



18/18
DECISION
NOW MADE
+ appendices 1+2
+ annexes 2+3

Notice of KEY Executive Decision

February 28 2018

Subject Heading:	Draft London Plan – response to consultation from London Borough of Havering
Cabinet Member:	Councillor Roger Ramsey Leader of the Council
SLT Lead:	Steve Moore Director of Neighbourhoods
Report Author and contact details:	Martyn Thomas Development and Transport Planning Manager E-mail : martyn.thomas@havering.gov.uk Tel : 01708 432845
Policy context:	National Planning Policy Framework (2012) London Plan (Consolidated with Alterations since 2011) A City for all Londoners : London Mayor (2016) Havering Vision (2017) Proposed Submission Havering Local Plan (2017) Havering Local Development Framework (2008)
Financial summary:	There are no direct financial implications arising from the draft London Plan and its associated consultation.

Key Executive Decision

Reason decision is Key	Significant effect on two or more wards
Date notice given of intended decision:	January 2018
Relevant OSC:	Towns and communities
Is it an urgent decision?	No
Is this decision exempt from being called-in?	No

The subject matter of this report deals with the following Council objectives

Communities making Havering	[X]
Places making Havering	[X]
Opportunities making Havering	[X]
Connections making Havering	[X]

Part A – Report seeking decision

DETAIL OF THE DECISION REQUESTED AND RECOMMENDED ACTION

That the Leader :

- (1) Approve the Council's response to be submitted to the London Mayor as the London Borough of Havering's formal response to the draft London Plan (2017) (as set out in Appendix 2 with its attached annexes)
- (2) Delegate authority to the Director of Neighbourhoods in consultation with Cabinet Member for Housing to prepare necessary evidential background material in support of the formal response to the London Plan as submitted (above) and to make representations at the public examination of the London Plan in support of the Council's response in the event that the opportunity arises.

AUTHORITY UNDER WHICH DECISION IS MADE

The following elements of the Council's Constitution apply :

Council's Constitution November 2010 Part 3 – Responsibility for Functions

2 Executive Functions – Functions

2.5 (b) Where there are implications for policies of the Council, to agree members of staff's responses to consultation papers from:

- (i) the Government (including White and Green papers)
- (ii) the London Councils, the Greater London Authority, the Local Government Association and all other bodies where those papers affect the services allocated.

STATEMENT OF THE REASONS FOR THE DECISION

(1) Introduction and purpose of this report

1. The London Mayor published his draft London Plan for public consultation purposes at the end of November 2017. The consultation period lasts until early March 2018.
2. The purpose of this report is to seek approval for the submission of Havering's formal response to the Mayor of London's draft London Plan and to support the ability of officers to continue to make representations on the Council's behalf.
3. Consultation comments may be made by on-line submission or letter / e-mail. As with responses to previous Mayoral consultations (such as the Mayor's draft Transport Strategy in

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autumn 2017), it is recommended that Havering respond by letter so that it can better ensure that all its comments are submitted. The on-line response facility provides respondents with the opportunity to provide narrative on a chapter by chapter basis along with an indication of support or / objection to the London Plan. The letter of response provided in Appendix 2 is an equally effective way of ensuring the Council's response(s) are submitted.

4. To enable this report to focus on the key matters that will inform the recommended response from the Council, relevant background and supporting information is included in Appendix 1 to this report.

The remainder of this report concentrates on :

- what is new about the draft London Plan
- its key contents (including those that specifically relate to Havering)
- why Havering should respond to the consultation

5. Members are advised to read both the substantive part of this report and Appendices 1 and 2 (and the four annexes to the latter).

6. A copy of the draft London Plan has been placed in the Members' Resource Room for 'library' purposes since December 2017.

7. An all-Member briefing took place on January 25 2018.

(2) What is 'new' about the draft London Plan

8. The draft London Plan is 500+ pages in length. The Mayor of London regards the latest document as a very different London Plan to those of his predecessors. The draft London Plan's introduction says it :

- is 'more ambitious and focussed than any previous Plans'
- is underpinned by the concept of 'Good Growth' – growth which is socially and economically inclusive and environmentally sustainable
- seeks to deliver on Mayoral manifesto commitments and – alongside the Mayor's other strategies – sets the framework for how these will be achieved in spatial development terms

9. The Mayor of London considers that his draft London Plan :

- has a proportionate evidence base
- is consistent with national policy and guidance
- deviates from national policy where he wants to deliver specific Mayoral commitments and / or addressing the specific circumstances of London

10. The Mayor of London states that the new document was 'shaped' by the Mayor's 'A City for all Londoners' document published in autumn 2016 as a 'direction of travel' document ahead of the draft London Plan being revised.

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11. This was extensively briefed to Havering officers and Members at that time. In broad terms it was considered that much of it could be supported by Havering especially as there was a close alignment between the Mayor's stance and Havering's about the necessary provision of new and improved infrastructure (particularly transport) to support the Mayor's 'good growth'. It was considered that this had the potential to be helpful to Havering if growth was to be accommodated provided that it was supported by better infrastructure. Since then, the document has informed discussions that Havering has had with the Mayor / Deputy Mayors. It was anticipated that those would be reflected in the recently published Mayoral strategies.

12. The Mayor of London expects all parts of London to embrace and manage change to meet the challenges of the future. He acknowledges that elements of it are 'ambitious' such as the significant increases in annual housing targets.

14. Importantly, in regard to the delivery of the draft London Plan, GLA planning officers have indicated that the Mayor will take a much more 'directive' approach in its implementation.

(3) Overview of content of the latest London Plan

15. The Mayor of London wants planning and development across London to be underpinned by six core 'Good Growth' policies.

16. These are set out in Chapter One (Planning London's Future – Good Growth Policies) of the draft London Plan. They comprise :

- building strong and inclusive communities
- making the best use of land
- creating a healthy city
- delivering the homes Londoners need
- growing a good economy
- increasing efficiency and resilience

17. All subsequent policies in the draft London Plan are intended to help deliver the above principles.

18. Transport is at the heart of planning for growth in the draft London Plan with several key themes :

- walking and cycling are recognised as important for 'unlocking' development
- new development is necessary to support ambitious modal shift targets
- policies recognise the importance of connectivity and capacity as well as public transport access
- sites with more connectivity are well suited to higher densities and lower car parking
- public realm is linked to the Mayor's 'healthy Streets' initiatives

19. The overall spatial strategy for London is set out in Chapter Two (Spatial Development Patterns). It focuses on identifying growth strategies for specific places in London and how they connect with the wider south-east region.

20. There are specific references to Havering Council in this section of the draft London Plan

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including the existing London Riverside Opportunity Area and a new Opportunity Area focussed on Romford Town Centre (see below).

21. After Chapter 2, the draft London Plan takes a 'topic-based' approach and comprises extensive planning policies intended to deliver 'Good Growth' and to support and deliver the six principles above.

22. There are specific 'topic' sections on : design, housing, social infrastructure, economy, heritage and culture, green infrastructure and the natural environment, sustainable infrastructure, transport, funding and monitoring. Every planning policy is supported by extensive explanatory text ('reasoned justification').

23. The Mayor of London intends the draft London Plan to be read and used 'as a whole'. The relative order of the chapters and the policies within them is not hierarchical nor is it in any priority order. Some policy content is specific to particular parts of London (such as the Central Activities Zone or involves topics that are not relevant to Havering such as World Heritage sites).

24. There is some similarity to the current London Plan in that the policies include all of / some of the following :

- requirements (criteria) that development proposals will be expected to satisfy
- responsibilities for boroughs when dealing with proposals
- responsibilities for boroughs to support 'robust' planning decisions in the future (such as proactively using brownfield registers)
- responsibilities for boroughs when developing and preparing planning policies for their own local plan documents

25. The Mayor of London says he will bring forward other documents such as Supplementary Planning Guidance to support the delivery of the draft London Plan.

(4) The content of the draft London Plan in more detail

26. The all-Member briefing and the 'library' copy of the document (deposited in the Members' Resource Room) have provided the opportunity for Members to ask officers about specific matters linked to the draft London Plan.

27. The draft London Plan includes a number of topics that are likely to generate debate such as :

- a focus on growth and change in East and Outer London (with these areas expected to accommodate much faster population / housing growth than London as a whole)
- 66,000 new homes are needed each year and half of these must be affordable
- the Mayor says there is capacity to delivery of 65,000 new homes per year across London up to 2029 from a range of large and small sites
- very significant increases in 10 year (and annual) housing targets for boroughs (see below for specific detail on Havering). The pan-London annual target has

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increased from 423,887 to 649,350 (an increase of 53%) which is equivalent to more than 22,500 homes per year above the current target

- a new focus on small sites (less than 0.25 hectares or from 1-25 units) so that they deliver much greater housing numbers and this will be the main 'tool' in the suite of policies to increase housing stock. There will be a 'presumption in favour' of residential development on small sites in well-connected locations
- existing housing retained unless new housing is at existing or higher densities and at least equivalent floor-space
- the scope for 'back-land' and garden land to provide new homes
- housing intensification on existing sites in town centres with sustainable transport opportunities
- the number of Opportunity Areas is increased from 38-45. Opportunity Areas (OAs) are seen as having 'the potential to deliver substantial amount of the new homes and jobs that London needs'. The draft London Plan characterises these as being the areas of greatest change. It recognises that infrastructure will be key to unlocking their potential and major investment being necessary in transport
- support for promoting and enhancing town centres including partnership approaches and preparation of Town Centre strategies
- identification of Strategic Areas for Regeneration based on deprivation levels
- the 'strategic' affordable housing target to remain at 50% across London and a focus on tenure matters linked to affordable homes in line with the Mayor's 'needs' study. Opportunities for 'fast-track' applications which satisfy Mayoral requirements for affordable homes
- very robust support for the Green Belt (as it is presently defined) including opposition to Green Belt land being de-designated.
- support for open spaces, green roofs and street trees and new proposals to contribute to London's 'greening'
- an indicative list of transport schemes and infrastructure improvements and an emphasis on 'growth corridors' aligned to transport investments. The new Plan recognises that significant transport infrastructure underpinning its approach to growth is unfunded and that new funding initiatives and opportunities will need to be explored such as devolved powers and capturing value through uplift
- 80% of all trips to be made by foot, cycle or public transport by 2041 (in line with the draft Mayor's Transport Strategy)
- an emphasis on delivering the 'Healthy Streets' agenda to facilitate residents making shorter trips by cycling or walking
- barriers to cycling to be removed through development proposals and development plans

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- car free developments (housing and commercial) in well-connected locations
- new parking standards for residential car parking
- restrictions on car parking in line with levels of existing and future public transport accessibility
- Mayoral Community Infrastructure Levy to be changed to enable it to contribute towards the funding of Crossrail 2 and other strategic transport infrastructure
- a focus on securing and delivering high quality design and a close correlation between density / design and infrastructure
- an emphasis on design quality and scrutiny to mitigate against the potential negative impacts associated with higher densities
- a design led approach to the provision of tall buildings
- making the most efficient use of land and developments to be at optimum densities and reducing the emphasis afforded to setting and context when considering proposals
- all social infrastructure provision to be underpinned by robust evidence and assessments and easily accessible by public transport, cycling and walking. Cross-boundary matters to be taken into account in planning for social infrastructure
- public toilet provision within large scale commercial developments accessible to the public
- business economy underpinned by robust infrastructure
- office provision to reflect changing work-styles, technological advances and new forms of accommodation and provision
- a plan-lead approach to managing the main industrial locations within an approach which seeks to ensure no net loss of floor-space
- a new approach to planning for gypsies and travellers (arising from the Mayor's concerns that many in this sector of the community fall outside the Government's planning definition)
- recognition of the importance of London's historic and natural environments
- support for London's culture and creative industries and the night-time economy. Opportunities for Creative Enterprise Zones identified
- London's air quality to be significantly improved and all developments to be Air Quality Neutral (with larger proposals being Air Quality Positive)
- Mayor's zero-carbon target for 2050
- Energy requirements to be identified at an early stage in the development

process

- Existing waste sites to be safeguarded and London's waste should be managed within London by 2026

28. The draft London Plan includes a specific chapter on how its delivery will be funded. It recognises that this will be a challenge that will require significant investment from both the public and private sectors. An assessment is included of the gap between currently committed and required public sector funding. Options for meeting this gap are summarised.

29. The draft London Plan identifies that the most critical areas for investment to achieve the step change in housing delivery that London needs are increased investment in transport infrastructure and fundamental changes to the housing market. Options for raising the required funding including fiscal devolution and sharing in land value uplift are explored.

(5) What the draft London Plan says about Havering

30. Several specific references to Havering are included. In summary, the **key** ones of these encompass :

- Havering 'characterised' as an Outer London Borough (Annex 2)
- London Riverside identified within an extensive overarching Opportunity Area referred to as Thames Estuary North and South. The Mayor says that this Opportunity Area would have the potential for over 250,000 new homes and 200,000 new jobs and include a number of existing Opportunity Areas. The London Riverside element of this OA is identified as having the potential to provide 44,000 new homes and 29,000 new jobs. The Plan sees this corridor as having links beyond London's boundaries and into two Infrastructure Priorities comprising the Essex Thames-side, A127 and A13 corridor and Thames Gateway Kent Elizabeth line extension and High Speed 1 line
- Romford included as a new Opportunity Area within an extensive new OA for the Elizabeth Line East corridor focussed on the transport investment corridor of the Crossrail line from Stratford to the eastern edge of Havering. The Romford OA envisages the provision of some 5,000 new homes and 500 jobs. This OA links beyond London's boundaries into a Strategic Infrastructure priority focussed on the Great Eastern Main line rail corridor
- Romford's role as a Metropolitan Centre is re-affirmed with growth potential for commercial and residential identified as medium and high, respectively
- Havering's 10 year housing target increases to 18,750 with an annualised target of 1,875 new homes per year (compared to 1,170 new homes per year in the current London Plan)
- Havering has a 10 year 'small sites' housing target of 9,040 new homes with an annualised target of 904 new homes per year
- an annual benchmark for specialist older persons housing (sheltered accommodation and extra care accommodation) of 185 new units per year
- Romford and Harold Hill identified as Strategic Areas for Regeneration (see below)

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- Collier Row, Elm Park, Harold Hill, Hornchurch, Rainham and Upminster identified as District Centres with growth potential for commercial and residential ranging from Low – Medium and Incremental – High (depending on location). Harold Hill and Rainham are identified as Strategic Areas for Regeneration reflecting that the impacts of inequality and causes of deprivation are particularly concentrated here
- Romford identified as an area of regional or sub-regional significance in terms of its Night Time Economy and Rainham identified as an area with more than local significance in respect of its Night Time Economy [note - the latter may be an incorrect reference to Hornchurch]
- Rainham Employment Area, Harold Hill Industrial Estate, King George Close, Romford Estate identified as Strategic Industrial Locations and Havering generally identified as an area where 'limited release' of industrial floor-space capacity will be appropriate
- areas south west of Romford identified as Air Quality Focus Areas
- a river crossing at Gallions Reach (LB Newham) and / or Belvedere (LB Bexley) for the period 2030 – 2041 (albeit subject to further assessment)
- River crossings (public transport) in East London (subject to further assessment)
- Romford and parts of south Hornchurch / Rainham identified as areas where higher minimum cycle parking standards will apply
- identification of an aggregates apportionment figure for Havering of 1.75million tonnes for the period to 2041
- The 'Walk London Network' including the Thames Path and the 'London Loop' within Havering
- extensive areas of Havering identified as Heat Network Priority Areas where the delivery of new district heating infrastructure will enable the opportunities that district heating can deliver to be maximised
- average download speeds for broadband not exceeding 75Mbit/s across the borough and extensive areas significantly below this
- several other figures also refer to Havering such as those for geo-diversity sites, conservation areas, waterways network and proximity to town centres

(6) The views of other stakeholders

31. Other London Boroughs are still finalising their responses at the time this report was prepared. So far there is very little published information about how other stakeholders are proposing to comment. London Councils, The Royal Town Planning Institute and Local London have each indicated they are responding but have yet to publish their formal responses.

(7) Why responding to the draft London Plan is important for Havering

32. Havering has commented extensively on previous draft Mayoral strategies. Most recently it commented in detail on the draft Mayor's Transport Strategy (autumn 2017).

33. Engagement in the draft London Plan process is important for several reasons :

- the importance of commenting to the Mayor on specific policy considerations across a wide range of topics (including those linked to significantly increasing housing supply) which are flawed and unrealistic and will adversely affect Havering if they remain part of the draft new London Plan
- once formally adopted by the London Mayor, the draft London Plan has a key role in the planning decision making process for planning proposals in all boroughs
- it will be part of the planning policy context for the preparation of the Council's own planning and other strategies. Havering's Local Plan must 'be in general conformity' with the draft London Plan
- it will gradually assume more 'weight' in planning terms as it progresses from the version published for public consultation to that which the Mayor formally submits to the EIP. This will have implications for borough's own strategies including the Havering Local Plan.
- it will set an 'agenda' for other Mayoral strategies and programmes (such as those linked to transport and infrastructure) which will in turn impact on the preparation of Havering's strategies and the delivery of programmes and projects in the borough
- commenting on it will augment and add weight to the Council's own comments to the Mayor of London on matters such as the need for greater investment in transport infrastructure investment (as previously provided through responses to the draft Mayor's Transport Strategy and other Mayoral programmes such as the river crossings 'package')
- it will 'shape' and prioritise Mayoral spending priorities (especially transport infrastructure) in a period of budgetary pressures for the Mayor of London and boroughs through programmes such as the Local Implementation Plan and the 'Liveable Neighbourhoods' and 'Healthy Streets' initiatives
- to highlight that it is misplaced to seek to deliver 'a one-size fits all' approach to policy preparation and an approach which fails to recognise that the particular characteristics of Outer London and the planning policies it needs are very different to those in Central and Inner London

(8) Key content of the recommended Havering response

34. Previous responses to Mayoral consultations from Havering have focussed on those matters of most relevance to Havering (rather than commenting on issues of a pan-London nature or most affecting other parts of London).

35. It is recommended that this approach be continued with the comments on the draft London Plan.

36. The recommended response has been prepared to reflect the Council Motion (dated January 24 2018) :

'This Council notes with grave concern the proposals contained in the draft London Plan recently published by the Mayor of London which proposes a housing target of 1,875 new

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homes per annum for Havering over the next ten years, which represents a 60% increase on the figure included in the draft Havering Local Plan (1,170). This Council further considers the target as totally unacceptable, unachievable and unsustainable to the point of changing the unique and open character of our borough for the worse. This Council, therefore, agrees to recommend to the Executive to respond to the consultation, which ends on 1st March 2018, in the strongest possible terms'.

37. The recommended response also reflects :

- the comments that Havering made in its recent consultation response in late 2017 dealing with the Mayor's draft Transport Strategy (and subsequently raised in several discussions with the several Deputy Mayors)
- the Council's response in autumn 2017 to the Government's 'Planning for homes in the right places' consultation because the draft London Plan raises similar issues for Havering
- comments made by Havering officers when they attended the London Assembly Housing Committee meeting in January 2018 where the Deputy Mayor for Housing and Residential Development responded to questions from the Assembly Members on many aspects of the draft London Plan (with a particular focus on housing)

38. As previously, it is recommended that the response letter highlight Havering's **key** concerns with other comments included within a supporting annexe(s).

39. The recommended response is set out in full in Appendix 2 and the supporting annexes. It will be seen that the response letter itself highlights the Council's concerns that :

- there are fundamental flaws underlying the housing targets in the draft London Plan meaning that they are both unrealistic and unachievable for Havering (and many other London Boroughs). These encompass matters such as how housing 'need' has been assessed and identified in the new draft London Plan and the contributions towards housing delivery that is expected to come from 'small sites'
- the housing targets will be wholly incompatible with Havering being able to continue to safeguard the borough's open and suburban character and appearance and this will be to the detriment of Havering as a place where people want to live and businesses wish to invest. The provision of new homes in Havering in line with the targets in the draft London Plan will herald very damaging and irreversible change to the character of Havering
- the draft London Plan does not properly recognise nor make provision for the timely and effective delivery of the social and community infrastructure which is a fundamental component necessary to support the growth of sustainable communities and needed to ensure that individuals have health, well-being and a high quality of life
- the draft London Plan fails to recognise that the transport circumstances in Outer London Boroughs like Havering are very different from Central and Inner London. The Mayor's approach to matter such as modal shift and car parking provision must recognise that private car use will remain higher than in other parts of London because there is not the public transport infrastructure to support more journeys being made by this mode
- the draft London Plan is flawed because it is based on the provision of important

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transport infrastructure that is currently unfunded

- the draft London Plan has failed to recognise that key strategic transport infrastructure is necessary in Havering. The Council's response to the draft Mayor's Transport Strategy in autumn 2017 set out very clearly what this is and despite the Council continuing to press for these interventions with the Mayor of London and his Deputies it is highly disappointing and unsatisfactory that they are absent in the new draft London Plan

40. Annexes 1 and 2 to Appendix 2 (the response letter) provide detailed responses to the draft London Plan and the opportunity should also be taken to re-submit the Council's response to the draft Mayor's Transport Strategy (MTS) as it sets out very fully the Council's requirements regarding the need for improved transport infrastructure to support growth in Havering. The response to the draft MTS is included as annexe 3. Finally, the transcript of the Housing Committee (see paragraph 37) is included as annexe 4.

(9) Next steps

41. Subject to Member approval, the recommended response will be submitted to the Mayor of London. The Panel of Inspectors appointed by the Secretary of State will review all the consultation responses. They will determine which stakeholders are invited to the Examination. The Council will not know if it is to be involved until nearer the time. It may be necessary for the Council to undertake, or commission, further work to support its initial response(s).

42. The stages following the Examination which may culminate in the London Plan being adopted are set out in Appendix 1 to this report (paragraph 9).

OTHER OPTIONS CONSIDERED AND REJECTED

The option of not responding to the consultation on the draft London Plan was rejected.

It is essential that the Council comments comprehensively and robustly on the draft London Plan for the reasons set out below :

- the draft London Plan gives rise to significant concerns for Havering (and many other Outer London Boroughs) as a result of its content and how it has been prepared. There are specific topic issues that cause significant concern to the Council (such as the unrealistic and unachievable housing targets) and the lack of engagement on matters such as the preparation of the housing need assessment and the targets for housing delivery required to come forward from small sites)
- the draft London Plan will continue to form part of the statutory development plan for Havering and will be a material consideration when planning applications for development are being assessed by the Council
- any local plan documents that this Council prepares have to be in general conformity with the draft London Plan and, as such, it forms a key policy context for Havering's own planning strategies alongside the Government's National Planning Policy Framework

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- the draft London Plan sits at 'the top of the tree' of several important Mayoral strategies and provides an over-arching strategy for these. It sets an important context for other Mayoral strategies that will impact on Havering such as those relating to transport, economic development and housing
- the draft London Plan will influence significantly the funding that may be available to boroughs through programmes such as the Local Implementation Plan (which deals with the Council's allocation of Mayoral funding for transport projects and programmes)

PRE-DECISION CONSULTATION

Officers attended the launch of the draft London Plan at GLA City Hall.

The draft London Plan was extensively circulated across the Council to its constituent Directorates to provide the opportunity for them to inform the preparation of the Council's collated response. These are reflected in annexes 1 & 2.

A copy of the draft new London Plan was placed for library purposes in the Members' Resource Room.

Executive Members of the Council had a briefing on the draft London Plan on Monday January 15 2018.

A briefing for all Members was held on Thursday January 25 2018 to provide the opportunity for all Member to ask questions about the draft London Plan and to comment upon it.

The Council's proposed draft response was provided informally to political group leaders for comments / approval before submission.

NAME AND JOB TITLE OF STAFF MEMBER ADVISING THE DECISION-MAKER

Name: Martyn Thomas

Designation: Development and Transport Planning Manager

Signature: 

Date: February 28 2018

Part B - Assessment of implications and risks

LEGAL IMPLICATIONS AND RISKS

In accordance with the Greater London Authority Act 1999 ('the Act'), the Mayor of London has a statutory requirement under Section 334 to prepare and publish a Spatial Development Strategy for London ('the Strategy') and ensure that it is kept under review under the requirements of the Greater London Act 1999 (as amended) and supporting regulations.

The Act stipulates matters which must be covered by the London Plan which covers only matters of strategic importance to Greater London hence setting out the strategic plan for London setting out an integrated, economic, environmental, transport and social framework for the development of London over the next 20-25 years.

The London Plan is the Mayor's Spatial Development Strategy for London and sets out that it is to promote the following hereby meeting the legislative requirements :

- Economic development and wealth creation in Greater London
- Social development in Greater London
- The improvement of the environment in Greater London

There are two major legal consequences once the London Plan is adopted by the Mayor of London :

1. The London Plan forms part of the development plan for each local authority area located within the Greater London boundary including the London Borough of Havering. Consequently, the London Plan becomes a material consideration against which the Council as Local Planning Authority must consider planning applications when forming decisions.
2. The London Borough of Havering Local Plans, inclusive of policies are required to be in general conformity with the adopted London Plan.

Therefore the Act, Sections 335, 337 and 338 requires the Mayor of London to prepare a draft Strategy, make this draft available for public comment and to take these comments into consideration in the final determination. Section 335(3) of the Act lists a number of statutory consultees that includes all local authorities located within the Greater London area. This report seeks to ensure that the Council submits a response to the Strategy.

FINANCIAL IMPLICATIONS AND RISKS

There are no direct financial implications arising from the draft London Plan and its associated consultation.

However, if the London Plan is adopted by the London Mayor it will result in a significantly increased number of homes being built including in Havering and this is likely to impact on the

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provision of Council services.

The London Plan is heavily dependent on the provision of a number of key transport infrastructure investments. The Mayor of London has only identified funding for some of these.

Further, if the very ambitious housing growth targets in the London Plan were delivered, social and community infrastructure facilities and utilities provision will need to be expanded very considerably. The draft London Plan does not identify funding for these nor comment on the implications for boroughs.

The implications of this for existing (and future) infrastructure and Council services cannot be ascertained at this stage.

The final London Plan will also form a context for the development of other important Mayoral strategies. Some of these have significant funding elements (such as the Mayor's Local Implementation Plan) and shape the Council's own activities and spending. Depending on the content of these there may be implications for the delivery of Havering's own programmes and projects across important areas such as transport and highways maintenance.

Havering's involvement in the Examination in Public and its associated costs cannot be known at this stage because it will be determined by the Panel of Inspectors appointed by the Government. If the Panel require or invite Havering to be involved then it is possible that the Council may need to engage external specialist support to assist with the preparation and / or discussion of its representations.

The Havering Local Plan is in the preparation stages and is being readied for formal submission to the Planning Inspectorate. The Local Plan is being delivered through funding identified of a Planning Delivery Grant, external funding and Directorate budgets. In addition, there is the potential use of the Business Risk Reserve to the value of £0.166m.

There is the risk that appropriate costs exceed the funding provision available for the Local Plan and any overspend would therefore need to be funded by the Council. Currently, however, funding has been identified to cover the additional costs (£0.287m) identified for the Local Plan in 2017/18.

HUMAN RESOURCES IMPLICATIONS AND RISKS (AND ACCOMMODATION IMPLICATIONS WHERE RELEVANT)

There are no direct implications arising from the draft London Plan.

However, it is possible that when the draft London Plan is considered at the Examination in Public, the Panel of Inspectors may seek to have Havering involved. Havering's involvement in the Examination in Public cannot be certain at this stage because it will be determined by the Panel of Inspectors appointed by the Government.

If the Panel require or invite Havering to be involved then it is possible that the Council may need to prepare further material to support its representations. It cannot be known at this stage if that work will be undertaken wholly 'in house' by existing staff or by engaging specialist external support. There may be an implication for the delivery of the Council's

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current and future priorities depending on whichever is the case.

EQUALITIES AND SOCIAL INCLUSION IMPLICATIONS AND RISKS

The new London Plan is underpinned by an integrated impact assessment. This encompasses :

- a strategic environmental assessment
- a sustainability appraisal
- an equalities impact assessment
- a health impact assessment and
- a community safety impact assessment

and this addresses the Mayor's legal duties to carry out a comprehensive assessment of the Plan and its proposed policies with one integrated assessment. The assessment is itself part of the formal consultation process and the Mayor is inviting comments on it.

Policies in the Plan give emphasis to ensuring that everyone is able to benefit from the delivery of the Plan and that London is a fairer and more equal city with inclusive communities.

The plans and policies prepared by boroughs are required to be in general conformity with the London Plan and will be required to reflect these important principles.

BACKGROUND PAPERS

None .

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Part C – Record of decision

I have made this executive decision in accordance with authority delegated to me by the Leader of the Council and in compliance with the requirements of the Constitution.

Decision

Proposal agreed

Proposal NOT agreed because

Details of decision maker

Signed



Name: Councillor Roger Ramsey

Cabinet Portfolio held: Leader of the Council

CMT Member title: Director of Neighbourhoods

Head of Service title : Assistant Director of Development

Other manager title: Development and Transport Planning Manager

Date: March 1 2018

Lodging this notice

The signed decision notice must be delivered to the proper officer, Andrew Beesley, Committee Administration & Interim Member Support Manager in the Town Hall.

For use by Committee Administration

This notice was lodged with me on 8/3/2018

Signed 