

Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
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Date: 2 March 2018

Our ref: 16192/DL/LVm/15544843v1

Your ref:

Dear Mr Khan

Representations on the draft London Plan: 117 North Street, Romford

On behalf of our client, F&C UK Property Fund ICVC ("F&C"), Lichfields is pleased to provide representations to the Greater London Authority (GLA) in response to the consultation on the draft New London Plan. F&C owns the existing retail unit at 117 North Street Romford (London Borough of Havering (LB Havering)) that is occupied by Matalan.

Current Context

The draft New London Plan runs from 2019 to 2041 and therefore it is vitally important for it to facilitate a range of development opportunities that are likely to come forward over the medium and longer term including sites such as 117 North Street. Our client's site comprises a single storey retail unit of approximately 3,700 sq m GIA with associated parking.

Within the adopted development plan the site is on the edge of Romford Metropolitan Centre (as defined in retail terms) but within the Romford Metropolitan Centre boundary (Romford Area Action Plan boundary (2008)) that is defined in the LB Havering Proposals Map 2008.

The Romford Area Action Plan 2008 (RAAP) states that Romford will contribute to the Borough's housing target through encouraging the intensification of single use sites including Matalan (117 North Street - our client's site), to provide residential units through mixed use development (Policy ROM14 – Housing Supply). The supporting text (para. 1.4) states that the Council welcomes proposals to secure new housing on these sites through mixed use redevelopment.

More recently the site is identified within the Romford Strategic Development Area within the Havering Local Plan 2016 – 2031 Proposed Submission Version. Specifically Policy 1 in the emerging Local Plan identifies that *"over the plan period the Council will support the delivery of over 5,300 (2) new high quality homes in well managed residential and mixed use schemes."*

The potential redevelopment/intensification of the site has therefore been recognised by LB Havering in both adopted and emerging development plan policy.

Further to this policy endorsement, it should be noted that the adopted and emerging Local Plans were based on a much lower Borough housing target than proposed in the draft New London Plan. Specifically the LB

Havering Core Strategy and RAAP (2008) responds to a need of (535 new homes per year) whilst within the emerging Local Plan the target is a minimum of 11,701 new homes over the period 2015-2025 (ie an annual average of 1,170 homes per year). The draft New London Plan proposes a housing target of 18,750 dwellings between 2019/20 – 2028/29 in LB Havering - i.e.an average of 1,875 per annum, equating to more than a threefold increase from that underpinning the 2008 RAAP Allocation.

This further emphasises the important role that a residential development on the site can make in helping to meet housing need within Havering and London generally – indeed the emerging Local Plan recognises the importance of such residential schemes within the Romford Strategic Development Area even prior to the increased housing need in the Borough identified in the Draft New London Plan..

Representations to the Draft New London Plan

F&C is supportive of the identification in the draft London Plan of Romford Metropolitan Centre as an area with high residential and commercial growth potential (Table A1.1 in Annex 1) and the requirement for Boroughs to plan proactively to seek opportunities for residential growth in and around town centres (page 467).

Our client is also supportive of draft Policy SD8 (Town Centres: development principles and Development Plan Documents) and its initiatives to identify sites suitable for higher density residential intensification, particularly capitalising on those sites with services within walking and cycle distance of current and future public transport provision. 117 North Street (our client's site) is in a very sustainable location, with a PTAL rating of 5. F&C welcomes the draft policy's identification in part 5 a) of low-density supermarket sites, surface car parks and edge of centre retail/leisure parks as sites that could be comprehensively redeveloped to provide housing..

F&C is likewise supportive of draft Policy H1 (Increasing housing supply) which, as summarised above, seeks an ambitious increase in housing supply, including within LB Havering (Table 4.1 shows 1,875 per annum, compared to a minimum target of 1,170 per annum in the current London Plan 2016). F&C is also encouraged by and welcomes the identification in part B 2) of the policy of potential sources for housing delivery, including in b) the redevelopment of car parks and low-density retail parks. Other sources of capacity that our client endorses are referred to in B 2) a) and c) respectively as being housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses, and sites with existing or planned public transport access levels (PTALs) 3-6.

In conclusion, our client is in support of the above referred-to draft policies, as they endorse the valid principles of relevant, extant local planning policies in LB Havering. Providing that emerging development plan documents being prepared by the boroughs are consistent with the proposed draft London Plan approach, the draft strategic policies for town centres and increasing housing supply should ensure that at a local, development management level, the future redevelopment of highly accessible, low density uses as potential sources of housing capacity.

F&C would welcome further opportunity to engage in the draft London Plan process, particularly in terms of participating in this year's examination. In the meantime, should you require any clarification, or additional information on this submission, please do not hesitate to contact Daniel Lampard or myself.

