



Planning Policy Team, London Borough of Havering,
Town Hall, Main Road, Romford RM1 3BB

By email to: DevelopmentPlanning@havering.gov.uk

27 April 2023

Dear Sir/Madam,

Response to LB Havering's Call for Sites

CPRE London is a membership-based charity with 2,500 members across London, concerned with the preservation and enhancement of London's vital green spaces, as well as the improvement of London's environment for the health and wellbeing of all Londoners.

While Call for Sites is carried out with a view to identifying sites where landowners may wish to propose development, to deliver enough sites for Havering's development needs – in a sustainable way* – the council should proactively contact landowners, particularly landowners of sites which currently:

- promote unsustainable travel patterns and/or
- make poor use of space.

These include:

- surface car parks
- excessive road layouts (e.g. unnecessary roundabouts)
- low rise retail with surface car parks
- commercial or industrial parks in need of regeneration; and
- smaller sites for example rows of garages.

To this end, we have identified a number of sites where Havering should approach the landowners to establish if the site might contribute to development needs.

***Delivering sites which promote sustainable patterns of development.** In order to effectively tackle the climate and health crises, car use and ownership across London needs to reduce. (Electric Vehicles still have a carbon, pollution, road danger and take up space on roads and for parking, with impacts for public transport and public realm, so it is not realistic to plan to simply replace petrol cars with EVs). Since provision of car parking encourages trips to be made by car, the council should seek opportunities to reduce car parking provision which can also free up space for development while discouraging short 'switchable' trips in particular.

The borough should promote higher density housing (not high rise: and the height of development should not impact negatively on the surrounding neighbourhoods and green spaces) and at the same time create new neighbourhood and district centres where it is easy to reach basic amenities on foot and where higher density populations make local amenities and public transport viable.

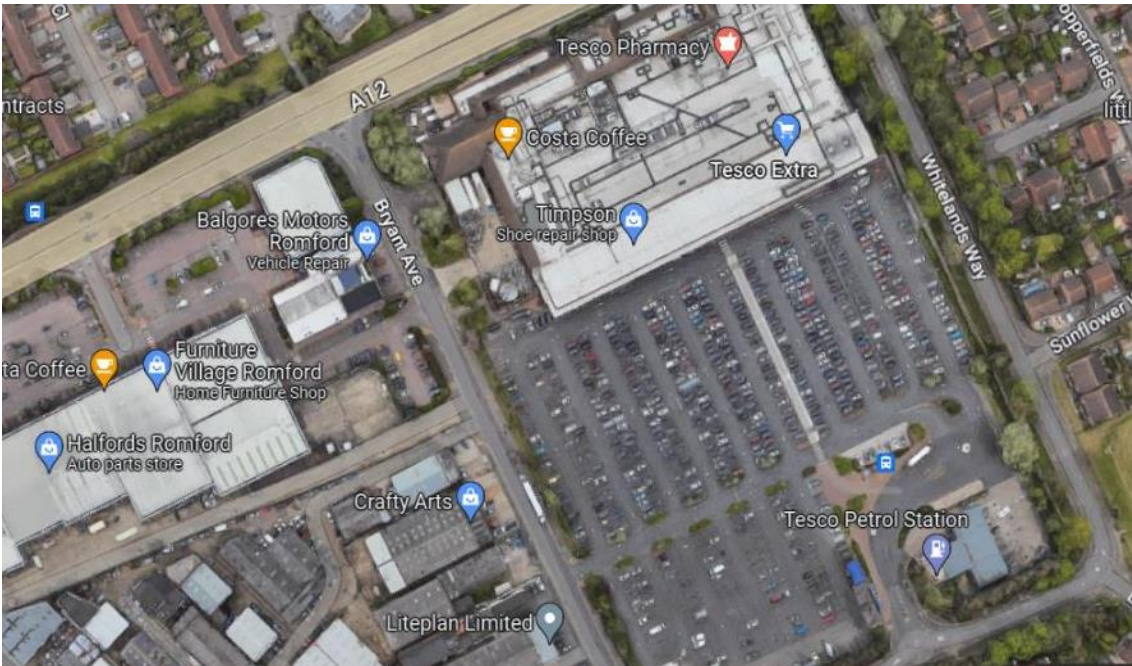


The following sites should be investigated as options for development and, where necessary, the council should contact landowners to establish a pipeline of sites:

Mercury ASDA and car park plus wasteful road layouts

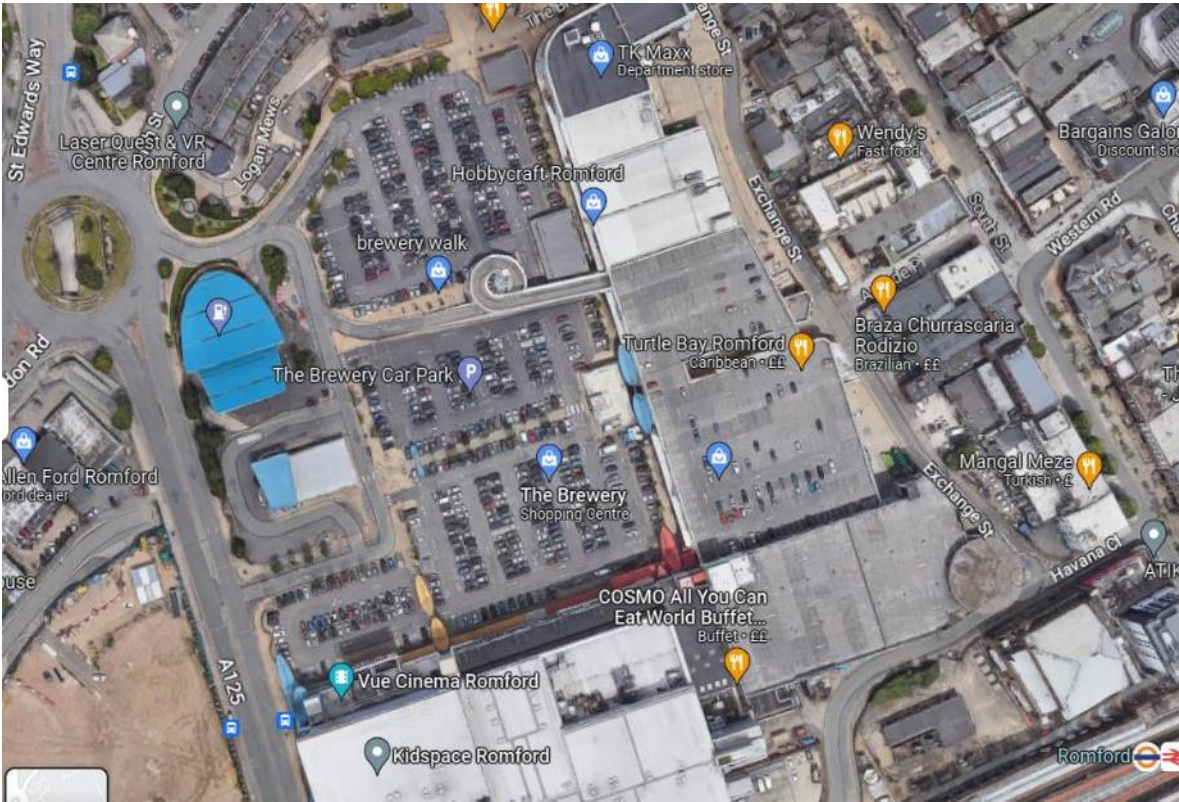


Tesco Car Park, Bryant Ave, Romford RM3 0LL





Romford Town Centre car parks and wasteful road layouts:



Upminster Station car park





Tesco Extra Car Park, Rainham – Viking Way, plus wasteful road layouts



Retail on Franmil Road plus wasteful road layouts





As per the London Plan, many commercial and industrial sites either make poor use of space (surface parking and low-rise buildings) OR are in need of regeneration and could be redeveloped to provide more modern facilities and, in some cases, be converted to mixed-use to incorporate new housing as well.

Harold Hill Industrial Estate, Harold Hill, Romford RM3 8UR – consider for regeneration and less wasteful layout



Romford gas works and depot – regeneration opportunity

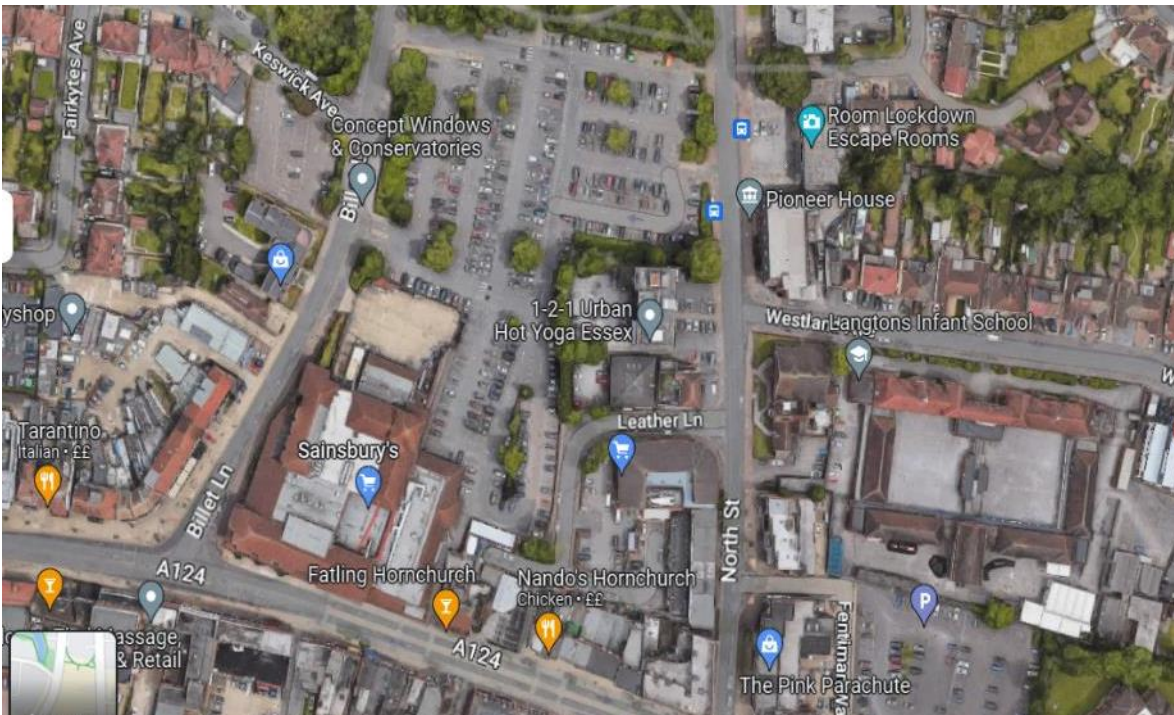




King George Close – intensification potential for commercial or mixed-use



Hornchurch Town Centre





Cloudberry Road – an example of a poor layout where car parking is dispersed throughout the housing making poor use of space



It is vitally important for Havering Council to avoid allocating Green Belt sites for housing development.

Building on Green Belt creates new problems and is not the answer. London's Green Belt remains a vital and relevant part of planning policy and building on it would:

- encourage low-density, car-dependent development which does not make good use of land and which would add to congestion, noise and air pollution in a Borough which needs to reduce the proportion of trips made by car
- be ineffective in addressing Havering's housing needs which could be better tackled by developing strategic sites with good public transport links
- fail to deliver affordable housing (CPRE evidence has shown that Green Belt developments deliver expensive housing)
- fail to preserve the openness and permanence of the Green Belt, harming its integrity and amenity value for current and future generations (the potential of which is great and enhancements can and should be planned)
- entail the loss of good quality agricultural land which could and should in fact be put back to use to create a sustainable local food source for Havering
- fail to recognise the important role Green Belt has in promoting regeneration of previously developed land within the existing urban footprint.



Identifying sites to deliver woodland in Havering.

CPRE London is currently leading a Defra-funded research project to secure a significant increase in woodland cover primarily in Green Belt and Metropolitan Open Land. Our aim is to develop a pan-London opportunity map and targeted communications map, supporting the creation of realistic targets and delivery of woodland cover across London by 2050. We would welcome input from Havering's biodiversity and planning teams to identify opportunities for woodland creation through the new local plan. Potential sites woodland planting might include:

- Rainham Lodge Farm, Berwick Pond Road, Upminster RM14 2XS - (sometimes referred to as Hacton meadows). Brett aggregates is the owner of Rainham Lodge Farm having purchased the site in 2006 and currently want to turn this land into a new Quarry. If these two farms (which are next to each other) were turned into woodland, it would join up 6 woodlands and an SSSI, Ingrebourne Hill, Hornchurch country park, Berwick Glades, Bonnetts, Parklands and Gaynes Parkway and Ingrebourne Marshes SSSI (the largest area of freshwater marsh in Greater London).
- Land next to Ingrebourne Hill – This council-owned land is currently disused scrubland with no official public access. However it could become an extension to the Forestry England site at Ingrebourne Hill.
- Arnold's field at Launderers Lane in Rainham - Privately owned and there are problems with illegal landfill and fires (since 2018 there have been over 70 fires). This is more complex but could be compulsorily purchased by the council for remediation, with funds raised through local community effort and national funding streams. This area has been an ongoing concern for the past fourteen years and the current owner has refused to clean the property. This would create a great extension to Beam Valley Park, a site of Nature Conservation Interest. Several rights of way cross this land.

Thank you again for providing the opportunity to reply to this important consultation.

Yours faithfully,

John Sadler
Campaigns Officer
CPRE London