



Havering
LONDON BOROUGH

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www.havering.gov.uk

Dear Sir,

London Borough of Havering (20025659) – Response to Rule 17 Request for Further Information (PD-022)

Thank you for the opportunity to respond to the Rule 17 request for further information published by the ExA on 27th May 2021 concerning the relevance of the London Plan 2021.

LB Havering considers the following policies of the London Plan 2021 to be relevant and therefore a material consideration to the decision of this application for Development Consent:

T1 - Strategic approach to transport, T3 – Transport Capacity, T4 – Assessing and mitigating transport impacts, T5 – Cycling, T7 – Deliveries, servicing and construction, D14 – Noise, G6 – Biodiversity and access to nature, G7 – Trees and Woodlands, SI1 – Improving Air Quality, S7 – Burial Space, H1 Increasing housing supply (Table 4.1 targets), SD2 – Collaboration in the Wider South East, SD3 – Growth locations in the Wider South East and beyond.

LB Havering maintains the position it provided in paragraph 10.1.2 of its Local Impact Report (REP1-031) and reiterates that it would expect the Greater London Authority (GLA) as author of the London Plan to have a view on the bearing of its own policy document on the Proposed Development. However, LB Havering considers that Policy H1 *Increasing housing supply* has not been appropriately considered by the Applicant and does have a bearing on the Proposed Development.

Table 4.1 of Policy H1 sets the ten-year targets for net housing completions that each local planning authority should plan for. This includes targets for each borough in the wider north east sub-region in London including Havering, Redbridge, Waltham Forest and Barking & Dagenham.

Through a number of representations during the Examination, LB Havering has consistently raised the concern that the traffic modelling undertaken by the Applicant has not fully taken into account sub-regional growth and therefore it is not possible to fully understand the impact the scheme will have on the Transport for London Road Network, or the network Havering is responsible for. This continues to be a matter of disagreement

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between LB Havering and the Applicant and is recognised as such in the Statement of Common Ground between the Applicant and LB Havering that was submitted by the Applicant at Deadline 7 (Section 10.0 of REP7-006).

It should be noted that the minimum ten-year Housing Targets contained in Table 4.1 of the London Plan 2021 are an increase from the ten-year targets contained in the 2016 London Plan. For example, Havering's ten year target has increased from 11,701 in the 2016 London Plan to 12,850 in the 2021 Adopted London Plan. Increases can also be found for a number of other London Boroughs in the east sub-region.

Whilst the London Plan 2021 contains residential parking standards that include in some instances car free development, given public transport connectivity challenges in Havering, car use and car ownership will remain high in the borough in the coming years.

Given the increase in ten-year housing target numbers set out in the London Plan 2021, and the strategic nature of the Applicant's proposed development, LB Havering considers the London Plan does have a significant bearing on the scheme.



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