

## Annex 2 - Havering Local Plan Further Main Modifications Representations and Council Responses

| Respondent ID | Name/<br>Organisation | Further Main<br>Modification<br>Number | Representation  | Council Response  | Attachment<br>included as part<br>of the<br>representation? |
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| 1251036       | Crest Nicholson       | FMM1                                   | <p>Crest Nicholson supports the Council's approach to carry out an immediate update of the Havering Local Plan in the context of the new London Plan and the National Planning Policy Framework 2019. The Council have set out an anticipated programme for the update of the Local Plan to the point of Submission to the Secretary of State, anticipated for late summer 2023. It is important that the programme is not subject to delay and the Council begin the preparation and engagement to update the Plan at the earliest opportunity. The Council recognise the importance of an immediate update of the Local Plan, and this should be carried out in a reasonable timeframe to ensure enough land is identified in the right places for development, importantly, to meeting the identified housing needs of the Borough, over a 15-year period. It is essential that the update considers the latest information relating to the London Plan minimum housing targets, any shortfall in delivery, and updated supply to ensure enough homes are planned for and delivered.</p> | <p>Support for the immediate update of the Local Plan is noted.</p> | No  |

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| 1253443 | Southern and Regional Developments | FMM1 | <p>The Council has inserted new paragraphs into the Plan to take account of the London Plan 2021 and the requirement for an immediate update of the Local Plan This includes setting out a timetable for updating the Local Plan, which will be reflected in an updated Local Development Scheme in due course. The proposed timetable is supported in principle, as it commits the Council to ensuring the required review is conducted swiftly; whilst also being realistic and recognising the stages of drafting that the review will need to pass through including the need to prepare updated evidence. In previous representations to the Local Plan Examination, Claremont Planning identified the importance of ensuring that the review is undertaken at the earliest opportunity, in order to ensure that the Review is completed and new plan in place prior to the housing shortfall arising. It is important for the Council to recognise the importance of the evidence gathering stage of this process. This will ensure that the Council is able to appropriately assess all potential sites that can be allocated through the review including conducting a robust Green Belt review. This should recognise the potential for allocating sites adjacent to the Rainham urban area, such as the land promoted by S&amp;R off New Road, as a suitable site to deliver housing in the later years of the plan period. The recognition of the need to undertake a Green Belt</p> | Support for the immediate update of the Local Plan is noted. | No |
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|         |  |      | Review as part of the evidence gathering will also be informed by the determination of housing types required; with an expected focus upon family homes including affordable housing.  |  |                          |
| 1277245 | Aberdeen Standard Investments (Montague Evans LLP) | FMM1 | <p>On behalf of our client, Aberdeen Standard Investments (“ASI”), we submit representations in respect of the current consultation exercise taking place on the Havering Local Plan Further Main Modifications. ASI are the owner of land currently occupied by a B&amp;Q store on Roneo Corner, Romford, RM11 1PY (“the Site”).</p> <p>The London Borough of Havering (“LBH”) is at an advanced stage of preparing their new Local Plan and following independent examination by a Planning Inspector, a series of proposed Further Main Modifications have been requested. As such the LBH is currently consulting on the following documents:</p> <ul style="list-style-type: none"> <li>• FMMC01 – Schedule of Proposed Further Main Modifications;</li> <li>• FMMC02 – Sustainability Appraisal of Further Main Modifications;</li> <li>• FMMC03 – Habitat Regulation Assessment of Further Main Modifications; and</li> <li>• FMMC04 – Housing Supply Statement.</li> </ul> | Support for an immediate update of the Local Plan is noted | Yes – Site Location Plan |

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|  |  |  | <p>We understand following this current consultation exercise, the Inspector's report will be published later in 2021 and the Local Plan is anticipated to be formally adopted by LBH in November 2021, subject to matters arising as part of this latest consultation.</p> <p>Montagu Evans have not previously submitted written representations to LBH on behalf of ASI and the B&amp;Q site during earlier rounds of Local Plan engagement because of commercial sensitivities at that stage. We recognise that representations are only being accepted where they relate to the proposed Further Main Modifications, and comments on any other components of the emerging Local Plan consulted on earlier will be likely to be disregarded by LBH.</p> <p><b>BACKGROUND TO THESE REPRESENTATIONS</b></p> <p>ASI are the owner of land which is currently occupied by a B&amp;Q store located on Roneo Corner, Romford, RM11 1PY. ASI have owned the Site since 2006. It is accessible to and located to the south of Romford town centre and falls within the Hyland Ward.</p> <p>A Site Location Plan is enclosed at Appendix 1 of this letter which shows how close the site is to the town centre.</p> |  |  |
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|  |  |  | <p>The Site is broadly rectangular in shape and is to the immediate north of the A125, which provides direct access to the Site. Further to the north of the site is Clydesdale Road and to the east is South Street.</p> <p>The Site's access route leads to a large area of car parking at the front of the Site. The existing B&amp;Q store runs along the northern border of the Site, with the northern and eastern boundaries comprising a number of mature trees. We understand none of these trees are subject to Tree Preservation Orders.</p> <p>The surrounding area is both residential and commercial in nature. To the south of the Site are commercial premises, and beyond are residential detached dwellings. To the immediate north of the Site are detached dwellings extending to three storeys. To the east of the Site is the Park Lane Recreation Ground, and petrol station. To the west of the Site is a commercial building consisting circa 6 storeys, and beyond this is flatted residential accommodation comprising circa 8 storeys beyond and detached residential dwellings.</p> <p>The Site has a Public Transport Accessibility Level (PTAL) of 2 indicating a 'poor' level of accessibility.</p> <p>The Site is located in Flood Zone 1 on</p> |  |  |
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|  |  |  | <p>the Environment Agency 'Flood Map for Planning (Rivers and Seas)' and therefore is considered to have a less than 1 in 1,000 annual probability of river flooding.</p> <p>The buildings on the Site are not listed, nor is the Site located within a conservation area. There are no statutorily or locally listed buildings within the immediate vicinity of the Site.</p> <p>The adopted Proposals Map (2008) indicates that the Site is allocated as 'Out of Town Centre'. However we note that neither the adopted or emerging Local Plan provides a definition of the above, so it is therefore reasonable to assume that this is not a protected designation. Once again Appendix 1 shows the real proximity of the site to the centre of Romford.</p> <p>On behalf of our client, we are keen to explore the redevelopment potential of the Site and consider it represents a sustainable, brownfield site in a central location which can be optimised for the delivery of alternative development. We recognise the role that LBH's emerging Local Plan will play in facilitating such development opportunities. Therefore as part of these representations we have reviewed the Schedule of Proposed Further Main Modifications (FMMC01) and set out our observations in the sections which follow.</p> |  |  |
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|  |  |  | <p>REFERENCE NUMBER: FMM1<br/>This Further Main Modification commits LBH to undertake an immediate update of the Local Plan in the context of the new London Plan and NPPF, which have both been published since the Local Plan was submitted for Examination. We understand this Local Plan Update will take place immediately after the current version of the Local Plan is adopted and the timetable for this process is set out as follows:</p> <ul style="list-style-type: none"><li>• Preparation of evidence base – 2021 and 2022</li><li>• Regulation 18 consultation – summer 2022</li><li>• Regulation 19 consultation – spring 2023</li><li>• Submission to the Secretary of State for examination – late summer 2023</li></ul> <p>Based on the above, ASI are supportive of the intention to undertake an immediate review of the Local Plan and agree this is required to ensure full conformity with all aspects of the development plan framework.</p> <p>We do however note that paragraph 1.1.7 makes reference to the NPPF (2019), and LBH will be aware that the NPPF was most recently updated in July 2021. As such we consider reference to the 2019 version of the</p> |  |  |
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|         |   |      | <p>NPPF should be updated to 2021 in Schedule FMMC01.</p> <p>We are keen to be involved in the Local Plan review process and wish to be kept informed of any upcoming consultation in this regard.</p>  |               |    |
| 1129210 | M Scott Properties Ltd (Victoria Cutmore) | FMM1 | <p>We support the inclusion of new paragraphs 1.1.6 and 1.1.7, particularly the confirmation of the proposed timescales for the immediate update of the Local Plan following adoption. The London Plan 2021 confers a higher housing target of 12,505 new homes over the first 10 years of the Plan period, and 18,930 over the 15-year period, therefore it is critical that the update to the Havering Local Plan is undertaken without delay. Further, the updates to national policy since both the Havering and London Plans were submitted for examination, including the introduction of the Standard Method, necessitate a review of housing needs within the Borough as part of this, to ensure the Plan is positively prepared and effective. We consider that a call for sites will also be necessary as part of the update, to secure a sufficient supply of sites within the remainder of the Plan period.</p> | Support noted | No |

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| 1253443 | Southern and Regional Developments | FMM2 | The Council has identified within these Further Main Modifications that the increase to the housing requirement from 17,550 to 18,930 dwellings, are required to ensure conformity with the housing targets expressed in the London Plan. This is supported, as it is important for the Council to ensure conformity with the London Plan and seek to meet the increased housing requirement in full through the Local Plan. This will ensure that these uplifted figures are taken into consideration in the forthcoming Local Plan Review and adequately planned for going forward, ensuring that the Council is not faced with similar shortfalls in housing delivery to those experienced in recent years and identified by the Housing Delivery Test. Failing to appropriately address the increased housing numbers arising from the London Plan would result in the Council seeking to progress a Plan that is not consistent with other policy and therefore does not meet the requirements of the Planning and Compulsory Purchase Act 2004. | Support noted   | No |
| 1276457 | Nigel Smith                        | FMM2 | In 3.2.1.ii - there should be a larger number of dwellings proposed   | The proposed further main modifications are to bring the Local Plan into general conformity with the minimum housing targets set out in the London Plan 2021. | No |
| 1136016 | Mayor of London                    | FMM2 | The Mayor welcomes that the housing numbers now correspond to the housing target set out in the LP2021  | Support noted   | No |

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|         |                 |      | to deliver 12,850 new homes between 2019 and 2029.  |  |    |
| 1113586 | Barrie Stone    | FMM2 | We recommend that the annual housing figure requirements are enforceable by law and failure to meet these from year one results in any sustainable project to be brought forward before the council with a presumption in favour of development. Based on under delivery in the past this is necessary to ensure the short fall of housing does not continue and development in the borough can be maintained in a sustainable, thoughtful and measured way instead of battles regarding housing numbers dominating attention that could be focused on ensuring future proof development takes place.   | Noted, the enforcement of housing requirements by law is outside of the remit of the Local Plan and the Further Main Modifications | No |
| 1251036 | Crest Nicholson | FMM2 | Havering aims to deliver at least 12,505 new homes over the first 10 years and 18,930 new homes over the 15-year plan period. Crest Nicholson are in full support of the increase in housing numbers over the plan period from 17,550 to 18,930, which is now broadly in line with the London Plan's minimum housing target requirement; however, it is important that deliverable and developable land is identified to meet the housing requirement, in the most sustainable locations. The increase in housing numbers is now consistent with the ten-year target for net housing completions that Havering should plan for, as set out in Policy H1 and Table 4.1 of the newly adopted London Plan. | Support noted  | No |
| 1253267 | St William      | FMM2 | Whilst the shift to a slightly higher minimum housing target is   | The Further Main Modifications are   | No |

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|  |  | <p>welcomed, there is little to justify the overall housing target of the whole Plan period.</p> <p>In justifying conformity with the London Plan, the Havering draft Plan now simply rolls forward the annual London Plan 10 year Housing Target for the remainder of the Plan period to 2031 – the rolling forward of a regional target, is not sufficient in defining Havering’s housing supply, as it doesn’t reflect the council’s OAN. This approach is not justified.</p> <p>It was made clear from the London Plan examination process and Inspectors Report (2019) that Boroughs should seek to deliver more homes than those set out in the London Plan, as the regional figures of circa 52,000 homes do not truly reflect London’s housing need. Further to housing supply requirements as set out in the NPPF, national policy states that, when plan- making, all plans ‘should promote a sustainable pattern of development that seeks to meet the development needs of their area’. The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. ‘This should be adequate and proportionate, focused tightly on supporting and justifying the policies</p> | <p>intended to bring the Local Plan into general conformity with the London Plan. The GLA, through their consultation response have confirmed that the proposed modifications are supported and do bring the Local plan into general conformity.</p> <p>The Council has committed to an immediate update of the Local Plan which will include the approach to housing delivery, the roll forward of the London Plan target will be addressed through this update.</p> <p>The timeframe for the immediate update is set out in FMM1.</p> |  |
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|  |  |  | <p>concerned, and take into account relevant market signals.’</p> <p>The evidence base underpinning the Plan, is not sufficient nor is it up to date – it relies on data set from 2016, which is now considered out of date; the Council’s Housing Supply Statement (June 2021) make it clear that this is the case; Paragraph 3.1 of the Housing Statement states, ‘The Council recognises the need to update the housing supply position. The Council has committed to an immediate update of the Local Plan, this is reflected in the Further Main Modifications. The immediate update will take into account the updated housing requirement in the London Plan 2021.’ The Statement also notes that ‘at this late stage in the examination process, a full update of the Housing Position Statement including the Housing Trajectory would result in significant further delays to the examination and adoption of the Local Plan’.</p> <p>If adopted, the current Local Plan would not be in conformity with the London Plan in terms of housing need and supply, nor would it meet the soundness tests of the NPPF. The point of ‘further delay’ to a Plan’s adoption, is not a valid reason to justify the adoption of a Plan that does not fully meet the soundness tests in Paragraph 35 of the NPPF, especially within a Borough that has</p> |  |  |
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|         |  |      | <p>failed to meet, and has demonstrated persistent under-delivery.</p> <p>To add to the above, following the Government's response to its consultation on an updated standard method of assessing housing need (October 2020), it has been indicated that London Housing Need figures are likely to increase by 35% with imposed methodology changes, with the aim of boosting housing supply quickly to deliver a new national total of 337,000 homes a year (compared to the 270,000 under the current methodology approach). The housing numbers in the draft Havering Local Plan do not reflect the Council's true housing need in light of both the adopted London Plan or as required by the NPPF.</p> <p>We support the Councils commitment to an early review of the Local Plan as shown in the FMM's; however, the Council should provide a firm commitment and produce indicative timescales of review stages.</p> |       |                          |
| 1277245 | Aberdeen Standard Investments (Montague Evans LLP) | FMM2 | Further Main Modifications 2 & 3 alter LBH's housing delivery figures over the Plan period to ensure conformity with the London Plan (2021). We note that LBH's housing target over the 15 year plan period has increased from 17,550 dwellings to 18,930 dwellings.   | Noted | Yes – Site Location Plan |

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| 1136016   | Mayor of London                                    | FMM3 | The Mayor welcomes that the housing numbers now correspond to the housing target set out in the LP2021 to deliver 12,850 new homes between 2019 and 2029.  | Support noted  | No                       |
| 1112384   | Nigel Teelan                                       | FMM3 | I've tried numerous times to log in and give a comment on the modifications but it doesn't seem to be working well so here's what I'd like to say I do not think the plan is sound or legal because The council have promised thousands and thousands of new houses in this plan and a budget of 1 billion pounds but not one single blade of grass or one penny for gypsy sites in the plan plus the Travellers who are Putting forward their own land are being made jump through hoop after hoop and restrictions to meet a need that is there and at no cost to the council or taxpayers I'm glad they're at least building these much needed houses but what about us Travellers. | Policy 11 of the Local Plan and main modifications sets out how the accommodation needs of gypsy and travellers will be met over the plan period. Policy 11 is not subject to further main modifications and therefore falls outside the remit of this consultation. | No                       |
| 1277245 , | Aberdeen Standard Investments (Montague Evans LLP) | FMM3 | Further Main Modifications 2 & 3 alter LBH's housing delivery figures over the Plan period to ensure conformity with the London Plan (2021). We note that LBH's housing target over the 15 year plan period has increased from 17,550 dwellings to 18,930 dwellings.   | Noted  | Yes – Site Location Plan |
| 1253443   | Southern and Regional Developments                 | FMM6 | Within Policy 3, the Council has recognised the need to modify the Policy to reference the increased housing requirement arising from the recently adopted London Plan. The increased housing requirement has led to increases in the phased housing targets for the plan period, and  | Support for the immediate update of the Local Plan is noted.   | No                       |

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|         |                       |      | <p>recognition of the need for the forthcoming Local Plan Update or Review to address any shortfall arising in housing delivery associated with the increased housing requirement. The increased housing requirement for each phase is supported, particularly as the Council has accepted the need to address the increased housing requirement early in the plan period. This is illustrated through the revised phased housing requirements which includes an uplift from 1,640 to 1,801 from 2021/22-2025/26. This is a positive step by the authority to address housing delivery issues and is strongly supported by Claremont Planning and S&amp;R.</p> <p>In order for the Council to fulfil these increased housing requirements in future years of this plan period and subsequent plans, it is considered essential that as part of the review the Council considers the potential for Green Belt sites to be released to contribute towards housing delivery. This will help to diversify the sources of housing and the types of housing that can be delivered, ensuring housing delivery is boosted and the needs of different sectors of the population are met.</p> |   |    |
| 1128705 | Romford Civic Society | FMM6 | <p>We note that the minimum number of new homes required in the Romford Strategic Development Area seems to have been reduced from 5,300 to 5,000, and welcome this reduction if it is the case (though it does seem to</p>   | <p>The Further Main Modifications are required in order to bring the Local Plan into general conformity with the London Plan 2021. Whilst the housing</p> | No |

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|         |                 |      | <p>clash with figures elsewhere in the document.)</p> <p>We note that overall, however, the expected number of new properties expected in Havering has increased. We see no reference in the document to updating where this extra level of housing could be accommodated, and are concerned that this may be a high-risk approach, leaving Romford in particular, with its various large vacant retail sites in the centre of the town, vulnerable to speculative development to meet any shortfall.</p> <p>We are keen to understand whether it would be an effective means of controlling a potential detrimental situation by zoning sites such as major disused retail sites around Romford Market and elsewhere in central Romford for high-quality purpose-built housing at a lower height than the current monolithic buildings on those sites, therefore allowing the environment of Romford Conservation Area to be improved while also providing extra units to meet housing need and allowing the excessive level of development planned on sites such as Waterloo Road to be revisited and reduced.</p> | <p>targets have increased slightly, there have been no changes to the identified housing supply as set out in the Housing Trajectory Oct 2019. The quantum of housing previously identified in the Housing Trajectory is sufficient to meet the increased London Plan target.</p> |           |
| 1136016 | Mayor of London | FMM6 | <p>The Mayor welcomes the clear recognition of Havering's housing target which is set out in Table 4.1 of the LP2021 for the delivery of 12,850 new homes between 2019 and 2029.</p>   | <p>Support noted</p>  | <p>No</p> |
| 1277085 | Chris Cristou   | FMM6 | <p>I don't agree with Havering council wanting to build thousands of homes until 2028. This will destroy wildlife</p>  | <p>Noted. The Local Plan seeks to protect Havering's green belt.</p>  | <p>No</p> |

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|         |                    |      | <p>habitat. And push wildlife animals to extinction. We still lose the green belt we have in the borough. The cause of the housing shortages are so called asylum seekers. Flooding the UK. They are adding to the population of the UK and putting local councils under pressure to put in housing developments. We haven't got the infrastructure. Plus more homes will cause flooding. Including mice and rats and other wildlife getting in peoples homes because their habitats are been destroyed on a daily basis. Most humans are ruining the environment.</p>  | <p>Infrastructure, flooding and environmental issues are addressed in the Local Plan. These policies are not subject to Further Main Modifications and are therefore fall outside of the remit of this consultation.</p> |    |
| 1113563 | Environment Agency | FMM6 | <p>The proposed main modifications show an increase to the housing numbers for sites assessed in previous consultations of the local plan. We supported the use of these sites within our previous responses and a statement of common ground between the Environment agency and Havering Council (dated 12 December 2018).</p> <p>There have not been alterations to the submitted Proposals Map however we reserve the right to make further comment should the distributions of additional housing fall into areas of environment constraint within our remit.</p> <p>Our previous comments regarding flood risk, contaminated land and biodiversity will apply.</p> | Noted  | No |
| 1251036 | Crest Nicholson    | FMM6 | <p>The proposed spatial approach set out in the Plan remains to direct a</p>  | <p>The spatial approach (including the protection</p>  | No |

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|  |  |  | <p>significant proportion of new housing development to two Strategic Development Areas: one in the main town centre at Romford, and the other at a new neighbourhood on former industrial land at Rainham and Beam Park. The reliance on Havering's housing supply delivered through the development of major brownfield strategic sites risk occurring long 'lead in' times because of a need for often complex land assembly, engagement with residents, decanting of exiting residents, remediation works and phased construction. As a result of the challenges of developing brownfield sites, even when set against the Council's minimum target for growth, the Council risk being unable to demonstrate a five-year land if development start dates are delayed and delivery rates are slow. The challenges and constraints when developing brownfield sites are concerning when considering the housing delivery requirements for the Borough, as delays to commence development could prevent housing completions expected to occur in the later part of the plan period, resulting in their completion beyond the plan period and an overall shortfall in housing delivery. Through the examination of the emerging Local Plan, the Romford Strategic Development Area allocation housing numbers have increased from 4,470 new homes to 5,241 over 10 years, with a total of 6,642 new homes over a 15 year period. The increase of</p> | <p>of Havering's green belt) has been subject to extensive discussion throughout the examination and is not subject to further main modifications.</p> <p>Support for an immediate update of the Local Plan is noted.</p> |  |
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|  |  |  | <p>housing identified to be delivered within the Romford Strategic Development Area adds to the reliance on one site for housing supply in Havering. If the development delivery of housing is delayed at commencement, or the site suffers from lower than expected build out rates, the result would pose a significant risk on the Borough to meet its housing delivery targets. The impact of which could accumulate throughout the Plan period.</p> <p>As recognised in the London Plan, the gap between average house prices in London and the rest of the country is considerable, and the private rental cost of a one-bedroom home in London is now more than the average for a three-bedroom home in any other English region. Affordable housing is central to allowing residents of all backgrounds to have the choice to live local to their community, education and employment. Providing a range of high quality, well-designed, accessible homes is important to delivering Good Growth, ensuring that London remains a mixed and inclusive place in which people have a choice about where to live. The failure to provide sufficient numbers of new homes to meet London's need for affordable, market and specialist housing has given rise to a range of negative social, economic and environmental consequences, including worsening housing affordability issues,</p> |  |  |
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|  |  | <p>overcrowding, reduced labour market mobility, staff retention issues and longer commuting patterns. The lack of supply of the homes has played a significant role in London's housing crisis. The 2017 London Strategic Housing Market Assessment has identified a significant overall need for housing, particularly for affordable housing. Therefore, it is imperative that Havering plans for development in the right places, on land that is developable and deliverable, so that enough homes, including affordable homes, are built to meet the growing demands. To meet the recognised need for housing in the Borough, Havering must seek to deliver new homes through a wide range of development options. Reusing large brownfield sites will remain crucial, although relying on large former industrial sites makes delivery slow. Planning for new housing on both brownfield and greenfield land is important to sustaining a healthy housing supply, while providing homes in the most sustainable and well-connected places.</p> <p>Policy H1 of the London Plan states that "where new sustainable transport infrastructure is planned, boroughs should re-evaluate the appropriateness of land use designations and the potential to accommodate higher-density residential and mixed-use development, taking into account future public transport capacity and</p> |  |  |
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|  |  |  | <p>connectivity levels." Crossrail has committed to opening in full by May 2023, which will connect Harold Wood to central London and beyond. The new trainline will run every 5 minutes and provide access to central London and beyond without needing to change trainlines, substantially reducing travel times. Development of new housing in proximity of Harold Wood rail station should be considered as one of the most sustainable locations in Havering for housing growth, as the location will benefit from accessibility to a key sustainable transport mode to key places of employment, education and leisure, in the way of access to destinations across London.</p> <p>As part of the main modifications to the Plan, the Council has reduced the minimum parking requirements to specific parts of the borough. The amendment is an indication that the Council wish to encourage the use of alternative modes of transport over the private car. For the reliance in the private car to diminish, residents need to have access to a variety of sustainable transport alternatives. For existing and new residents, proximity to the enhanced rail network will be hugely attractive as a place to live and provide access for travel without the need for a private car. Therefore, new land identified for development should be in reasonable proximity to these sustainable transport modes.</p> |  |  |
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|         |              |      | <p>Despite the shortage of housing land supply and the reliance on brownfield, highly constrained strategic sites, the Council remains committed to maintaining its Green Belt in full, despite land in the Green Belt having less constraints to development than brownfield sites. The Council does not consider that unmet housing need constitutes very special circumstances justifying development in the Green Belt. This approach continues to be at odds with neighbouring local authorities to Havering, who propose to release land from the Green Belt for sustainable development. Sites that fall within the Green Belt should be assessed and given merit based on their sustainable credentials, particularly in terms of location and sustainable transport connections, as well as deliverability, particularly in the short-term. Crest Nicholson encourage the Council to consider a Green Belt review as part of the immediate Local Plan update as this will be necessary in assessing land in the most sustainable locations in Havering. It is imperative that new allocations are deliverable and developable in the short-to-medium term to combat the past short- fall in housing delivering in the borough.</p> |   |    |
| 1113586 | Barrie Stone | FMM6 | <p>Considering previously developed and brownfield land only is short sighted when there are sights of previously used reinstated and brownfield reinstated land available such as bush farm which meet all the criteria that</p>   | <p>The spatial approach (including the protection of Havering's green belt) has been subject to extensive discussion throughout the</p> | No |

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|  |  | <p>the plan must achieve. as Havering has many former quarry sites available this will help achieve a significant increase in the land available.</p> <p>Page 3 point x states that 'the delivery of new homes will also be achieved by supporting appropriate development of infill, under-utilised and vacant sites in the borough's sub-urban areas' which surely previously used reinstated and brownfield reinstated land should be considered part of.</p> <p>Page 7 – 7.1.6<br/>Further to our point earlier regarding FMM2, without some form of sufficiently stringent enforcement or penalty in law there is a high risk the Council will continue to under deliver the housing targets set out for the areas</p> <p>Page 8 – 7.1.9<br/>Housing supply is critical now and so this approach seems foolish, particularly as the council has underperformed on several occasions in meeting its housing targets, this approach just seems to facilitate further stalling. There are multiple sites available which meet the required criteria now.</p> <p>Page 8 – 7.1.11<br/>Where a buffer of 20% has been recommended to be used immediately owing to poor past performance, this needs to be acted on straight away</p> | <p>examination and is not subject to further main modifications.</p> |  |
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|         |            |      | <p>and carefully reviewed annually to ensure the figures are actually met.</p> <p>Page 10 – 7.1.16<br/>The Council could adopt more developers working on different parts of sites simultaneously which would drastically increase the delivery timescale. The Council could also re-visit other large available sites in order that a number of independent developers might bring development forward simultaneously and reducing the overall competition time and meet and potentially exceed annual housing numbers. This approach could also provide an opportunity for local small and medium sized builders to be involved, contributing to the local economy.</p> |  |    |
| 1253267 | St William | FMM6 | <p>Further to our comments made in relation to FMM2, the supply of homes and housing figures as distributed spatially in points i to v is not justified; at a basic level, the figures attributed to each spatial area equate to 11,300 new homes, which is below the 12,505 figure quoted at the start of the same paragraph. This discrepancy needs to be amended.</p> <p>At the previous Main Modification stage the minimum target for delivery of homes in the Romford Strategic Development Area (RSDA) was increased from 5,300 (Local Plan Submission Version) to 6,000, which St William supported. This increase of homes within an Opportunity Area,</p>       | <p>The 12,505 represents the housing target based on the London Plan.</p> <p>The 11,300 is the sum of the <u>minimum</u> figures expressed for the main areas of housing delivery. It does not represent all identified housing supply which is set out in the Housing Position Statement and Housing Trajectory Update October 2019. The figures that make up the 11,300 remain unchanged since the</p> | No |

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|  |  | <p>was in line with Mayoral policy and the approach was consistent with the Good Growth objectives of the London Plan.</p> <p>The London Plan makes it clear that development must:</p> <ul style="list-style-type: none"> <li>- prioritise sites that are well-connected by existing or planned public transport;</li> <li>- actively explore the potential to intensify the use of land to support additional homes; and,</li> <li>- promote higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.</li> </ul> <p>On this basis, the approach to increase homes to 6,000 within the RSDA was already in conformity with the London Plan and changes were not needed. Main Modifications 6 to Policy 3 'Housing' now changes this figure to 5,000 homes, a decrease of 300 from the Submission Version of the Plan (2019) and 1,000 less than the Main Modifications published August 2021. This lower provision is not based on evidence nor is there any justification for this; a decrease of homes to be delivered in an Opportunity Area is not in line with London Plan policy and this change is not in conformity.</p> <p>As a former utilities site within the RSDA, Romford Gas Works is the</p> | <p>Main Modifications Consultation in 2020.</p> <p>The capacity of individual sites has been discussed extensively through the examination process and is not within the remit of this consultation.</p> |  |
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|         |  |      | <p>type of site that should be used to deliver the needed homes for the Borough. As previous representations have indicated, we consider that the former Gas Works Site at Crow Lane, Romford (which the new Plan de-designates from employment to residential) has the potential to deliver more than the 450 homes as currently indicated in the draft Plan evidence base. In line with Mayoral policy, former industrial sites like this across London should be used in the most effective and efficient manner – the 450 homes as indicated by the Council is a gross under utilization of the site; therefore Policy 3 still remains inconsistent to the London Plan.</p>      |               |                          |
| 1277245 | Aberdeen Standard Investments (Montague Evans LLP) | FMM6 | <p>REFERENCE NUMBER: FMM6</p> <p>Further Main Modification 6 relates to housing supply within the Borough. It is acknowledged in paragraph 7.1.12 that there has been a persistent under delivery of housing within the Borough and that delivery of new homes will be achieved by:</p> <ul style="list-style-type: none"> <li>• Promoting mixed-use development in town centres and designated out of town centre locations;</li> <li>• Prioritising all non-designated land for housing when it becomes available;</li> <li>• Supporting the re-use of brownfield sites when they become available; and</li> <li>• Supporting appropriate development of infill, under-</li> </ul> | Support noted | Yes – Site Location Plan |

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|  |  |  | <p>utilised or vacant sites in the borough's sub-urban areas.</p> <p>Our client's site falls to the immediate south of the Romford Strategic Development Area ("SDA"), and as such we consider the redevelopment of the Site could achieve all of the above requirements. It also has fewer obstacles to development than many other sites which could contribute to the delivery housing, particularly in the medium term.</p> <p><b>CONCLUSION</b></p> <p>On behalf of our client, ASI, we write to express our broad support for the proposed Further Main Modifications to the Havering Local Plan and consider they are necessary to make the Local Plan sound.</p> <p>These representations are written in respect of our client's site, land comprising the B&amp;Q store at Roneo Corner in Romford, and we have reviewed the proposed FMM's with regard to our client's ambition to explore the redevelop the Site for alternative uses. This is of course subject to the position of the long term tenant which ASI has supported over many years.</p> <p>ASI are keen to explore the potential future redevelopment potential of the Site and consider it represents a sustainable, brownfield site in a central location which could be</p> |  |  |
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|  |  |  | <p>optimised for the delivery of alternative development. The proximity of the Site to the Romford SDA and 'unallocated' nature of the Site strongly suggest that a range of land-uses would be acceptable on the Site, subject to detailed design considerations. We recognise the role that LBH's emerging Local Plan will play in facilitating such development opportunities, hence the submission of these representations. ASI's position is to open this dialogue constructively with the Council so appropriate alternatives to the existing successful use can be explored.</p> <p>We understand the FMM Schedule commits LBH to undertake an immediate update of the Local Plan, following its adoption later this year. Our client is supportive of this intention and wishes to be kept informed of the timescales leading up to this further opportunity for engagement.</p> <p>We also politely request to be kept informed of the publication of the Inspector's recommendations and the subsequent adoption of the Local Plan later this year.</p> <p>Given the size of the Site and its proximity to the SDA, we would be pleased to meet to explain ASI's thoughts on how the Site could change in the medium to longer term and also to understand the Council's</p> |  |  |
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|         |  |      | thoughts on the Site.<br>Should  |  |                          |
| 1253320 | Mactaggart and Mickel (Iceni Projects) | FMM6 | <p>Iceni Projects Ltd have been instructed by Mactaggart &amp; Mickel to prepare representations to the Further Main Modifications consultation to the Havering Submission Local Plan (March 2018). These representations follow those submitted during the Main Modifications Consultation in October 2020.</p> <p>Mactaggart &amp; Mickel has an interest in land at Damyns Hall / Bush Farm and has an ambitious vision with neighbouring landowners and local stakeholders to bring forward a sustainable urban extension, incorporating a mix of uses including housing, community, health and employment uses, through the plan-making process. The site, in conjunction with adjoining land controlled by Havering Borough Council, has the capability of contributing significantly towards the provision of a new Garden Village at this location to meet the Borough's forthcoming housing needs.</p> <p>The vision of the scheme is to deliver traditional family-led housing based around cutting-edge digital and sustainability components, with potential to facilitate the delivery of a new train station. A site location plan is attached at Appendix A1.</p> <p>a. About Mactaggart and Mickel</p> | <p>The spatial approach (including the protection of Havering's green belt) has been subject to extensive discussion throughout the examination and is not subject to further main modifications.</p> <p>Support for an immediate update of the Local Plan is noted.</p> <p>As set out in the Housing Supply Statement, the Council is relying on the housing supply evidence contained within the Housing Position Statement and Housing Trajectory Oct 2019.</p> | Yes – site Location Plan |

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|  |  |  | <p>Mactaggart &amp; Mickel was founded in 1925 in Scotland. They are a fifth-generation family company, with family values and long term goals.</p> <p>As well as shaping new communities in Scotland, Mactaggart and Mickel has more recently shaped projects in Oxfordshire and London and has several projects in North America (Chelsea in Manhattan and Williamsburg in Brooklyn). They recently opened a London-based office, demonstrating their commitment to projects in the south-east and south-west of England.</p> <p>Mactaggart &amp; Mickel is a leading house-builder and a resilient company that has strong and diversified foundations. Its governance structure allows it take entrepreneurial decisions and to break the status quo. They have an enthusiasm to implement new sustainable technologies, reduce the dependence on the private motor car and encourage new start-up entrepreneurial businesses.</p> <p>Mactaggart &amp; Mickel are committed to supporting the London Borough of Havering through the planmaking process. The team will work alongside both officers and elected Members at the London Borough of Havering to create a place that provides a shared sense of pride and commitment to</p> |  |  |
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|  |  | <p>longevity. The consultant team is already familiar with the issues and opportunities facing the Borough and are dedicated to delivering sustainable development.</p> <p>b. The Site and Surroundings</p> <p>The site is located within the south east of the London Borough of Havering, south of Upminster and north east of Rainham, positioned a short distance to Thurrock's administrative boundary to the south with the M25 Motorway located to the east and South Ockendon to the south east.</p> <p>The land has provided multiple uses over time, from agriculture, to municipal landfill some in parts, to a festival and aerodrome in others.</p> <p>The western area of the landholding comprises of the Damyns Hall Aerodrome located on Aveley Road. The aerodrome was founded in 1969 and since 2004, has been open for daytime operations by both fixed-wing aircraft and helicopters. Bush / Bramble Farm is located on the eastern area of the landholding where Sunnings Lane passes through north to south.</p> <p>The majority of the landholding consists of greenfield land covered mostly by grass with small areas of trees. The land between Sunnings Lane and Stubbers Lane, to the</p> |  |  |
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|  |  |  | <p>further east, is covered by a Tree Protection Order (TPO).</p> <p>A very successful music festival (we are FSTVL) is held annually on the western area of the site and has influenced how the land is managed. The festival typically attracts approximately 30,000 visitors but was cancelled due to Covid-19 restrictions and set to return on site from 2022. To allow for a comprehensive approach in bringing the site forward, the festival and aerodrome are expected to relocate permanently, ideally within Havering if a suitable site can be identified, but if not, elsewhere in the South East.</p> <p>The eastern area of the site borders the London Borough of Havering's landholding which includes Russell's Lake, Stubbers Adventure Centre and associated amenities. Corbets Tey is located to the north of the site where the context of development is very much suburban with low density housing.</p> <p>There is access to a range of services such as schools, pubs and local convenience shops. Corbets Tey Conservation Area, designated in 1990 covers the south of the settlement, extending towards the site to the south.</p> <p>Upminster is located approximately 1 mile to the north of the site with</p> |  |  |
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|  |  | <p>additional services such as supermarkets, restaurants and medical centres. Upminster Station is located approximately 1.8 miles to the north of the site, which has direct connections into central London via the c2c to London Fenchurch Street every 5-10 minutes and the London Underground District Line to Ealing and Broadway and Richmond. Rainham is located approximately 3.2 miles from the east of the site. c2c trains from Rainham Station leave every 30 minutes to London Fenchurch Street.</p> <p>What do residents' value about the area?<br/>From a review of responses to previous engagement exercises in Havering, we know that the existing community enjoy the proximity to London that the area provides, particularly given the upgrades and improvements to the transport infrastructure in the Borough. They are keen, however, that the area maintains a distinct and separate identity, not being seen as an extension to London.</p> <p>The community enjoy the benefits of both urban and rural living. Upminster town centre is appealing, with over 180 shops and restaurants and there are areas of landscape that are highly valued by people locally. It is clear that construction disruption and adequate car parking are also key to people locally when considering new</p> |  |  |
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|  |  |  | <p>development.</p> <p>c. Responding to the Proposed Further Main Modifications to the Submission Havering Local Plan (March 2018) consultation – August 2021</p> <p>The London Borough of Havering Council is preparing a new Local Plan which will set out policies and proposals that will guide development in the area throughout the plan period. The Council is currently consulting on Further Main Modifications to the Submission Local Plan which was submitted for examination in March 2018.</p> <p>In June 2021, The Council received correspondence from the Inspector regarding conformity with the Local Plan, and the Council responded. This stated that the Inspector did not consider the Plan to be in general conformity with the London Plan 2021. In order to enable the Inspector to conclude that the Plan is legally compliant in this respect, the Inspector recommended that further main modifications were needed.</p> <p>Housing Supply</p> <p>The Council have increased the supply of housing to a minimum of 18,930 dwellings over the 15 year plan period (previously 17,550). At least 12,505 new homes will be built over the first 10 years of the Plan period (previously 11,701). This comprises a target of 1,170 units per annum for the first three years of the Local Plan in</p> |  |  |
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|  |  |  | <p>accordance with the previous London Plan and annual target of 1,285 for the following 7 years in accordance with the London Plan 2021.</p> <p>The Planning Inspector requested an up to date 5 year housing land supply position, reflecting an adoption date of 2021 and taking into account the updated housing targets.</p> <p>Notwithstanding, the Council considers that, at this late state in the examination process, a full update would result in significant delays to the examination and adoption of the Local Plan. Therefore, an immediate review of the Local Plan will take into account the updated housing requirement.</p> <p>The following timescales have been proposed:</p> <ul style="list-style-type: none"><li>• Preparation of evidence base – throughout 2021 and 2022</li><li>• Regulation 18 consultation – summer 2022</li><li>• Regulation 19 consultation – spring 2023</li><li>• Submission to the Secretary of State – late summer 2023</li></ul> <p>Whilst we support and welcome the Council's decision to commit to an immediate review of the Local Plan, the Council are required to demonstrate a 5 year housing land supply upon adoption of the Plan.</p> <p>Therefore, we request that the Council update the 5 year housing land supply position in order for the Local Plan to be found sound by the Inspector and avoid further delays to adoption.</p> |  |  |
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|  |  |  | <p><b>Housing Growth Strategy</b><br/>The Council's current growth strategy is focused on the intensification of previously developed land, including major estate regeneration projects in Romford, Rainham and Beam Park; a regeneration programme for its own homes; the establishment of the Council's own housing company; opportunities across a range of brownfield sites and working pro-actively and collaboratively with developers to bring forward sites in private ownership.</p> <p>Policy 3 (Housing Supply) states that the delivery of new homes will be achieved by a number of actions, including supporting the re-use of brownfield sites when they become available (viii). Whilst we welcome this approach, the Council should also consider the importance of previously worked sites, such as Damyns Hall / Bush Farm, in contributing to the delivery of housing. We therefore recommend that the policy be amended to reflect this as follows:</p> <p>viii. Supporting the re-use of brownfield and / or previously worked sites when they become available</p> <p>The Housing Position Statement (2019) states that there are not exceptional circumstances to warrant the release of Green Belt land to meet need and believe that any release could undermine the delivery of housing on key brownfield sites.</p> |  |  |
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|  |  |  | <p>Whilst this strategy is supported, Havering's housing target is set to increase significantly during the Local Plan review. Havering's current housing target as set out in the London Plan equates to a minimum annual average of 1,170 units. On the basis that Havering has an up to date Local Plan (adopted within the last 5 years) the local housing need figure calculated using the current Standard Method is capped at 40% above the average requirement in the Plan. Using the average annual housing requirement of 1,170, the capped figure would be equal to 1,638 per annum, an increase of 40%. We consider that in order for the Council to meet this target through the Local Plan Review, it should seek to release Green Belt land for the following reasons:</p> <ul style="list-style-type: none"><li>• Brownfield land alone will not deliver sufficient land to meet the Council's housing target. With 53% of the Borough situated within the Green Belt - the highest proportion of open space of any London Borough2 - there is a growing shortage of suitable brownfield land.</li><li>• There is a growing need for family housing in the Borough. The emerging Local Plan is heavily reliant on the intensification of brownfield sites set to deliver high-rise flatted accommodation which is not desired by families.</li></ul> |  |  |
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|  |  |  | <ul style="list-style-type: none"><li>• Reliance on brownfield land alone will have significant consequences for housing delivery and satisfying the Housing Delivery Test going forward.</li><li>• The use of Green Belt land can allow the delivery of more and higher quality infrastructure such as schools and public transport. For the reasons set out above, releasing Green Belt land will ensure that the Council will meet its housing target whilst ensuring communities that contribute to a high-quality of life are delivered for Havering residents. We therefore consider that exceptional circumstances can be demonstrated to justify the release of Green Belt land through the Local Plan Review and Mactaggart and Mickel are well-positioned to support the Council in achieving this at Damyns Hall / Bush Farm.</li></ul> <p>d. The Vision<br/>Mactaggart and Mickel appointed a consultant team in March 2020 to carry out extensive due diligence for Damyns Hall/ Bush Farm. A place-led approach was undertaken, setting out the opportunities and challenges, needs and constraints of the site from a physical, social and economic perspective. This has led to a detailed understanding of the area which has informed the overall vision for the site.</p> <p>A Distribution of Smaller Settlements</p> |  |  |
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|  |  | <p><b>Providing for Day-to-Day Needs</b><br/>The future of urban areas are where people have a desire to travel less, shop locally and have sufficient access to open space. To achieve this, well designed, liveable neighbourhoods which reduce the reliance on the private car and champion sustainable modes of transport need to be delivered. The Covid-19 pandemic has added increased pressure for towns to be planned around people, rather than car travel.</p> <p>Havering Council identified that the Borough has clear Town Centres rather than the continuous mass of housing that makes up inner London Boroughs. This brings constraints, such as increased travel time from one urban area to another. As a result, car usage is high, with 77% of households having at least one car and 32.8%<sup>3</sup> having 2 more cars - the second highest proportion reported in London. The scheme will deliver good public transport links to district centres and has the potential to deliver a new train station, reducing the reliance on cars.</p> <p>The proposals will be designed to provide for day-to-day needs within a 15-minute journey by foot, cycle or public transport. A distribution of smaller settlements will be delivered, including commercial space, with clear scope for new ways of working with localised access.</p> |  |  |
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|  |  |  | <p><b>Digital Connectivity</b><br/>The societal shift to home working has been vastly accelerated by Covid-19. The emerging proposals seek to embrace these changes, including a greater need for agile working environments. The vision is to create a scheme that provides the very best digital infrastructure and is supported by high-speed digital upgrades in the wider area. Havering is uniquely placed to enhance its digital standing given its proximity to power, existing fibreoptic infrastructure and proximity to the capital.</p> <p>The scheme could include incubator workspace and community space that could be utilised for close-to-home working, embracing sensor technology and predictive analytics help to better align services with resident needs. This will include information on energy usage; air quality; public transport, and emissions.</p> <p><b>Sustainability Principles</b></p> <p>The Planning White Paper seeks to ensure the planning system addresses and fights climate change and promotes environmental and sustainable benefits. The Government recognises that buildings have a crucial role to play if we are to meet the station ambition of being net-zero carbon by 2050. The scheme could deliver cutting edge sustainability, integrating leading technologies to deliver a development that exceeds the London Plan zero carbon standard</p> |  |  |
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|  |  |  | <p>and RIBA 2030 target, to be net-zero 2050 ready.</p> <p>Working with a leading UK University, the scheme could develop an integrated sustainability plan based on advanced technologies, combined where possible with local energy opportunities, to deliver industry-leading standards of energy efficiency, water performance and waste recycling. The scheme could be designed to achieve a net positive carbon footprint, generating more energy than used over the course of a year.</p> <p>In doing so, the scheme aims to be a leader in delivering, or exceeding PassivHaus standards, through efficient design and use of materials, reducing embodied carbon as well as operational carbon emissions.</p> <p>e. Conclusion</p> <p>Mactaggart &amp; Mickel welcome the Council's commitment to undertake an immediate review of the Local Plan to ensure enough housing is delivered over the 15-year plan period. With this said, we urge the Council to provide an up to date 5 year housing land supply position to ensure the Local Plan is found sound by the Inspector and avoid further delays to adoption.</p> <p>Once an immediate review of the Local Plan commences, we hope that</p> |  |  |
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|         |                        |      | <p>the Council will strongly consider releasing Green Belt land in order to meet the increased housing target as calculated by the current Standard Method.</p> <p>We encourage the Council to consider the importance of Damyns Hall / Bush Farm as having the potential to bring forward a sustainable urban extension which incorporates traditional family housing with cutting-edge digital and sustainability components. Mactaggart and Mickel would like to work collaboratively with the Council and other stakeholders to ensure an ambitious plan is delivered for Havering.</p> <p>Thank you for the opportunity to respond to the Further Main Modifications consultation. We would be grateful for confirmation of the receipt of these representations and would welcome the opportunity to discuss the site and the contribution it can make to sustainable development of the Borough.</p> |  |    |
| 1129210 | M Scott Properties Ltd | FMM6 | <p>The proposed additions to paragraph 7.1.18 outline a commitment to update the Local Plan “taking into account the latest information relating to the London Plan 2021 target, any shortfall in delivery and updated supply.” We consider that this commitment should be expanded to take into account any increase in the housing need calculated using the Standard Method.</p>   | <p>The purpose of the further main modifications are to ensure that the Local Plan is in general conformity with the London Plan 2021. LBH do not consider it necessary to specifically refer to the standard methodology in relation to the immediate update of the Local Plan. The</p> | No |

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|  |  |  | <p>As set out in our comments on FMM1 above, it has been three years since the Plan was submitted for examination. To ensure that the Plan is capable of meeting the housing needs within the Borough going forward, it is imperative that the update to the Local Plan is based on the most up-to-date assessment of housing need, which should be calculated using the Standard Method. It is noted that the London Plan was also examined under the provisions of the 2012 NPPF, highlighting the need for the update to the Havering Local Plan to include an assessment of housing need, as opposed to being based solely on the target set out within the London Plan, which represents a minimum.</p> <p>It is clear from updated Table 7.3 within the Housing Supply Statement 2021 that the Council is unable to demonstrate a five year land supply, based on the housing targets in the London Plan 2021 and using a stepped trajectory and the Sedgefield Approach. Paragraph 3.1 of this Statement reaffirms the intention to take into account the update housing requirement in the London Plan 2021, however, the update to the Havering Local Plan would be examined in accordance with the provisions of the</p> | <p>update will need to take account of all aspects of the NPPF 2021 including the standard methodology, but this does not need to be stated in the current Local Plan.</p> |  |
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|         |                 |      | <p>2021 NPPF. PPG advocates the use of the Standard Method and confirms that a different approach should be used only in exceptional circumstances. Given the passage of time since the Plan was submitted for examination and the subsequent changes to national policy, it is considered that the update to the Local Plan should not be solely based upon the housing target set out in the London Plan 2021.</p> <p>The lack of five year land supply further highlights the need to ensure that a call for sites forms part of the update to the Local Plan, and that additional sites within the Borough are identified to ensure the Plan has a sufficient housing supply for the remainder of the Plan period.</p> |   |    |
| 1113586 | Barrie Stone    | FMM7 | <p>Page 16 – 7.2.6<br/>The Council should provide a list of registered providers of affordable housing and the requirements for new companies to be able to join the list to be proactive in ensuring that the appropriate levels of affordable housing are met without unnecessary delay.</p>   | Noted, this is outside the remit of the Local Plan Further Main Modifications | No |
| 1136016 | Mayor of London | FMM7 | <p>The Mayor welcomes the clear intention to follow the 50% thresholds for affordable housing on public sector land and industrial sites where residential development would result in a loss of industrial capacity. This is</p>  | Support noted   | No |

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|         |            |      | <p>consistent with the approach set out in Policy H4 of the LP2021.</p> <p>Also welcome is the clear explanation that those schemes not meeting the thresholds will be required to take the Viability Tested Route which is consistent with Policy H5 of the LP2021.</p>  |   |    |
| 1253267 | St William | FMM7 | <p>The wording in FMM7 aligns Policy 4 'Affordable Housing' with London Plan policy. Given the updated policy will now read 'Residential development on public sector land where there is no portfolio agreement with the Mayor or on industrial sites where the scheme would result in a net loss of industrial capacity will be required to provide 50% affordable housing.', to ensure full conformity with the London Plan and to be deemed as 'sound', Local Plan policy 4 and supporting text will need to reflect footnote 59 of the London Plan which highlights the unique challenges of former utility sites. Footnote 59 recognises that 'some surplus utilities sites are subject to substantial decontamination, enabling and remediation costs. If it is robustly demonstrated that extraordinary decontamination, enabling or remediation costs must be incurred to bring a surplus utilities site forward for development, then a 35 percent affordable housing threshold could be applied, subject to detailed evidence, including viability evidence, being made available.' New proposed paragraph 7.2.5 of the draft Local Plan also should reflect footnote 59 for conformity reasons.</p> | <p>The GLA have confirmed through their consultation response that the Further Main Modifications bring the Local Plan into general conformity with the London Plan.</p> <p>LBH do not consider it necessary to repeat verbatim the wording of the London Plan policy which already forms part of the development plan for the borough.</p> | No |

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| 1276607 | John Howes      | FMM22 | The council and developers parking recommendations are not fit for purpose. For example how can you allocate 0.5 of a space to a 1 bedroom development. Most development of apartments that I have seen and make better use of the surroundings area by having a separate floor for parking usually beneath the apartments. This alleviates the need for on street parking which going forward leads to less on road parking. Once again the two bedroom and three bedroom houses by the number of bedrooms means that more cars will be required pushing them onto the road, making the roads more difficult to pass for other vehicles including emergency vehicles. This is already having an effect with the bay parking this borough insists on being the way forward. This will also make the people left with front gardens to turn them into car park helping to increase the risk of flooding. | The parking standards have been modified to ensure that the Local Plan is in general conformity with the London Plan 2021, as required by the Planning Inspector. | No |
| 1276606 | Dave Griff      | FMM22 | I live in Rainham, we have 2 trains an hour to London terminating at Fenchurch Street. The outer boroughs have been neglected to fund inner London so how can you compare them. Give us the same transport links as inner London and I won't need a car. We pay all the London rates and taxes to support inner London.   | Noted   | No |
| 1136016 | Mayor of London | FMM22 | The Mayor's opinion on the general conformity of the draft Plan in March 2021 concluded that three parking related issues constituted non-conformity but could be resolved by:  | Support noted   | No |

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|         |                      |       | <ul style="list-style-type: none"> <li>• Deleting all reference to PTAL 2 in the part of the policy referring to minimum standards</li> <li>• Referring to minimum standards applying 'in PTAL 0-1 outside of Opportunity Areas', and</li> <li>• Reducing the minimum standard for 4+ beds from 2 to 1.5</li> </ul> <p>The Mayor welcomes the proposed FMM22 amendments which follow each of his recommendations and mean that these issues are now fully resolved.</p> |   |    |
| 1113586 | Barrie Stone         | FMM22 | <p>Page 19<br/>Sufficient on-site electric charging allowance must be made in the initial plan.</p> <p>Page 20 – 10.2.2<br/>Serious consideration must be made into ensuring all parking spaces have access to electric charging points to future proof the plan.</p> <p>Page 22 – 10.2.8<br/>Just including the minimum number of electric vehicle parking spaces is not enough. Ideally all parking spaces should have access to charge an electric car.</p>          | Requirements for electric charging are set out in the London Plan 2021. | No |
| 1277195 | Transport for London | FMM22 | We welcome the proposed changes to policy 24 – Parking Provision and Design which have been made in response to the issues raised in the Mayor's response to your request for his opinion on the general conformity of the draft Havering Local Plan with the London Plan 2021. Concerns about the approach to parking  | Support noted   | No |

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|  |  |  | <p>standards focused on three issues which were outlined in the Mayor's response. These were:</p> <p>1 – The potential for minimum standards to undermine the separate parking standard for Opportunity Areas set out in Table 10.3 of the London Plan 2021. This could in turn undermine housing delivery as higher density development becomes increasingly unfeasible to deliver with higher parking ratios;</p> <p>2 - The requirement in Policy T6 part K of the London Plan 2021 for any boroughs seeking minimum residential standards to do so only in areas with PTAL 0-1;</p> <p>3 - The proposed minimum standards in the draft Plan being set higher than the new London Plan maximum standards for 4+ beds, with a minimum of 'up to' 2 spaces per unit, rather than the 1.5 spaces per unit in Table 10.3 of the London Plan 2021.</p> <p>The Mayor's response concluded that each of these three parking related issues constituted non-conformity but could be resolved by:</p> <ul style="list-style-type: none"><li>• Deleting all reference to PTAL 2 in the part of the policy referring to minimum standards</li><li>• Referring to minimum standards applying 'in PTAL 0-1 outside of Opportunity Areas'</li><li>• Reducing the minimum standard for 4+ beds from 2 to 1.5</li></ul> |  |  |
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|         |                                   |       | <p>We therefore welcome FMM22 (replacing MM22 in the previous consultation) which puts forward modifications to Policy 24 – Parking Provision and Table 10 Design. The changes address all three of the parking related issues as recommended in the Mayor’s response. As a result of the proposed modifications we are pleased to confirm that the Local Plan is now in conformity with the London Plan 2021 on the issue of parking standards.</p>  |  |    |
| 1277367 | Q.Square Group Ltd                | FMM22 | <p>We consider that greater flexibility in the wording of this modification should be applied to consider areas close to Romford Town Centre which have a PTAL 0-1, so that these minimum standards are not applied in these locations. It is noted that the draft policy refers to these minimum standards applying ‘...where no improvements are planned...’. With the opening of the Elizabeth Line, we consider that sites within walking distance of Romford Town Centre will benefit from this significant public transport improvement and that the emerging policy should reflect this. We therefore consider that the wording of the policy, or the reasoned justification should clarify this specific point by referring to sites within proximity of Romford Town Centre.</p> | <p>LBH do not consider that amendments are needed to this modification. Minimum parking standards do not apply in opportunity areas, which includes Romford.</p> | No |
| 1113563 | George Lloyd (Environment Agency) | FMM29 | <p>We welcome the reference back to policy commented on and supported in previous consultations.</p>  | Support noted  | No |

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| 1253443 | Southern and Regional Development (Katherine Else) | FMM29 | <p>As set out above, S&amp;R strongly supports the Council's decision to increase the housing requirement to ensure that it is consistent with the recently adopted London Plan 2021. As such, the increased housing requirement recognised in the Monitoring Framework is supported and provides a robust basis for the Council to ensure that housing delivery fulfils the targets required by the London Plan. We trust that the above comments will be taken into consideration when reviewing responses to the Further Main Modifications Consultation, as well as when the Council begins the update or review of the Local Plan following adoption.</p> | Support noted   | No |
| 1277228 | Swifts Local Network: Swifts & Planning Group      | FMM29 | <p>Nature Conservation (Policy 30) should also state:<br/> <i>“Seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context.”</i></p> <p>This is to make this policy sound in accordance with The London Plan (March 2021) Policy G6 Biodiversity and access to nature (page 325):</p>   | Policy 30 is not subject to further main modifications and therefore falls outside of the remit of this consultation. | No |

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|         |                |        | <p><i>"B Boroughs, in developing Development Plans, should:</i></p> <p><i>4) seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context."</i></p>   |  |    |
| 1276457 | Nigel Smith    | FMMC02 | <p>The continued increase in noise and light pollution (this at night) is not addressed sufficiently</p>  | <p>Noise and light pollution are addressed in Local Plan Policy 34 (Managing Pollution). This policy is not subject to further main modifications and therefore falls outside of the remit of this consultation.</p> | No |
| 1276457 | Nigel Smith    | FMMC03 | <p>No mention of protecting micro/mini sites for wildlife, e.g. grass verges, small woodland, street plantings. These can add up to a substantial wildlife habitat.</p> <p>Too much emphasis on appeasing traveller communities who usually do not contribute financially to local finances.</p>  | <p>Biodiversity is address in Local Plan policy 30 (Biodiversity and Geodiversity). This policy is not subject to further main modifications and therefore falls outside of the remit of this consultation.</p>      | No |
| 1277219 | Anderson Group | FMMC04 | <p>I write in response to the ongoing consultation on the further proposed 'Main Modifications' to the Havering Local Plan, having regard to the land north of St. Mary's Road, Cranham. Accompanying this representation is a completed Response Form.</p> <p>The Land North of St. Mary's Road was the subject of previous representations made to the Council throughout the</p> | <p>Support noted</p>   | No |

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|  |  | <p>development of the Local Plan, and this includes a submission to the Regulation 19 consultation in September 2017. Throughout the Local Plan making process, the site has been referenced 'GB75'. Most recently, an addendum submission was made to the initial Main Modifications consultation in 2020. Anderson Group have since entered into an agreement with the landowners and is now continuing the promotion of the site with a view to developing the land for housing and supporting infrastructure.</p> <p>In general terms we support the modifications that reflect the increase in the supply of housing from 17,550 homes to 18,930, principally for the reasons set out in FMMC04. These reasons are set out in more detail below.</p> <p><b>FMMC04 – Housing Supply Statement 2021</b></p> <p>We note the recommendations of the Housing Supply Statement 2021, which support the use of the updated housing requirement of the London Plan when assessing the housing need for the London Borough of Havering. This is a proactive approach which is supported, as it would lead to a more robust assessment of the housing requirement that draws from a more substantial evidence base.</p> <p>Document FMMC04 provides updates to previously published Housing</p> |  |  |
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|  |  |  | <p>Position Statements, with particular reference to how the updated target of 18,930 would be met by the proposed trajectory. It is not clear from the proposed modifications whether the additional homes will be provided from the identified sites, and as a result paragraphs 1.3 and 3.1 of the Statement, which reflect that</p> <p>Council's acknowledgement of the complications of this and the resultant commitment to an immediate update, are wholly supported.</p> <p>Having followed the Local Plan process and the Examination in Public (EiP), it is considered that the Council will be required to release Green Belt land to sufficiently meet this increased need, notwithstanding the uncertainty that the previous target would have been reached effectively. As the plan moves forward, and particularly considering the stated requirement for an immediate review on its adoption, Anderson Group are keen to work together with the Council to identify opportunities such as the Land at St. Mary's Road which will assist in meeting the robustly assessed need for additional housing land.</p> <p>The Land North of St. Mary's Road is deliverable and available, and all interested parties are committed to engaging positively with the Local Planning Authority to assist in bringing the site forward to provide a valuable</p> |  |  |
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|         |                                    |  | contribution housing and growth requirements of the borough.  |               |     |
| 1110670 | Isabella Jack<br>(Natural England) | The comments are not specific to any Further Main Modification | Natural England has no comments to make on this consultation.   | Noted         | Yes |
| 1120219 | Mark Furnish<br>(Sport England)    | The comments are not specific to any Further Main Modification | Sport England have reviewed the proposed modifications and there does not appear to be any changes that affect the policies that relate to sport, recreation and physical activity. As a result, Sport England has no comment on the modifications currently proposed.  | Noted         | No  |
| 1110076 | Port of London<br>(Michael Atkins) | The comments are not specific to any Further Main Modification | No comment.   | Noted         | No  |
| 1136016 | Mayor of London                    | The comments are not specific to any Further Main Modification | Thank you for consulting the Mayor of London on the proposed further Main Modifications to the Havering Local Plan following the examination hearing sessions. As you are aware, all development plan documents must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor provided comments on the Regulation 19 version of the draft Havering Local Plan on 28 September 2017 (Reference: LDF16/LDD12/CG01) and following the publication of the London Plan 2021, set out his position on the general conformity of the Havering Local Plan on 18 March 2021 | Support noted | No  |

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|         |              |  | <p>(Reference: LDF32/LDD09/LP03/HA011).</p> <p>The London Plan 2021 was formally published on the 2 March 2021, and now forms part of Havering's Development Plan and contains the most up-to-date policies.</p> <p>Following the request from Havering for the Mayor's opinion on the general conformity of the draft Local Plan, following the publication of the London Plan 2021, the Mayor made it clear in his response that the draft Plan was not in general conformity with the London Plan. The Mayor has carefully considered the proposed main modifications and is of the opinion that they address all the concerns raised in his earlier correspondence and the draft Local Plan is now in general conformity with the London Plan 2021 (LP2021).</p> |       |    |
| 1110842 | Thames Water | The comments are not specific to any Further Main Modification | <p>Thank you for consulting Thames Water on the above document. Thames Water is the statutory sewerage undertaker for most of London Borough of Havering and is hence a "specific consultation body" in accordance with the Town &amp; Country Planning (Local Development) Regulations 2012. The following comments are made in this respect.</p> <p>Site Specific Comments</p> <p>The emerging Local Plan only considers proposed future growth and development at a strategic level, and</p>  | Noted | No |

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|  |  |  | <p>does not provide details of specific allocations. As such we are limited on the level of detail we can provide. At a high level Thames are able to advise that the borough of Havering drains to Riverside STW and Brentwood STW. Whilst it is anticipated at this stage that Riverside STW can accommodate the predicted growth there are concerns about the capacity to accommodate any growth at Brentwood STW. In order to fully understand the impact of growth we will require further information on scale, location and specifically phasing of new development. This is the same for our network infrastructure. If the Local Authority could provide shape files of the proposed sites, their scale and proposed phasing, that would enable us to carry out a more detailed assessment.</p> <p>It is important to note that where development is being proposed within 800m of a sewage treatment works, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works.</p> |  |  |
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