes to residents and visitors other than use of private cars. It includes policies to secure strategic transport infrastructure improvements in Havering to improve connectivity and ease congestion. The Council will work with partners and other stakeholders to enhance connectivity and strategic transport links in the borough. The Local Plan recognises that in Outer London there is not the</p>
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		<p><i>currently have no access to it! Feeding into the main rail links to London at each end - Crossrail, C2C and District Line, it links two of the most important town centres as well as passing close to Hornchurch Town/Cultural Centre and Havering 6th Form College. It should be considered for future upgrading, more frequent service and increased number of stopping points, perhaps change form of Transport e.g. Tram, Guided bus etc. also potential for adding a cycle route. Great potential for getting cars off the road and also reducing parking around stations.</i></p> <p><i>Parking is a major issue for many residents particularly close to stations/ shopping areas etc. where commuters/shoppers etc. park in residential roads. When granting consent for new developments/extensions/conversions in these locations there tends to be a slap dash adoption of theoretical parking standards (rather than a commonsense approach) that are totally impractical in such places. Onsite parking should be carefully located to avoid the turning of front gardens purely into parking lots, creating a concrete jungle with an absence of greenery and vehicles obstructing view of the house, quite soul destroying. Similarly for commercial buildings just because an office building is close to a local suburban station does not mean that those working there will mainly be travelling by train. Indeed many find a car necessary to undertake their work. Overspill parking only adds to the existing problem and consequent control and enforcement issues. This needs to be addressed in policy and commonsense should rule.</i></p> <p><u>Town Centers:</u> Policy needs to be rethought. <i>The smaller centres such as our own at Gidea Park are struggling to survive (4 vacant units at present)- greater assistance is required particularly in the form of very cheap</i></p>	<p>‘dense’ provision of public transport found in Inner and Central London. In line with the London Plan, the Local Plan acknowledges that this may justify more generous parking provision. e importance of parking facilities being necessary.</p> <p>The provision of ‘cheap plentiful parking’ is outside the scope of the Proposed Submission version of the Local Plan.</p> <p>The Local Plan policies recognise that a more flexible approach to the balance of uses in smaller centres may be appropriate and may assist in maintaining their viability and vitality.</p>
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<p>DOT10</p>	<p><i>Leonie Oliva- (Deloitte Real Estate on behalf of SEGRO plc)</i></p>	<p><u>Emerging strategic objectives and spatial strategy:</u> <i>The emerging Local Plan should ensure that strong emphasis is placed on the importance of delivering economic growth and high quality business space. The promotion of successful employment sites in the Borough will be essential to ensure there is an appropriate balance between employment opportunities and the new residential communities promoted in the Borough and the wider London Riverside Opportunity Area.</i></p> <p><i>The London Riverside OAPF sets out an aspiration to release large amounts of industrial land for the delivery of housing and relocation of Strategic Industrial Land to the Dagenham Dock and Rainham Employment Areas. SEGRO therefore support the document’s reference (para 3.4.4) to the continued protection and promotion of employment areas including London Riverside.</i></p> <p><i>Furthermore, given that the London Riverside Area, and in particular the Rainham Employment Area, benefits from excellent road transport links and a good supply of local labour, the location offers an attractive proposition for logistic occupiers. SEGRO therefore also supports the Document’s reference (paras 3.3.2, 3.4.9) to the intensification of industrial</i></p>	<p>Noted. The Proposed Submission version of the Local Plan is underpinned by robust evidence in the Employment Land Review study. In summary, it seeks to protect the most important employment land.</p> <p>The Council will engage with developers and other stakeholders such as SEGRO as part of the delivery mechanisms of the Local Plan.</p> <p>The Local Plan has policies to secure a wide range of transport improvements including the provision of a new station at Beam Park, Rainham and better connectivity within Havering (including north –south and to / from London Riverside.</p> <p>The Local Plan is underpinned by robust evidence on parking and it seeks to reflect the opportunities</p>

		<p><i>land in the Rainham Employment Area, which re-affirms the aspirations of the London Riverside OAPF (Section 3 of the OAPF). We would welcome future discussions with LB Havering as part of the emerging Local Plan process to consider options as to how best intensify the development of industrial sites in the area to meet the growing needs of the logistics sector and maximise employment opportunities.</i></p> <p><u>Transport and car parking (paras 1.6.8, 3.2.8 and 3.4.4):</u> <i>SEGRO, as a long term investor in the Borough, support the Document's emphasis on the need for new and improved transport links across the Borough (para 3.4.4). In particular, SEGRO support the delivery of a new rail station at Beam Park, which is due to be operational by 2020 (para 3.2.8) and will help serve new residents and businesses in the London Riverside area. However, the emerging Local Plan should ensure that sufficient flexibility is provided for higher levels of car parking associated with industrial sites in the Rainham Employment Area. Given long standing issues in the area surrounding 'Accessibility to Public Transport' and 'Flexibility for shift patterns', we believe a flexible approach to parking standards in this area will be essential to ensure that industrial sites meet the operational needs of future occupiers, and are ultimately attractive to the market.</i></p> <p><u>Training and employment for local residents (para 3.3.2):</u> <i>SEGRO is committed to maximising training and employment opportunities for the local community by working with its contractor and their subcontractors and future occupiers to provide employment, training and work experience opportunities to local residents and young people. This is demonstrated by the comprehensive skills and employment</i></p>	<p>provided by the London Plan in regard to more generous parking provision in areas of lower levels of public transport accessibility such as London Riverside.</p> <p>The Local Plan has a commitment to developing skills and training and the specific comments about some forms of construction are noted.</p>
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		<p><i>initiative agreed as part of the forthcoming Beam Reach 5 development. However, local employment and training policies within the emerging Local Plan should recognise the unique employment model requirements for the construction of ‘fast-track’ industrial buildings, which means that it is not always possible to appoint new local labour during the construction phase.</i></p>	
DOT11	Romford Civic Society	<p><i>We are concerned that the document makes no reference to Conservation Area Appraisals or the borough’s Shop Fronts SPD.</i></p> <p><i>Regarding Romford Housing Zone at paragraphs 3.4.5 – 3.4.7 on page 19, we are concerned that there is no reference to a coherent and holistic approach to design throughout the housing zone, no reference to the relationship of Romford Housing Zone to the River Rom, no reference to a relationship between Romford Housing Zone and the urban form of Romford as a whole, and no reference to biodiversity and ecosystems opportunities arising from the development of Romford Housing Zone in the Direction of Travel document.</i></p> <p><i>At paragraph 3.2.3, page 16, we are concerned that the paragraph on Romford does not mention the River Rom as a key geographical, historic and ecosystems feature of the town, and makes no reference to ecosystems and biodiversity aspirations for the town, improving its relationship to green corridors and the landscape around it.</i></p>	<p>Noted. There will be an opportunity in taking the Local Plan forward to review the existing documents supporting the existing Local Development Framework such as existing SPDs.</p> <p>The Proposed Submission version of the Local Plan recognises the significance of the River Rom in the policy for the Romford Strategic Development Area and a policy on rivers and river corridors.</p>
DOT12	Zoe Simmonds (Nathaniel Lichfield & Partners representing <u>Groeworld Beam Park Regeneration</u>)	<p><i>GBPR welcome the Council’s Vision for Rainham and Beam Park and its commitment to transform the area in a new green neighbourhood with modern residential accommodation. GBPR then supports the statement at paragraph 3.2.4 of the</i></p>	<p>Noted. The Proposed Submission version of the Local Plan has been prepared in line with the approach in the London Plan and the London</p>

	<p><u>Co. LTD.)</u></p>	<p><i>Direction of Travel document that “the new neighbourhood “will be structured around a new station and vibrant local centre at Beam Park” and its integration with the historic elements of Rainham village.</i></p> <p><i>The Direction of Travel document makes reference to the adopted Rainham and Beam Park Planning Framework, stating that it will be used to inform the preparation of the Local Plan alongside a wider range of evidence documents. Whilst GBPR do not contest this approach to planning policy making, they consider that account should also be taken of the area’s designations and the need to meet London’s acute housing shortage when drawing up policies for the area.</i></p> <p><i>In particular, GBPR questions whether the provision of 40-45% townhouses within the residential mix is an efficient use of land, particularly within an area identified as a Housing Zone and Opportunity Area. Providing this number of townhouses on a key housing site is an underutilisation of the land and is not reflective of the drastic need for housing in London. Similarly, GBPR queries whether the residential density (given as 60 - 80 dwellings per hectare for Beam Gardens) and the suggested building heights (set as 4 storeys fronting onto New Road and 2-3 storey townhouses within the main neighbourhood) will provide the optimum amount of residential development.</i></p>	<p>Riverside Opportunity Area Planning Framework as well as the Council’s own Masterplan and Development Framework. The Local Plan is also supported by an up to date Strategic Housing Market Assessment (SHMA) and this will inform the development of the area.</p>
<p>DOT13</p>	<p>Marie-Claire Marsh (Nathaniel Lichfield and Partners representing <u>‘Higgins Homes’</u>)</p>	<p><i>It is noted that the DoT states that a strategic objective of the Local Plan should be to “increase the supply of high quality housing in Havering by a minimum of 1,170 dwellings per annum over the Plan period”.</i></p> <p><i>Paragraph 3.4.4 of the DoT states that in order to achieve this strategic objective, the spatial strategy is to ensure development is focussed in the most accessible and well</i></p>	<p>Noted. The Proposed Submission version of the Local Plan aims to bring forward significant housing delivery in the most accessible and well connected areas – specifically, Romford and Rainham and Beam Park as well as other centres.</p>

		<p><i>connected areas of the borough: Romford Town Centre, Rainham and Beam Park SDA and the regeneration of Council owned housing estates.</i></p> <p><i>Whilst these spatial strategies seek to ensure that the opportunities to increase residential development in town centres are maximised, the Council needs to also consider careful how these will all be delivered and at what stages. It is our view that it will take a long time to develop many of these sites/opportunities and that as a consequence, the required annual delivery rates will not be achieved, particularly in the short term when much needed new homes are required.</i></p> <p><i>In this regard, it is noted that paragraph 2.1.6 states that the priorities, reflected in the emerging visions and objectives for the Local Plan, includes protecting and enhancing the Green Belt. Whilst in principle this is a sound approach, it should be recognised that not all Green Belt land serves that purpose and that much is well located on the urban fringe, where sustainable development could be achieved and delivered.</i></p> <p><i>We would therefore, question whether the current strategy of protecting all Green Belt land is necessary and whether the current strategy will provide the housing numbers the Borough needs over the Plan period.</i></p> <p><i>Given the need to meet the increased housing requirements, we would strongly urge the Council to give greater consideration to releasing areas of the Green Belt for residential development which are in a sustainable location as extensions to existing settlements, where there are clearly defined boundaries and where none of the purposes of the Green Belt are met.</i></p>	<p>Both Romford and Rainham and Beam Park have been identified as Housing Zones by the Mayor of London. These have funding programmes in place to accelerate housing delivery and to provide greater certainty for developers. The Local Plan is supported by a Housing Position Statement which sets out in more detail how the Council envisages housing delivery coming forward over the Plan Period.</p> <p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan.</p>
DOT14	Suzy Wilson (CgMs on	<u>RESPONSE TO REGULATION 18 CONSULTATION</u>	Noted.

	<p><i>behalf of Taylor Wimpey Strategic Land)</i></p>	<p><i><u>Question 3: What do you think the Local Plan priorities for housing should be?</u></i></p> <ul style="list-style-type: none"> - <i>Addressing the current shortfall and exceed the Council's current target by increasing and maximising housing numbers within the Borough.</i> - <i>Positively seek opportunities to do this and identify and seek to enable additional development capacity to be brought forward to supplement these targets.</i> - <i>Widen opportunities for home ownership and the creation of sustainable, inclusive and mixed communities in locations where people want to live.</i> <p><i><u>Question 4: Where do you think new homes should be located?</u></i></p> <ul style="list-style-type: none"> - <i>Houses should be located where people want to live and settle, taking account of the needs of the residential community. This is one of the aims the Council itself has identified as an aim within its Direction of Travel document.</i> - <i>Two new housing zones have been identified within Planning Frameworks. These zones are intended to deliver 6,554 homes. However, this provision is over a 20 year period; involves sites with existing occupiers/development; will require the delivery of associated infrastructure, and will require site amalgamation and a joined up approach to planning. As a result there is uncertainty over the delivery rates achievable from these sites over the first 5 years and therefore their contribution to achieving the Boroughs 5 year housing target.</i> - <i>In addition, the two housing zones are located to the</i> 	<p>The Proposed Submission version of the Local Plan is underpinned by a robust Strategic Housing Market Assessment. This will inform the delivery of housing. The Local Plan includes a policy to secure a wide range of housing types including different tenures.</p> <p>The Spatial Strategy of the Proposed Submission version of the Local Plan directs development including housing supply to the most accessible and well connected areas of the borough where there are existing concentrations of supporting infrastructure.</p> <p>The strategy of the Proposed Submission version of the Local Plan positively seeks opportunities to increase and maximise housing output through identifying and assessing land to enable additional development capacity to be brought forward to supplement the two housing zones.</p> <p>The Council has undertaken a Green Belt study as part of the evidence base for the Proposed Submission version of the Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one</p>
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		<p><i>west of the Borough with no sites allocated within Upminster to serve the town itself. The allocation of an additional housing site in Upminster would assist by sharing the “burden” of the Borough’s allocated housing target in a sustainable pattern of development which provides for local housing need and spreads infrastructure demand across the Borough.</i></p> <ul style="list-style-type: none"> - <i>These Housing Zones do not reflect the local demand within the borough as required by the NPPF by such large sites being located within just two of the towns within the borough.</i> - <i>The site adjoins the built up area of Upminster on two boundaries and has direct road frontage on 3 boundaries. A suitable vehicle access point is located on the northern boundary of the site via Little Gaynes Lane, which is also the closest point and most direct succinct route to Upminster’s town centre and train stations. There are also additional opportunities for pedestrian and cycle access points at the northern end of the site adjacent to existing housing.</i> - <i>The land to the <u>South of Little Gaynes Lane, Upminster</u> is considered to represent the best opportunity to meet the objectively assessed housing need for the settlement of Upminster in a sustainable location.</i> <p><u>Question 8: How do you think the Plan should support the Culture and Leisure offer within Havering?</u></p> <ul style="list-style-type: none"> - <i>The land to the <u>South of Little Gaynes Lane, Upminster</u> sits within the Thames Chase Community Forest, which is an area established in 1990 covering 40 square miles of East London and South Essex. The Vision for the Forest is that by 2030, it will be recognised as ‘an</i> 	<p>or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. The Proposed Submission version of the Local Plan takes into account the requirements of the NPPF in Local Plan. The study concluded that all of the Green Belt in the borough makes a contribution towards one or more purposes of the Green Belt identified in the NPPF and is based on defensible boundaries. No exceptional circumstances have been identified to justify making any modifications to the Green Belt in the Proposed Submission version of the Local Plan following the approach set out in the NPPF and London Plan. The Green Belt Evidence Study therefore does not support any release of Green Belt land in Havering. The Local Plan recognises the opportunity provided by Thames Chase Community Forest. It has policies dealing with green</p>
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		<p><i>inspirational example of landscape regeneration where enhanced connected woodland and green space has made a clear difference to wildlife and peoples' lives'.</i></p> <ul style="list-style-type: none"> - <i>The site does not currently contain any forest or woodland. There is potential, with the development of the site, to incorporate environmental enhancements to this section of the Community Forest, such as tree planting and hedgerow and non-woodland habitat creation/ restoration, as well as improving public access to and through the site, including links between the Ingrebourne Valley Greenway to the north west of the site and Parklands Open Space to the south east, as part of a comprehensive green infrastructure strategy for the site.</i> - <i>This will enhance the Thames Chase Community Forest and will improve the recreational opportunities of the local population to enjoy the green spaces both within the site and beyond in line with the NPPF.</i> <p><u>Question 10:</u> <i>Do you have any suggestions for the revisions to the Green Belt Boundary?</i></p> <ul style="list-style-type: none"> - <i>The land to the South of Little Gaynes Lane, Upminster is a suitable site for release from the Green Belt to accommodate local housing need in Upminster. The site is partially enclosed by existing development to the north, north-west and east. The development of the site would not adversely impact the setting of Upminster and its distinct identity from Hornchurch to the north-west. The site is separated from Hornchurch by the Ingrebourne Valley and existing built development. Hacton Lane and Park Farm Road form a clear boundary to the site and a strong future boundary</i> 	<p>infrastructure, to protect and enhance nature conservation and to increase opportunities for informal countryside recreation..</p>
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		<p><i>between the settlement of Upminster and the green belt.</i></p> <p><i>Opportunities:</i></p> <ul style="list-style-type: none"> - <i>Creation of a sustainable urban extension to Upminster</i> - <i>Enhanced Recreation</i> 	
DOT15	Samantha Powell (Department for Education)	<p><i>The EFA encourages LB Havering to safeguard land for the provision of new schools to meet government planning policy objectives as set out in paragraph 72 of the NPPF.</i></p> <p><i>In addition, there is a need to ensure that the education contributions made by developers are sufficient to cover the increase in demand for primary and secondary school places that is likely to be generated by new development. When new schools are developed, local authorities should seek to safeguard land for the future expansion of new schools where demand indicates this might be necessary.</i></p> <p><i>In developing policies for new schools, consideration should be given at an early stage in the site appraisal process as to how the use of public transport, cycling and walking can be encouraged to help reduce the number of car journeys to and from new schools. The inclusion of a well-developed green travel plan can help to ensure that new schools are better integrated with existing communities.</i></p> <p><i>The EFA also notes that LB Havering will use the Infrastructure Delivery Plan to inform the evidence for the Council's emerging CIL (para 2.2.7). There is a need to ensure that education contributions made by developers are sufficient to cover the increase in demand for school places that are likely to arise from major developments in the borough. Robust forecasting</i></p>	<p>Noted. The preparation of the Proposed Submission version of the Local Plan was informed by close working across the Council with Council staff involved in the planning of new education facilities. It takes account of the latest Schools Commissioning Plan. The Council would look for proposed sites for schools to be well located and accessible by a range of travel modes.</p>

		<p><i>will also help to secure investment from other services and housing developers for infrastructure projects and new housing developments through Section 106 negotiations.</i></p> <p><i>The EFA encourages collaborative working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places. As such, and in line with the Duty to Cooperate, and Havering's commitment to 'continue to engage with public bodies to inform the policy approach to the provision of strategic infrastructure' (para 2.3.4) please add the EFA to the list of infrastructure providers with which the Council consults and engages with for the next stage of this and other Local Plan documents.</i></p>	
DOT16	<i>Roy Burnett (Guys & St. Thomas' NHS Foundation Trust)</i>	Not quite sure what you are trying to achieve with this, but an obvious consideration is to open up all bus lanes to motorbikes. Thanks.	Noted. This is outside the scope of the Proposed Submission version of the Local Plan.
DOT17	<i>Sports England</i>	<i>Sport England acknowledges that paragraph 2.2.6 states an Open Space, Allotment and Sport and Recreation Needs Assessment will form the evidence base for the emerging Local Plan but question why the Playing Pitch Strategy (PPS), which is currently being developed, will not form the evidence base. The PPS will set out a clear strategy and action plan with delivery priorities for playing pitches within the borough and therefore should direct the objectives and policies of the Local Plan. Sport England also notes that the Council do not appear to have a specific Built Facility Strategy that assesses the needs and requirements for future provision of built sporting facilities. This strategy should be developed in order to provide a robust and</i>	Noted. The Proposed Submission version of the Local Plan is underpinned by a robust evidence base including a Space, Allotment and Sport and Recreation Needs Assessment Study. The Local Plan includes a policy to protect and enhance open space, sport and recreation and within this there is recognition of the role of playing pitches and support for bringing back into use playing fields which

		<p><i>up-to-date evidence base for any emerging policies relating to built sport provision.</i></p> <p><i>Sport England welcome that health and leisure provision will be reflected in the emerging vision and objectives for the Local Plan but are concerned that the Council are not seeking specific policies relating to playing pitch/outdoor and indoor sports facilities. Sport England recommend that such policies are incorporated within the emerging Local Plan so that sports facilities can be clearly planned and provided in the right places at the right time. These policies should fully reflect Sport England's objectives to protect, enhance and provide and should be based on an established and robust assessment of need and a clear strategy and action plan that fully reflects Sport England's Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives.'</i></p> <p><i>Sport England has concerns relating to the evidence base and the intention to not provide specific policies relating to sport but would be happy to work alongside the Council in the development of the Local Plan so that sport within the borough can be positively planned.</i></p>	<p>are disused.</p>
<p>DOT18</p>	<p>James Stevens (Home Builders Federation Ltd.)</p>	<p><i>The London Plan has undertaken an OAN for London, treating London as a single housing market area. The overall OAN of 49,000 has then been apportioned among the 35 London local planning authorities (including the two development corporations) on the basis of capacity. Capacity for only 42,000 homes has been identified.</i></p> <p><i>We note in paragraph 3.4.3 that the emerging local plan will provide for 1,170 dwellings per annum (dpa). This reflects the minimum dwelling requirement in Table 3.1 of the London Plan.</i></p>	<p>Noted. The Proposed Submission version of the Local Plan is underpinned by a Strategic Housing Market Assessment (SHMA). The Council has also prepared a Housing Position Statement to support the delivery of housing through the Local Plan. The Council recognises the importance of providing new</p>

		<p><i>The London Plan does require the London boroughs to undertake local assessments of need (SHMA) and local assessments of capacity (SHLAA) to augment the London Plan targets in order to try and close the gap between the need to provide 49,000 dpa – which represents the lower end of the OAN, and the capacity for 42,000 dpa.</i></p> <p><i>We hope, therefore, that the Council will try and augment the minimum figure of 1,170 dpa in order to help address London’s wider strategic unmet need of circa 7,000 dpa.</i></p>	<p>homes and the policies in the Local Plan are intended to optimise housing delivery. They include policies for the Romford and Rainham and Beam Park Strategic Development Areas which have the potential to deliver significant housing.</p>
DOT19	Highways England	<p><i>Our interest in local plans is specifically focussed on the council’s approach to highway and transport matters in relation to regeneration and new development. Given the proximity of London borough of Havering to the M25, A13 and A12 that are all part of the SRN, we are keen to understand what impact the Havering Local Plan will have on the SRN for which we are responsible.</i></p> <p><i>We note that the evidence base for the Local Plan will include Transport Background Papers that are currently being prepared that will bring together a number of transport evidence base documents to support the Plan. It is important that the transport appraisals covered by these papers adequately assess the impact of the Local Plan on the SRN. This is necessary to ensure that any requirements for enhancements to the SRN triggered by the impact of the Local Plan are identified, including how they would be funded.</i></p>	<p>Noted. The Proposed Submission version of the Local Plan is underpinned by a Transport Position paper and strategic modelling paper undertaken with the support of Transport for London.</p>
DOT20	Historic England	<p><i>There is an expectation that local planning authorities should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPFF para 126).</i></p>	<p>Noted. The emerging Proposed Submission version of the Local Plan includes policies to protect and enhance the historic</p>

		<p><i>This should be supported by a robust evidence base which clearly demonstrates an understanding of London’s historic environment, the significance of its heritage assets and their contribution to the wider environment (NPPF para 169). In this context it is important to recognise that heritage assets are widely defined as any .building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in both plans and decision making.</i></p> <p><i>Ultimately we would expect the emerging Local Plan to provide a robust framework that delivers sustainable development including net gains for the conservation and enjoyment of the historic environment.</i></p> <p><u>Evidence Base:</u> <i>On reviewing the evidence provided in the Direction of Travel and the council’s web site, it is not possible to identify what evidence has been gathered on the Boroughs historic environment and how it has been used to inform the current consultation document.</i></p> <p><i>Reflecting national policy we would seek to ensure the evidence gathered and used is sufficiently robust, inclusive and not just focused on quantitative aspects, but includes details of condition and the positive contribution of the historic environment. Our advice as set out in ‘The Historic Environment in Local Plans’ (GPA1) provides helpful pointers on what evidence should be gathered and how it could be applied.</i></p> <p><i>A way forward which could help improve understanding of the Borough’s historic and local character (as part of the local plan evidence base and inform both the Borough Portrait and distinctive local policies) could be to commission a Borough-wide characterisation Study. Historic England has just completed an audit of characterisation studies already</i></p>	<p>environment of Havering and the heritage assets of the borough. The policies in the Local Plan have been informed by the Council’s existing evidence base for heritage assets. This includes the Havering Heritage Assets Register and several Conservation Area Appraisals and Management Plans for Havering’s eleven Conservation Areas. The strategic objectives in the Local Plan include a specific objective dealing with heritage and it reflects the suggestions put forward by Historic England in their representation. The key elements of the Spatial Strategy identify the importance of heritage and the policies for the two strategic development areas in Romford and Rainham and Beam Park both identify heritage.</p>
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undertaken and as a result identified a number of lessons to be learnt: Executive Summary via the following link:

<https://content.historicengland.org.uk/content/docs/get-involved/luc-characterisation-london-historic-environment-exec-summary.pdf>

It is noted that reference is made to the associated Sustainability Appraisal as part of the evidence base. Paragraph 2.2.16 states that the Scoping Report has taken into account comments received following consultation in 2015 (response dated 12th January 2015) and as a result provides a link to the document. However it is not clear if views are being sought on this document (February 2015). If so, as a statutory consultee, we should receive a formal request to comment further.

Spatial Portrait: *We welcome the inclusion of designated heritage assets as part of the portrait. However, the level of detail is minimal and does not explain how the Borough's heritage positively contributes towards the distinctiveness of Havering and its continuing changes. For example many of Havering's town and district centres have historic character that contributes to the distinctiveness of places. These places appear to be identified to accommodate further intensification and growth, yet in the Portrait this relationship is not recognised sufficiently.*

The Emerging Strategic Objectives: *The Strategic Objective for the historic environment could be strengthened further, for example:*

'Proactively conserve, enhance, and ensure greater understanding of Havering's heritage assets, their settings and the wider historic environment.'

		<p><u>Emerging Spatial Strategy:</u> <i>It is with concern that heritage is not included as part of the spatial strategy. Heritage assets are by default spatial and through understanding their 'significance' can make a positive contribution to place making and managing change. An approach which should be used to help inform appropriate scales of development in the borough's District Centres, and intensification in Romford Town Centre.</i></p> <p><i>Intensification of development can potentially, if not planned and developed from a baseline of understanding the heritage interest, cause harm to the significance of heritage assets. It is noted that in Romford, emphasis is placed upon delivering high densities. This is not necessarily an issue, if the right tools and mechanisms with regards to conserving the significance of heritage assets are applied rigorously (as expressed by national policy and best practises). Otherwise inappropriately designed developments could result in a net loss to the conservation of the historic environment and be contrary to the achievement of sustainable development as clearly sought by national policy.</i></p>	
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