

LONDON THAMES GATEWAY DEVELOPMENT CORPORATION**PLANNING COMMITTEE MEETING: Thursday 11 January 2007****COMMENTS ON LONDON BOROUGH OF HAVERING LOCAL DEVELOPMENT FRAMEWORK SUBMISSION DOCUMENTS****Report of Director of Planning****1. Summary**

1.1 The London Borough of Havering's Local Development Framework (LDF), will, when adopted, replace the existing Unitary Development Plan (UDP). The LDF sets out the Council's planning strategy, policies and proposals and, together with the London Plan, will constitute the statutory development plan to be used in the determination of planning applications by the Corporation.

1.2 There have been several stages of consultation on LDF documents. For the third stage the Planning Committee on 9th February 2006 agreed representations on Core Strategy and Development Control Policies and Site Specific Allocations – see Appendix One. Havering considered the representations made on these LDF Preferred Options before amending and agreeing the LDF for submission to the Secretary of State (SoS). The LDF Submission Documents were placed on deposit for a six week consultation period from 24 November 2006 until 11 January 2007. The DPDs relevant to the Corporation are the:

- Core Strategy and Development Control Submission Document
- Site Specific Allocations Document
- Proposals Map

Representation made on the LDF Submission Documents will be considered by a Planning Inspector at an Independent Examination. The Inspector will then issue a binding report on behalf of the SoS which sets out any proposed changes to the DPDs prior to adoption by Havering.

1.4 The Core Strategy and Development Control Submission DPD sets out the Council's generic objectives and policies to be considered in the determination of planning applications and apply to all sites within the Borough and hence to sites in the Corporation's area.

1.5 The Site Specific Allocations Submission DPD focuses on two key strategic area - London Riverside and Romford Town Centre - and the former either falls within the Corporation's boundary or is adjacent with clear relationships. The DPD provides land use proposals for individual sites within the context of the Core Strategy and Development Control Policies Submission DPD.

1.6 It is important to comment on these matters given the significance of planning policies and land use allocations when considering planning applications and also regeneration initiatives being put forward by the Corporation.

1.7 The purpose of this report is to seek approval of representations (text in italics) to be made to the Secretary of State on these two key documents.

2. Background

2.1 At the Preferred Options stage the Corporation provided comments on both site specific allocations as well as the Core Strategy and Development Control policies along with a general comment that the Corporation's roles as planning authority and regeneration agency be set out as part of the introductory chapters of the LDF documents. Whilst many of the comments have been addressed there are still various outstanding issues which it is recommended need to be addressed. It is recommended that the amendments are supported subject to the comments set out below in italics.

3. Site Specific Allocations

3.1 The following site specific allocations have been made within the LTGDC area. There have been changes from the previous document so the order and names do not follow those of the previous report (where applicable the number used in the previous report is in brackets). Also there is text at the bottom of each page referring to the need to comply with the other DPD and related Supplementary Planning Documents. *If this is to be retained reference should also be made to compliance with relevant London Plan policies as appropriate.*

Policy SSA 11 – Beam Park (4). Land use allocation is as before, mainly residential and ancillary retail, education and other community uses. This site is very close to the proposed new C2C “Beam Reach” station and would be also served by the ELT extension from Dagenham to Rainham. Both DPDs are understandably very positive about these two improvements to public transport in the area and the benefits that they can bring for the main development sites either side of the A1306 (New Road). However the funding and programming for both these projects is regrettably far from certain. It is proposed, along with other sites along the A1306, that new homes can not be occupied until Beam Reach station and/or ELT are operational and that conditions will be imposed to that effect. Quite apart from the fact that it will be the LTGDC which will decide which conditions to impose on any permission, the delay in bringing forward regeneration in this area caused by such a restriction, if applied, could be significant. Allied to this is a proposed car parking range of 1-1.5 spaces per home which would normally be equated with a very low PTAL, which would not apply with the improvements to public transport. It is proposed that a Supplementary Planning Document (SPD) is produced for the site including detailed design guidelines and guidance on the provision of social and physical infrastructure. New buildings should be predominantly three storeys high, a mix of houses and flats.

As recommended previously this site should be part of a masterplanning exercise along with Rainham West (below) and proposed linking of development to the new station/ELT extension being operational needs to be reconsidered. The masterplanning should not necessarily be done by way of an SPD – need more consideration as to the time taken to formally get an SPD adopted and the resources in the Borough to take forward this work. Also need to focus on the appropriate scale of housing in the area and reconsider the level of car parking provision.

Policy SSA12 – Rainham West (5). This includes a strip along the north side of the A1306 where the Borough is the planning authority. Same designation as Beam Park with additional requirement for employment uses. In the case of those sites south of the A1306, at least 33% of the site area needs to be developed for employment B1 (a,b) and education and other community facilities ancillary to residential uses. This

figure might be reduced “where intensive employment uses are provided, for example multi-storey office blocks.” The site south of the A1306 is split into six sub sites – Dovers Corner, Carpet Right, Mudlands, Rainham Steel, Suttons Industrial Park and Somerfields. Single use applications will not be allowed. Also, with the exception of Dovers Corner, the same restriction on occupation of homes and car parking standards are proposed as for Beam Park along with new buildings being predominantly three storeys high and the production of a SPD. The need for masterplanning of this area has already been identified with the Borough. Restricting employment to only B1 (a, b) and particularly excluding B1c and not allowing even for a small element of B8 has to be challenged. Clarity as to what percentage of the 33% comprises employment as opposed to ancillary facilities would come out of a masterplanning exercise along with the best locations for these various activities. It would be inappropriate to just apply 33% to each of the six sub sites.

Same recommendation as for Beam Park with additional comment that types of employment activities need to be reconsidered.

Policy SSA 13 – Land between Railway and Broadway, Rainham (7). Residential and community uses with some retail and leisure activity as before. LTGDC is involved in assembling the site and within masterplanning area based on the town centre which is to commence shortly.

Policy SSA14 – Mardyke Development. This comprises the existing Mardyke Estate, shops and open space and former landfill site at Mardyke farm. Whilst outside the LTGDC area there are obvious links in terms of the quantum and location of education, social and community facilities for new and refurbished homes either side of the A1306 as well as potential for access to improved public transport and employment opportunities. This will be dealt with as part of a Masterplan and design Guide to be developed in consultation with residents on the Mardyke Estate and the surrounding community.

Policy SSA 15 – Rainham Traffic Management Scheme (10). Generally accepted that improvements are needed and proposals to form part of masterplanning work.

Policy SSA 16 – Rainham Station Transport Interchange and Civic Square (3). LTGDC directly involved in bringing this forward as well as the masterplanning work.

Policy SSA 17 – Rainham Central (9). Same as before, with focus on better integrating Tesco supermarket and upgrading other retail activities and new housing. Part of masterplanning work.

Clarity required as to what might happen to the Tesco store – both “remodelling” and “redevelopment” are used. The latter clearly has commercial implications in terms of maintaining a retail provision and possible need for a relocation site.

Policy SSA 18 – Thames Gateway Regional Casino and Entertainment Centre (8). Clear references to consistency with national and regional policy guidance, including PPS6, as requested in previous comments.

Notwithstanding LTGDC support for the project, there should be an alternative proposal for this site if the casino bid is unsuccessful given the life of this document and the size and importance of the site for the regeneration of the wider area.

Policy SSA 19 (1) - London Riverside Conservation Park. With regard to implementation, specific reference is made to the various bodies, including the LTGDC, involved in delivering “Wildspace for a World City”. Reference to the document addresses the issue of the need for a criteria based policy. However there

is also the statement that “Contributions will be sought from the Thames Gateway Regional casino and Entertainment Centre”.

Given the current situation with regard to selecting a site for a regional casino in Britain this sentence should be deleted or subject to a caveat along with more information as to likely sources of funding

Policy SSA 20 – Ingrebourne Creek (6). As before, improvements to the historic quay as public recreation facility. To be funded by LTGDC and subject to masterplanning.

Policy SSA 21 – Rainham Hall and Grounds (2). As before. Owned by National Trust and the Borough and LTGDC to work with NT and English Heritage to preserve and enhance hall and grounds and recreational value. Part of masterplanning area.

4. Core Strategy and Development Control Policies

4.1 As with the previous report, comments are provided on the following policies referring to: the regional casino proposal, employment, housing, leisure, transport and S106 agreements.

4.2 **Regional Casino.** Now provides full assessment of anticipated regeneration benefits and references to national policies and guidance.

4.3 **Employment.** With regard to Beam Reach Business Park, the text has been changed to allow for other employment uses (other than higher value advanced manufacturing) where high standard of design achievable and numbers of employees and quality of jobs is comparable. Need to accommodate waste activities related to the Borough and other ELWA boroughs is also accepted along with a need to ensure safeguard secondary employment areas as informed by the Borough’s employment land study.

4.4 **Housing.** As before, the Sustainable Communities approach is to the fore and cross referenced to the London Plan targets and the Borough’s Housing Capacity Study. The need for masterplanning of the main areas of proposed residential development is accepted. *However, the reference to “larger housing sites” where masterplanning will occur, should be more definite in terms of numbers and types of accommodation.*

4.5 **Leisure.** Previous comment relating to whether the regional casino satisfies the policy relating to the location of intensive leisure and recreational facilities has been addressed.

4.6 **Transport.** As before, the town centre hierarchy for linked to high trip generating development is supported. There are direct links with Core Policy 10 “Sustainable Transport” where the Borough will continue to lobby and seek funding for a range of sustainable transport modes, particularly ELT, Crossrail, improvements to C2C line including a new station at Beam Reach and general improvements to the local bus network.

4.7 **S106.** Possible items to be included in S106 agreements have been pulled together from the relevant subject chapters with further reference to a range of supplementary planning guidance where the use of planning obligations is identified. *It would further assist if reference is made to the potential for the pooling of contributions in appropriate circumstances given the likely linkages between the major development sites with regard to the full range of supporting infrastructure.*

5. General Comments

5.1 *There is still the need for a clear reference to the LTGDC at the start of the documents which explains its roles both as planning authority and regeneration agency. This is particularly relevant for the Site Specific document given the Corporation is the decision making authority on applications for nearly all of the sites apart from the Mardyke. Currently there is a section and map at Pages 168 and 169 of the Core Strategy etc DPD in the Implementation and Monitoring chapter and elsewhere and earlier in this document, and in the Site Specific Allocations document, there is reference to “the Corporation” or “the LTGDC” in a somewhat random fashion.*

6. Conclusion

6.1 Whilst the LDF Submission Documents have been amended to reflect many of the comments previously made, there are some key outstanding issues as highlighted in italics which need to be addressed as part of the EiP process, if not before.

6.2 It is recommended that further amendments are required both in respect of site allocations, including supporting text, and the Core Strategies and Development Control Policies as well as the general issue of adequately setting out in an appropriate part of the documents the LTGDC's roles and responsibilities.

7. Recommendation

7.1 It is recommended that the Committee agree the text in italics which will form the basis of representations to be made to the Secretary of State on the LB Havering Submission Documents.

Appendix 1 Report to Planning Committee of 9th February 2006 (Item 3)

Appendix 1

London Thames Gateway Development Corporation

Planning Committee Meeting: 9th February 2006

LB HAVERING CONSULTATION ON LOCAL DEVELOPMENT FRAMEWORK PREFERRED OPTIONS

Report of the Director of Planning

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- Recommendation

1. PURPOSE OF REPORT

- 1.1 To advise Planning Committee Members of the content of the LDF Documents on which LB Havering are currently consulting, and to inform members of the issues on which the LTGDC should comment. Recommended comments are given in bold at the end of each topic area.
- 1.2 Should members wish to read the LDF documents in full, they are available on LB Havering's website <http://www.havering.gov.uk/index.cfm?articleid=4603>

2. BACKGROUND

- 2.1. Following the recent consideration of emerging LDF Documents for Tower Hamlets and Barking and Dagenham board members will now be familiar with the requirement for Local Planning Authorities to produce a Local Development Framework (LDF) to replace their Unitary Development Plan (UDP). The LDF comprises a range of documents which are consulted upon to an agreed timescale culminating in an Examination in Public (EIP) conducted by a Planning Inspector who, following the EIP, produces a report the findings of which are binding on the authority.
- 2.2. LB Havering are currently consulting on the following LDF documents:
 - Core Strategy Development Plan Document Preferred Options Report, and accompanying Sustainability Appraisal
 - Site Specific Allocations Development Document Preferred Options Report, and accompanying Sustainability Appraisal

The consultation period runs from 30th November 2005 to 24th February 2006.

- 2.3. This is the third stage of consultation which Havering have undertaken on their LDF, having previously consulted on Issues (Nov 04 to Jan 05), and Options (June 05 to September 05). Further rounds of consultation will include consultation on a draft Area Action Plan for Romford Town Centre and a Draft Joint Waste Plan (which is being produced together with the London Boroughs of Barking & Dagenham, Newham and Redbridge).
- 2.4. The LDF will replace the Havering UDP which, having been adopted in 1993, is now considerably out of date.
- 2.5. Any comments made at this stage of the process will be the subject of further discussion with LB Havering before their submission document is produced in October 2006 for the final round of public consultation, and submission to the Secretary of State.

3. SITE SPECIFIC ALLOCATIONS

- 3.1. A number of site specific allocations are currently being consulted on. LB Havering are also currently undertaking a number of additional topic specific studies (i.e. retail and leisure, employment land and recreational open space) which, once the results are available, may necessitate additional allocations or amendments to existing allocations. It is understood from LB Havering that any alterations or additional allocations would be introduced once the current documents are adopted.
- 3.2. The following site specific allocations have been made within the LTGDC Area. All of the following are referred to as "London Riverside" allocations within the LDF. A plan showing the locations of the site specific allocations is attached at Appendix 1 of the report (numbered as the following list):
 1. **London Riverside Conservation Park** – the site is allocated as a Conservation Park. LB Havering have an aspiration that the Conservation Park will be a visitor destination of regional importance. Specific proposals include a "gateway" environment near to Rainham Station, progressive restoration of the landfill site, promotion and interpretation initiatives, a conservation park visitor centre, a "Green" tram link to Rainham and Purfleet, and a local nature reserve on Rainham Marshes.
- Recommend LTGDC supports the principle of the conservation park but highlights the need for a criteria based policy for the assessment of proposals for visitor facilities and other built form proposed to facilitate the use of the site as a conservation park. Such a policy should include criteria such as public transport accessibility, design and siting of buildings etc.
 2. **Rainham Historic Core** – The site is allocated as a Heritage site within which the existing heritage value is to be preserved and enhanced.
- Recommend LTGDC comments on the potential to capitalise on the heritage assets within the area as a basis for regeneration, and the need for a masterplan to coordinate development of the group of allocations centred on Rainham Village, this could be taken forward as an SPD.

3. **Rainham Station Transport Interchange and Civic Square** – The allocation proposes a new station square and mixed use development incorporating residential, retail, and community facilities, a terminus for ELT, taxi facilities and bus stops, and a bridge over the railway lines.
- Recommend LTGDC comments on need for a masterplan for the area, which should also include sites referred to at 2, 6, 9 and 10, and which could be taken forward as SPD.
4. **Beam Park** – This allocation proposes primarily residential use with densities to be based on future public transport accessibility levels and new community facilities including a new primary school, and a new local centre with retail, health and multi purpose community facilities, clustered to the north of the new station.
- Recommend LTGDC comment that residential uses should not be developed in association with public transport improvements and provision of social infrastructure and that this area together with Rainham West (below) should be subject to a masterplanning exercise, which will identify sites for the relevant community facilities, appropriate densities and urban design principles.
5. **Rainham West**- This allocation proposes residential uses at densities based on future public transport accessibility levels, together with a mix of other uses including some employment use and a PCT Health Centre
- Recommend LTGDC comment as 4
6. **Ingrebourne Creek** – This allocation proposes protected public open space with water based recreation and community uses, and a café. It would involve the recreation of the historic quay on the River Ingrebourne to provide public space and extension of and access improvements to Ingrebourne Valley Greenway.
- Recommend LTGDC comment as 3
7. **Land Between Railway and Broadway, Rainham** – This allocation proposes residential development and community facilities, there is a need to protect and enhance the conservation area, it is proposed to retain and enhance the Angel, the vicarage, and the Phoenix.
- Recommend LTGDC comment as 3
8. **Rainham Regional Casino Complex** – A regional casino and entertainment complex is proposed which is proposed would incorporate a hotel and leisure and entertainment uses alongside B1, B2 and B8 uses.
- Recommend LTGDC comments on the need for prospective developers to set out a convincing case for this proposal, in terms of the advice set out in PPS6 and PPS13 concerning the location of leisure facilities, which should normally be directed to a town centre. All references to this proposal in the LDF should refer to the need for PPS6 tests of need, impact and sequential test to be met. The case for the loss of land designated as Strategic Employment Location should also be made. The anticipated regeneration effects of the proposal should be fully appraised, and understood.
9. **Rainham Central** – This allocation proposes a new supermarket, better integrated into the town centre, with improved links to Rainham Village

with High density residential development and improved open space. Development must protect and enhance the conservation area.

- Recommend LTGDC comment as 3

10. **Rainham Traffic Management System** – Proposes a new one way traffic management system for the centre of Rainham Village in conjunction with the above proposals.

- Recommend LTGDC comment as 3

11. **Beam Park Station** – Proposes a new station between Dagenham Dock and Rainham Stations on the London – Tilbury/Southend line to serve the new and existing communities to the north and the employment and learning opportunities to the south of the railway.

- Recommend LTGDC comment that the station proposals should form part of the masterplan for the adjacent housing proposals in order that the transport node can be fully integrated into the residential schemes, and contributions should be sought through S106 towards funding the provision of the new station and other public transport improvements

- 3.3.** In addition to the site specific allocations it is LB Havering's intention to produce an SPD for the London Riverside area during 2007, which could include much more detail such as urban design guidelines, and guidance on residential densities, location of community facilities. **It is recommended that the LTGDC express willingness work with LB Havering to produce masterplans for Rainham Village and for the Beam Park/Rainham West areas in order to provide a coordinated approach to bringing forward the allocations in these areas, and to provide a basis for the London Riverside SPD, which would then represent up to date detailed planning guidance for this area.**

4. CORE STRATEGY AND DEVELOPMENT CONTROL POLICIES

- 4.1 The Core Strategy Development Plan Document sets out LB Havering's vision and objectives for the planning of the Borough up to 2020 and is intended to provide the framework for all the other Local Development Documents. It will also include a number of strategic policies, as well as details development control policies, which apply across the whole Borough. Collectively these policies will set out the planning criteria against which planning applications for the development and use of land and buildings will be considered.

- 4.2 There are policies proposed on the following topics:

- Heritage, Biodiversity and Green Belt
- Urban design, Crime and Accessibility
- Climate Change
- Recreation and Leisure
- Minerals and Waste
- Community Facilities
- Transport
- Housing
- Arts, Culture, and Entertainment
- Retail and Services
- Employment

4.3 There are a number of individual policies on which it is recommended that LTGDC make comments. It is intended to comment specifically on the Policies which refer to the regional casino proposal, housing policies, employment policies, leisure policies, transport policies and policies regarding S106 contributions.

4.4 **Casino Proposal** - Site Specific Allocation and Development Control Policy K1AA

The Preferred Option allocates land to the north of the A13 and west of Ferry Lane for a Regional Casino and Employment Complex and employment uses which is proposed to include a hotel, leisure, and entertainment uses including a casino, with employment uses including B1, B2 and B8 uses on the remainder of the site.

In considering its comments on this proposed policy LTGDC should consider the PPS6 requirement for such a proposal to satisfy the sequential test, demonstration of need, and assessment of impact on nearby centres. In addition PPG13 is relevant with reference to the need for development to be accessible by a range of modes of non car transport and located near to other travel generators. The proposal results in the loss of an area of SEL. **It is recommended that LTGDC comment that any reference to the proposed regional casino within the LDF documents should make reference to the need to satisfy the PPS6 and PPG13 tests, and provide a full assessment of the anticipated regeneration benefits.**

4.5 **Employment Policies**

4.5.1 Development Control Policy K1AA - Strategic Employment Locations

The LDF Preferred Option is to prioritise higher value advanced manufacturing uses in Beam Reach Business Park, but to continue to allow business and industrial uses in appropriate sites within the SEL's.

In considering comments on this policy the LTGDC should consider whether this approach could unnecessarily constrain development of the Beam Reach Industrial Park, and what the policy is in relation to waste uses within the SEL (NB the waste policies have yet to be consulted on). **It is recommended that the LTGDC comment that the policy should exceptionally make provision for other employment uses within the Beam Reach Business Park , where they are capable of a high standard of design appropriate for its business park locations and where the numbers of employees and the quality of jobs are comparable, and that the final draft policy should make some reference to the acceptability or otherwise of waste uses within the remainder of the SEL.**

K1 AB Secondary Employment Areas & K1 AC Non-Designated Sites)

The thrust of both policies is to allow managed release of employment land for residential use, whilst providing sites for small scale and affordable industrial units for small businesses.

The main issues for LTGDC to consider is how these proposed policies will manage the release of employment land to residential, and still ensure that small businesses are provided for. **It is recommend that LTGDC comments that a clear criteria based policies are required to ensure that all of the existing**

employment land falling under these policies is not lost to residential, and that it is balanced with retention of employment land where appropriate. Criteria could include whether the site is located within a residential area, whether the site characteristics are suitable for reuse for employment uses, and the availability of land for employment uses. This should be informed by LB Havering's forthcoming employment land study.

4.6 Housing Policies

The Preferred Option for the housing policies is to follow the Sustainable Communities approach in respect of housing supply, housing mix & density, etc. relating densities to future transport accessibility, and encouraging a mix of types of housing including family housing.

LTGDC need to consider whether these proposed policies present any difficulty to LTGDC in determination of applications within its area, and, due to the low level of public transport accessibility in some parts of the area how the timing of residential development coming forward tied to the provision of public transport infrastructure.

It is considered that the LTGDC can generally support the proposed housing policies, with a comment that there is a need to prepare a masterplan for the main areas of proposed residential development within the LTGDC area, in order to provide a suitable framework within which these sites should come forward, avoiding a piecemeal approach. There is a need to ensure that development is phased appropriately alongside public transport infrastructure, to avoid over dependence on the car.

4.7 Leisure Policies - Policy D1 AD Location of Intensive Leisure and Recreation Facilities

This policy seeks to locate such facilities according to transport accessibility and not necessarily direct them towards town centres.

LTGDC should consider that this policy could apply to the consideration of the regional casino proposal, and also development at the proposed Conservation Park, and others. The proposed approach is contrary to PPS6. **It is therefore recommended that LTGDC comment that policy should be amended in line with PPS6 advice.**

4.8 Transport Policies

The preferred option seeks to reinforce the town centre hierarchy by supporting high trip generating development only at locations with high public transport accessibility levels and by supporting day to day uses in local centres, promoting high density mixed uses in town centres and use of contributions from developers for improvements to public transport in areas of low accessibility. The need to safeguard land for CTRL and Crossrail, and to create the necessary conditions for Thames Gateway Transit (ELT) is recognised.

LTGDC generally support the proposed transport policies.

4.9 S106 Policies

Proposed policies currently fragmented with separate policies on open space contributions, social infrastructure provision, transport infrastructure, etc. LTGDC should consider whether the policies provide an adequate basis for S106 negotiations on planning applications for which we are planning authority, and whether the policies acknowledge the role of LTGDC within its area. Do the policies cover comprehensively the range of areas for which S106 contributions may be sought?

It is recommended that a single overarching S106 policy to provide clarity to developers, which should reflect the emerging LTGDC S106 strategy, should be included within the Core Strategy Policies.

4.10 Relationship with Barking and Dagenham

Given the strategic overview of the LTGDC, it is important to consider whether there are any cross boundary issues. There are not considered to be any cross boundary issues as a result of the policies and proposals set out in these consultation documents.

4.11 General Comments

It is recommended that the LTGDC comment that there should be reference to the LTGDC within the introductory chapters of the LDF documents, which explain its role within the area both in terms of its role as planning authority and regeneration agency. At such time as a draft proposals map is produced it is suggested that the LTGDC boundary should be shown on the map. Reference in the LDF documents to London Riverside being a priority area for funding and implementation for the LTGDC take account of the LTGDC programme and priorities for funding identified through the LTGDC regeneration framework.

5. RECOMMENDATION

- 5.1 That committee agree to the recommended comments (shown in bold throughout the report) as comprising the formal response to the LB Havering in response to the LDF Preferred Options consultation.



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