



Public Document Pack

Haverling
L O N D O N B O R O U G H

CABINET

7.30 pm	Wednesday 18 January 2012	Council Chamber - Town Hall
----------------	--------------------------------------	--

Members 10: Quorum 5

Councillor Michael White (Leader of the Council), Chairman

	Cabinet Member responsibility:
Councillor Steven Kelly (Vice-Chair)	(Deputy Leader) Individuals
Councillor Michael Armstrong	Transformation
Councillor Robert Benham	Community Empowerment
Councillor Andrew Curtin	Culture, Towns & Communities
Councillor Roger Ramsey	Value
Councillor Paul Rochford	Children & Learning
Councillor Geoffrey Starns	Community Safety
Councillor Barry Tebbutt	Environment
Councillor Lesley Kelly	

Ian Buckmaster
Committee Administration & Member Support Manager

**For information about the meeting please contact:
Andrew Beesley 01708 432437
andrew.beesley@haverling.gov.uk**



**Please note that this meeting will be webcast.
Members of the public who do not wish to appear
in the webcast will be able to sit in the balcony,
which is not in camera range.**

AGENDA

1 ANNOUNCEMENTS

On behalf of the Chairman, there will be an announcement about the arrangements in case of fire or other events that might require the meeting room or building's evacuation.

2 APOLOGIES FOR ABSENCE

(if any) - receive

3 DECLARATIONS OF INTEREST

Members are invited to declare any interests in any of the items on the agenda at this point of the meeting. Members may still declare an interest in an item at any time prior to the consideration of the matter.

4 MINUTES (Pages 1 - 6)

To approve as a correct record the minutes of the meeting held on 14 December 2011, and to authorise the Chairman to sign them.

5 THE COUNCIL'S BUDGET 2012/15 (Pages 7 - 42)

Members attending the Cabinet Meeting on 18 January and the Joint Meeting of all Overview & Scrutiny Committees on 19 January are requested to bring the copy of the budget report to the meeting(s) with them.

6 EXTENSION OF COUNCIL'S INSURANCE CONTRACT (Pages 43 - 48)

7 DISPOSAL OF UNDER-UTILISED SITES WITHIN THE HOUSING REVENUE ACCOUNT (Pages 49 - 82)

8 HAVERING LOCAL DEVELOPMENT FRAMEWORK - ADOPTION OF JOINT WASTE DEVELOPMENT PLAN DOCUMENT (DPD) (Pages 83 - 186)

9 HAVERING LOCAL DEVELOPMENT FRAMEWORK - GYPSY AND TRAVELLER SITES DPD PROPOSED SUBMISSION DOCUMENT (Pages 187 - 286)

10 EXCLUSION OF THE PUBLIC

To consider whether the public should now be excluded from the meeting on the grounds that it is likely that, in view of the nature of the business to be transacted or the nature of the proceedings, if members of the public were present during the following item there would be disclosure to them of exempt information within the meaning of paragraph 3 of Schedule 12A to the Local Government Act 1972 which it is not in the public interest to publish; and, if it is decided to exclude the public on those grounds, Cabinet to resolve accordingly on the motion of the Chairman.

11 CONSIDERATION OF CHIEF EXECUTIVE'S REPORT CONTAINING EXEMPT INFORMATION

This page is intentionally left blank

Public Document Pack Agenda Item 4



MINUTES OF A CABINET MEETING
Council Chamber - Town Hall
Wednesday, 14 December 2011
(7.35 - 8.25 pm)

Present:

Councillor Michael White (Leader of the Council), Chairman

	Cabinet Member responsibility:
Councillor Michael Armstrong	Transformation
Councillor Robert Benham	Community Empowerment
Councillor Lesley Kelly	Housing
Councillor Steven Kelly (Vice-Chair)	(Deputy Leader) Individuals
Councillor Roger Ramsey	Value
Councillor Paul Rochford	Children & Learning
Councillor Geoffrey Starns	Community Safety
Councillor Barry Tebbutt	Environment

An apology for absence was received for Councillor Andrew Curtin.

Councillors Clarence Barrett, Keith Darvill, David Durant, Linda Hawthorn, Paul McGeary, Pat Murray and Garry Pain also attended.

Three members of the public and a representative of the Press were also present.

The decisions were agreed with no vote against.

The Chairman introduced Alicia Murphy who was the first elected Young Leader of Havering. Members welcomed Miss Murphy to the meeting.

40 MINUTES

A Member questioned the accuracy of Minute 39 regarding the discussion around the proposed lorry routes for the importation of inert material through residential locations and that he had not been given the opportunity to discuss matters which were contained in the exempt appendix to the report.

The Chairman commented that he had reviewed the discussion via the public webcast and was satisfied that the minutes accurately reflected the discussion. He added that the member, when discussing the report, had not requested that the public be excluded from the meeting so that the exempt business could be discussed.

Accordingly, the minutes of the meeting of Cabinet held on 16 November 2011 were agreed as a correct record and signed by the Chairman.

41 THE COUNCIL'S FINANCIAL STRATEGY

Councillor Roger Ramsey, Cabinet Member for Value, introduced the report.

Over the course of the last 15 months, Havering Council had agreed a package of savings to mitigate the impact of very significant cuts in central government funding to local authorities.

These savings, totalling in excess of £19 million in the first tranche, with a further £16 plus in the second tranche, had been made up of a range of measures designed to reduce back-office costs, cut bureaucracy and focus resources where they would have the most impact – while remaining fair to those local residents who most relied on the Council for day-to-day support.

Subsequent to the approval of the savings measures, the Government had issued a series of consultation papers on a variety of issues which were considered by Cabinet in October 2011. The report included an assessment of the potential impact of the Government's proposals, and the Council's response to them. The final decisions on these areas had not yet been received. There was one further issue relating to the Local Government Pension Scheme, which was covered in the report before Cabinet members.

Although the Government announced a two year financial settlement, the figures for 2012/13 were provisional at the time the report was drafted. It had since been announced that the provisional Capital Budget settlement for the coming financial year was £54.043m, this included the Council Tax Freeze Grant. It was reported that the settlement would be finalised after the consultation period, which was due to end on 16 January 2012.

The report contained the summary statements setting out the main principles of the Council's Medium Term Financial Strategy, in particular the revenue strategy, the capital strategy, and the procurement strategy. The report sought approval to recommend these to Council for adoption.

The report also set out the position in the current financial year, and a number of other relevant issues, as these needed to be taken into account in developing the detailed budget for 2012/13.

An error was contained in the table under Paragraph 6.2 of the report. The variance forecast for Development and Building Control was incorrectly expressed as £766k. It was announced that the correct figure was £76k.

Reasons for the decision:

It was essential that the Council's financial strategy took due account of Government plans, and any other material factors where these were likely to have an impact on the Council's financial position. The report provided an update to Cabinet on issues relevant to the budget setting process.

Other options considered:

None. The Constitution required consideration of the report as a step towards setting the Council's budget.

A discussion took place concerning the redistribution of business rates. The Cabinet Member for Value announced that no agreement on the matter had been reached at London Councils. The final Government proposals on the issue had yet to be received.

A member commented that the formula used for the financial settlement from Government was highly biased against Havering Council. The Cabinet Member for Value agreed that the formula was not only complex but also biased against the Council. He added that the Council repeatedly raised this as an issue of concern in consultation responses to the Government.

It was noted that there would be a further report to the next Cabinet meeting (which would also be going to the subsequent joint meeting of all Overview & Scrutiny Committees about the budget proposals), in which the capital position would be addressed.

Cabinet:

1. **Noted the Government's consultation process for the Local Government Pension Scheme, and the assessment of the potential impact on the Council.**
2. **Noted that details of the Local Government Financial Settlement for 2012/13 would be reported to Cabinet in full in January.**
3. **Approved the revenue, capital and procurement strategy statements, as set out in Appendix B to the report, and recommended their adoption to Council.**
4. **Noted the position in the current financial year, as set out in Section 6 of the report.**
5. **Agreed that financial support for the services provided by the Queens Theatre, Studio 3 Arts, HAVCO, and Motorvations as described in paragraph 7.10 of the report should be extended and incorporated into the base budget for 2012/13.**

42 BLUE BADGE SCHEME

Councillor Michael Armstrong, Cabinet Member for Transformation, introduced the report.

The report informed Cabinet of the forthcoming national changes to the Blue Badge scheme; and sought approval to increase the administration charge to successful applicants.

The current charge for a Blue Badge was £2, which was the maximum local authorities were allowed to charge. The Government had amended legislation so that the maximum Blue Badge fee that Local Authorities could charge would rise to £10.

Reasons for the decision:

The decision to implement the Blue Badge Improvement Service (BBIS) had been taken to meet the requirements of Blue Badge Reform

Programme announced by Norman Baker (Parliamentary Under-Secretary of State for Transport) on 14 February 2011.

The Blue Badge Scheme Local Authority Guidance (England) issued by the Department for Transport in June 2011 confirmed that the Government intended to increase the maximum fee that a local authority may charge for the issue of a Blue Badge to £10. This sum would help fund the administrative and other processes required in providing secure Blue Badges.

Other options considered:

As it was a statutory requirement to implement the BBIS, no other options were considered.

Members commented that the proposed increase in the charge for the Blue Badge was reasonable, and the measures would assist in the prevention of Blue Badge fraud.

Cabinet:

1. **Noted the introduction by the Department for Transport of the Blue Badge Improvement Service with effect from 1 January 2012.**
2. **Agreed to the proposed increase in administration charges from £2 to £10 for each successful Blue Badge application, replacement or renewal with effect from 1 January 2012; thereby recovering associated costs.**
3. **Noted the Department for Transport's requirement for the Mobility Assessment of all Blue Badge applicants with effect from 1 January 2012.**
4. **Noted that the changes would not affect the existing facility for Blue Badge holders with the greatest need (those who qualify for the Badge without the need for further assessment) to park for free in Council car parks.**

43 **EXCLUSION OF THE PUBLIC**

Cabinet decided on the motion of the Chairman that the public should be excluded from the remainder of the meeting on the ground that it was likely that, in view of the nature of the business to be transacted, if members of the public were present there would be disclosure to them of exempt information within the meaning of paragraph 3 of Schedule 12A to the Local Government Act 1972 and it was not in the public interest to publish the information.

44 **AWARD OF FRUIT AND VEGETABLE FRAMEWORK TENDER AS PART OF LONDON CONTRACTS SUPPLY GROUP**

Councillor Paul Rochford, Cabinet Member for Children and Learning, introduced the report

The report explained that the contract for the supply of Fresh Fruit and Vegetables was a framework contract with members of the London Contracts Supplies Group (LCSG), which includes representatives of all London Boroughs. LCSG sought to obtain the best value for the supply of various goods and services.

It was noted that there was no existing contract for the supply of fresh fruit and vegetables as the previous supplier had withdrawn from the contract.

Reasons for the decision:

To ensure that the London Borough of Havering and other members of the LCSG have cost effective and value for money contracts awarded for the purchase of Fresh fruit and Vegetables for the period 1 January 2012 until 31 December 2015.

Other options considered:

Each Council department entered into individual arrangements with suppliers. Framework contracts provided a framework for fixed costs and agreed levels of service.

Service users sourced their own Fresh Fruit and Vegetables in the wider marketplace. This would create a situation whereby the less reputable companies in this market would be provided with an opportunity to sell to Havering and/or the LCSG. There were a number of companies that approached Councils to provide various catering contracts but past experiences had shown that the true cost of sourcing such contracts via this route was more expensive than a framework contract.

There was no contract in place for Fresh Fruit and Vegetables due to the previous contractor pulling out. A contract needed to be in place to ensure value for money when purchasing this item.

Cabinet AGREED:

- 1. To authorise the award of the contract for the provision of Fresh Fruit and Vegetables.**

Chairman

This page is intentionally left blank



CABINET

18 January 2012

REPORT

Subject Heading:

THE COUNCIL'S BUDGET 2012/15

Cabinet Member:

Councillor Roger Ramsey

CMT Lead:

Andrew Blake-Herbert

Report Author and contact details:

Mike Stringer
 Head of Finance & Procurement
 01708 432101
mike.stringer@havering.gov.uk

Policy context:

The Council is required to approve an annual budget and this report provides information to enable Cabinet to make recommendations to Council in February 2012

Financial summary:

This report deals with the overall budget position and sets out the specific proposals for 2012/13

Is this a Key Decision?

Yes/No

Is this a Strategic Decision?

Yes/No

When should this matter be reviewed?

Reviewing OSC:

Value

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

Ensuring a clean, safe and green borough	[X]
Championing education and learning for all	[X]
Providing economic, social and cultural activity in thriving towns and villages	[X]
Valuing and enhancing the lives of our residents	[X]
Delivering high customer satisfaction and a stable council tax	[X]

SUMMARY

Cabinet received a report at the last meeting in December that set out the details of national developments and information on the financial position within Havering.

This report updates Members on the progress of the 2012/15 corporate budget and the proposed financial strategy for responding to the financial position facing the Council.

This report sets out the additional proposals now identified for consideration by all the relevant Committees and for consultation with stakeholders.

The provisional Local Government Financial Settlement has now been announced, and relevant details are included in this report.

RECOMMENDATIONS

Cabinet is asked to:

1. Approve the progress made to date with the development of the Council's budget for 2012/13 and beyond.
2. Note the outcome of the provisional local government financial settlement announcement and in particular, the expected reduction in Government funding for 2012/13 of £5m.
3. Note the expected date for the announcement of the final settlement and that, owing to timing, further supplemental information to the main Council Tax report may need to be submitted at the February Cabinet meeting.
4. Note the comments of the Local Government Minister on expected council tax increases and the introduction of referenda where rises are beyond defined levels.
5. Note that the proposals contained in the reports to Cabinet in July 2010 and July 2011 are now being incorporated in the Council's future budget.
6. Note the Council's intention to take advantage of the additional Council Tax freeze grant for 2012/13.
7. Issue this report for consultation to Members, the unions and affected staff, and other stakeholder groups.

8. Agree that a consultative presentation will be made to a joint meeting of the Overview & Scrutiny Committees.
9. Note the financial position of the Council in the current year.
10. Note that the GLA's consultation budget has yet to be published, details will be provided separately.
11. Note that the Administration is committed to maintaining the stability of the Council's finances and is doing everything it can to keep Council Tax rises to a minimum.

REPORT DETAIL

1. INTRODUCTION

- 1.1. Cabinet received a report on progress with the Corporate Budget at its meeting in December. This report sets out the position with developing the Council's budget for the coming financial year, the proposed financial strategy for following years, the financial prospects for the Council, and the announcement of the local government financial settlement.
- 1.2. Cabinet agreed in December to the release of specific budget proposals in January, and these are included as part of this report where these have been developed.

2. THE SETTLEMENT AND GENERAL FINANCIAL PROSPECTS

Comprehensive Spending Review (CSR)

- 2.1. The Coalition Government published the outcome of its Comprehensive Spending Review in October 2010. Full details of the Review were reported at some length in previous reports to Cabinet as part of the last budget-setting cycle.
- 2.2. As previously reported to Cabinet, the Review set out at a high level spending plans for each Government department. The major effect was, as expected, a significant reduction in funding for the public sector over the four years covered by CSR. This has subsequently been translated into the detailed financial settlement, which for Havering saw a loss of general revenue support grant of around £8m, and a further £3m in specific grants.
- 2.3. The Council's budget for 2011/12, and its overall financial strategy, reflected both this immediate loss of funding, and anticipated further reductions in subsequent years. Cabinet agreed reports in July 2010 and July 2011, setting out a range of savings proposals designed to largely bridge the forecast budget gap between 2011/12 and 2014/15. The remaining gap would be met

by modest rises in Council Tax, assuming no material change in funding was announced by the Government.

Local Government Settlement

- 2.4. Details of the provisional settlement for 2012/13 were announced on 8th December, which was later than expected and, again, late in the context of the Council's budget-setting process. Although it had not been expected that the details of the settlement would differ materially from those announced last year.
- 2.5. A summary of the settlement is set out in Appendix A. This follows the same approach as the original announcement for 2011/12. As that announcement reflected a significantly different approach, this was covered in some detail in the report to Cabinet in January 2011. It is not intended to repeat that assessment here, although the Appendix does set out how the Council's grant allocation has been determined.
- 2.6. The main points affecting local government in general, and Havering in particular, are set out below; a fuller explanation of these key elements then follows:
- The settlement covers the second of the final two year period before there is a fundamental change in the system of funding
 - The final settlement is likely to be announced around 2 weeks after consultation closes on 16th January, which may not be early enough for inclusion in the February report to Cabinet
 - Havering's provisional grant allocation is £54.043m, however this now includes the base sum for Council Tax freeze grant
 - The equivalent figure excluding this grant is £51.363m for 2012/13, which is only marginally different from the figure included in the final announcement last year
 - The national settlement shows the average year-on-year grant reduction is 7.3% once the Council Tax Freeze Grant is stripped out
 - London is, again, regionally, the least worst affected area, although average grant reductions are still 7.0%, but this position is distorted by the GLA
 - However, looking specifically at outer London boroughs, the average grant reduction is 7.9%; only shire councils see a bigger reduction than this.

Settlement Periods and Final Announcement

- 2.7. Whilst the CSR covered a four year period, the LGFS was only expected to cover the first two financial years. Although there were not expected to be any radical changes to the spending plans set out in the CSR, this was dependent on the general economic climate during the initial period. This has not improved as the Government had presumably hoped and expected, which has heightened the prospects for further changes to public sector funding. This now appears not to be the case for 2012/13, but remains a considerable risk for subsequent years. This re-emphasises the need for financial prudence.

- 2.8. The consultation period for the LGFS runs until 16th January. It is anticipated that the final settlement will be announced around 2 weeks after consultation closes – probably too late for inclusion in the February Cabinet report. It will therefore be necessary to update Cabinet at that meeting if there are any material changes to Havering's settlement.

Havering's Grant Funding

- 2.9. The original settlement announced last year gave Havering funding of £56.520m for 2011/12 and £51.357m for 2012/13. This meant that Havering's grant was cut by around £8m in 2011/12, with a further £5m in 2012/13; this equated to a grant cut of around 20% over the two years. The provisional grant figure for 2012/13 has been announced as £51.363m, after adjusting for the Council Tax freeze grant. This is only a marginal change from last year and therefore fully in line with the Council's financial strategy and budget models.

National Position

- 2.10. The starting point for the national position was set out as part of CSR, with an expected equivalent annual grant reduction of 7.1% a year for each of the four years. The 2011/12 settlement showed that, nationally, there were overall reductions of 9.9% in 2011/12, with a further 7.7% in the following year, or 17.6% over the two years. The latest settlement announcement, again taking account of the Council Tax freeze grant, shows total reductions for 2012/13 of 7.3% – a marginal reduction.
- 2.11. For 2012/13, the settlement means that the South East and Eastern regions suffer the greatest losses in Formula Grant, with London and the West Midlands being relatively less affected. Whilst by type of authority, the Shire Districts are the worst affected by the 2012/13 settlement. There is however a bigger impact on outer London boroughs than for inner. It should be noted that the regional effect in London is again dampened by the impact on the GLA, as police and fire authorities are much less affected than other types of authority.

Floors and Scaling Factors

- 2.12. There were major changes to the way in which the floor was determined for upper and lower tier authorities, in order to take into account individual local authorities' reliance on Formula Grant. This introduced four floor levels for both the upper and lower tier authorities, with a further factor to scale grant changes. Havering was placed in the highest band for both years.
- 2.13. To ensure that no local authority has its "Revenue Spending Power" reduced by more than 8.9% for 2011/12 and 2012/13 only, the Government has created a Transition Grant which is in addition to any funding floor. Only 2 London Authorities received the transition grant and Havering was not one of them.

Specific and Area Based Grants (ABG)

- 2.14. As previously reported to Cabinet, there were major changes to the system of specific grants and ABG. This resulted in either the merger of, or in most case, cessation of, funding streams. This was reflected in the Council's budget for 2011/12. A list of the remaining grants is included in Appendix A.
- 2.15. Details of the Dedicated Schools Grant were not announced as part of settlement; these are therefore awaited, and will be included in the February report to Cabinet.
- 2.16. As Cabinet will be aware, details of the Council Tax freeze grant were included in last year's settlement announcement. Whilst this is a base grant, expected to last for the duration of the CSR period, a further announcement was made in late 2011 regarding an additional such grant. This, however, was solely for financial year 2012/13; details were set out in the previous report to Cabinet.
- 2.17. The Government has made it clear that they intend to ensure that council tax payers are protected against Councils that reject the offer of the freeze grant and impose what they consider to be "excessive" council tax rises. They have also confirmed their intention to proceed with the introduction of powers to enable residents to veto council tax rises.
- 2.18. As part of the settlement announcement, a requirement is being introduced for local authorities to undertake referenda should their proposed Council Tax rise exceed a pre-determined level. These levels are:
- 3.5% for most principal authorities;
 - 3.75% for the City of London;
 - 4.0% for the Greater London Authority, police authorities, and single purpose fire and rescue authorities.
- 2.19. Any proposed rise in Council Tax at or above these levels would trigger a local referendum. The outcome is based on a simple majority of those voting, either in favour or against.

Dedicated Schools Grant

- 2.20. As indicated above, the details of the grant funding for 2012/13 were not included as part of the settlement announcement. It is again not expected that the grant figures will differ significantly from those anticipated from last year's grant sum. However, once the grant details have been published, they will be analysed and their impact will be set out in the report to Cabinet in February.

Overall Impact on Havering

- 2.21. The latest announcement shows little change in Havering's funding from that previously included as part of the settlement for 2011/12. This means that the Council's financial strategy remains unaffected, as this level of reduction had

been anticipated, and was reflected in the July 2011 Cabinet report. There have been no further reductions in funding beyond those originally envisaged this time last year. In broad terms, it should not therefore be necessary to seek further savings proposals, at least for 2012/13.

- 2.22. The position beyond 2012/13 has not changed as a result of the latest settlement announcement, with the exception of the existing uncertainty over the change in the funding system. The Council has an overall plan in place, which reflects the expected continuing reduction in local authority funding for 2013/14 and 2014/15. However, the general economic climate, reflected in the Autumn Budget Statement, means that the current period of austerity may need to be extended. This could well impact on funding levels for the remaining years of the CSR period, as well as beyond it.
- 2.23. The situation will therefore be kept under review and, should there be further changes to funding levels, further reports will be brought back to Cabinet at the appropriate time.
- 2.24. The Council is in the process of considering its formal response to the settlement consultation and a copy of the response will be included in the February Cabinet report. A meeting with the Local Government Minister to discuss the settlement and its impact on Havering is also being sought, as happened last year, to ensure that the Council's position is made clear.

3. PROPOSALS – REVENUE BUDGET

- 3.1. In broad terms, the approach adopted by the Council provides for an assessment of the Council's *Living Ambition* priorities in relation to its Medium Term Financial Strategy and corporate goals, and for resources to be allocated to those areas of the highest priority. Whilst the general economic climate and financial outlook have remained highly challenging, the focus of the Council's budget will need to be on significant levels of savings and only any material unavoidable pressures, with little scope for any additional investment. The efficiency savings already identified have the prime objectives of allowing the redirection of resources to areas of higher priority, the preservation of priority services, and the minimisation of the impact of Council Tax on our local community.

Progress with Proposals Already Agreed

- 3.2. As stated earlier in this report, Cabinet previously agreed reports in July 2010 and July 2011, set out a series of proposals designed to bridge the forecast budget gap. These set out proposals totalling around £35m (excluding the Council Tax base effect, which is accounted for separately), spread over financial years as follows:

	2011/12 £m	2012/13 £m	2013/14 £m	2014/15 £m	2015/16 £m
Cumulative Savings	9.5	19.0	32.3	34.6	35.1

- 3.3. Detailed schedules of these proposals were included in the respective Cabinet reports and were subject to formal consultation, including consideration at joint meetings of all Overview & Scrutiny meetings. The more significant items, and progress generally in delivering these savings, are set out in the following paragraphs. This includes a review of progress with savings in the current year.
- 3.4. An analysis of savings by service area affecting 2012/13 is shown in the table below:

	July 2010 £000	July 2011 £000	Total £000
Adults Services	100	1,655	1,755
Children's Services	200	507	707
Customer Services	775		775
Business Systems	100	180	280
Corporate Services	919	2,616	3,535
Place Services	695	860	1,555
Shared Services	1,000		1,000
Total	3,789	5,818	9,607

- 3.5. There were four significant items included within the savings proposals; these are shown in the table below, together with their current progress:

Savings Item	Cabinet Report	Value of 2012/13 Savings £000	Progress
Customer Services Transformation (CST)	July 2010	775	Planned saving from further stages of the CST restructure which are now underway
Property Strategy	July 2010	650	Additional incremental impact arising from the closure of Scimitar House (full year effect), now completed
Internal Shared Services (ISS)	July 2010	1,000	Planned saving from stage 2 of the ISS restructure, details of which were released for consultation in early December
Strategic Provisions	July 2011	1,250	Met through existing provisions for ELWA and freedom passes (as set out in the February 2011 Cabinet report) plus part of the provision for single status/agency workers directive

- 3.6. Work is now well underway to deliver the planned savings for 2012/13. Progress is monitored through each of the Transformation Programme Boards and this is in turn reported to CMT. Service managers are expected to highlight any shortfalls or slippage, and to propose alternatives where these occur. At this stage – and subject to the assessment of the current year,

which is covered later in this report – it is assumed that the full amount of savings will be met. These savings are therefore being built into detailed service budgets accordingly. The overall scale of savings to be delivered is significant, and the Council is actively managing the financial risk.

- 3.7. A similar reporting mechanism has been in place for the current year. Any shortfalls or slippage are also highlighted as part of the revenue monitoring process, and as such, will appear in the revenue monitor report. The majority of the savings are being delivered through service restructures, all of which are either well underway or have been concluded. Both the ISS and CST programmes are very complex, and in the case of the latter, there has been a slippage in delivery of savings in the current year. This is being addressed and is not expected to recur in future years.
- 3.8. Work on delivering the scheduled savings will continue and where possible, these will be delivered earlier than originally planned. The current year's revenue monitor highlights a saving with the budget set aside for the corporate transformation team, as well as a saving within the regeneration service. These, of course, benefit only the earlier year in which they are achieved; there is no ongoing gain as the savings are needed longer term to match the agreed targets.
- 3.9. There is clearly a risk that it will not be possible to deliver the full level of savings already approved by Cabinet. Circumstances are changing all the time and alongside this, so are demand for services and their associated costs. Whilst the budget contains a significant contingency sum, this is designed to address in-year issues, and the sheer scale of the savings proposals and the lengthy period over which they are being implemented – £36m over a 4 year period – mean that some slippage or shortfall is entirely possible. The level of risk is currently being assessed and this will be reflected in the final budget setting report to Cabinet.

Revenue Proposals

- 3.10. Given the financial climate, there has been considerable speculation, within the national and local government press, about the financial climate facing the public sector. There is no doubt the national economy is facing an unparalleled position, and any incoming Government will be faced with hard choices. This has been at the forefront of the budget development process, and as a consequence, there has no scope for any budget growth at all. In reality provision has only been made where there is no other option and the need for the budget adjustment is unavoidable.
- 3.11. A list of three budget adjustment items is set out in Appendix C; these are the only proposed additional items, beyond the agreed schedule of savings already approved by Cabinet and any items of a corporate nature, such as the ELWA levy and freedom pass, which are both covered later in the report. Due account has been taken of the financial position in the current year, which is considered later in this report.

4. CAPITAL PROGRAMME

Background to Current Programme

- 4.1. The Council approved the adoption of an eight year Capital Programme as part of the planning process at its meeting in October 2008. This Programme was based on the gradual move towards the use of prudential borrowing to finance it and provision for this was reflected in the budget proposals. This Programme was subsequently approved by Council in February 2009.
- 4.2. Since that time, there has been a continued hold on interest rates, so borrowing remains relatively inexpensive. However, the generation of capital receipts has not occurred in line with the expected level anticipated in 2008. In addition, it remains the case that the Council's ability to generate receipts is rapidly reducing. It is therefore an increasing risk that receipts will not arise as had been predicted, which means the Programme needs to be kept under constant review to respond to any material change in circumstances.
- 4.3. For the longer term, financing any form of capital programme will almost certainly be heavily reliant on borrowing, although external financing and Section 106 receipts are expected to remain available, if unpredictable. This therefore brings an additional revenue pressure.
- 4.4. For the immediate short term, borrowing will only be used as a last resort. The exception to this will be where a specific business case can be made to finance investment through borrowing, for example where savings or additional income can be generated. Longer term, the Council will be faced with an increasing dependence on borrowing, with the consequent revenue impact this has. Existing forms of external funding, such as TfL grants, are expected to continue, although their longer term existence is uncertain.
- 4.5. The original long term programme was based on a number of assumptions around funding sources, and in particular capital receipts. Both the overall level of spend and the forecast receipts have been kept under review. As a result of that review, adjustments have previously been made to the core programme to bring this in line with the expected duration of capital receipts. However, the risk remains that receipts will not arise as planned, and where these relate to a specific site with a material value, this could adversely impact on the planned programme.
- 4.6. The programme beyond that point is being reassessed against the Government's planned changes to local government funding and this will be considered as part of the budget cycle for 2013/14 and beyond. This will be covered in future reports to Cabinet as part of that year's budget setting process.

Proposed Forward Programme

- 4.7. The Programme – and in particular that part of the Programme funded by the Council's own resources – has therefore been constructed with these factors

in mind. A more detailed Programme is being compiled for 2012/13, and approval to this Programme will formally be sought from Cabinet in February.

4.8. The Programme for 2012/13 comprises two elements; those schemes (including the block sums within the overall Programme) which have already been approved, and a new range of schemes funded from the uncommitted block sums for the year. A detailed schedule of schemes is currently being compiled, and where this has reached a sufficiently advanced stage, will be included in the February Cabinet report. This is to facilitate delivery of those schemes through their early approval through Cabinet and then Council. As part of this process, the overall uncommitted part of the Programme is being reassessed against forecast receipts and other funding streams. The outcome of this will be reflected in the subsequent report.

4.9. A summary is shown in the table below for these elements; this includes any committed capital spend financed through external resources, but excludes the Housing Revenue Account, as this is reported separately to Cabinet:

	2012/13 £000	2013/14 and beyond £000	TOTAL £000
Committed Schemes	20,456	2,851	23,307
Uncommitted Schemes	6,823	13,400	20,223
Total	27,279	16,251	43,530

4.10. The indicative uncommitted core programme now proposed for the 3 years subsequent to 2011/12 is as follows; a summary of this part of the Programme is set out in Appendix B:

	2012/13 £000	2013/14 £000	2014/15 £000	Total £000
Total	6,823	6,800	6,600	20,223

4.11. The overall Programme is broadly balanced, although still heavily reliant on the generation of capital receipts at the appropriate level. This is therefore an area of risk as stated above, and is kept under review as disposals progress. There is a significant amount of spend towards the end of the current programme, as the table above indicates; this currently provides sufficient scope to accommodate a degree of change in the level of receipts generated.

5. CURRENT FINANCIAL POSITION

5.1. As part of its standard business processes, a robust system of budget monitoring is in place to ensure the Council's financial stability. As part of this process, both variances and potential risks are identified and action plans developed to counteract any adverse variances. Reports are considered up the management chain, from cost centre managers through to Heads of Service, and then CMT, individually and collectively, as well as Cabinet Members. High level reports appear on the Council's website. Full reviews of

the financial position are undertaken quarterly, with high risk areas being reviewed monthly. Reports are on an exception basis.

- 5.2. The previous report to Cabinet indicated that an overall underspend of £888k had been identified. The material variances within this forecast were set out in that report. The most current monitoring report is for period 7, October 2011. There has been no significant movement in the position from period 6, so the main variances highlighted to date are as follows:

Service	Issue	Variance £000
Parking	Continued shortfall in Angel Way income levels, season tickets, permits & parking discs	200
Customer Services	Reduction in income from court costs	200
Children's Services	CAMHS commissioned services £360k Children's Placements £612k	972
Asset Management	Romford Market £220k Technical Services £500k	720
Corporate Financial Matters	Underspends on various corporate provisions and additional income and interest £(2,494k) Shortfall on advertising hoarding income £230k	(2,264)

- 5.3. As Cabinet will be aware, the budget includes a Contingency Fund. This is to ensure the Council's budget is robust, and to provide financial stability to enable adverse in-year variances to be overcome. The level of the Fund is reassessed annually as part of the budget-setting process. Allocations from the Fund are generally only made once other measures have been considered, and during the latter part of the year. This is in accordance with practice of previous years. Allocations made later in the year cover those items that cannot be contained within departmental spend, and are generally beyond their local control. The Fund is designed to enable the Council to resolve any in-year issues that cannot otherwise be contained within approved budgets. It is not however available to fund permanent, ongoing changes; these need to be resolved as part of the formal budget-setting process.
- 5.4. Part of the planning process ensures that any in-year variances are fully assessed and taken into account. These issues are therefore being reflected in the approach to 2012/13 and beyond. Each of the variances reported at period 7 has been analysed to determine if any of these have a longer term effect, and therefore need to be considered as a base budget issue for next year. The outcome of this assessment is set out in Appendix D.
- 5.5. In summary, whilst risks remain over income items such as parking and advertising, these are felt to be realisable in the longer term, so have been retained within the base budget. The variances reported within adults are containable in-year and the budget includes continued growth for this area, though this also remains a budget risk. It is not felt that any of these items

require specific provision within the base budget, beyond the two items included in Appendix C, but they will need to be kept under review.

- 5.6. The Appendix includes a small number of positive variances. The majority of these relate to corporate provisions, which are being reflected in the 2012/13 budget, and are thus not otherwise available to offset service spend. The remaining two items are windfall gains, which are neither sufficiently reliable nor robust – especially the gain on interest rates – to be included as permanent, base budget savings.
- 5.7. Whilst the current year position shows a net underspend, this masks a considerable level of adverse variance, around £2.3m for the major items listed in the Appendix. Although this is offset by underspends within corporate provisions and budgets, these are already accounted for within the 2012/13 budget proposals, or are one-off gains that are neither sufficiently reliable nor robust to be included within the longer term base budget position.

6. OTHER KEY MATTERS

Impact of Inflation

- 6.1. As Cabinet will be aware, inflation levels have remained at their lowest point in many years. The 2009 local government pay award saw a rise of around 1%, and further restraint in pay rises, given the economic climate, has continued, with no pay rise at all for 2010 or 2011.
- 6.2. The Government set out its expectation that there will be minimal rises in the public sector as part of the Emergency Budget announcement in June 2010, indicating their expectation that this principle would apply to local government. This has taken the form of a pay freeze for the current year and 2012/13. This has been followed by an announcement, as part of the Autumn Budget Statement, of a further 1% cap on public sector pay for the subsequent two years. Whilst local government pay negotiations are dealt with differently, the Government has made it clear that they expect the sector to comply with these guidelines, and the funding they will provide will be reflective of this. With this in mind, provision has been made in line with the Government's spending plans. There is a risk that the Government will reduce funding in line with the pay cap; further information on this is being sought, although this would not have any effect until 2013/14.
- 6.3. Provision is being made for increases in major contracted services. Broadly, this is 2%, with specific rises being applied dependent on local circumstances. There are exceptions in the case of contracted services within Social Care & Learning and within Streetcare, where rises of 3% are felt to be more appropriate.
- 6.4. Provision has also been made for an increase in fees & charges. Account will, as usual, need to be taken of any fees set statutorily, as these are outside the control of the Council.

Interest Levels

- 6.5. The forecast predicted at the time of setting the 2009/10 budget was that interest rates would fall to 0.5% by March 2009, which subsequently occurred. The financial strategy for the budget for 2010/11 assumed that there would be a recovery in interest levels during that year, and continuing into 2011/12. This has not happened, and therefore the originally planned increase for next year was, as part of the budget setting process for 2011/12, delayed for a further 12 months, ie to 2012/13.
- 6.6. Given that there is no indication of any rise occurring, it is felt prudent to slip the anticipated rise in interest rates a further year, until 2013/14. This will avoid running into the next year with a significant degree of risk, although there has been speculation that interest rates will not, in fact, rise for possibly as much as a further two years. The position will be kept under review.

Concessionary Fares

- 6.7. This has been a major factor in previous years and the previous report to Cabinet highlighted the expected rise in the Council's contribution for 2012/13. Although this increase is within the overall budget allocation for freedom passes, the balance on the provision had already been assumed as a contribution towards the savings targets agreed in July 2011, and as set out in the report to Cabinet in February.
- 6.8. There is thus an additional pressure, originally reported to Cabinet, of around £416k in 2012/13, which will need to be addressed as part of the budget setting process. The subsequent final report on freedom passes shows a slightly reduced rise for Havering for next year of £342k. This area remains a financial risk to all London boroughs as future rises could well be at a similar level.

Pension Fund

- 6.9. The difficulties experienced nationally by pension funds in general, and the Local Government Pension Fund in particular, have been well publicised. The current position, relating to consultation on proposals to change the operation of the existing scheme, was set out in the previous report to Cabinet, and the Council is responding to this. There have been concerns that any savings delivered from changes to the scheme would effectively be taken by the Government, but this fear has recently receded.
- 6.10. Whilst the consultation process is underway, and bearing in mind the proposals within the Hutton report have yet to be addressed, it is proposed to maintain the existing approach. This will ensure that the Council continues to make appropriate revenue contributions for the costs of the scheme. The current annual provision of £500k will therefore be maintained until the outcome of the current discussions becomes clearer.

Social Care Services

- 6.11. Social Care Services remain an area of pressure for the Council. The aging population demographic leads to a projected increase in demand for adult social care. On the Children's side the implications of the Laming report have resulted in additional safeguarding measures being implemented. This is currently coupled with an increase in demand and case complexity.
- 6.12. These issues are reflected in the proposed budget, but due to the fluid nature and high risk will continue to be closely monitored. Provision has been made in the financial strategy for annual growth in the adults social care budget, based on a detailed financial model, which has been subject to a further review to ensure it remains realistic and robust.

Levying Bodies

- 6.13. The levies are part of the Settlement and therefore need to be taken into account when setting the Havering element of the Council Tax. There are a number of levies, but the predominant levy relates to ELWA. The current overall levy budget is around £11.65 million, of which ELWA accounts for £10.9 million.

ELWA

- 6.14. Provision has broadly been made within the MTFS for increases in the ELWA levy of around £1m per annum over the budget window the Council now operates. The Authority considered a report on its financial prospects at its meeting in November. Due account has been taken of the use of one-off receipts in 2012/13. As a result, the expected levy for Havering is now considerably lower, with this now expected to be £11.34m, an increase of £446k. The provisional figures for subsequent years remain in line with the Council's financial strategy.
- 6.15. The result of this is that the estimated levy for next year will now be significantly lower than that for which provision has so far been made. Subject to deliberations by ELWA, due account will need to be taken of this in the Council's own budget setting process. The position for future years remains largely unchanged; the indicative figures are broadly in line with the Council's financial planning.

Other Bodies

- 6.16. Of the remaining levying bodies, for planning purposes, a prudent approach has been taken to the level of increase that might be expected.

London Boroughs Grants Scheme

- 6.17. Reductions in Council contributions to the scheme have previously been reported to Cabinet, and details of the scheme and associated costs for 2012/13 are due to be considered in due course by Council. Based on the

report prepared for the London Councils' Leaders' Committee, this shows a Havering contribution of £377k. The current budget for this stands at £795k, which was the original contribution prior to reductions introduced during 2011, though these were subject to an extended consultation process.

- 6.18. There is thus an overall reduction in Havering's contribution of £418k. Cabinet agreed proposals at its meeting in December to utilise £67k to invest directly in local organisations. The budget adjustments list assumes a corporate saving of £250k will be taken as part of the budget setting process. That leaves a balance of £101k as yet unaccounted for. This will be considered over the coming month as the final figures for the 2012/13 budget are collated for the February Cabinet report.

Business Rates Multipliers

- 6.19. The Government has yet to announce the provisional small business and main non-domestic multipliers for 2012/13, although these usually increase in line with the RPI level in September. The multipliers for the current year are 42.6p and 43.3p respectively.

7. EXPENDITURE RESTRICTIONS AND BUDGET ROBUSTNESS

Expenditure Restriction by Government

- 7.1. The Government has previously stated that it will use its capping powers where necessary. As part of the settlement announcement, following on from previous announcements, a referenda process is now being introduced. The levels at which these would be triggered are set out earlier in this report, and in the Appendix on the settlement. Clearly, those Councils choosing to avail themselves of the Council Tax freeze grant on offer for 2012/13 only will not be affected by this.
- 7.2. The Government has indicated that the referenda process will remain in place for future years, although they have not committed to the actual percentage levels. It would appear likely that these will remain at the levels announced for 2012/13, but this is by no means guaranteed.

Budget Robustness/Reserves Position

- 7.3. The Local Government Act 2003 sets out requirements in respect of Financial Administration, and in particular to the robustness of the budget and the adequacy of reserves. The Act requires the Chief Finance Officer (CFO) to report to an authority when it is making the statutory calculations required to determine its council tax or precept.
- 7.4. In line with the requirements of the Act, the formal report of the CFO on budget robustness will be included in the February Cabinet report. The authority is required to take the report into account when making the calculations.

- 7.5. The General Reserves at 31 March 2011 were £12m. Prior to making a final recommendation to Council, there will also be a need to further consider the current financial position for 2012/13. The MTFs, as agreed by Council, sets out that the minimum level of reserves held will be £10m. There is an opportunity cost of holding reserves, in particular the alternative use that these balances could be put to and the benefits that might accrue as a result. Equally, the importance of retaining sufficient reserves has been emphasised by the position within adult social care services during previous financial years, and particularly so now, with the Council suffering an ongoing reduction in grant funding from Government.
- 7.6. The Council's revenue budget strategy statement requires that:
- While addressing its priorities and setting a balanced and prudent budget, the Council will seek to keep any increase in the Council Tax to the lowest possible level and in line with its stated aspirations whilst maintaining reserves at the minimum level of £10m
 - And as part of that process, the Council will not utilise those reserves, or any reserves earmarked for specified purposes, to subsidise its budget and reduce Council Tax levels as this is neither a sustainable nor a robust approach.
- 7.7. In addition to its general reserves, the Council also holds a number of earmarked reserves. At 31 March 2011, the total value of reserves stood at £38m. Of this, a significant element had been earmarked for the corporate transformation programme, which is delivering much of the savings target agreed by the Council. The vast majority of these funds have now been allocated to programmes and much of this has been expended already in funding programme resources and IT investment, and over an extended period of time, redundancy costs. A further element relates to strategic projects, whilst the remaining reserves cover a variety of purposes. Any reserves utilised as part of the budget-setting process can only be applied once; thereafter equivalent reductions – or increases in Council Tax – would still need to be found.
- 7.8. The current advice of the Group Director Finance & Commerce is that the existing level of general reserves can be considered to be adequate, but issues in previous years over adult social care spend, and the imminent major reduction in grant funding, emphasise the need for prudence with the management of reserves.
- 7.9. The Council's external auditor has in the past emphasised the need for the Council to strengthen its financial health and to build in protection against unforeseen circumstances and to seek advice from the Chief Finance Officer on the adequacy of its working balance level.

8. SUMMARY OF FINANCIAL POSITION

- 8.1. Based on the factors that are set out in this report, the Council is in a strong position to take advantage of the additional Council Tax freeze grant offered by the Government. Assuming that there are no changes in the final settlement, and no other material factors come to light, the budget recommendations to Cabinet and Council in February will reflect this position.
- 8.2. It is, however, recognised that this does bring a degree of risk; taking the grant does mean foregoing an increase in base Council Tax income which can only be recovered by compensating rises in subsequent years. The alternative would be to seek an additional level of savings at the appropriate time. Given the current financial climate, with the prospects for national growth shrinking, and with the Government extending its planned austerity period, holding Council Tax at the current level for a further year is felt to be the approach favoured by our residents. The Administration remains committed to maintaining the stability of the Council's finances and doing everything it can to keep Council Tax rises to a minimum wherever possible.
- 8.3. Adopting this approach would see Havering's Council Tax held at the same level for a second successive year, following a reduction in 2010/11. Owing to the prudent approach adopted and the focus on reducing back-office bureaucracy in order to protect frontline services, the Council is able to recognise the priorities indicated by our residents. This means that:
- The Council can maintain weekly waste collections
 - No libraries have been closed or had their opening hours reduced
 - The Council will continue to invest in roads and pavement repairs
 - Social care support for vulnerable residents can be maintained
 - The Council can continue to prioritise clean streets and a pleasant environment for all.

9. HOUSING BUDGET

- 9.1. Budget discussions with Homes in Havering are currently underway. The HRA budget, together with an updated version of the business plan, and proposed housing rent levels, will be presented to Cabinet in February.
- 9.2. As previously advised to Cabinet, fundamental changes to the housing finance system are in the course of being implemented. These will take effect from April 2012, and are being reflected in the appropriate reports to Cabinet.

10. CONSULTATION

- 10.1. The report to Cabinet in July – which followed a comprehensive survey of nearly 12,000 local residents – was considered further at a special joint meeting of the Overview & Scrutiny Committees and was subject to considerable publicity through the local media and the Council's Living magazine. The responses to this consultation have been taken into account as the detailed proposals have been developed and implemented.

- 10.2. The proposals set out in this report will be publicised through the local media and on the Council's website and responses from residents will be encouraged. In addition, a short survey will be sent to those respondents to the Your Council, Your Say survey who provided the Council with contact details for further information. A further joint meeting of all Overview & Scrutiny Committees is being held on 19th January to invite comments on the detailed proposals now being released for consultation.
- 10.3. We will also write to the local Chamber of Commerce and Federation of Small Businesses to alert them to the budget report and ask for any feedback from the local business community

11. GREATER LONDON AUTHORITY (GLA)

- 11.1. The announcement of the Mayor's draft budget proposals for his 2012/15 financial strategy was awaited at the point of completing this report. It is therefore intended to provide supplementary information to Cabinet once details are available.

12. TIMETABLE

- 12.1. The key dates for consideration of the budget strategy and capital programme are as follows:

Key Tasks	Date
Release of specific proposals taking account of settlement	January Cabinet
Detailed budgets and public consultation consideration	Considered by joint Overview & Scrutiny Committees January
Final Cabinet recommendation to Council taking account of any further issues	February
Council Tax Setting and Corporate Budget Agreement	February

- 12.2. This outline timetable is kept under review to ensure that the budget and policy are fully integrated and reflect community priorities. The timetable may also vary if meetings are changed.

REASONS AND OPTIONS

Reasons for the decision:

This enables the Council to develop its budget as set out in the constitution.

Other options considered:

None. The Constitution requires this as a step towards setting its budget.

IMPLICATIONS AND RISKS

Financial implications and risks:

The Council's budget-setting process will ensure that financial implications and risks are fully met. Any financial implications or risks are covered in this report as necessary. There are significant risks given the continuing degree of uncertainty over the outcome of the LGFS, and the general economic environment, but the steps already taken by the Council should mitigate much of this. It will however be necessary to continually refine the financial forecasts underpinning the Council's budget to ensure that any necessary actions can be taken at the appropriate times, allowing for consultation as appropriate.

Legal implications and risks:

There are no direct legal implications or risks from this report. The corporate business planning process will need to take account of new and existing statutory duties and responsibilities that are imposed on the Council by central government even if there are inadequate or no commensurate increases in government funding to finance them. Failure to do so will put the Council at risk of legal challenge by affected residents or businesses.

Human Resources implications and risks:

There are no direct HR implications arising from this report, however, if proposals that require staffing reductions are to be considered, as a result of the budget position, these will be managed in accordance with Council policy and procedure

Equalities implications and risks:

Detailed proposals will need to be assessed as part of the business and service planning process. Equalities impact assessments are produced as standard as part of the detailed budget process.

BACKGROUND PAPERS

Equalities Impact Assessments for savings proposals.

APPENDICES

- A LOCAL GOVERNMENT FINANCIAL SETTLEMENT
- B CAPITAL PROGRAMME 2012/13
- C BUDGET ADJUSTMENTS
- D ASSESSMENT OF IN-YEAR VARIANCES

GOVERNMENT GRANT & ASSOCIATED MATTERS

LOCAL GOVERNMENT FINANCE SETTLEMENT 2012/13 BRIEFING

1. Introduction

- 1.1. The Department for Communities and Local Government (CLG) issued the final Local Government Finance Settlement before the introduction of the new funding regime on 8th December 2011. This will be the last finance settlement in this form as this will be replaced by a new model of retaining a proportion of locally raised business rates. This briefing note highlights key issues of note and some comparative information.
- 1.2. The figures announced were based on the Formula Grant Distribution (FGD) consultation (which closed on 6 October 2010) and the Spending Review cash limits for local government (outlined in the Spending Review report, which was published on 20 October 2010).

2. The Provisional Settlement – Havering

- 2.1. Havering's grant allocation for 2012/13 will be £54.043m however this figure includes the 11/12 council tax freeze grants therefore comparative grant settlement excluding the council tax freeze grant is £51.363m. This is an increase of £10k from the provisional estimate in provided in 2011/12 due to minor changes due to the affect of the transfers in and formula calculation. The introduction of the council tax freeze grant implies that this could roll into the new model of funding.
- 2.2. Havering's grant entitlement excluding the Council Tax Freeze grant is a cash decrease of £5.169m (9.1%) over the 2011/12 allocation of £56.532m. The headline figure is a reduction (due to the negative grant floor damping of 10.4% and the scaling factor) of £4.6m over 2011/12.
- 2.3. The adjusted Formula Grant figure for 2012/13 for Havering, is shown in **Appendix 1** which provides an analysis of the settlement figures 2011/12 to 2012/13 figures across the four-block model. **Appendix 2** shows the transfers within the formula grant for 2011/12 and 2012/13.

3. The Final Settlement – Nationally

- 3.1. Bob Neill MP announced that Councils will face an average reduction in spending power of 3.3%; and that no local authority would experience a decrease of more than 8.8%. However the average year-on-year reduction is 7.3% once the Council Tax Freeze Grant is stripped out.
- 3.2. The table overleaf shows the changes to the overall level of local government funding between 2011/12 and 2012/13

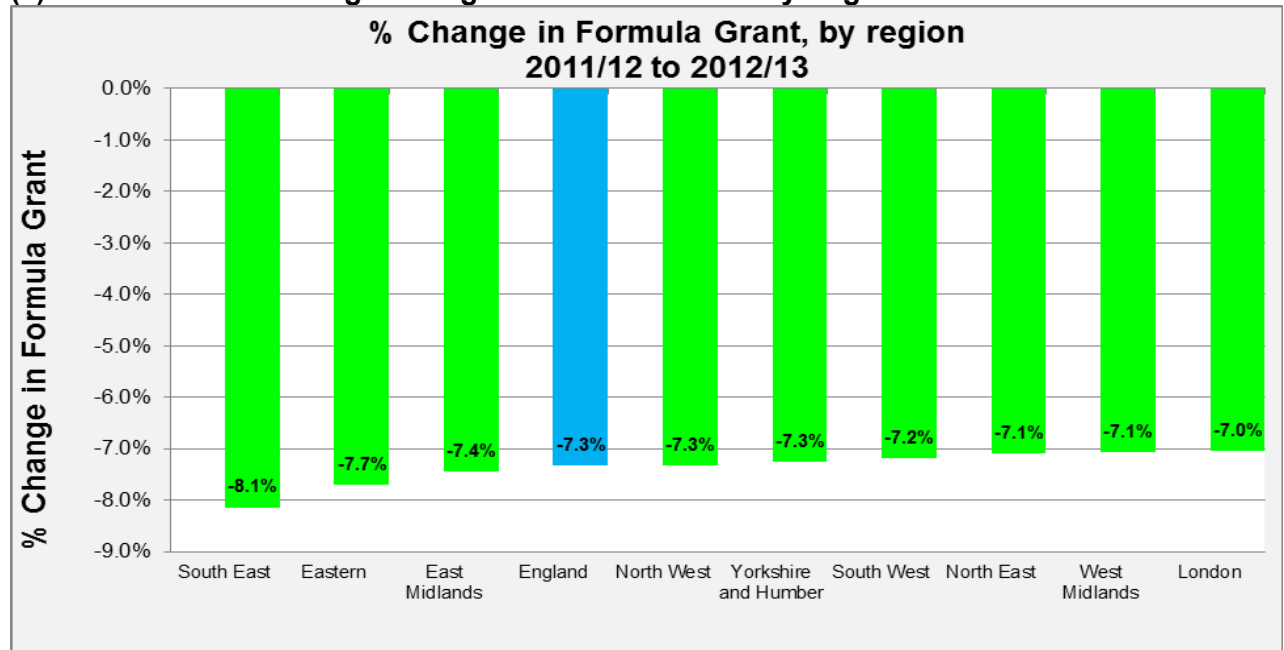
(i) Overall Level of Local Government Funding

	2011/12 Adjusted	2012/13
	£m	£m
Formula Grant	29,289	27,139
£m change on previous year		(2,145)
% change on previous year		(7.3%)

4. The Final Settlement 2012/13 – Regionally

4.1. The 2011/12 change in Formula Grant, by region, is shown in the graph below.

(ii) Provisional Percentage Changes in Formula Grant by Region 2011/12

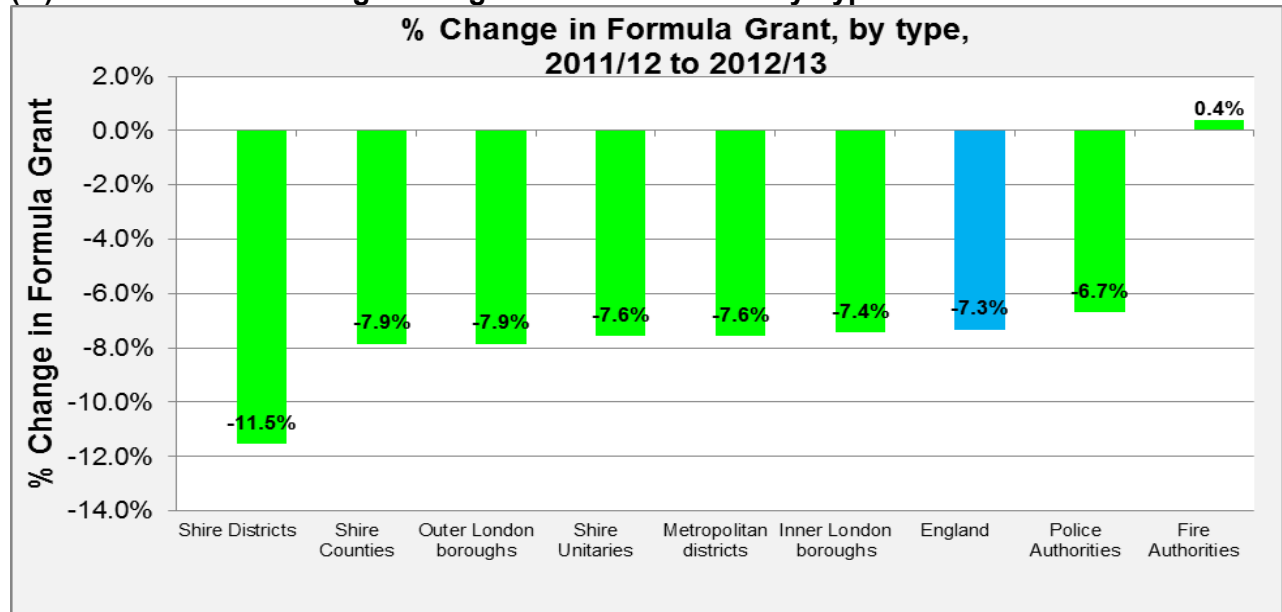


4.2. It can be seen that the South East and Eastern regions suffer the greatest losses in Formula Grant, with London and the West Midlands being relatively less affected.

5. The Provisional Settlement 2012/13 – By Authority Type

5.1. The 2012/13 change in Formula Grant, by authority type, is shown in the graph overleaf.

(iii) Provisional Percentage Changes in Formula Grant by Type 2012/13



5.2. Local government, excluding Shire Districts, there is a decrease in funding of between - 6.7% and -7.9%. The Shire Districts have the most significant funding decrease at - 11.5%.

6. Formula Grant Floors and Scaling

6.1. The cost of guaranteeing the minimum increase in grant continues to be paid for by scaling back the increase in grant for authorities above the floor. As in previous years, the floor damping system is self-financing within each group of authorities i.e. authorities in one group will not cross-subsidise the floor for authorities in another group.

6.2. There has been a change to how the floor is now determined for upper and lower tier authorities, in order to take into account individual local authorities' reliance on Formula Grant. For 2011/12 and 2012/13, there will be four floor levels for both the upper and lower tier authorities.

6.3. The following grant floors have been announced as part of the 2011/12 finance settlement:

(iv) Floors and Scaling Factors

	2011/12		2012/13	
	Floor	Scaling	Floor	Scaling
Education / PSS authorities	(11.3%)	(71.4%)	(7.4%)	(71.7%)
	(12.3%)		(8.4%)	
	(13.3%)		(9.4%)	
	(14.3%)		(10.4%)	
Police Authorities	(5.1%)	(99.9%)	(6.7%)	(99.9%)
Fire & Rescue Authorities	(9.5%)	(34.0%)	(3.4%)	(32.1%)
Shire Districts	(13.2%)	(99.7%)	(11.2%)	(75.1%)
	(14.2%)		(12.2%)	
	(15.2%)		(13.2%)	

	(16.2%)		(14.2%)	
--	---------	--	---------	--

6.4. Within London, only 4 authorities have been set the highest floor of 10.4% these include Havering, Bromley, Kingston-upon-Thames & Richmond-upon-Thames. The table below shows the level of floor for each London Authority:

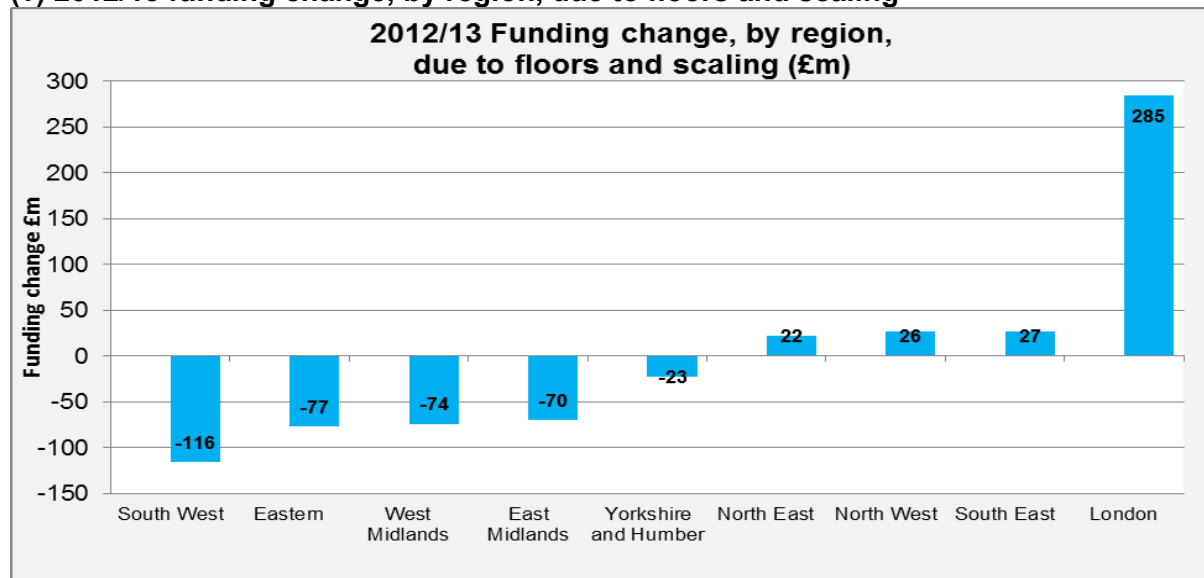
(v) 2012/13 London Authority Floor Levels

Authority % Floor			
7.4%	8.4%	9.4%	10.4%
Camden, Greenwich, Hackney, Hammersmith and Fulham, Islington, Lambeth, Lewisham, Southwark, Tower Hamlets, Wandsworth, Westminster, Barking and Dagenham, Brent, Haringey, Newham, Waltham Forest.	Kensington and Chelsea, Ealing, Enfield.	Barnet, Bexley, Croydon, harrow, Hillingdon, Hounslow, Merton, Redbridge, Sutton.	Bromley, Kingston-upon-Thames, Richmond-upon-Thames, Havering.

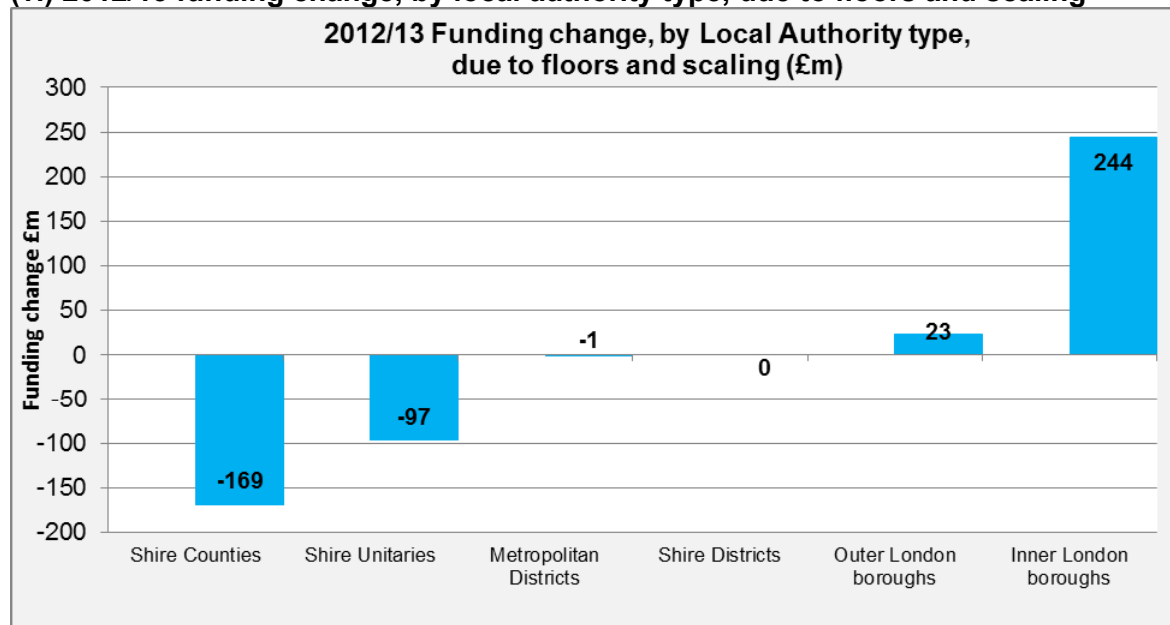
6.5. The government has placed individual local authorities into one of the relevant four floor levels based on an overall ranking, determined by grant dependency, which is defined as the proportion of the 2010/11 budget requirement that was funded through the 2010/11 Formula Grant; and ensuring there are an equal number of authorities in each of the four bands. Havering has been placed in the highest band for both years.

6.6. The graphs below show the level of redistribution, as a result of floors and scaling, by region and authority type.

(v) 2012/13 funding change, by region, due to floors and scaling



(vi) 2012/13 funding change, by local authority type, due to floors and scaling



7. Council Tax Capping

7.1. In his written statement today, announcing the settlement, Bob Neill MP set out the levels of council tax increase above which he intends to require local authorities to seek the approval of their electorate via a local referendum, as follows:

- 3.5% for most principal authorities;
- 3.75% for the City of London;
- 4.0% for the Greater London Authority, police authorities, and single purpose fire and rescue authorities.

8. Grants

8.1. Havering's individual grant allocations for the following specific grants have also been announced and are shown in **Appendix 3**.

- Early Intervention Grant £2.365bn. This grant replaces funding from a number of specific grants that have now ended, including Sure Start Centres and Early Years Sustainability.
- Learning Disability and Health Reform £1.359bn.
- Extending Rights to Free Travel £0.047bn
- Neighbourhood Policing Fund £0.323bn
- Transition Grant £0.020bn
- Preventing Homelessness £0.090bn
- Housing and Council Tax Benefit Subsidy Admin Grant £0.439bn
- Lead Local Flood Authorities £0.036bn

9. Responding to 2012/13 settlement

9.1. The deadline for written responses to the provisional settlement 2012/13 is 5pm on Monday 16th January 2012. Havering's response to the proposed financial settlement will be provided to Cabinet as part of the budget report for the meeting on 16th February, as it will not have been completed early enough for inclusion within the deadline for this January report.

Responses can be:

Emailed to: settlement.consult@communities.gsi.gov.uk

Posted to:

Mr Andrew Lock,
Zone 5/J2
Eland House
Bressenden Place
London SW1E 5DU

GRANT SETTLEMENT 2012/13

HEADLINE FIGURES	Final Settlement 2011/12	Transfers In / Out (1)	Adjusted 2011/12 Settlement	Provisional Settlement 2012/13	Floor increase on the adjusted 2012/13 Settlement	
Havering	£000	£000	£000	£000	£000	%
Relative Needs Formula	52,964		52,964	48,248		
Central Allocation	32,895		32,895	29,441		
	85,859		85,859	77,689		
Less: Relative Resources Amount	(33,126)		(33,126)	(29,968)		
Add: Floor Damping (2)	(3,040)		(3,040)	(3,133)		
Add: Other Adjustments (3)	9,228			6,775		
	(2,389)					
Formula Grant (1)		-585	-585			
Increase in Grant Receivable on Previous Year's Settlement	56,532			51,363	-5,169 on	-9.14% 56,532

Notes

(1) **Transfers In / Out** - these are shown on the appended sheet

- (2) **Floor Damping** - this is the additional resources allocated to Havering to ensure it receives the national minimum increase in grant above the previous year
- (3) **Other** - relates to Local Government Finance amending reports

PROVISIONAL GRANT SETTLEMENT 2011/12 & 2012/13 - TRANSFERS

-	Settlement 2011/12	Settlement 2012/13
	£000	
Bal B/f	55,314	56,532
-	-	-
<u>Transfers Out</u>	-	-
-	-	-
Concessionary Travel	1,158	
Child Death Review Processes	30	
Care Matters White Paper	199	
Mobile Homes Act	1	
Economic Assessment Duty	65	
Adult Social Services	2,965	
Personal Social Services	1,247	
Private Sewers	(94)	(88)
Planning Inspectorate SUDs Appeals Costs	(4)	
Academies	(630)	(497)
Supporting People	3,159	
Housing Strategy for Older People	70	
LSC Staff Transfer	304	
HIV/AIDS	88	
Preserved Rights	656	
Animal Health & Welfare	14	
Total Transfers	9,228	(585)
<u>Redistributed Grants</u>		
Adjusted Grant	64,542	55,947
Reduction in core allocation	(2,581)	(886)
Grants incorporated into formula	(2,389)	(585)
Minus reduction in floor	(3,040)	(3,113)
<u>Provisional Grant</u>	<u>56,532</u>	<u>51,363</u>

UNRINGFENCED GRANTS	Baseline 2011-2012	Provisional 2012-2013	Variance	Notes
Learning Disability Development Grant	7,436,198	7,617,808	181,610	
Early Intervention Grant 11-12 original alloc	8,161,167	8,934,299	773,132	In 2011-12 Extra In year allocs of EIG were £35,733 and £20,000
	15,597,365	16,552,107	954,742	
Local Services Support Grant made up of:				
Homelessness Grant	500,000	500,000	0	In 11-12 figure included £100K for Tenancy Fraud
Extended Rights to Free Travel	46,765	58,019	11,254	Estimate same alloc for 12/13
Flood Funding	132,000	209,500	77,500	
	678,765	767,519	88,754	
New Homes Bonus	396,745	836,738	439,993	Provisional figures published 01/12/11
Transitional Grant	-	-	0	N/A to Havering
Housing Benefits Admin Grant	1,669,241	1,598,621	(70,620)	
TOTAL	18,342,116	19,754,985	1,412,869	
OTHER UNRINGFENCED GRANTS				
Community Safety Funding	220,194	132,116	(88,078)	Late notification for 2011-12 - Provisional - expecting 40% down on 11/12 (Could hear January 12)
Council Tax Freeze Grant	2,679,701	2,679,701	0	Per Settlement 08/12/11
NHS Grant	2,666,829	2,553,118	(113,711)	Per Settlement 08/12/11
TOTAL	23,908,840	25,119,921	1,211,081	

CAPITAL PROGRAMME 2012/13

Uncommitted Core Programme

	2012/13 £000	2013/14 £000	2014/15 £000	Total £000
Parks, Libraries, Leisure, Cemeteries (1)	415	1,000	1,000	2,415
Information Technology	1,500	1,000	800	3,300
Street Environment	2,000	2,000	2,000	6,000
Education	1,900	1,900	1,900	5,700
Management of Assets and Health & Safety	500	500	500	1,500
Housing	208	0	0	208
Regeneration (1)	0	100	100	300
Disabled Facilities Grant	300	300	300	900
Total	6,823	6,800	6,600	20,223
Note 1 : elements of these forward programmes are included within the Committed Programme, £585k and £100k respectively				

PROPOSED BUDGET ADJUSTMENTS

Item Number	Adjustment Item	Service Area	Description and Implications	Value £000
Budget Additions – Income Items				
1	Market Income	Romford Market	Current economic climate means it is highly unlikely the target level of income can be achieved	200
2	Fees	Technical Services	There has been a continued reduction in fees arising from works which has impacted adversely on the trading position	250
Budget Reductions				
3	London Borough Grants Scheme	Corporate	Reduction in corporate contribution to London-wide scheme following decisions by London Councils on overall funding strategy	(250)

ASSESSMENT OF IN-YEAR VARIANCES

The period 6 monitoring report identifies a number of variances and as part of the budget-setting process, these have been analysed to determine whether there is any potential ongoing impact on 2012/13. This analysis is set out below:

Directorate	Current Forecast Outturn Variance £'000	Major Elements of Variance £'000	Impact on Future Budgets
Culture & Community	304	Parking £200k	In-year variance, steps in hand to increase income. Area remains volatile however. Increased risk of future savings delivery
		Court costs £200k	These costs are generally absorbed within the overall costs of benefits administration and, subject to no change in the funding base, this should be achieved in future years
Social Care & Learning	295	CAMHS £360k	Revisions to the service structure are being planned to eliminate this variance, although these may not be implemented until into 2012/13
		Children's Placements £612k	Likely to remain a variance owing to numbers and cost of care packages
		Catering £(400k)	Trading activities have proved to be particularly favourable this year, however, this is a volatile area and it is not felt prudent to rely on this as base income
Finance & Commerce	(2,264)	Freedom passes and corporate provisions £(1,244k)	Freedom pass and ELWA elements reflected in future savings from corporate provisions. Insurance provision has been applied against advertising as stated below
		Central transformation team £(500k)	Likely to recur in 2012/13, may be required to fund overall transformation

Directorate	Current Forecast Outturn Variance £'000	Major Elements of Variance £'000	Impact on Future Budgets
			programme. Already included as full saving in 2013/14
		Advertising hoardings £230k	Plans being developed to generate income but remains an area of risk; has been historically offset against the insurance provision
		Increased income and interest £(750k)	One-off gains, not sufficiently robust to include within base budget. Income is heavily dependent on volumes, which are volatile. Budget assumed rise in interest rates, this has been deferred as indicated in body of report
		Technical Services £500k	Savings delivered in 2011/12 following restructure. Continued reduction in workload means the fees income target is unlikely to be realised. Included in budget adjustments schedule
		Romford Market £220k	The current economic environment is impacting on usage levels and demand has fallen, leading to a reduction in income, which is not likely to be recouped for the foreseeable future. Included in budget adjustments schedule
Assistant Chief Executive	(54)	No material variances	Not applicable
Revenue Total	(888)		

This page is intentionally left blank

CABINET

REPORT

Subject Heading:	Extension of Council's Insurance Contract
Cabinet Member:	Cllr Roger Ramsey
CMT Lead:	Andrew Blake Herbert – Group Director Finance & Commerce
Report Author and contact details:	Vanessa Bateman – Internal Audit & Corporate Risk Manager ext 3733
Policy context:	Contract Extension
Financial summary:	Value of extension is £2.9m
Is this a Key Decision?	YES
Is this a Strategic Decision?	NO
When should this matter be reviewed?	January 2012
Reviewing OSC:	n/a

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

Ensuring a clean, safe and green borough	□
Championing education and learning for all	□
Providing economic, social and cultural activity in thriving towns and villages	□
Valuing and enhancing the lives of our residents	□
Delivering high customer satisfaction and a stable council tax	X

SUMMARY

- 1.1 This report informs members regarding the options available to the Council when the main insurance contract expires at the end of December 2012. It is proposed that the current contract is extended for two years from that date and approval is sought for this action.

RECOMMENDATIONS

- 1.2 It is recommended that Cabinet:
1. Note the options considered.
 2. Approve the two year extension to the contract with Zurich Municipal from 1 January 2013.
 3. To note the savings achieved and how this expenditure will be redirected.

REPORT DETAIL

- 1.3 In September 2007, following an EU rules compliant tendering exercise; Cabinet approved the award of the main insurance contract to Zurich Municipal. The contract was for the period of five years with the option to extend for up to a further five years.
- 1.4 The insurance contract provides cover over a range of classes including property, motor liability and other classes, including an element of self funding and the claims handling function linked to this.
- 1.5 The estimated value of the Insurance Contract is £1.5m annually.
- 1.6 In the current economic climate there have been a number of discussions across public sector bodies and including insurance providers about how organisations can save money on insurance. There are clear messages from the Insurance Companies that robust Risk Management arrangements are critical to ensuring a good claims history and therefore securing value for money and that this is where organisations should focus their attention.
- 1.7 Risk Management benchmarking exercises score LB Havering favourably against other Boroughs in the surrounding area. Since April 2011 the Insurance Service has been moved to be part of the Audit and Risk Service with the aim of aligning these two Risk Management activities more closely. Projects to consider the risks of the authority are underway and dialogue

with the Insurance Company around risk is on-going and does not just take place at times of renewal or contract extension.

1.8 The research conducted to inform this decision has also highlighted that competition between insurers could be increased by breaking up the main policy into smaller lots and therefore welcoming in more specialised insurance companies. This is an option that will be considered for the future; however costs of administering policies across more than one organisation must also be evaluated.

1.9 The original contract term expires at the end of December 2012. The options therefore available to the Council are to extend for a period of up to five years, in line with the previous decision by Cabinet, or to retender the insurance contract.

1.10 The following steps have been taken to gather information on which to base an informed decision:

1. Negotiations with Zurich Municipal regarding benefits from extending; and
2. Advice from the Council's Insurance Broker regarding market conditions.

1.11 It has been negotiated with Zurich Municipal that rates will be guaranteed for two years following the extension (01.01.2013 to 31.12.2014), with the exception of the rechargeable policies where cover is arranged by the council and recharged to another party and non premium based services i.e. Claims Handling Fee (£80k) and Statutory Inspection Service for Engineering Plant and Lifts (£50k). A 5% reduction in rates will also be applied from 01.01.12, a year prior to the end of the current contract period. This equates to an annual revenue savings value of approximately £50k.

1.12 The Council's Insurance Broker, Jardine Lloyd Thompson, has provided a report which concluded that:

"Whilst there is still little evidence of increased rates filtering through into quotation terms at tender, it is fully expected that this is likely to happen at some point during 2012. As a result of this, Insurers are pricing cautiously. However, we are also seeing a trend of insurers showing a keenness to hang onto to business which is profitable and running well. As such, our expectations from insurers offering extensions would be for the terms to at the very least be the same as expiring.

Zurich Municipal have offered to reduce current rates by 5% of the final year of the initial period on the long-term agreement in return have requested confirmation that the option to exercise an extension is granted.

Recent tender results have shown that portfolios that are performing well are achieving stable rates and small reductions. London Borough of Havering continues to be a good risk and should we go to tender, we would anticipate being able to generate a good spread of quotations. However, given our earlier commentary as regards changing rates and our thoughts with

regards to 2012, we would feel unable to be as conclusive about making a recommendation for tender next year, particularly given that an offer of guaranteed reduced rates has been put forward”.

- 1.13 The report recommended the Council:
1. Ensures the extension is in line with the terms of the original tender;
 2. Considers the risk in accepting a deal in excess of the period that rates are guaranteed for;
 3. Further negotiates with Zurich Municipal in order to extend the rate guarantee for as long as possible into period of the contract extension; and
 4. Sends a letter to Zurich Municipal explaining the precise terms and basis of the acceptance of the extension when accepting the deal offered by them.
- 1.14 Recommendations 1 – 3 have been accepted and completed and 4 will be completed following approval of the decision by Cabinet. The outcome of recommendation 3 was to secure an additional year of guaranteed rates.
- 1.15 The estimated value of the two year extension is £2.9m.

REASONS AND OPTIONS

Reasons for the decision:

- 1.16 The option to extend for two years was chosen as rates would be guaranteed for the whole duration of the extension; the 5% reduction in rates provides savings before the end of the contract.
- 1.17 The quality of the service provided by Zurich Municipal is considered to be very good and strong and effective working relationships exist.
- 1.18 It is advantageous to have consistency in Insurance providers as there is a significant resource cost in tendering and in transferring insurers should an alternative provider or providers be selected.
- 1.19 Risk Management activities including projects to consider risk tolerance and appetite, future insurance needs of services and the costs/benefits of tendering smaller lots need to be explored more fully before we go back to the market and tender.

Other options considered:

- 1.20 The option to extend for one year was disregarded as this did not give sufficient negotiating advantages.

- 1.21 The option to extend for three plus years was disregarded because rates would not be guaranteed and the market conditions are hard to predict. Extending for two years would not prevent the Council negotiating a further extension, up to the five year term originally tendered, if this was considered at the time to be the best action.
- 1.22 The option to retender was disregarded due to the cost of the exercise and the market information provided by the broker.

IMPLICATIONS AND RISKS

Financial implications and risks:

The estimated value of contract 2008-2012 is £6.6m and the estimated value of extension is £2.9m. The estimated annual saving from the extension is around £50k.

There exists a need to carry out annual property surveys, for which there is no existing permanent budget, so it is planned that this saving will be used to create that budget – having better property information in turn lessens the risk of claims which should in turn bring down our premiums, hence the logic to deploying the saving in that way.

There are risks of not going to market as well as of accepting the extension offer and a cost of going to market. These risks relate in main to the potential to secure further reductions in rates for the period of the extension and the fact that the market conditions may deteriorate during the extension and make securing favourable rates for the future more of a challenge.

However on balance, the view is to maintain the existing contract on the reduced rates negotiated.

Legal implications and risks:

Under the Contracts Procedure Rules extensions to existing contracts are generally not permitted unless certain exceptions apply. In the circumstances of this extension the exceptions are that (1) value for money can be demonstrated, (2) the extension is for the same or a lesser value and period than the original contract (which is clearly the case), and one of three different conditions apply. The most relevant additional condition in this case is that the possibility of an extension was included in the original tender documentation. It is understood that there is evidence that the possibility of such an extension was so included. Therefore if Cabinet is satisfied that value for money can be demonstrated by the two year extension, rather than retendering the contract, then the legal risks of any successful challenge to the award should be minimal.

Human Resources implications and risks:

There are no human resource implications or risks arising directly from this report.

Equalities implications and risks:

There are no equalities implications or risks arising directly from this report.

BACKGROUND PAPERS

Insurance Programme Extension Review for London Borough of Havering Jardine
Lloyd Thompson

September 2007 Cabinet Report

<h2 style="margin: 0;">CABINET</h2> <p style="margin: 0;">18 JANUARY 2012</p>	<h2 style="margin: 0;">REPORT</h2>
<p>Subject Heading:</p> <p>Cabinet Member:</p> <p>CMT Lead:</p> <p>Report Author and contact details:</p> <p>Policy context:</p> <p>Financial summary:</p> <p>Is this a Key Decision?</p> <p>Is this a Strategic Decision?</p> <p>When should this matter be reviewed?</p> <p>Reviewing OSC:</p>	<p>Disposal of Under Utilised Sites within the Housing Revenue Account Councillor Roger Ramsey, Cabinet Member for Value</p> <p>Andrew Blake-Herbert, Group Director, Finance & Commerce</p> <p>Garry Green, Property Strategy Manager e-mail: garry.green@havering.gov.uk tel: 01708 432566</p> <p>The criteria for retaining ownership of land and property assets is set out in the 2010-2011 Corporate Asset Management Plan</p> <p>The disposal of the properties identified in this report would generate capital receipts that would accrue interest until they were used to deliver the capital programme</p> <p>Yes</p> <p>No</p> <p>Not Applicable</p> <p>Value</p>

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

Ensuring a clean, safe and green borough	[X]
Championing education and learning for all	[X]
Providing economic, social and cultural activity in thriving towns and villages	[X]
Valuing and enhancing the lives of our residents	[X]
Delivering high customer satisfaction and a stable council tax	[X]

SUMMARY

- 1.1 At various occasions over the last few years Cabinet approval has been given to the disposal of a number of Council owned sites that had been identified as surplus either as a result of specific projects or more general property reviews carried out by Strategic Property Services. More specifically, at various occasions, approval has been given to the disposal of a number of small, under-utilised sites held within the Housing Revenue Account (HRA) and these disposals have resulted in an increased flow of affordable houses and capital receipts. A further review of potentially under-utilised sites within the HRA has been carried out and more potential disposal/development opportunities have been identified.
- 1.2 As the Council has pursued a policy of selling surplus sites for many years it becomes more difficult to identify new sites for disposal that do not pose challenges, either technically or in terms of planning, and especially in respect of objections to disposal that arise in many cases. Nonetheless, constant and ongoing appraisal of property assets to identify disposal opportunities is a requirement on all local authorities and at Havering is essential in providing capital receipts to fund spending to support and enhance Council services.
- 1.3 This report identifies further sites that do not appear to meet the Council's approved criteria for property ownership and therefore need to be considered for disposal.

RECOMMENDATIONS

- 2.1 **That the properties identified in this report (details of which are shown in Appendix 1) be declared surplus and authorisation be given for their disposal (subject to obtaining any necessary planning permissions and other consents as appropriate) and that the Property Strategy Manager in consultation with the Assistant Chief Executive (Legal and Democratic Services) be authorised to deal with all matters arising and thereafter to complete the disposal of the properties identified.**

REPORT DETAIL

- 3.1 Over the last few years the Cabinet has considered several reports that dealt with the results of a number of systematic property reviews and service led projects that identified surplus property assets.

Following this consideration approval has been given to a number of property disposals.

- 3.2 One of these ongoing, systematic reviews has considered relatively small, under used sites that are often found within the residential estates held within the Housing Revenue Account. On 16 September 2009 Cabinet approval was given to the disposal of a number of these sites. The report identified 84 sites and noted that many of them attract anti-social behaviour, make a very limited contribution to the area and are under used. The disposal programme arising from this approval has progressed well.

Contracts for sale have been exchanged with Registered Social Landlords who have made planning applications. As a result, 84 new dwellings have been approved with a further 38 dwellings being considered by the planning department presently. Through this route the problems that these small sites sometimes cause is removed, a capital receipt is secured and, in these cases, the supply of affordable housing has been increased.

- 3.3 The review process in respect of such sites is ongoing and a further number of potential disposal/development opportunities have been identified. These are set out in Appendix 1.
- 3.4 As reviews of this type proceed it is the case that the opportunities identified tend to become more challenging with the increased risk of a sale not proceeding to completion as a result of market conditions, technical difficulties, planning issues or objections to the principle of disposal. Nonetheless, constant and ongoing appraisal of property assets to identify disposal opportunities is a requirement on all local authorities and, especially in this case, is essential to address existing issues and to provide capital receipts to fund spending to support and enhance Council services.
- 3.5 From a policy perspective the Council's Asset Management Plan states that land and property assets should only remain in Council ownership if they:
- need to be retained in Council control for the provision of services
 - are of great value to the Council, community and other stakeholders and are in need of the degree of protection from development or other uses afforded only by ownership
 - are investment properties providing a financial return that can fully satisfy relevant investment criteria
- 3.6 The individual data sheets on each site provide site details and indicate that none of the sites currently appear to meet any of these criteria. Consequently, disposal should be considered.

REASONS AND OPTIONS

4 Reasons for the decision:

- 4.1 In order to improve the efficiency of the Council's portfolio of land and property assets and to generate further capital receipts it is important to ensure that surplus assets continue to be identified for disposal.

5 Other options considered:

- 5.1 If these sites are not sold, the most likely alternative is that they remain in their current use or will remain vacant. Any other alternatives are identified in the individual appendices for each site.
- 5.2 If the sites are not sold it is likely that the capital programme will have to be reduced or funded from borrowing which will incur additional revenue costs.

IMPLICATIONS AND RISKS

6 Financial implications and risks:

- 6.1 Proceeds of sale from the disposals identified in this report have been highlighted as potential receipts within the capital programme and are required to match the existing strategy.
- 6.2 Disposing of the sites would generate capital receipts that would accrue interest until they were used in the capital programme.
- 6.3 Interest on the receipts identified will be dependent on the timing and size of the receipt but will be available until the receipt is used for capital purposes.
- 6.4 Capital presale expenses up to the allowable maximum will be offset against the capital receipt. Any costs over and above this, or of a revenue nature will be met through the prioritisation of existing resources.
- 6.5 Where appropriate other financial implications are highlighted on the individual appendices that deal with each of the proposed disposals.
- 6.6 There is a risk that the disposal proceeds may be less than anticipated or that additional pre sale expenses may be identified in which case the Property Strategy Manager would reconsider the position in consultation with the Cabinet Member for Value.

7 Legal implications and risks:

- 7.1 There are no direct legal implications in the property review itself or in identifying that certain properties are potentially surplus to the Council's requirements and can be sold.
- 7.2 The legal implications for each individual disposal will be considered on a site by site basis as they are brought to the market.

8 Human Resources implications and risks:

- 8.1 The report deals with the disposal of surplus land and buildings and therefore has no direct Human Resources implications or risks

9 Equalities implications and risks:

- 9.1 The report deals with the disposal of surplus land and buildings and therefore has no Equalities or Social Inclusion implications or risks.

BACKGROUND PAPERS

None

This page is intentionally left blank

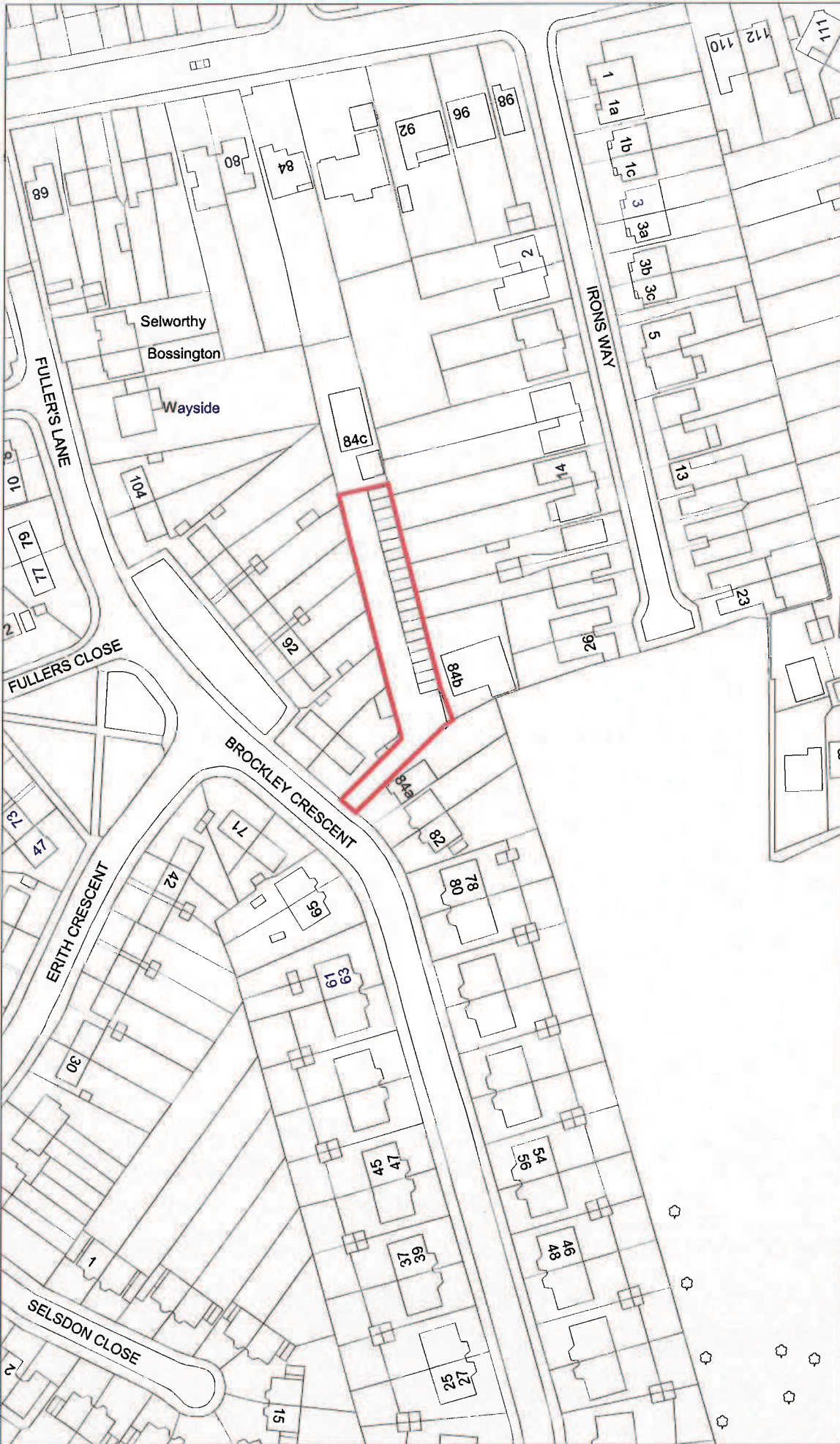
PROPOSED DISPOSALS

REF	SITE
A1	<p>Brockley Crescent</p> <p>Site of 20 garages surrounded on all boundaries by residential housing and providing access to 2 adjoining dwellings.</p>
A2	<p>Chelmsford Drive</p> <p>Site of 12 garages surrounded by residential housing and access land.</p>
A3	<p>Cooks Close</p> <p>Site consisting of 18 garages surrounded residential housing and Lawns Recreation Ground.</p>
A4	<p>Daventry Road</p> <p>Site of 16 garages surrounded by residential housing.</p>
A5	<p>Dewsbury Road</p> <p>Site consisting of Scout hall, former horticultural hall and garage site of 26 garages.</p>
A6	<p>Kilmartin Way</p> <p>Site consisting of 15 garages.</p>
A7	<p>Navarre Gardens</p> <p>Site of 10 garages which connects to an additional garage area and is set within a residential area.</p>
A8	<p>Penn Gardens</p> <p>Site of 3 garages set between residential housing.</p>
A9	<p>Quarles Close</p> <p>Site of 18 garages surrounded by residential houses and flats.</p>
A10	<p>Tempest Way</p> <p>Site consisting of 17 garages surrounded by residential housing.</p>

A11	Vanguard Close Site consisting of 12 garages surrounded by residential houses and flats.
A12	Vernon Road Site consisting of 15 garages close to disused Council depot site.
A13	Victory Way Former garage site consisting of 41 garages which have now been demolished.

**BROCKLEY CRESCENT GARAGE SITE,
COLLIER ROW**

Housing Revenue Account or General Fund	Housing
Site Area (acres)	0.21 acres
Description	Garage site consisting of 20 garages
Current Use	As above
Site Details	<p>Description</p> <p>The site consists of 20 garages. The Housing department advise that only 2 are let and occupancy levels have been low for at least 3 years.</p> <p>Access to the site is obtained directly from Brockley Crescent.</p> <p>Principle of Development</p> <p>Planning and access issues have been considered by the relevant Officers. The site has no designation in the Local Development Framework. As such, residential use may be acceptable in principle subject to justification for the loss of parking. It should be noted, however, that it will be necessary for the individual characteristics and constraints of the site to be considered in the context of a development scheme before the planning position can be finally determined.</p> <p>Legal Title</p> <p>The site is registered in part to the Council presently with the remainder of the site in the process of registration. There are no covenants that would preclude development. Part of the land is subject to a formal right of way.</p> <p>Other</p> <p>The site provides access to adjoining properties. It is recommended that the disposal proceeds subject to the existing constraints.</p>



Strategic Property Services

Tollgate House
96-98 Market Place
Romford
RM1 3ER

Telephone: 01708 434343

email: propertyservices@havering.gov.uk
Internet: www.havering.gov.uk

© Crown Copyright. All Rights Reserved.
London Borough Of Havering.
Licence No: 100024327

Based upon Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationary Office © Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings.

This Drawing shall not in any way be used or reproduced without the Prior Permission Of Strategic Property Services.

All Dimensions are to be checked on site prior to commencement of work & any discrepancies reported to Strategic Property Services.

Do not scale, work only to figured dimensions.

No	Revisions	Int	Date



Job Title:
Brockley Crescent Garages

Drawing Title:
Site Plan

Drawn By:
nt

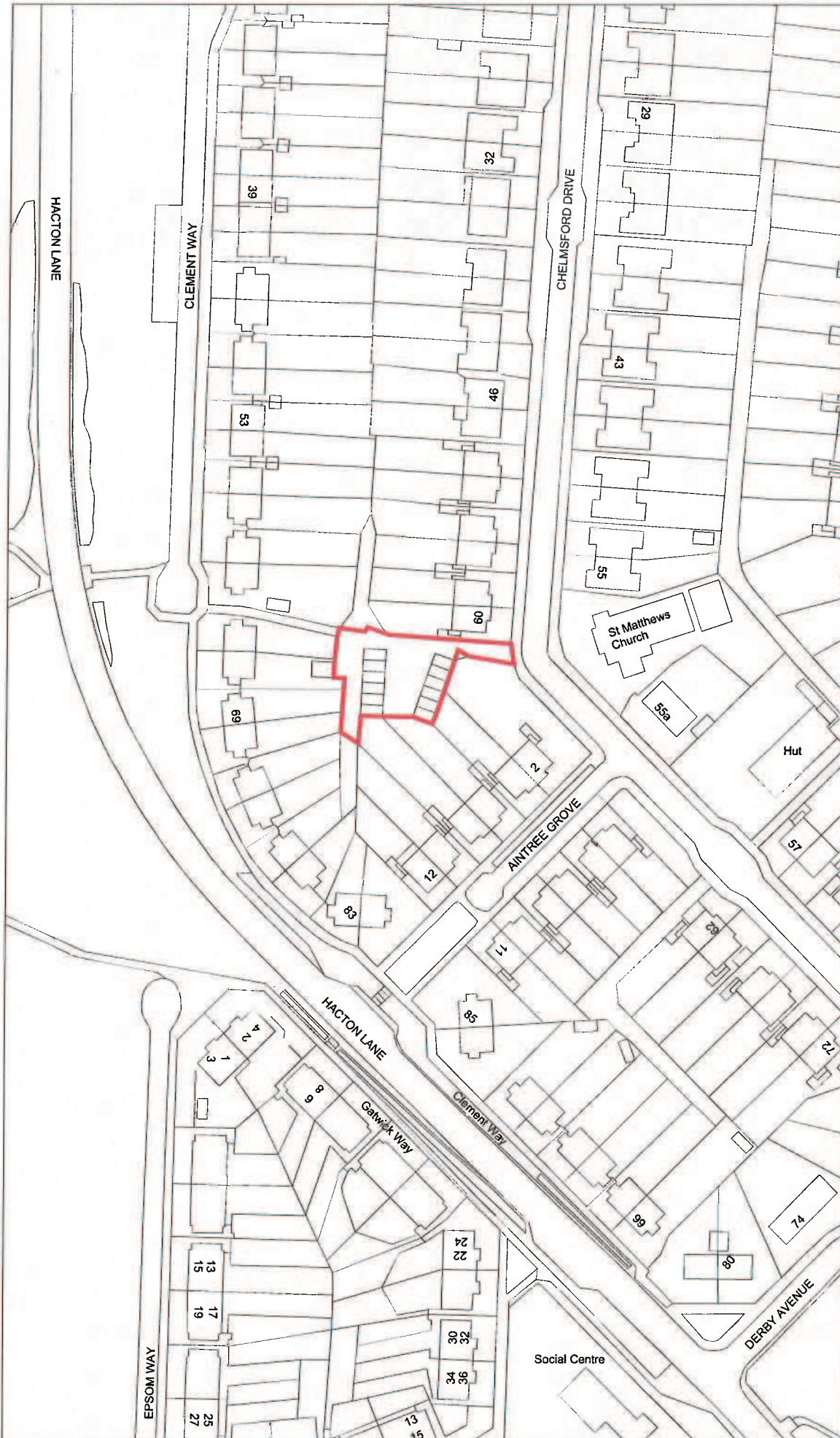
Scale:
1:1250 @ A4

Date:
December 2011

Drawing Number:
sps1341

**CHELMSFORD DRIVE GARAGE SITE,
UPMINSTER**

Housing Revenue Account or General Fund	Housing
Site Area (acres)	0.18 acres
Description	Garage site consisting of 12 garages
Current Use	As above
Site Details	<p>Description</p> <p>The site consist of 12 garages. The Housing Department advise that only 4 are let presently and there is alternative provision available for all tenants on Hacton Parade.</p> <p>Access to the site is obtained directly from Chelmsford Drive.</p> <p>Principle of Development</p> <p>Planning and access issues have been considered by the relevant Officers. The site has no designation in the Local Development Framework. As such, residential use may be acceptable in principle subject to justification for the loss of parking. It should be noted, however, that it will be necessary for the individual characteristics and constraints of the site to be considered in the context of a development scheme before the planning position can be finally determined.</p> <p>Legal Title</p> <p>The site is registered in part to the Council presently with the remainder of the site in the process of registration. There are no covenants that would preclude development.</p> <p>Other</p> <p>The site provides access to adjoining properties. It is recommended that the disposal proceeds subject to the existing constraints.</p>




Havering
LONDON BOROUGH

Strategic Property Services

Tollgate House
 96-98 Market Place
 Romford
 RM1 3ER

Telephone: 01708 434343
 email: propertyservices@haverling.gov.uk
 Internet: www.haverling.gov.uk

© Crown Copyright. All Rights Reserved.
 London Borough Of Havering.
 Licence No: 100024327

Based upon Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationary Office © Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings.

This Drawing shall not in any way be used or reproduced Without The Prior Permission Of Strategic Property Services.

All Dimensions are to be checked on site prior to commencement of work & any discrepancies reported to Strategic Property Services.

Do not scale, work only to figured dimensions.

No	Revisions	Int	Date





Job Title:
 Chelmsford Drive Garages
 Hornchurch

Drawing Title:
 Site Plan

Drawn By:
 nt

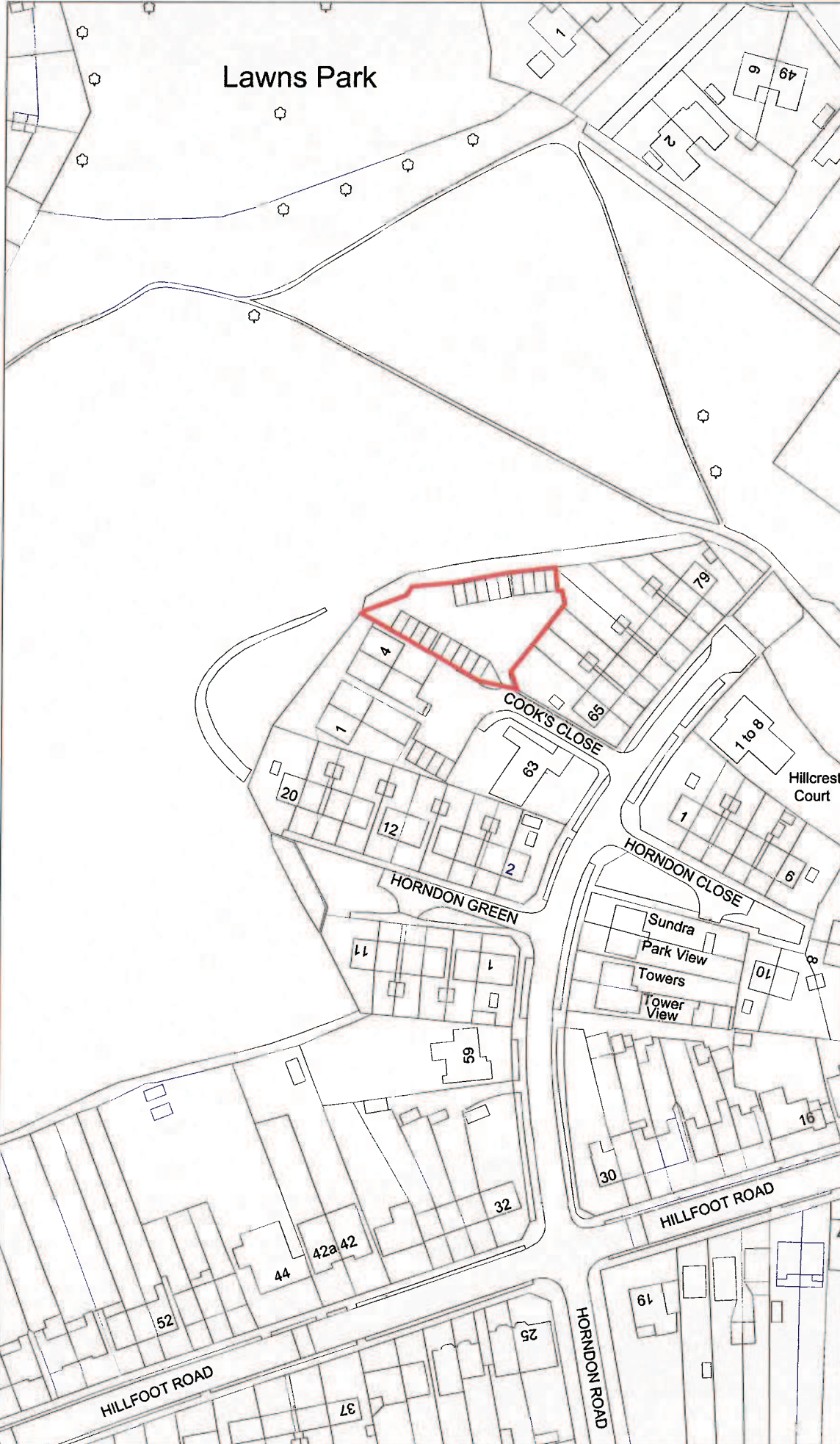
Scale:
 1:1250 @ A4

Date:
 December 2011

Drawing Number:
 sps1342

**COOKS CLOSE GARAGE SITE,
COLLIER ROW**

Housing Revenue Account or General Fund	Housing
Site Area (acres)	0.32 acres
Description	Garages
Current Use	As above
Site Details	<p>Description</p> <p>The site consists of 18 garages. The Housing department advise that 11 are let and some alternative provision is located at Mowbrays Close.</p> <p>Access to the site is obtained from Cooks Close.</p> <p>Principle of Development</p> <p>Planning and access issues have been considered by the relevant Officers. The site has no designation in the Local Development Framework. As such, residential use may be acceptable in principle subject to justification for the loss of parking. It should be noted, however, that it will be necessary for the individual characteristics and constraints of the site to be considered in the context of a development scheme before the planning position can be finally determined.</p> <p>Legal Title</p> <p>The site is registered to the Council and there are no covenants that would preclude development. Part of the land is subject to a formal right of way.</p> <p>Other</p> <p>The site provides access to adjoining properties. It is recommended that the disposal proceeds subject to the existing constraints.</p>



Lawns Park



Strategic Property Services

Tollgate House
96-98 Market Place
Romford
RM1 3ER

Telephone: 01708 434343

email: propertyservices@havering.gov.uk
Internet: www.havering.gov.uk

© Crown Copyright. All Rights Reserved.
London Borough Of Havering.
Licence No: 100024327

Based upon Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationary Office © Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings.

This Drawing shall not in any way be used or reproduced Without The Prior Permission Of Strategic Property Services.

All Dimensions are to be checked on site prior to commencement of work & any discrepancies reported to Strategic Property Services.

Do not scale, work only to figured dimensions.

No	Revisions	Int	Date



Job Title:
Cooks Close/Horndon Road
Collier Row

Drawing Title:
Site Plan

Drawn By:
nt

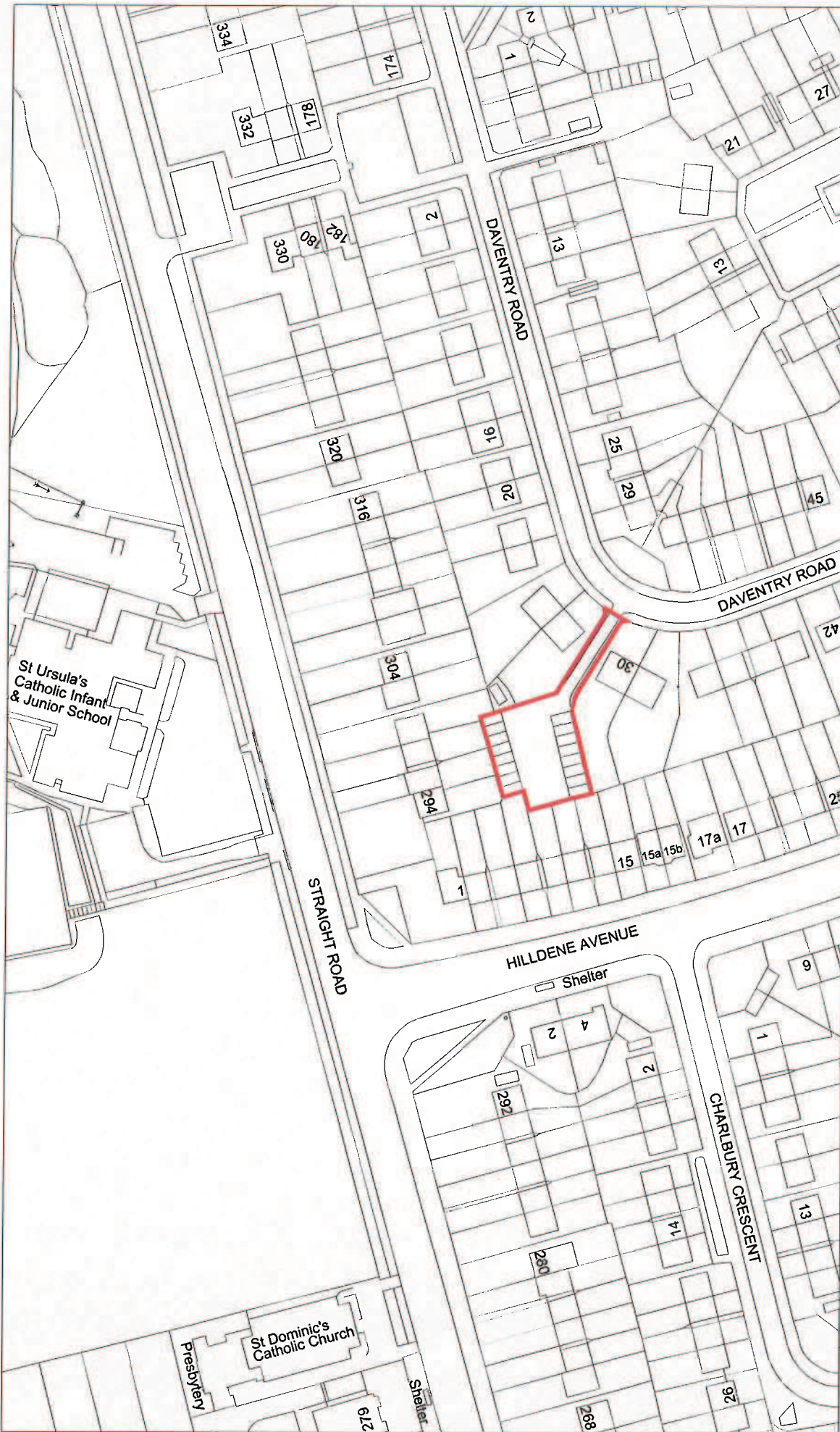
Scale:
1:1250 @ A4

Date:
December 2011

Drawing Number:
sps1343

**DAVENTRY ROAD GARAGE SITE,
HAROLD HILL**

Housing Revenue Account or General Fund	Housing
Site Area (acres)	0.14 acres
Description	Garage site consisting of 16 garages
Current Use	As above
Site Details	<p>Description</p> <p>The site consists of 16 garages. The Housing department advise that none are in use presently.</p> <p>Access to the site is obtained directly from Daventry Road.</p> <p>Principle of Development</p> <p>Planning and access issues have been considered by the relevant Officers. The site has no designation in the Local Development Framework. As such, residential use may be acceptable in principle subject to justification for the loss of parking. It should be noted, however, that it will be necessary for the individual characteristics and constraints of the site to be considered in the context of a development scheme before the planning position can be finally determined.</p> <p>Legal Title</p> <p>The site is registered to the Council and there are no covenants that would preclude development.</p> <p>Other</p> <p>The site provides access to adjoining properties. It is recommended that the disposal proceeds subject to the existing constraints.</p>



Havering
LONDON BOROUGH

Strategic Property Services

Tollgate House
96-98 Market Place
Romford
RM1 3ER

Telephone: 01708 434343

email: propertyservices@havering.gov.uk
Internet: www.havering.gov.uk

© Crown Copyright. All Rights Reserved.
London Borough Of Havering.
Licence No: 100024327

Based upon Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationary Office © Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings.

This Drawing shall not in any way be used or reproduced Without The Prior Permission Of Strategic Property Services.

All Dimensions are to be checked on site prior to commencement of work & any discrepancies reported to Strategic Property Services.

Do not scale, work only to figured dimensions.

No	Revisions	Int	Date

Job Title:
Daventry Road Garages

Harold Hill

Drawing Title:
Site Plan

Drawn By:
nt

Scale:
1:1250 @ A4

Date:
December 2011

Drawing Number:
sps1344

**LAND AND GARAGES AT DEWSBURY ROAD,
HAROLD HILL**

Housing Revenue Account or General Fund	Housing
Site Area (acres)	0.46 acres
Description	Scout hall, former horticultural hall and garage site.
Current Use	The horticultural hall is vacant. The Scout hall is currently leased to the Scouts. 12 of the garages are in use.
Site Details	<p>Description The site consists of 26 garages, a leased scout hall and a vacant former horticultural hall. The Housing department advise that 12 garages are let. Alternative provision to accommodate all tenants is available on Tansy Close.</p> <p>Access to the site is obtained from Dewsbury Road.</p> <p>Principle of Development Planning and access issues have been considered by the relevant Officers. The site has no designation in the Local Development Framework. As such, residential use may be acceptable in principle subject to justification for the loss of parking and the reprovision of the community facility. It should be noted, however, that it will be necessary for the individual characteristics and constraints of the site to be considered in the context of a development scheme before the planning position can be finally determined.</p> <p>Legal Title The site is registered to the Council and there are no covenants that would preclude development.</p> <p>Other Any redevelopment of the site will be dependent upon the relocation of the Scouts.</p> <p>The site provides access to an adjoining property. It is recommended that the disposal proceeds subject to the existing constraints.</p>



Strategic Property Services

Tollgate House
96-98 Market Place
Romford
RM1 3ER

Telephone: 01708 434343

email: propertyservices@havering.gov.uk
Internet: www.havering.gov.uk

© Crown Copyright. All Rights Reserved.
London Borough Of Havering.
Licence No: 100024327

Based upon Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationary Office © Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings.

This Drawing shall not in any way be used or reproduced without the prior permission of Strategic Property Services.

All Dimensions are to be checked on site prior to commencement of work & any discrepancies reported to Strategic Property Services.

Do not scale, work only to figured dimensions.

No	Revisions	Int	Date



Job Title:
Dewsbury Road Garages

Harold Hill

Drawing Title:
Site Plan

Drawn By:
nt

Scale:
1:1250 @ A4

Date:
December 2011

Drawing Number:
sps1345

APPENDIX A6
LAND AND GARAGES AT KILMARTIN WAY,
ELM PARK

Housing Revenue Account or General Fund	Housing
Site Area (acres)	0.6 acres
Description	Garage and amenity green
Current Use	As above
Site Details	<p>Description</p> <p>The site consists of 15 garages. The Housing department advise that only 3 are let presently.</p> <p>Access to the site is obtained from South End Road.</p> <p>Principle of Development</p> <p>Planning and access issues have been considered by the relevant Officers. The site has no designation in the Local Development Framework. As such, residential use may be acceptable in principle subject to justification for the loss of parking. It should be noted, however, that it will be necessary for the individual characteristics and constraints of the site to be considered in the context of a development scheme before the planning position can be finally determined.</p> <p>Legal Title</p> <p>The site is registered to the Council. There are no covenants that would preclude development.</p> <p>Other</p> <p>The site adjoins an electricity substation and access to this will need to be maintained in accordance with rights granted across the land.</p>

**NAVARRE GARDENS GARAGE SITE,
COLLIER ROW**

Housing Revenue Account or General Fund	Housing
Site Area (acres)	0.12 acres
Description	Garages
Current Use	Vacant Garages
Site Details	<p>Description</p> <p>The site consists of 10 garages. The Housing Department advise that all 10 are void.</p> <p>Access to the site is obtained directly from Navarre Gardens.</p> <p>Principle of Development</p> <p>Planning and access issues have been considered by the relevant Officers. The site has no designation in the Local Development Framework. As such, residential use may be acceptable in principle subject to justification for the loss of parking. It should be noted, however, that it will be necessary for the individual characteristics and constraints of the site to be considered in the context of a development scheme before the planning position can be finally determined.</p> <p>Legal Title</p> <p>The site is registered to the Council and there are no covenants that would preclude development.</p> <p>Other</p> <p>None</p>

**PENN GARDENS GARAGE SITE,
COLLIER ROW**

Housing Revenue Account or General Fund	Housing
Site Area (acres)	0.02 acres
Description	Garages
Current Use	Vacant Garages
Site Details	<p>Description</p> <p>The site consists of 3 garages. The Housing Department advise that all 3 garages are void.</p> <p>Access to the site can be obtained directly from Penn Gardens.</p> <p>Principle of Development</p> <p>Planning and access issues have been considered by the relevant Officers. On account of the site area, it is considered too small to accommodate any new residential development.</p> <p>Legal Title</p> <p>The site is in the process of being registered to the Council presently.</p> <p>Other</p> <p>The site provides access to an adjoining property. It is recommended that the disposal proceeds subject to the existing constraints.</p>



Tollgate House
96-98 Market Place
Romford
RM1 3ER

Telephone: 01708 434343

email: propertyservices@havering.gov.uk
Internet: www.havering.gov.uk

© Crown Copyright. All Rights Reserved.
London Borough Of Havering.
Licence No: 100024327

Based upon Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationary Office © Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings.

This Drawing shall not in any way be used or reproduced Without The Prior Permission Of Strategic Property Services.

All Dimensions are to be checked on site prior to commencement of work & any discrepancies reported to Strategic Property Services.

Do not scale, work only to figured dimensions.

No	Revisions	Int	Date



Job Title:
Penn Gardens Garages

Drawing Title:
Site Plan

Drawn By:
nt

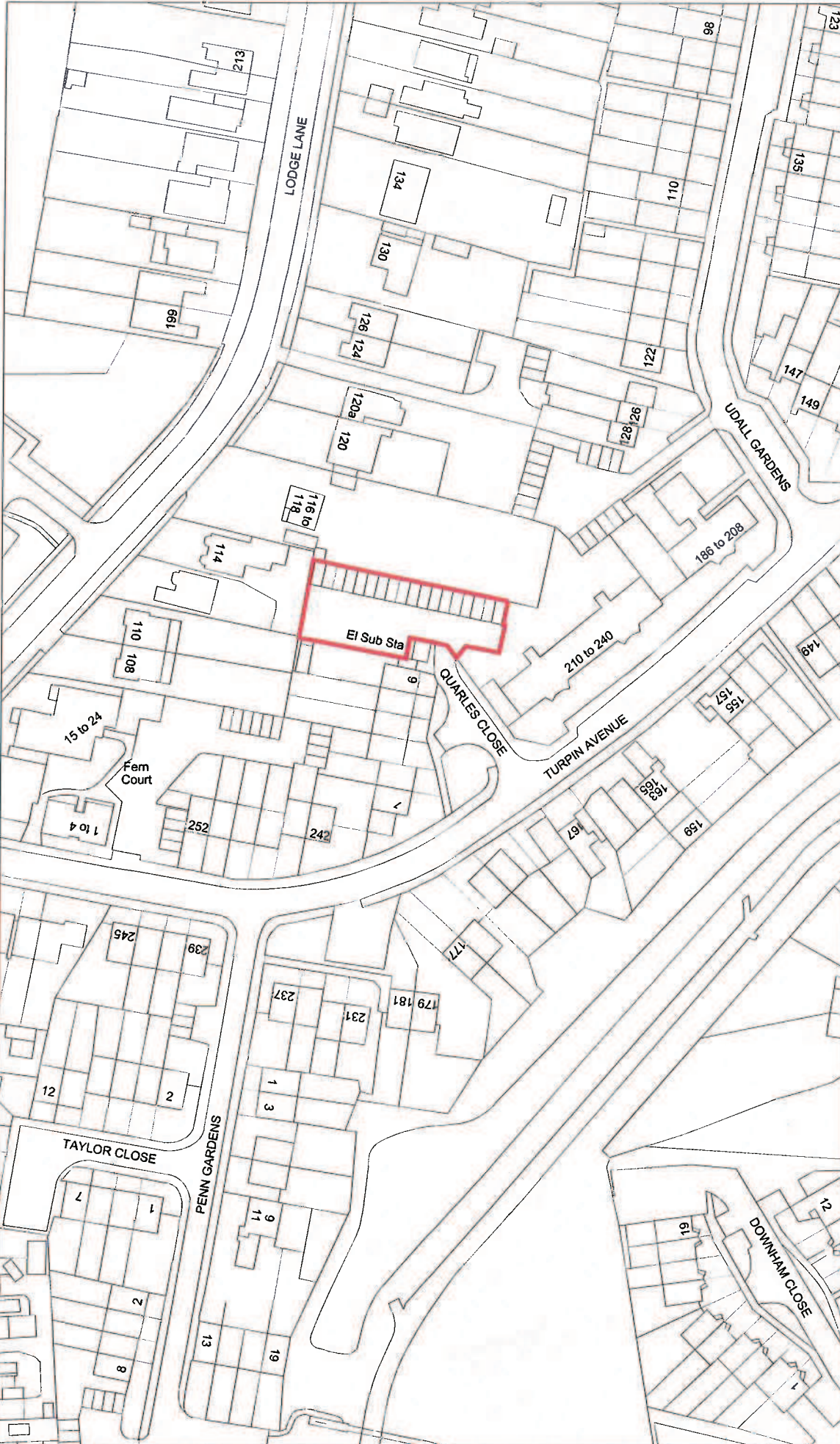
Scale:
1:1250 @ A4

Date:
December 2011

Drawing Number:
sps1350

**QUARLES CLOSE GARAGE SITE,
COLLIER ROW**

Housing Revenue Account or General Fund	Housing
Site Area (acres)	0.21 acres
Description	Garages
Current Use	Garages
Site Details	<p>Description</p> <p>The site consists of 18 garages. The Housing department advise that 6 garages are let presently and alternative provision is available for all tenants in Udall Gardens.</p> <p>Access to the site is obtained directly from Quarles Close.</p> <p>Principle of Development</p> <p>Planning and access issues have been considered by the relevant Officers. The site has no designation in the Local Development Framework. As such, residential use may be acceptable in principle subject to justification for the loss of parking. It should be noted, however, that it will be necessary for the individual characteristics and constraints of the site to be considered in the context of a development scheme before the planning position can be finally determined.</p> <p>Legal Title</p> <p>The site is registered to the Council and there are no covenants that would preclude development.</p> <p>Other</p> <p>The site provides access to an adjoining property. It is recommended that the disposal proceeds subject to the existing constraints.</p>



Havering
LONDON BOROUGH

Strategic Property Services

Tollgate House
96-98 Market Place
Romford
RM1 3ER

Telephone: 01708 434343

email: propertyservices@haverling.gov.uk
Internet: www.haverling.gov.uk

© Crown Copyright. All Rights Reserved.
London Borough Of Havering.
Licence No: 100024327

Based upon Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationary Office © Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings.

This Drawing shall not in any way be used or reproduced Without The Prior Permission Of Strategic Property Services.

All Dimensions are to be checked on site prior to commencement of work & any discrepancies reported to Strategic Property Services.

Do not scale, work only to figured dimensions.

No	Revisions	Int	Date



Job Title:
Quarles Close Garages

Collier Row

Drawing Title:
Site Plan

Drawn By:
nt

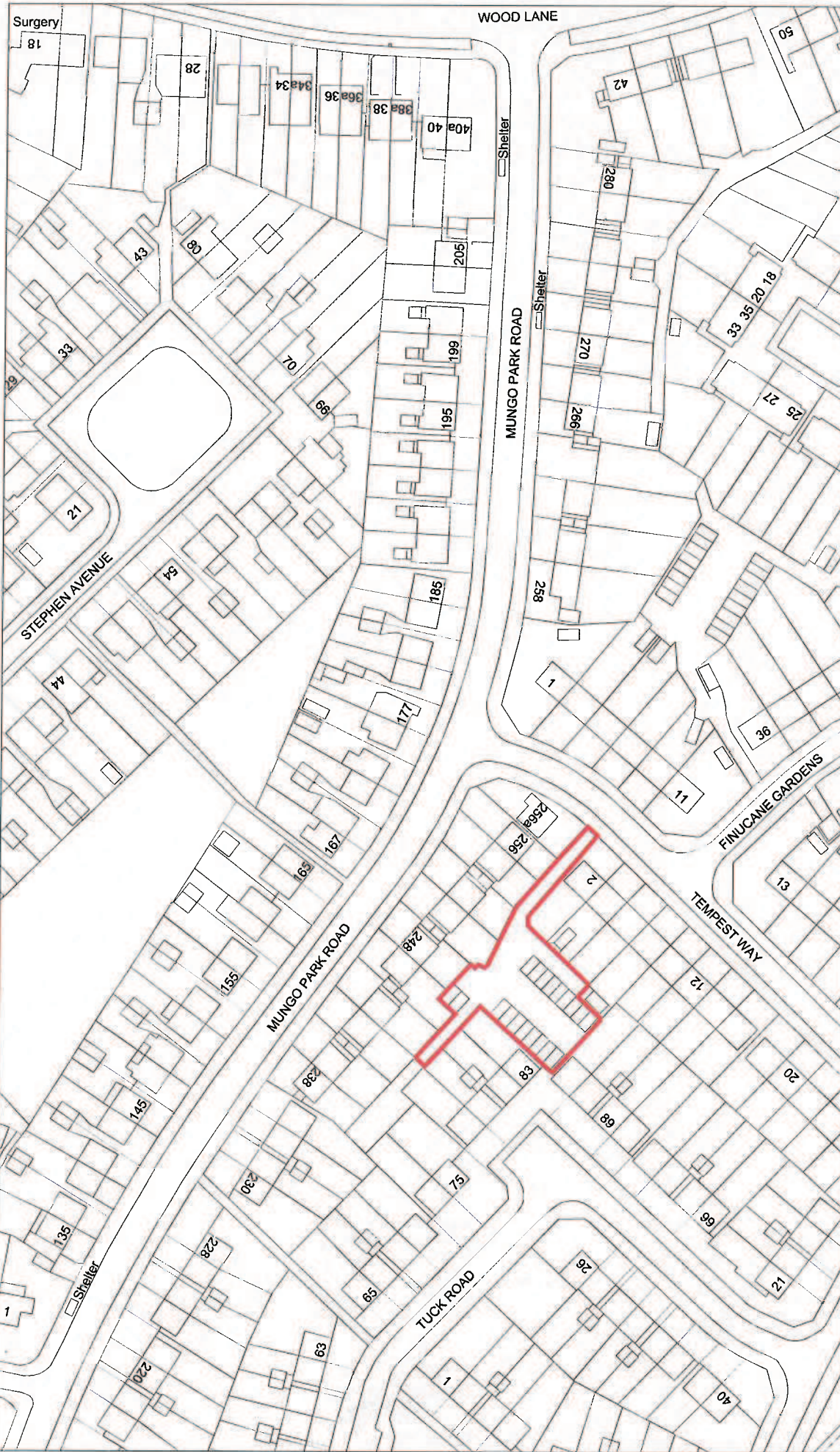
Scale:
1:1250 @ A4

Date:
December 2011

Drawing Number:
sps1351

**TEMPEST WAY GARAGE SITE,
ELM PARK**

Housing Revenue Account or General Fund	Housing
Site Area (acres)	0.23 acres
Description	Garages
Current Use	Garages
Site Details	<p>Description</p> <p>The site consists of 17 garages. The Housing Department advise that 9 garages are let presently and alternative provision is available in Finucane Gardens.</p> <p>Access to the site is obtained directly from Tempest Way.</p> <p>Principle of Development</p> <p>Planning and access issues have been considered by the relevant Officers. The site has no designation in the Local Development Framework. As such, residential use may be acceptable in principle subject to justification for the loss of parking. It should be noted, however, that it will be necessary for the individual characteristics and constraints of the site to be considered in the context of a development scheme before the planning position can be finally determined.</p> <p>Legal Title</p> <p>The site is registered to the Council and there are no covenants that would preclude development.</p> <p>Other</p> <p>The site provides access to adjoining properties. It is recommended that the disposal proceeds subject to the existing constraints.</p>



Strategic Property Services

Tollgate House
96-98 Market Place
Romford
RM1 3ER

Telephone: 01708 434343

email: propertyservices@havering.gov.uk
Internet: www.havering.gov.uk

© Crown Copyright. All Rights Reserved.
London Borough Of Havering.
Licence No: 100024327

Based upon Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationary Office © Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings.

This Drawing shall not in any way be used or reproduced Without The Prior Permission Of Strategic Property Services.

All Dimensions are to be checked on site prior to commencement of work & any discrepancies reported to Strategic Property Services.

Do not scale, work only to figured dimensions.

No	Revisions	Int	Date



Job Title:
Tempest Way Garages

Elm Park

Drawing Title:
Site Plan

Drawn By:
nt

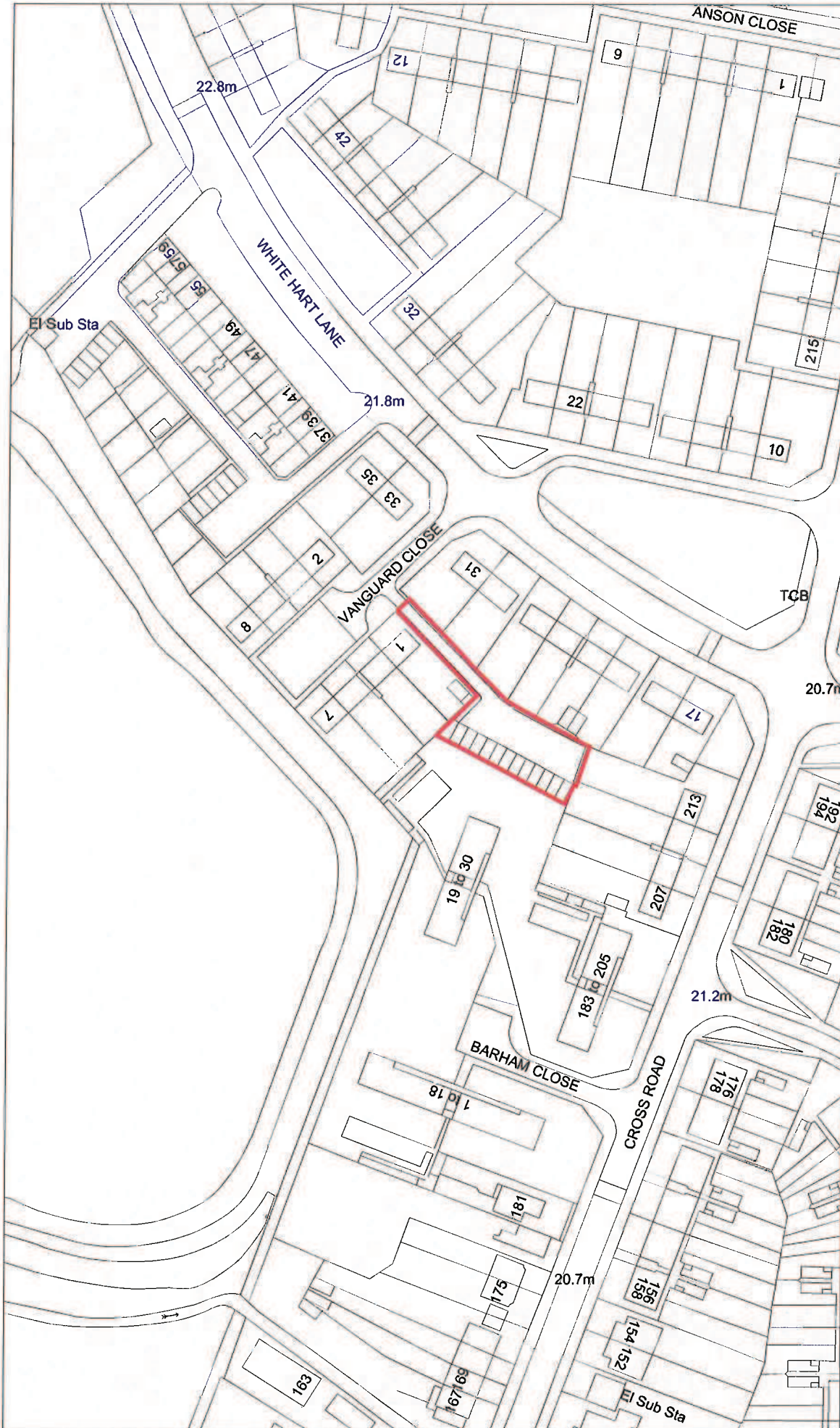
Scale:
1:1250 @ A4

Date:
December 2011

Drawing Number:
sps1353

**VANGUARD CLOSE GARAGE SITE,
COLLIER ROW**

Housing Revenue Account or General Fund	Housing
Site Area (acres)	0.14 acres
Description	12 Garages
Current Use	As above
Site Details	<p>Description</p> <p>The site consists of 12 garages. The Housing Department advise that only 6 are let and alternative provision is available on Mawney Close and White Hart Lane.</p> <p>Access to the site is obtained via an access way off Vanguard Close.</p> <p>Principle of Development</p> <p>Planning and access issues have been considered by the relevant Officers. The site has no designation in the Local Development Framework. As such, residential use may be acceptable in principle subject to justification for the loss of parking. It should be noted, however, that it will be necessary for the individual characteristics and constraints of the site to be considered in the context of a development scheme before the planning position can be finally determined.</p> <p>Legal Title</p> <p>The majority of the site is registered to the Council and the remainder is in the process of being registered presently. There are no covenants that would preclude development.</p> <p>Other</p> <p>The site provides access to adjoining properties. It is recommended that the disposal proceeds subject to the existing constraints.</p>



Havering
LONDON BOROUGH

Strategic Property Services

Tollgate House
96-98 Market Place
Romford
RM1 3ER

Telephone: 01708 434343

email: propertyservices@havering.gov.uk
Internet: www.havering.gov.uk

© Crown Copyright. All Rights Reserved.
London Borough Of Havering.
Licence No: 100024327

Based upon Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationary Office © Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings.

This Drawing shall not in any way be used or reproduced without The Prior Permission Of Strategic Property Services.

All Dimensions are to be checked on site prior to commencement of work & any discrepancies reported to Strategic Property Services.

Do not scale, work only to figured dimensions.

No	Revisions	Int	Date

Job Title:
Vanguard Close Garages
Collier Row

Drawing Title:
Site Plan

Drawn By:
nt

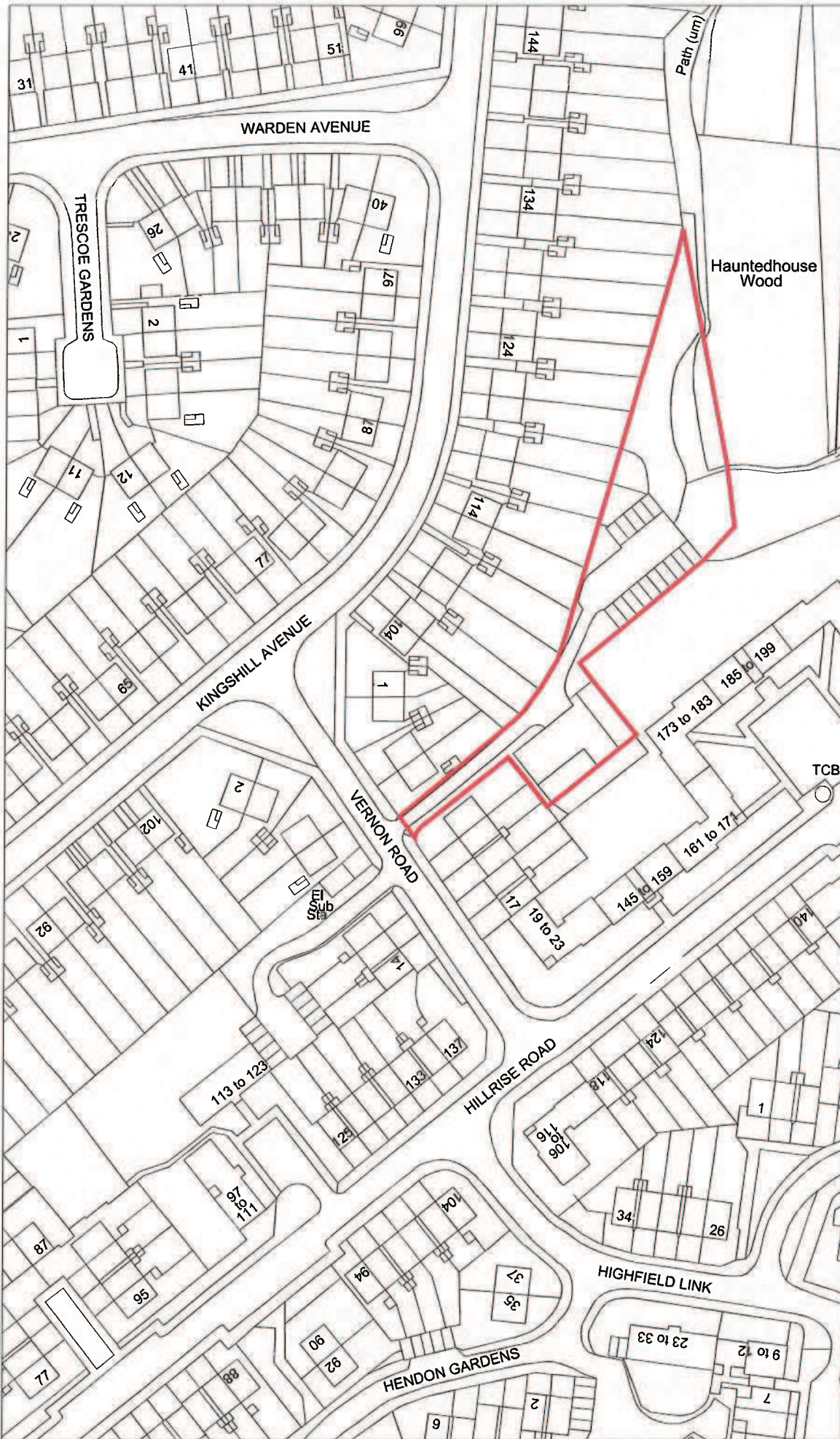
Scale:
1:1250 @ A4

Date:
December 2011

Drawing Number:
sps1354

**LAND & GARAGES AT VERNON ROAD,
COLLIER ROW**

Housing Revenue Account or General Fund	Housing
Site Area (acres)	0.52 acres
Description	Garages and Land
Current Use	As above
Site Details	<p>Description The site consists of 15 garages. The Housing department advise that 5 are let presently and alternative provision is located across Vernon Road. The alternative garages are in need of repair and the cost of such repairs will be met from the receipt.</p> <p>Access to the site is obtained from Vernon Road.</p> <p>Principle of Development Planning and access issues have been considered by the relevant Officers. The site has no designation in the Local Development Framework. As such, residential use may be acceptable in principle subject to justification for the loss of parking. It should be noted, however, that it will be necessary for the individual characteristics and constraints of the site to be considered in the context of a development scheme before the planning position can be finally determined.</p> <p>Legal Title The site is registered to the Council and there are no covenants that would preclude development.</p> <p>Other The site provides access to adjoining properties. It is recommended that the disposal proceeds subject to the existing constraints.</p> <p>The Council already has approval to sell Vernon Road depot which has the benefit of a planning consent for two houses. It is intended that this site and the depot will be sold as one disposal.</p>



Strategic Property Services

Tollgate House
96-98 Market Place
Romford
RM1 3ER

Telephone: 01708 434343

email: propertyservices@havering.gov.uk
Internet: www.havering.gov.uk

© Crown Copyright. All Rights Reserved.
London Borough Of Havering.
Licence No: 100024327

Based upon Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationary Office © Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings.

This Drawing shall not in any way be used or reproduced without the Prior Permission Of Strategic Property Services.

All Dimensions are to be checked on site prior to commencement of work & any discrepancies reported to Strategic Property Services.

Do not scale, work only to figured dimensions.

No	Revisions	Int	Date



Job Title:
Vernon Road Garages

Collier Row

Drawing Title:
Site Plan

Drawn By:
nt

Scale:
1:1250 @ A4

Date:
December 2011

Drawing Number:
sps1355

**VICTORY WAY GARAGE SITE,
COLLIER ROW**

Housing Revenue Account or General Fund	Housing
Site Area (acres)	0.35 acres
Description	Demolished garage site
Current Use	As above
Site Details	<p>Description</p> <p>The site is a former garage site which has been demolished. Only hard-standing remains surrounded by steel palisade fencing.</p> <p>Access to the site is obtained directly from Victory Way.</p> <p>Principle of Development</p> <p>Planning and access issues have been considered by the relevant Officers. The site has no designation in the Local Development Framework. As such, residential use may be acceptable in principle subject to justification for the loss of parking. It should be noted, however, that it will be necessary for the individual characteristics and constraints of the site to be considered in the context of a development scheme before the planning position can be finally determined.</p> <p>Legal Title</p> <p>The site is registered to the Council and there are no covenants that would preclude development.</p> <p>Other</p> <p>The site provides access to an adjoining property. It is recommended that the disposal proceeds subject to the existing constraints.</p>



Tollgate House
96-98 Market Place
Romford
RM1 3ER

Telephone: 01708 434343

email: propertyservices@havering.gov.uk
Internet: www.havering.gov.uk

© Crown Copyright. All Rights Reserved.
London Borough Of Havering.
Licence No: 100024327

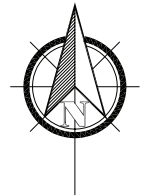
Based upon Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationary Office © Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings.

This Drawing shall not in any way be used or reproduced Without The Prior Permission Of Strategic Property Services.

All Dimensions are to be checked on site prior to commencement of work & any discrepancies reported to Strategic Property Services.

Do not scale, work only to figured dimensions.

No	Revisions	Int	Date



Job Title:
Victory Way Garages
Collier Row

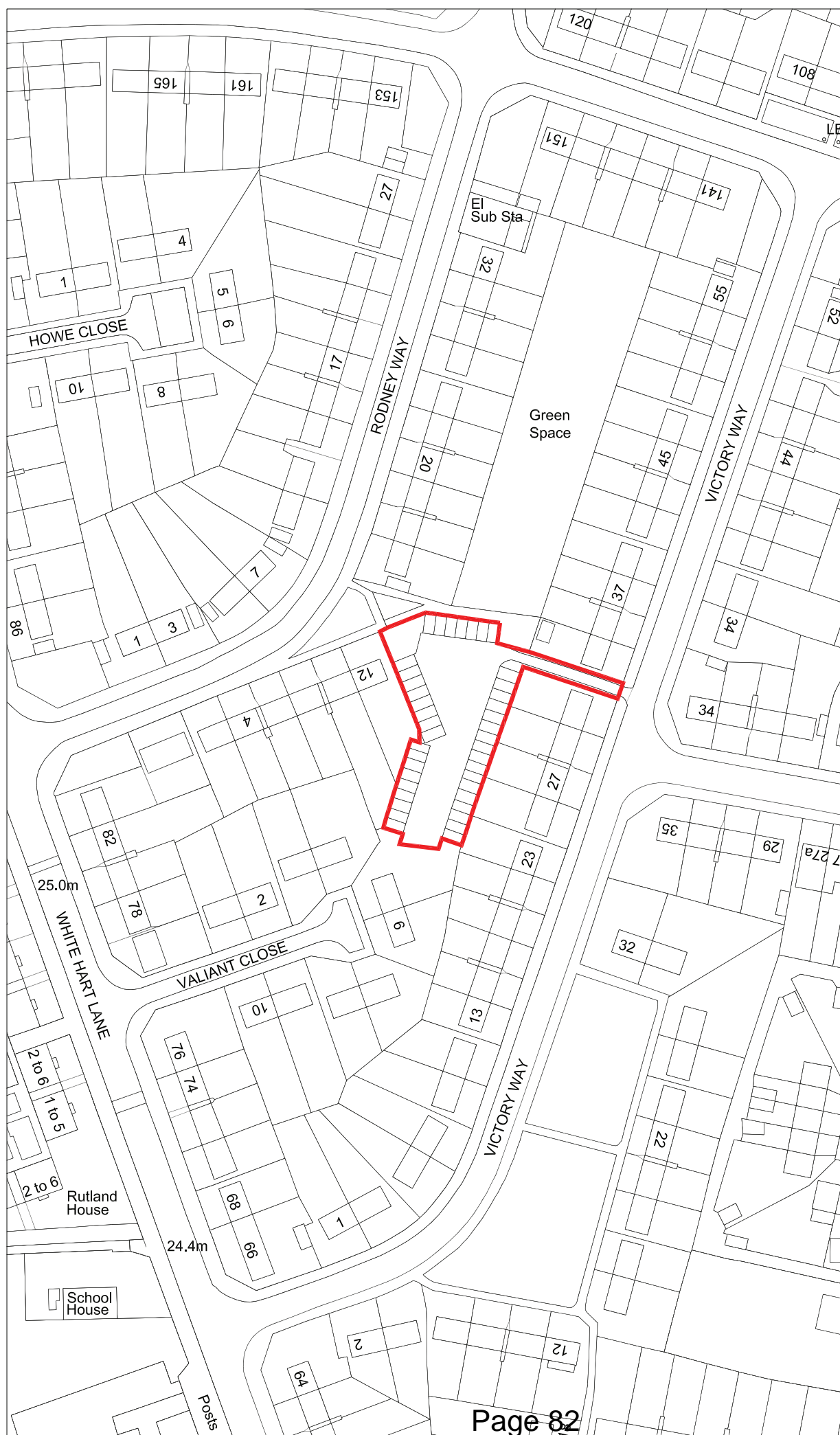
Drawing Title:
Site Plan

Drawn By:
nt

Scale:
1:1250 @ A4

Date:
December 2011

Drawing Number:
sps1356





CABINET 18 January 2012	REPORT

Subject Heading:	Havering Local Development Framework: Adoption of Joint Waste Development Plan Document (DPD)
Cabinet Member:	Councillor Robert Benham
CMT Lead:	Cynthia Griffin, Group Director Culture and Community
Report Author and contact details:	Peter Hall, Development Planning Team Leader Tel : 01708 432522 E-mail: peter.hall@havering.gov.uk
Policy context:	LB Havering Local Development Framework
Financial summary:	The costs of adoption are expected to be minor as they only involve publicity for the adoption process. They will be met from existing budgets within the Development and Transport Planning Group. The adoption itself will have no impact on Council budgets.
Is this a Key Decision?	Yes
Is this a Strategic Decision?	Yes
When should this matter be reviewed?	It would be appropriate for the Overview and Scrutiny Committee to review this decision not less than 18 months from when the policies come into force.
Reviewing OSC:	Towns and Communities

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

Ensuring a clean, safe and green borough	[✓]
Championing education and learning for all	[]
Providing economic, social and cultural activity in thriving towns and villages	[✓]
Valuing and enhancing the lives of our residents	[✓]
Delivering high customer satisfaction and a stable council tax	[]

SUMMARY

- 1.1 The London Boroughs of Barking and Dagenham, Havering, Newham and Redbridge have prepared a Joint Waste Development Plan Document (DPD) which will be part of the Local Development Framework(s) for the respective boroughs. Preparation of the Joint Waste DPD builds on the strong partnership agreement which the four Councils already have with the East London Waste Authority (ELWA) for managing municipal solid waste and which covers the geographical extent of the four boroughs. The main purpose of the Joint Waste DPD is to ensure there is sufficient waste management capacity across the four boroughs to manage the apportionment set by the London Plan (2011) for municipal and commercial and industrial waste.
- 1.2 Following Member approval within each of the boroughs, the Joint Waste DPD has been through appropriate consultation in line with the Town and Country Planning Regulations. It has been the subject of an independent examination by an Inspector appointed by the Government. The Planning Inspectorate has now approved the Joint Waste DPD subject to a number of binding changes being made. Officers consider that these changes do not significantly alter the Plan and recommend that the Plan is adopted.

The other boroughs are progressing adoption in parallel with Havering.

RECOMMENDATIONS

- 2.1 That Cabinet:
 - (1) Recommend that Council adopt the Joint Waste Development Plan Document (DPD), incorporating the Inspector's recommended changes (attached as Appendix 2) in accordance with Section 23 of the Planning and Compulsory Purchase Act 2004 and the subordinate legislation made thereunder.

REPORT DETAIL

1 Background

- 1.1 The London Boroughs of Barking and Dagenham, Havering, Newham and Redbridge have prepared a Joint Waste Development Plan Document (DPD) which is part of the Local Development Framework. The main purpose of the Joint Waste DPD is to ensure there is sufficient waste management capacity across the four boroughs to manage the apportionment set by the London Plan (2011) for municipal and commercial and industrial waste.
- 1.2 The Joint Waste DPD has been through appropriate consultation in line with the Town and Country Planning Regulations and has been the subject of an Examination by an independent Inspector appointed by the Government. The Planning Inspectorate has now approved the Joint Waste DPD subject to a number of binding changes being made (see Appendix 1). **Officers consider that these changes do not significantly alter the Plan and recommend that it should be adopted.**
- 1.3 The Joint Waste DPD meets the London Plan waste apportionment through a combination of safeguarding existing waste management capacity and allocating sites for new facilities. As previously approved by Cabinet the Plan identifies the need for three new waste management sites within Havering; Ferry Lane North (two small scale facilities), Gerpins Lane and Hall Farm.

2 The outcome of the Examination

- 2.1 The Examination took place in April 2011 and, at the instruction of the Inspector, included a further round of consultation on further minor changes. Only a limited response was received and this was principally from those bodies who had previously submitted representations, in particular the GLA.
- 2.2 The Councils received the Inspector's Final Report on the examination in November 2011. (A copy of the report is in the Members' Resource Room) The Planning Inspectorate has approved the Joint Waste DPD subject to a number of binding changes being made. Officers consider that these changes do not significantly alter the Plan and therefore this report recommends that the Cabinet agree to its adoption by Council.
- 2.3 The main differences to the previous version of the Plan approved by Cabinet are as follows:
- The time span of the DPD has been revised from 2010-2020 to 2011-2021
 - The revised (lower) London Plan apportionment has been included in the Joint Waste DPD and it makes clear that the need for additional waste management capacity will be monitored against this figure.

- Maps of the Schedule 1 and Schedule 2 sites have been included in the final DPD
- A schedule of superseded policies has been added as Appendix 2 to the final DPD

2.4 A copy of the proposed Joint Waste DPD incorporating the Inspector's recommended changes is attached as Appendix 2. It retains the structure and format of the version last considered by Members.

2.5 As before, it includes five policies:

- Policy W1: Sustainable Waste Management
- Policy W2: Waste Management Capacity, Apportionment and Site Allocation
- Policy W3: Energy Recovery Facilities
- Policy W4: Disposal of inert waste by landfilling
- Policy W5: General considerations with regard to waste proposals.

3 Adoption Process

3.1 Subject to Cabinet and Council agreeing adoption, officers will take the necessary steps to progress the final adoption of the DPD. The DPD cannot be adopted until approved by all four Local Authorities and this is scheduled for January – February 2012. Following approval by all four Local Authorities, an Adoption Notice is required to be published in the press [Romford Recorder] and copies of the DPD to be made available on the Council website and libraries.

REASONS AND OPTIONS

Reasons for the decision:

Please see legal implications (below)

Other options considered:

The Council could choose not to adopt the Joint Waste DPD. However, Cabinet previously approved the pre-submission version of the plan and officers consider that the changes recommended by the Inspector do not alter it significantly.

IMPLICATIONS AND RISKS

Financial implications and risks:

The costs of adoption are expected to be minor and will be met from existing budgets within the Development and Transport Planning Group.

The costs of the Examination were equally shared by all four boroughs and work out at £9,500 each. For Havering, this will be met from Planning Delivery Grant.

The adoption itself will have no impact on Council budgets, either collection or disposal.

The recommended new sites will be privately funded, and depend on operators coming forward.

Legal implications and risks:

Section 23(5) of the Planning and Compulsory Purchase Act 2004 requires that a Development Plan Document is adopted by resolution of the authority (Council). This is the course of action that officers recommend that Cabinet take for the Joint Waste DPD.

Human Resources implications and risks:

The administrative process of adopting the Joint Waste DPD will be undertaken within existing resources by the Development Planning team. There are no further HR implications arising from this report

Equalities implications and risks:

None relating directly to this decision.

BACKGROUND PAPERS

None

This page is intentionally left blank



The Planning
Inspectorate

Report to the East London Waste Authority Boroughs

by Terrence Kemmann-Lane JP DipTP FRTPI MCMI

an Inspector appointed by the Secretary of State for Communities and Local Government

Date: 14th November 2011

PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

**REPORT ON THE EXAMINATION INTO JOINT WASTE
DEVELOPMENT PLAN DOCUMENT**

Document submitted for examination on 30 November 2010

Examination hearings held between 5 and 7 April 2011

File Ref: PINS/G5750/429/7

Non-Technical Summary

i. This report concludes that, with the recommendations that I make, the East London Waste Authority Boroughs' Joint Waste Development Plan Document provides an appropriate basis for waste planning in the Boroughs to 2021. The Councils have sufficient evidence to support the strategy and the approach taken to site identification and can show that it has a reasonable chance of being delivered.

ii. There are a number of matters of soundness which it has been necessary to address, and which are the subject of recommendations by me. As submitted the Development Plan Document (DPD) did not meet all the requirements set out in legislation: there was no Proposals Map and no Schedule of Superseded Policies. In addition, the period covered by the policies and proposals of the DPD did not meet the requirements of national guidance. I drew these matters to the attention of the Joint Boroughs and they responded with proposed changes which meet the requirements and which are therefore subject to recommendations. As a result there are ordnance survey based maps showing allocated sites, together with a location map covering the area of the four boroughs; a Schedule of Superseded Policies has been prepared; and the plan period has been extended to cover the required "at least 10 years". My recommendations in respect of these matters are set out in Appendix A.

iii. The changes which are the subject of my recommendations, together with the minor changes which I mention below, have all been the subject of advertisement and public consultation. The Boroughs have also assessed whether the changes affect the outcome of the Sustainability Appraisal (SA): this work satisfies me that the SA remains an adequate basis underpinning the plan. The GLA has re-confirmed, in a revised statement dated 21 September, that the plan is in general conformity with the London Plan July 2011.

iv. There were a number of shortcomings in the text of the document, including typographical errors, a lack of clarity in some areas where the text might be misleading, where it was insufficient to convey the full meaning, contained minor factual errors or could usefully be augmented by additional text. For the most part the Boroughs recognised these shortcomings at an early stage, either by their own post publication editing procedures or from responses made to advertisement of the document or proposed changes to it or from suggestions made by participants during the hearings. In addition, during the examination I have raised matters which, while not going to the question of soundness, have caused the Boroughs to determine that proposed minor changes would be beneficial. As a result, Appendix B to this report contains a schedule of all the Minor Changes proposed by the Joint Boroughs. For clarity I endorse these changes, but since they do not alter the thrust of the Boroughs' overall strategy, they require no formal recommendation from me.

Introduction

1. This report contains my assessment of the East London Waste Authority Boroughs Joint Waste Development Plan Document (DPD) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004. It considers whether the DPD is compliant in legal terms and whether it is sound. Planning Policy Statement (PPS) 12 (paragraphs 4.51-4.52) makes clear that to be sound, a DPD should be justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the Joint Boroughs have submitted what they consider to be a sound plan. The basis for my examination is the submitted draft Joint Waste Development Plan Document (November 2010) which resulted from changes to the document published for consultation in August 2009.
3. As a result of my reading of the DPD, my consideration of the written responses to the consultations, and the discussions at the hearings, I have identified three matters which go to the soundness of the DPD relating to the lack of a Proposals Map and a Schedule of Superseded Policies and the length of the plan period. These are dealt with in my assessment of soundness below.
4. There are a number of shortcomings in the text of the document, including typographical errors, a lack of clarity in some areas where the text might be misleading, where it was insufficient to convey the full meaning, contained minor factual errors or could usefully be augmented by additional text. For the most part the Boroughs recognised these shortcomings at an early stage, either by their own post publication editing procedures or from responses made to advertisement of the document or proposed changes to it or from suggestions made by participants during the hearings. In addition, during the examination I have raised matters which, while not going to soundness, have caused the Boroughs to determine that minor changes would be beneficial.
5. Some of the changes put forward by the Boroughs are factual updates, corrections of minor errors or other minor amendments in the interests of clarity. As these changes do not relate to soundness they are generally not referred to in this report although I endorse the Boroughs' view that they improve the plan. None of these changes materially alter the substance of the plan and its policies, or undermine the sustainability appraisal and participatory processes undertaken. These are shown the Appendix B. I am content for the Councils to make any additional minor changes to page, figure or paragraph numbering and to correct any spelling errors prior to adoption.

Assessment of Soundness

Preamble

6. There is a compliance issue in relation to Regulation 13(4) which requires that, where a document includes a site allocations policy, it must include a submission proposals map showing changes which would result to the adopted proposals map if the DPD is adopted. The submitted DPD is not accompanied by a submission proposals map. I have raised this with the Boroughs. They have outlined a considered approach to producing consolidate proposals maps, which seeks to balance the provision of sufficient information with the very

real consideration of minimising the cost to the public purse. There are clearly complexities raised by virtue of four Councils working together and I recognise the need to be pragmatic. The Councils have mitigated my concern by the provision of Ordnance Survey map extracts showing the allocated sites, together with a location map covering the areas of the four Boroughs. **I recommend that the DPD be changed by the inclusion of these maps, as set out in Inspector Change (IC) number 1 in Appendix A below.**

7. The submitted DPD has no List of superseded policies as required by Regulation 13(5). This has been overcome by the addition of the required list prepared by the Boroughs. **I recommend that this schedule be included in the DPD, as set out in IC number 2 in Appendix A below.**
8. The period covered by the DPD is to 2020 - less than the "at least 10 years" required by paragraph 16 of PPS10 and less than the "at least 15 years" required by paragraph 4.13 of PPS12. A time horizon to at least 2021 is necessary to meet the PPS10 policy and it is desirable for the DPD to look forward to the situation beyond 2021. This is a consequence of the DPD being delayed, but given the flexibility of identified sites against lower apportionment figures in the July 2011 London Plan, the Boroughs have proposed a change so that the period covered is 2011-21. **I recommend that the period of the plan, as dealt with in paragraph 1.2 of the DPD, be changed as set out in IC number 3 in Appendix A below.**
9. It will also be necessary for the Boroughs to review the DPD, in coming years, in the light of their annual monitoring, to take into account the period beyond 2021.

Main Issues raised in representations

10. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified five main issues which potentially, in addition to the matters dealt with in paragraphs 6 to 8 above, affect the soundness of the plan and which need to be dealt with in this report.

Issue 1 – i) Whether there has been adequate consultation with the local waste industry; ii) whether any lack of consultation has resulted in ineffective policies for construction, excavation and demolition waste

Consultation

11. Representations suggest that there has been inadequate consultation with the private sector waste management industry in the East London area, with the result that the evidence base is lacking in relation to construction, excavation and demolition (CE&D) waste, leading to an unsound plan.
12. Set against this is the fact that the Boroughs have attempted to maintain an extensive database of consultees, which includes a substantial number of waste industry companies, as well as many professional consultancies which are likely to include those acting for members of the industry. It is also of relevance to this issue that there have been notices published in local newspapers, copies of documents at various locations throughout the area and, of course, on the Boroughs' websites. The DPD has also been included in

the Local Development Schemes for the four boroughs. It is also fair to say that there is a responsibility on interest groups, including members of the waste industry, to make it their business to monitor the intentions of local planning authorities to prepare plans and the progress being made.

13. I conclude that there has been an acceptable level of consultation, fulfilling the requirement of the Statements of Community Involvement and following the advice in PPS12 and that there has been no real prejudice to any element of the waste industry. Furthermore, I am not persuaded that there are serious shortcomings in the evidence base, if anything it maybe that the existing waste management facilities are dealing with greater amounts of waste than the DPD indicates, but the figures change from year to year. This is an issue which should be answered by rigorous monitoring. The Boroughs are alive to this and have proposed a minor change which inserts a new indicator.

Polices for CE&D waste

14. The issue here is whether there is a need for safeguarding of existing sites. This is because it is not possible for all CE&D waste to be dealt with on construction sites, so that there is a significant amount that requires treatment on waste management sites. I accept that there will be construction sites, both medium size and small, where it will not be feasible, or viable, to set up dedicated recovery and recycling facilities. However, I was given evidence that the Boroughs have adequate capacity, including at the Barking Riverside Recycling Park, to deal with these arisings. I see no need to identify areas of search for new facilities, but I do see the need for safeguarding of existing waste management sites. My attention was drawn to policies of the London Plan (version recently superseded), specifically policy 4A.28 which specifies that "Boroughs should ensure that existing construction, excavation and demolition waste management sites are safeguarded...". It was suggested that the development plan needs to be read as a whole, and that there is no need for repetition of policy at the different levels of plan. Whilst I support this contention, it seems to me that policy 4A.28 does require some response from the Boroughs in terms of their own policy. Such an addition would be a minor change to the East London Waste DPD, because of the existing policy context, and the Boroughs have agreed to make such a change.

Issue 2 – Whether the DPD conforms generally to the London Plan

15. Following discussion at the hearings, and further meetings between officers of the four Boroughs and the Greater London Authority (GLA), in the light of the Boroughs' advertised Changes, the GLA has confirmed that the document is in general conformity with the London Plan.
16. The apportionment figures were taken from table 4A.6 of the London Plan extant at the time of the DPDs submission and at the point at which the examination hearings took place. However, in light of the publication of the replacement London Plan on 22 July these changes have been updated to remove reference to the 2008 London Plan, and fully incorporate content from the 2011 London Plan, which was previously included as emerging policy. I consider that these are minor changes because figures have been revised downwards by the GLA and the thrust of the document does not change. Nevertheless, these changes have been advertised.

17. As to the use of 75% of licensed capacity for sites, the evidence is clear that actual throughput at sites varies quite considerably from year to year. There has been agreement between the Borough and the GLA on this, and I agree that it is a pragmatic approach to be used in plan making. The necessary monitoring will reveal the effect of changes over time and the need for any action to be taken by the Boroughs.

Issue 3 – Whether Policy W5 xii is sound in relation to maximising sustainable travel modes.

18. All four boroughs have planning policies in other documents which promote sustainable modes of transport, including transport by water. Development plans must be read as a whole, taking all of the constituent parts into account. As far as this DPD is concerned, policy W5(xii) includes a reference to sustainable transport modes. However, on reflection the Boroughs have agreed that this element (xiii) of the policy is not well worded in relation to the wording of the London Plan or the other numbered points in policy W5, and have suggested a minor change. At the same time, they have taken the opportunity to add a reference in the reasoned justification to policy W5 dealing with designated routes and vehicle operating times. I support both minor changes, which I consider satisfactorily answer the issue, whilst not affecting the thrust of policy.

Issue 4 – Whether there is a robust and credible evidence base for site selection.

- i. Are the details and capacities of the Schedule 1 sites accurate or adequate?
- ii. Are the Schedule 2 sites deliverable?
- iii. Should Policy W2 support facilities in industrial areas set out in Table 4A.8 of the London Plan? Does it adequately deal with waste water/sewerage waste?
- iv. Is there a need to deal explicitly with landfill capacity?

Schedule 1

19. It was clear at the hearing that sites had been omitted from Schedule 1 of the submitted DPD. This was acknowledged by the Boroughs and subsequently additions have been made to the schedule by way of minor changes. I am satisfied that the recognition of existing sites does not amount to a change which requires a recommendation by me, although these additions have been subject to publicity and consultation.
20. Schedule 1 uses licensed capacities in listing the capacities of the sites. The explanation for this, which I accept, is that this is the compensatory provision that must be made if a facility is lost to non waste use, as required by policy W2 which is consistent with policy 4A.24 of the (recently superseded) London Plan. There were errors of capacity, but again this has been rectified by minor changes which do not change the overall situation.

Schedule 2

21. Schedule 2 identifies areas which are considered to be deliverable within the

Plan's timeframe, now showing phasing, ownership, availability and implementation. I consider that this is in accordance with paragraphs 17 and 18 of PPS10. The site over which the biggest doubt has been suggested is the Beckton Riverside site owned by National Grid Property Holdings, shown as 7ha in the schedule but, by minor change, indicated to be that figure gross but 3.5ha net. It is situated within Beckton Strategic Industrial Location, making it suitable for industrial use, and consistent with the London Borough of Newham's submission Core Strategy.

22. It is not the most straightforward of sites for development since there are a number of constraints including the East London River Crossing, Dockland Light Railway extension, East London Transit, the need for remediation, etc. Having had these constraints discussed in some detail I am not convinced that the inclusion of this site in Schedule 2 makes the DPD is unsound. It appears to me that it is likely that a suitable area for the intended purpose can be identified, given the will to do so, whilst the alternative put forward would not have the advantage of the potential sustainable transport opportunity of jetty and landing stage for waste materials which the adjacent River Thames provides. Furthermore, there has been no suggestion that the alternative has been the subject of sustainability appraisal.
23. I consider that Schedule 2 provides a reasonable and desirable degree of certainty by designating sites. Any addition to the document which would leave open ready acceptance of other sites, instead of providing necessary flexibility, would open the door to a proliferation of facilities. There is a degree of flexibility in the policy, which allows for other sites within designated industrial locations to be considered if it is demonstrated that the preferred areas provide no opportunity.

Policy W2

24. In light of my reasoning in paragraph 23 above, I consider that there is no basis for Policy W2 to give general support for waste facilities in industrial areas.
25. The question of whether Policy W2 adequately deals with waste water/sewerage waste has been answered by an advertised change which sets out within the policy, text which was initially part of the reasoned justification. Since this is a statement of policy, I consider that the Policy is the proper place for it.

Landfill

26. Policy W4 sets out a criteria based approach to landfilling. The overarching policy is to reduce waste going to landfill to the absolute minimum, and over time there should be a substantial reduction, although it seems that there will always be a residual amount. I am satisfied that Policy W4, together with the continued working with other authorities as mentioned in paragraph 28 below, is a sound basis for dealing with the likely level and nature of waste going to landfill in the future.

Issue 5 – Whether there should be phasing of sites, and whether the DPD provides for adequate monitoring and implementation?

- 27. As a result of raising this issue, Schedule 2 of the submission document has been amended so that it now includes an indication of anticipated timescale of implementation and the landowners involved. This provides a better basis for monitoring. This also has the benefit of enabling the addition of monitoring indicators in the schedule in the Monitoring and Implementation section of the DPD. In addition the Boroughs have inserted an indicator for monitoring the actual waste throughput of the Schedule 1 sites.
- 28. Related to this issue, since it facilitates monitoring and determining any remedial action which may be required, the Boroughs have added a reference in paragraph 6.6 of the document which refers to them continuing to work closely with the East London Waste Authority, together with joint working with other London Boroughs, local authorities outside Greater London, and the Environment Agency by way of continued membership and participation at the London Regional Technical Advisory Body.

Legal Requirements

- 29. My examination of the compliance of the **Joint Waste Development Plan Document** with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Joint Waste Development Plan Document is identified within the approved LDS of each of the four Borough Councils, although there is some discrepancy in the dates indicated for submission and adoption. The Joint Waste Development Plan Document's content and timing are compliant with the LDS.
Statements of Community Involvement (SCI) and relevant regulations	All four Boroughs have SCIs and consultation has been compliant with the requirements therein, including the consultation on the advertised proposed changes.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	Natural England has confirmed that the Habitats Regulations AA satisfied the required methodology and the assessment is sound.
National Policy	The Joint Waste Development Plan Document complies with national policy except where indicated and a change is recommended.
Sustainable Community Strategies (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act and Regulations (as amended)	The Joint Waste Development Plan Document complies with the Act and the Regulations except where indicated and changes are recommended.
Regional Strategy (RS)	The Joint Waste Development Plan Document is in general conformity with the July 2011 London Plan.

Overall Conclusion and Recommendation

30. **I conclude that with the advertised changes proposed by the Boroughs, set out in the Appendix A, which are the subject of my recommendations, the East London Waste Authority Boroughs Joint Waste DPD satisfies the requirements of s20(5) of the 2004 Act and meets the criteria for soundness in PPS12. For the avoidance of doubt, I also endorse the Boroughs' proposed minor changes set out in Appendix B. Therefore I recommend that the plan be changed accordingly.**

Terrence J Kemmann-Lane

Inspector

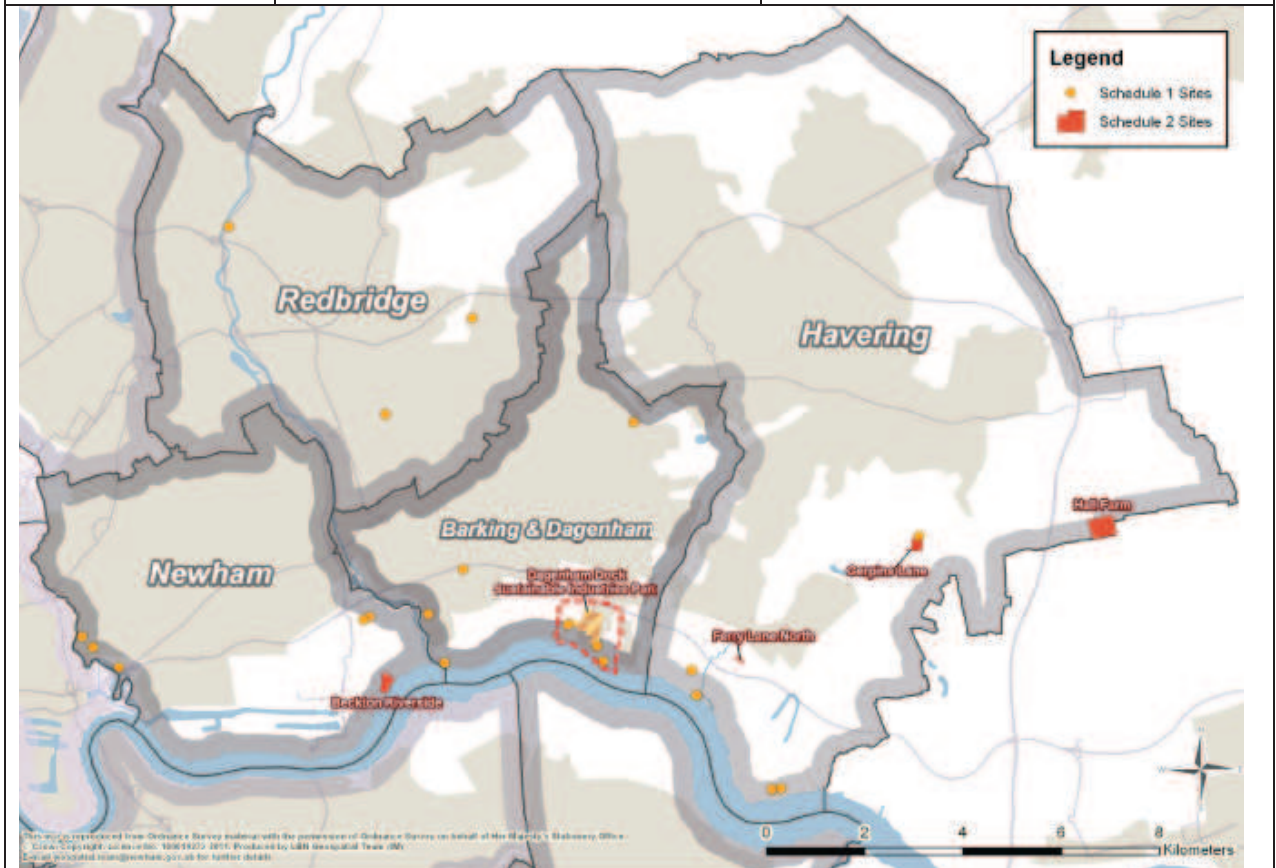
This report is accompanied by:

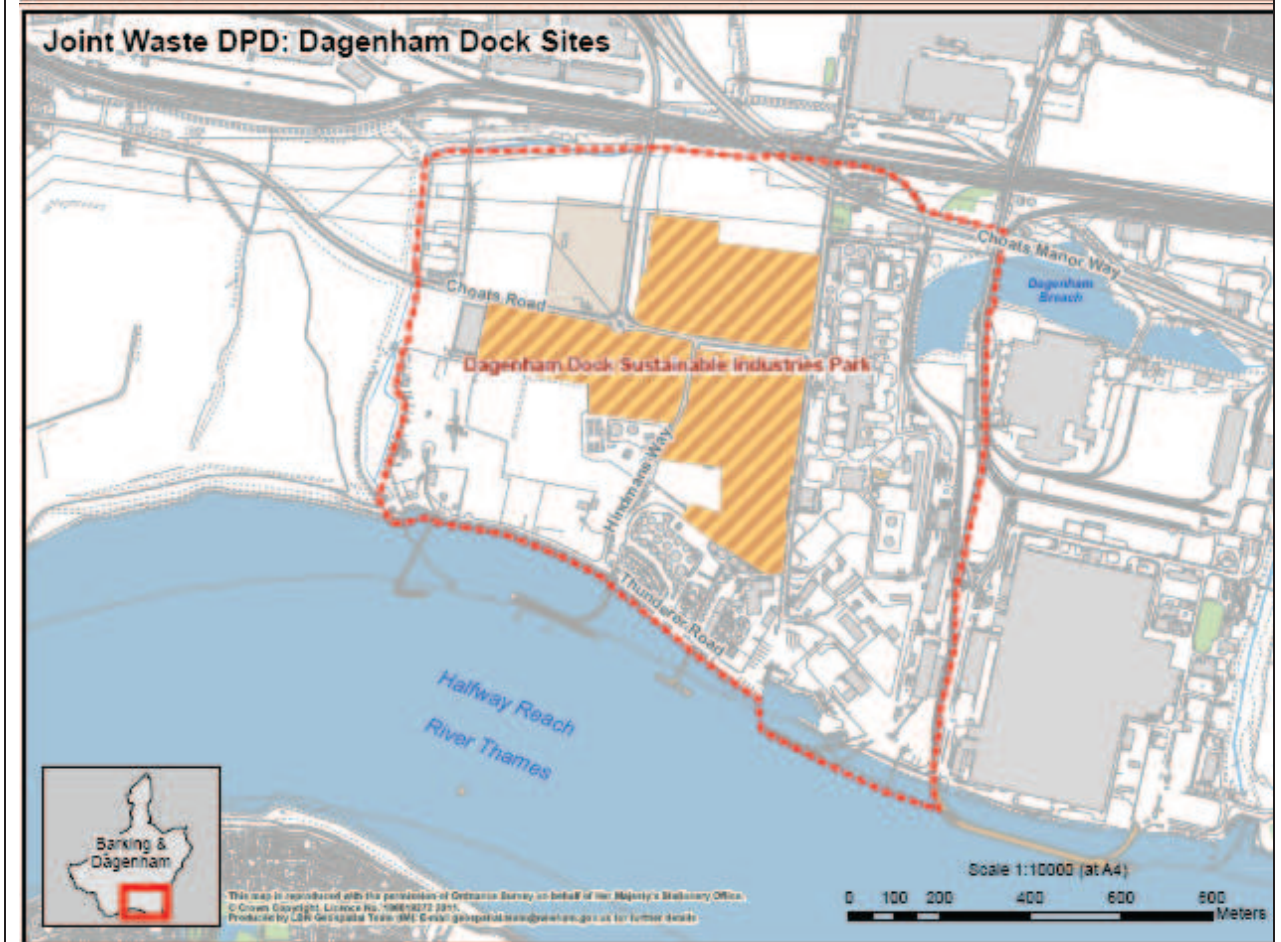
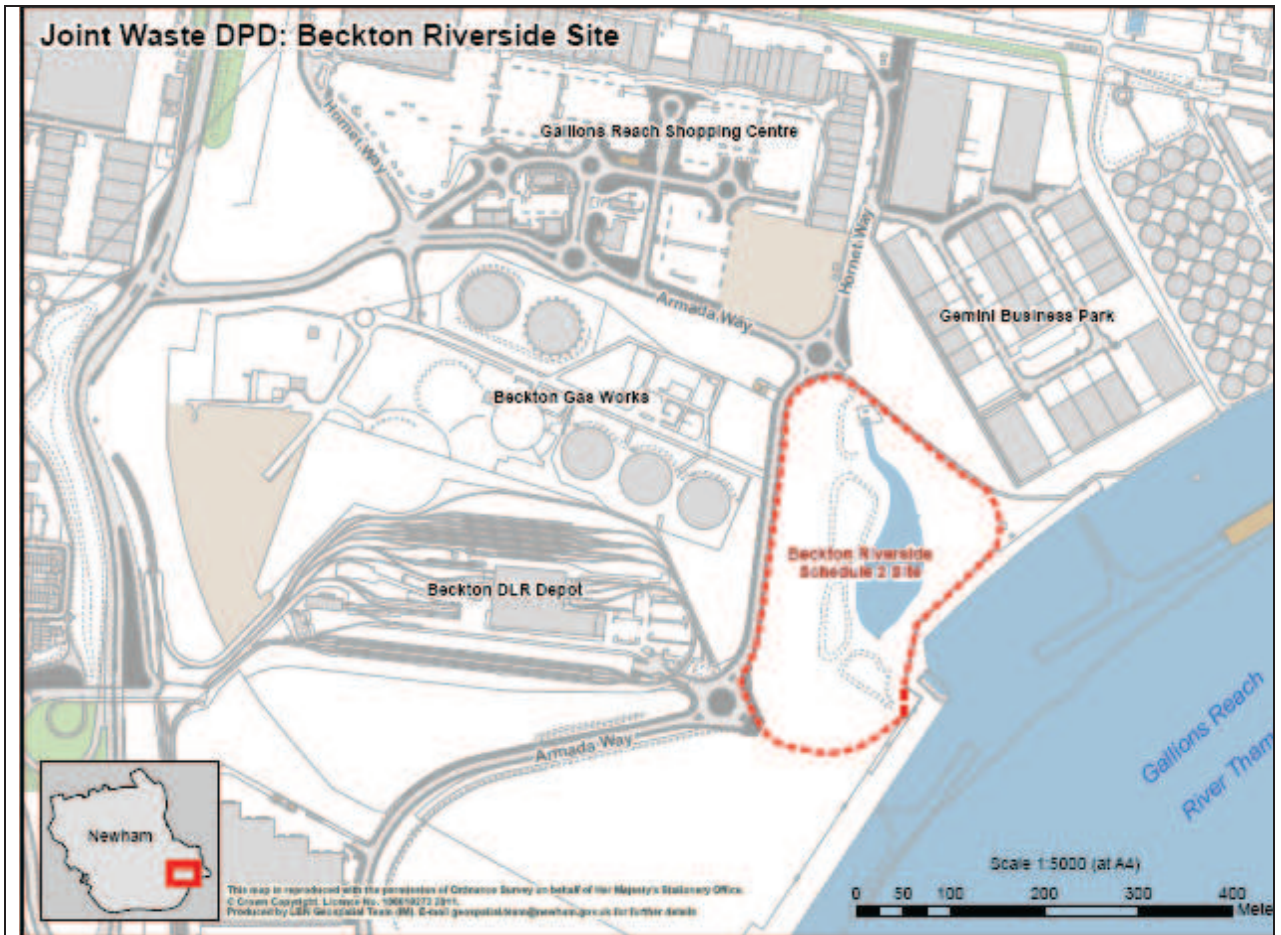
Appendix A Changes that the Inspector considers are needed to make the plan sound.

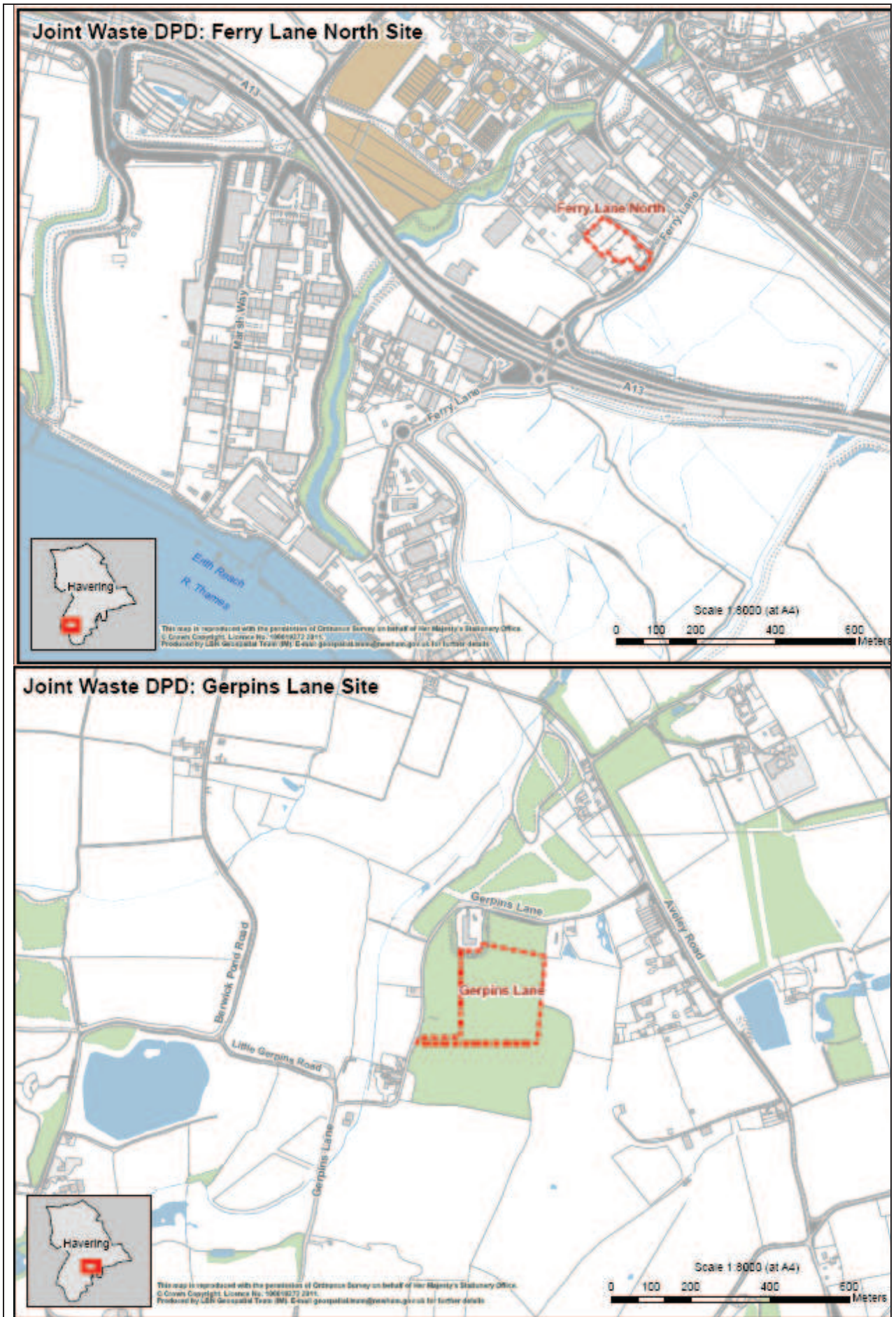
Appendix B Council's Minor Changes.

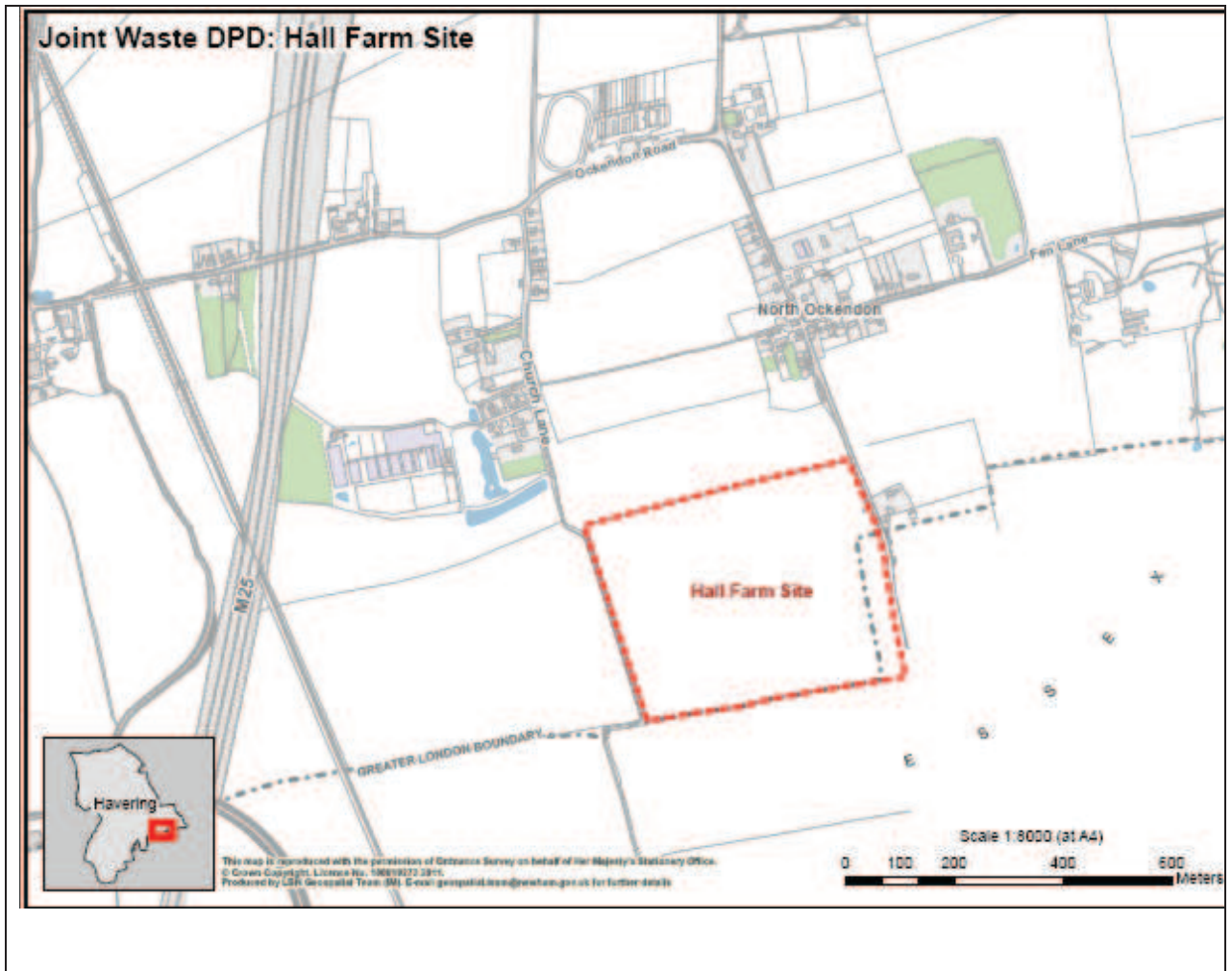
Appendix A – Changes that the Inspector considers are needed to make the plan sound

Inspector Change No.	Policy/Paragraph/Page	Change
IC1	Appendix 1: Joint Waste Site Map and Site boundary plans	Delete and substitute detailed site plans and Location Map:









<p>IC2</p>	<p>No current content</p>	<p>Add as Appendix 2 a Schedule of Superseded Policies</p> <p>Policies Superseded by the Adoption of the Joint Waste Development Plan Document</p> <ul style="list-style-type: none"> • <i>Barking and Dagenham</i> <p>LBBB UDP policies to be superseded by the Joint Waste DPD are G29, G30 and G31. Attached is a document setting out information relating to all the LBBB UDP policies.</p> <ul style="list-style-type: none"> • <i>Havering</i> <p>Havering has an adopted Core Strategy (2008) and all of its UDP policies are now fully superseded. The Joint Waste DPD will sit alongside Core Policy CP11 (Sustainable Waste Management).</p> <ul style="list-style-type: none"> • <i>Newham</i> <p>Newham has a submission Core Strategy and a list of proposed superseded UDP policies, as follows:</p> <ul style="list-style-type: none"> ○ UDP policy EQ58: Waste and Disposal, Reclamation of Land, replaced by INF3 ○ UDP policy SH23 Recycling, replaced by INF3 <p>Other UDP policies are saved until the Core Strategy and / or JWDPD are adopted:</p> <ul style="list-style-type: none"> i. EQ54: Integrated waste management facilities (until adoption of JWDPD) ii. EQ55: Safeguarding of Jenkins Lane (until adoption of JWDPD) iii. EQ56: Waste management facilities (until
------------	---------------------------	---

		<p>adoption of JWDPD)</p> <p>iv. EQ57: Hazardous waste (until adoption of JWDPD though this is covered in INF3)</p> <p>v. EQ60 Recycling of aggregates (until adoption of JWDPD)</p> <p>Redbridge</p> <p>Redbridge UDP was fully superseded in 2008, so there are no policies left for the Joint Waste DPD to supersede – it will sit alongside Strategic Policy 11 (Waste) in the adopted Core Strategy. The Joint Waste DPD simply provides additional detail which would not be suitable in a Core Strategy but nevertheless requires DPD status, as advocated by para 5.3 of PPS12.</p>
IC3	Paragraph 1.2	Line 1, delete 2020 and insert 2021

Appendix B – Schedule of Minor Changes that the Joint Boroughs have proposed as factual updates, corrections of minor errors or other minor amendments in the interests of clarity.

Please note: For completeness and clarity this Schedule includes the Inspector Changes which are set out in Appendix A.

Joint Waste Development Plan for the East London Waste Authority Boroughs

Schedule of post-Hearing minor changes to the Submitted Joint Waste Development Plan Document

Consultation period 6th September 2011
until 26th September 2011

Appendices:

- Annex 1 - Note regarding Sustainability Appraisal, Habitats Regulations Assessment, PPS25 Sequential Test and Equalities Impact Assessment**
 - Annex 2 - Revised Schedule 1 (separate document)**
 - Annex 3 - Revised Proposals Maps and insets (separate document)**
 - Annex 4 – Revised Technical Report (separate document)**

April 2011

(Updated August 2011 to reflect London Plan publication)

Local Development Framework
London Borough of Barking and Dagenham
London Borough of Havering
London Borough of Newham
London Borough of Redbridge

This document includes the Further Proposed Changes made prior to the start of the hearings, the Hearing Proposed Changes made as a result of discussion during the hearings and the London Plan changes made as a result of the adoption of the London Plan 2011.

The changes below are expressed in the form of ~~strikethrough~~ for deletions and underlining for additions of text. Where there has been an amendment to the Advertised Proposed Changes through the Further Proposed Change or to the Further Proposed Changes through the Hearing Proposed Changes this is shown as ~~deletion~~ for deletions and double underlining for additions of text. Where there has been a change to an Advertised Proposed Change and a Further Proposed Change through the Hearing Proposed Change or to these changes through the London Plan changes this is shown through ~~double strikethrough in red font~~ for deletions and double underlining in red font for additions.

Proposed Minor Changes to the Submitted East London Joint Waste Plan

No. of Proposed Change	Proposed Change	Reason for Change						
<p><u>Further Proposed Change 1</u></p>	<p>Amend Table 1 as follows:</p> <table border="1" data-bbox="592 607 1319 1373"> <thead> <tr> <th data-bbox="592 1048 627 1373">Borough</th> <th data-bbox="592 607 627 1048">Documents</th> </tr> </thead> <tbody> <tr> <td data-bbox="627 1048 1177 1373">Barking and Dagenham</td> <td data-bbox="627 607 1177 1048"> <ul style="list-style-type: none"> • Core Strategy (Pre-submission Report Adopted July 2010) • Borough Wide Development Policies DPD (Pre-submission Report Adopted March 2011) • Site Specific Allocations (Preferred Options Adopted December 2010) • Barking Town Centre Area Action Plan (Preferred Options Adopted February 2011) </td> </tr> <tr> <td data-bbox="1177 1048 1319 1373">Havering</td> <td data-bbox="1177 607 1319 1048"> <ul style="list-style-type: none"> • Core Strategy (Adopted, July 2008) • Site Specific Allocations (Adopted, July 2008) </td> </tr> </tbody> </table>	Borough	Documents	Barking and Dagenham	<ul style="list-style-type: none"> • Core Strategy (Pre-submission Report Adopted July 2010) • Borough Wide Development Policies DPD (Pre-submission Report Adopted March 2011) • Site Specific Allocations (Preferred Options Adopted December 2010) • Barking Town Centre Area Action Plan (Preferred Options Adopted February 2011) 	Havering	<ul style="list-style-type: none"> • Core Strategy (Adopted, July 2008) • Site Specific Allocations (Adopted, July 2008) 	<p>Updating document.</p>
Borough	Documents							
Barking and Dagenham	<ul style="list-style-type: none"> • Core Strategy (Pre-submission Report Adopted July 2010) • Borough Wide Development Policies DPD (Pre-submission Report Adopted March 2011) • Site Specific Allocations (Preferred Options Adopted December 2010) • Barking Town Centre Area Action Plan (Preferred Options Adopted February 2011) 							
Havering	<ul style="list-style-type: none"> • Core Strategy (Adopted, July 2008) • Site Specific Allocations (Adopted, July 2008) 							

No. of Proposed Change	Proposed Change		Reason for Change
		<ul style="list-style-type: none"> • <u>Development Control Policies (Adopted, October 2008)</u> • <u>Romford Area Action Plan (Adopted, October 2008)</u> 	
	Newham	<ul style="list-style-type: none"> • <u>Core Strategy Proposed Submission Document (Submitted, March 2011)</u> • <u>Core Strategy (Issues & Options)</u> • <u>Development Control Manual (Issues and Options)</u> 	
	Redbridge	<ul style="list-style-type: none"> • <u>Core Strategy (Adopted, March 2008)</u> • <u>Borough Wide Primary Policies DPD (Adopted, May 2008)</u> • <u>Development Sites with Housing Capacity (Adopted, May 2008)</u> • <u>Development Opportunity Sites (Adopted, May 2008)</u> • <u>Ilford Town Centre Area</u> 	

No. of Proposed Change	Proposed Change		Reason for Change
		<p>Action Plan (Adopted, May 2008)</p> <ul style="list-style-type: none"> • Gants Hill Area Action Plan (Submitted Adopted, March 2009) • Crossrail Corridor Area Action Plan (Submitted) • Minerals DPD (Issues and Options) 	
<u>Further Proposed Change 2</u>	<p>Introduction—under heading “Timetable for the Preparation of the Joint Waste DPD”</p> <p>Delete paragraphs 1.6 – 1.16 and renumber subsequent paragraphs.</p>		Updating document.
<u>Further Proposed Change 3</u>	<p>Amend paragraph 1.17 as follows:</p> <p>1.17 Details of other documents referred to throughout this document are detailed below:</p> <ul style="list-style-type: none"> • Planning Policy Statement 10: Planning for Sustainable Waste Management (ODPM, July 2005). Available at http://www.communities.gov.uk/index.asp?id=1443834 • The London Plan (GLA July 2011) (GLA, February 2004) including Alterations to the Plan’s housing provision targets and waste and minerals policies (December 2006) and Draft further alterations to the London Plan (September 2006) and Draft minor alteration on borough level waste apportionment (December 2006) Available at http://www.london.gov.uk/mayer/strategies/sds/index.jsp • Building the Evidence Base and Identifying the Issues & Options Consultation Document (May 2007) 		Updating document and improving clarity.

No. of Proposed Change	Proposed Change	Reason for Change
	<p>Technical Report (October 2006) Sustainability Appraisal Interim Report: An appraisal of the Issues and Options (May 2007) Report on Consultation (November 2007)</p> <ul style="list-style-type: none"> • Preferred Options • Preferred Options Report (April 2008) • Sustainability Appraisal of Preferred Options (April 2008) • Site Assessment to inform Preferred Options (June 2007) • Sustainability Appraisal of reasonable alternative sites (July 2007) • Preferred Options Technical Report (April 2008) • Proposed Submission Documents • Proposed Submission Joint Waste DPD • Joint Waste DPD Map • Sustainability Appraisal of the Joint Waste DPD • Technical Report 	
<p><u>Hearing Proposed Change 2</u></p>	<p>Amend Further Proposed Change 4 and split existing paragraph 2.11 so that a new paragraph is inserted after the first sentence and insert additional text under existing paragraph 2.11 to refer to Sustainable Community Strategies:</p> <p><u>2.11 The preparation of each borough Core Strategy reflects their Sustainable Community Strategy.</u></p> <p><u>London Borough of Barking & Dagenham</u> <u>Barking and Dagenham's Sustainable Community Strategy. The Community Plan (2009 Agreed Version) has six aims one of which is to work together for a clean, green and environmentally sustainable borough. As part of this the Partnership will be focusing on reducing the amount of waste that goes to landfill and reducing how much carbon dioxide is realised released into the environment. The rate of recycling (NI192) in 2008/09 was 25% increasing to 32% in 2009/10.</u></p>	<p>Adding explanatory cross-referencing.</p>

No. of Proposed Change	Proposed Change	Reason for Change
	<p><u>London Borough of Havering</u> Havering's Sustainable Community Strategy (2008 -2013) states that the <u>LSP Local Strategic Partnership (LSP)</u> wishes to ensure a clean, safe and green borough. High recycling rates will reduce the burden we place on landfill and the Council will invest in new ways of improving recycling rates. The rate of recycling (NI192) in 2007/08 was 23.98%, increasing to 27.37% in 2008/09 and 34.35% in 2009/10.</p> <p><u>London Borough of Newham</u> Newham Sustainable Community Strategy (2010-2030) states that the LSP wishes to help residents and businesses to minimise waste arisings and to recycle in the easiest and most cost effective way. The Council is examining ways to reduce the amount of waste produced, improve how it is disposed of and improve access to recycling. The rate of recycling (NI192) increased from 16% in 2008/9 to 19% between April and November 2009; the baseline (2007/8) rate was 15%.</p> <p><u>London Borough of Redbridge</u> The Redbridge Sustainable Community Strategy (SCS) (2008-2018) sets an ambition to promote a positive attitude to the environment and have a cleaner, greener Redbridge. As part of this ambition the strategy makes a commitment to reduce waste production and increase recycling. The SCS provides the overarching framework for all Local Development Documents, and the Joint Waste DPD will assist with with the delivery of its priorities. The 2009/10 AMR showed that the recycling and composting rate in Redbridge was 31.5%, which was an increase from 26.2% in 2008/09, but below the 40% national target.</p>	
<u>Hearing Proposed Change 3</u>	<p>Amend Further Proposed Change 5, delete detailed policy text to Borough Core Strategy policies and incorporate text underneath the newly created paragraph 2.12</p> <p>2.12 This Joint Waste DPD must be in conformity with borough Core Strategy policies. Borough Core Strategy policies of specific relevance to the Joint Waste DPD are outlined below:</p>	To avoid repetition of policies in other documents and to make sure documents are future proof as Newham's policy may be amended

No. of Proposed Change	Proposed Change		Reason for Change
	Barking & Dagenham (Pre-Submission Report, Nov-2008 Adopted July 2010)	<p>POLICY CR3: SUSTAINABLE WASTE MANAGEMENT</p> <p>To protect human health and the environment the Borough will seek to manage waste in a sustainable way and to help achieve national recycling and composting targets.</p> <p>This will be done by prioritising waste reduction, re-use, recycling and composting, new and emerging recovery technologies and conventional incineration over landfill, which will only be considered acceptable as a last resort.</p> <p>To meet the needs of our growing population, and to meet the Waste Apportionment requirements set out in the Further Alterations to the London Plan (Consolidated with Alterations since 2004), appropriate existing waste management capacity will be safeguarded and preferred sites for new facilities identified. The specifics of what capacity will be safeguarded and what sites are preferred for new waste management facilities will be set out in the Joint Waste DPD which the Council is developing with the neighbouring boroughs of Havering, Newham and Redbridge. In the interim the favoured broad locations for new or expanded waste management facilities in Barking and Dagenham are the Strategic Industrial Locations and Locally Significant Industrial Sites (subject to environmental and amenity considerations).</p>	during the examination process.

No. of Proposed Change	Proposed Change		Reason for Change
		<p>Until the Joint Waste DPD has been adopted, applications for waste developments will be determined in accordance with PPS10 and the London Plan, and the capacity of existing waste management facilities will be safeguarded.</p>	
	<p>Having (Adopted, July 2008)</p>	<p>CP11- Sustainable Waste Management</p> <p>The Council is committed to minimising the production of waste, increases in recycling and composting and achieving substantial reductions in the use of landfill.</p> <p>New waste management facilities, therefore, will only be acceptable in Havering where they:</p> <ul style="list-style-type: none"> ▲ represent the most sustainable location for the management of the waste ▲ ensure that the community of business which generated the waste is taking responsibility for its management ▲ help the waste planning authority or London waste authority where the waste arose to achieve the maximum degree of self-sufficiency in managing their waste ▲ help deliver national targets for recycling and composting of waste. <p>The broad locations for new waste management facilities will be in Strategic Industrial Locations, secondary employment areas and existing licensed waste management sites.</p> <p>Until the Joint Waste Plan is adopted the Council will safeguard all existing waste management sites, unless appropriate compensatory provision is made.</p> <p>The Joint Waste Plan will identify the amount of waste that</p>	

No. of Proposed Change	Proposed Change		Reason for Change
		<p>Newham, Submission (31 March 2011)</p>	<p>will need managing across the four East London Boroughs up to 2020 and this will be based on robust evidence which will be informed by the regional waste apportionment. It will identify the range and type of facilities necessary to manage this waste and suitable locations for them.</p> <p>The Joint Waste Plan will identify sufficient land to manage waste by having regard to the apportionment at Borough level as in the London Plan.</p> <p>Policy INF3</p> <p>Development proposals for waste management facilities must support movement up the waste hierarchy as follows: Reduce, Reuse, Recycle, Energy recovery, then Disposal</p> <p>The emerging Joint Waste Development Plan Document for the East London Waste Authority Boroughs sets out the amount of waste to be managed by the Boroughs of Barking and Dagenham, Havering, Newham and Redbridge; the range and type of facilities needed to manage the waste, and suitable locations for these facilities.</p> <p>Licensed operational sites are listed in Schedule 1 of the Joint Waste Development Plan Document, as follows:</p> <ul style="list-style-type: none"> Jenkins Lane Waste Management and Materials Recovery Facility Bywaters, Materials Recovery Facility, Twelve Trees Crescent, Bow The Remet Company Limited, Gedy Road, Ganning

No. of Proposed Change	Proposed Change		Reason for Change
		<p>Town Mayer Perry Recycling Limited, Bidder Street, Ganning Town</p> <p>In Schedule 2, A 7 ha site has been identified at Beckton Riverside for a medium sized waste management site to manage the level of additional waste apportioned to Newham in the London plan. Proposals for alternative/additional sites will need to demonstrate that the Beckton Riverside site is inappropriate for the type of waste or waste management process or has been developed and further waste management facilities</p> <p>Other Minor changes proposed to Policy INF3: A minor change is proposed following the second paragraph of the policy and its bullet points to the effect that: <u>"The Environment Agency licenses a further 18 operational sites in Newham, all of which are safeguarded by (Draft) London Plan Policy 5.17 and will be reviewed in a Site Allocations Development Plan Document. The sites do not contribute towards the London Plan waste apportionment as their function lies outside of the definition of the apportionment (see Glossary); however the London Plan requires that if for any reason an existing waste management site is lost to non-waste use, an additional compensatory site provision will be required that meets the maximum throughput that the site could have achieved."</u></p>	
	Redbridge (Adopted, March 2008)	<p>Strategic Policy 11: Waste The Council is committed to helping the delivery of national targets for recycling and composting by minimising the production of waste, increasing recycling and composting,</p>	

No. of Proposed Change	Proposed Change		Reason for Change
		<p>and achieving substantial reductions in the use of landfill:</p> <p>A Waste Development Plan Document will be prepared in partnership with the London Boroughs of Barking & Dagenham, Havering and Newham which will identify:</p> <ul style="list-style-type: none"> (a) the amount of waste to be managed across the four Boroughs up to 2020; (b) sufficient land within Redbridge to manage the relevant waste appropriate to the Borough level; (c) the range and type of facilities necessary; and (d) locations for new waste management facilities including designated business areas and the expansion of existing licensed waste management facilities. 	
<u>Further Proposed Change 6</u>	Delete paragraph 2.13		Now redundant paragraph
<u>Hearing Proposed Change 4</u>	<p>Amend Further Proposed Change 7, incorporate the first sentence of para. 2.21 into para. 2.20 and delete the remainder of para. 2.21 and also para 2.22:</p> <p>“2.20 The Sustainability Appraisal of Preferred Options⁴ tested the DPD objectives, policies and identified sites against the Sustainability Framework. The Appraisal suggested mitigation measures which were have been incorporated into the development of this Proposed Submission Document. Note: A Habitats Regulations Assessment of the Joint Waste DPD has been undertaken to determine whether the DPD will effect European biodiversity designations. The HRA was developed in consultation with officers at Natural England. 2.21 A Final Sustainability Appraisal specifically relating to the Proposed Submission Joint Waste DPD has now been produced.”</p> <p>We welcome your comments on the Sustainability Appraisal and the reports are available online at www.barkingdagenham.gov.uk; www.havering.gov.uk; www.newham.gov.uk or www.redbridge.gov.uk or by contacting your Council (see details on page 4). Responses to this document should be received no later than 5pm</p>		Updating document.

No. of Proposed Change	Proposed Change	Reason for Change
	<p>on 28 September 2009. Comments should be made via the online response form available at http://newham-consult.timehouse.co.uk/portal/. Alternatively, please return the response form to the address on page 4 or email ldf@newham.gov.uk.</p> <p>2-22 Please be aware that comments made cannot be treated as confidential and will be made available for public inspection.</p>	
<p><u>Further Proposed Change 9</u></p>	<p>Amend existing paragraph 3.4 as follow:</p> <p>The four ELWA boroughs are at different stages in the preparation of their Local Development Framework Core Strategy. <u>The London Boroughs of Barking and Dagenham, Havering and Redbridge have an adopted Core Strategy, Barking & Dagenham have consulted on their Proposed Submission Document, and Newham is at Issues & Options. Newham's Core Strategy was submitted on 31 March 2011. The Borough Core Strategies each contain a strategic waste policy which sets the framework for the Joint Waste DPD including:</u></p> <ul style="list-style-type: none"> • encouraging movement up the waste hierarchy • suitable locations for waste management facilities • help deliver targets for recycling and composting • regard to the London Plan apportionment • Joint Waste DPD to identify amount of waste to be managed, the range and type of facilities needed, sufficient land to manage waste apportionment and suitable locations for these facilities. 	<p>Updating document.</p>
<p><u>Hearing Proposed Change 6</u></p>	<p>Insert new fourth sentence into existing paragraph 4.6 as follows:</p> <p><u>As with all the other facilities (see paragraph 4.7 below), the Joint Waste DPD technical report then applies an actual throughput of 75% of this existing capacity at ELWA's four Reuse and Recycling Centres (i.e. 75% of 50% of the annual permitted tonnage). As almost all C, E & D waste is inert it is</u></p>	<p>For clarification.</p>

No. of Proposed Change	Proposed Change	Reason for Change
<u>Hearing Proposed Change 10</u>	appropriate to include Landfill taking Non-Biodegradable (i.e. inert) waste. Proposed new table 5, note 2: Amend paragraph numbering from 4.8 to 4.7	Correction to paragraph number
<u>Further Proposed Change 11</u>	Number the table set out under existing paragraph 4.8 as Table 3 and renumber subsequent Tables.	Correcting typographical omission.
<u>Hearing Proposed Change 7</u>	Amend further Proposed Change 12 and amend the final sentence of existing paragraph 4.8 as follows: <u>The established targets for implementation in the Joint Waste DPD are: The Waste Strategy 2007</u>	For clarification.
<u>Hearing Proposed Change 11</u>	Amend Advertised Proposed Change 6 and move paragraph 4.20 to [new] paragraph 5.14 and re-number subsequent paragraphs <u>Waste Water and Sewage Treatment Plants: 5.14 There is an established network of sewage facilities within East London, but upgrades may be required during the Plan period and this may involve new development. As the Landfill Directive introduces a ban on the disposal of liquid to other landfill facilities, this may result in additional pressure to find available space within operational sewage treatment plants to manage liquid wastes that were previously disposed of through landfill. Sewage treatment plants may also be appropriate locations for new facilities to manage domestic and other wastes.</u>	Moving existing text into Policy W2 justification for clarity.
<u>Hearing Proposed Change 12</u>	Amend Advertised Proposed Change 6 and Further Proposed Change 15 and move paragraph 4.21 to Policy W2 as the penultimate paragraph and re number subsequent paragraphs in chapter 4. <u>4.21 Planning permission will only be granted for new waste water and sewage treatment plant, extensions to existing works, or facilities for the codisposal of sewage with other wastes, where development is either needed to treat waste arisings from within the East London Waste Authority area or in the case of arisings from elsewhere the need cannot be practicably and reasonably be met at another site – subject to the relevant borough's</u>	Correcting typographical error. Moving existing text into policy for clarity.

No. of Proposed Change	Proposed Change	Reason for Change
	<u>policy/guidance and Policy W5 of this Plan. Wherever practical and economical, renewable energy generation will be encouraged as part of such waste management facilities.</u>	
<u>Hearing Proposed Change 19</u>	Delete the third bullet point in Policy W4 as follows: (iii) Whalebone Lane North: Marks Warren Farm (Brett Lafarge Ltd) [SiteID1712] has been duly considered as a site for the disposal of inert C, E & D waste.	For clarification.
<u>Hearing Proposed Change 13</u>	Amend Further Proposed Change 16 and amend first paragraph in box under Paragraph 4.22 <u>4.20</u> as follows: A MRF is designed to process source separated or comingled dry recyclables into individual materials prior to despatch to processors who prepare the materials for manufacturing into new recycled products. The MRF is made up of a series of conveyor belts and a mix of manual and automatic machines to separate the materials and remove any items that can <u>can</u> be recycled.	See Hearing Proposed Change 11. Correcting typographical error.
<u>Hearing Proposed Change 14</u>	Para 4.23 <u>4.21</u> In accordance with PPS10, the London Plan and borough Core Strategy policy, the Proposed Submission Joint Waste DPD identifies sites suitable for recycling and waste treatment facilities. The process for determining these sites has been documented throughout the development of this Submission Document and has been influenced by representations received.	Updating document.
<u>Hearing Proposed Change 15</u>	Amend Further Proposed Change 17 and add reference to the draft replacement London Plan. Para 5.2, add references: <u>Waste Strategy for England (2007, page 11)</u> ; <u>Second two bullets: London Plan 2011 Policy 5.16 (Waste Self-Sufficiency)</u>	For clarification.

No. of Proposed Change	Proposed Change	Reason for Change
<u>Further Proposed Change 18</u>	Policy W2. Delete “preferred” in the very last line of the policy wording.	For clarification.
<u>Hearing Proposed Change 17</u>	Amend the last sentence in paragraph 5.9 as follows: Table 4-6 summarises the capacity required and estimated land-take that may be required to provide this capacity.	Updating
<u>Further Proposed Change 19</u>	Para 5.9 Table to be renumbered. Table 5-6: Summary of average capacity required within the ELWA boroughs and land area required to meet the London Plan apportionment for MSW and C&I waste	Updating
<u>Further Proposed Change 20</u>	Delete Para 5.13 New waste management facilities should be of a high standard of design and contribute positively towards the overall development of the ELWA area.	Deleting text already covered by Policy W5 (x).
<u>Further Proposed Change 21</u>	Para 5.17. Delete “it is recommended that” and insert after working the word “can” 5.17 Due to the need for inert C,E&D waste landfill capacity, it is recommended that the voids left by mineral working can be used for landfill to achieve restoration of the site. Policy W4 sets the requirements that will govern the circumstances under which these sites should be developed can be used for landfill materials	For clarification.
<u>Further Proposed Change 22</u>	Para 5.18 Amend the second and third sentence in paragraph 5.18 and replace with a new sentence as follows: The finished levels of a restored landfill site may be higher than adjoining land, however this is commonly not the case for inert waste landfills. However, they will still be expected to incorporate high quality standards of restoration of the site that are appropriate to the surrounding landscape. All restored landfills will be expected to incorporate high quality standards of restoration of the site that	For clarification

No. of Proposed Change	Proposed Change	Reason for Change
Hearing Proposed Change 21	<p><u>are appropriate to the surrounding landscape</u>’.</p> <p>Para 5.21:</p> <p>To maintain the principles of sustainable development and the right balance of waste facilities across London, proposals for <u>new facilities managing waste</u> which is not included in the London Plan apportionment for the ELWA area must undergo a sequential test. This will entail the applicant demonstrating as part of their application that there are no more suitable opportunities to manage the non-apportioned waste closer to its source. This is necessary to ensure that the distance waste is transported is minimised, to encourage communities to take more responsibility for managing their own waste, and to prevent an over-concentration of waste management facilities in east London.</p>	Boroughs proposed change following discussion at Examination.
Further Proposed Change 23	<p>Policy W5 title: <u>General Considerations with regard to Waste Proposals.</u></p>	For clarification.
Further Proposed Change 24	<p>Policy W5: : <u>“(xii) transport impacts of all movements, including opportunities for use of sustainable transport modes, traffic generation, access and the suitability of the highway network in the vicinity; access to and from the primary network.”</u></p> <p><u>“(xii) adverse impacts of all movements including: traffic generation, an unsuitable highway network, inadequate accessibility to the site or the primary road network in the vicinity; and limited or no opportunities for the use of sustainable transport modes.”</u></p>	For clarification.
Further Proposed Change 25	<p>Para 5.25: <u>Consideration of traffic generation characteristics will incorporate an assessment of the level and type of traffic generated and the impact of that traffic. This assessment will identify opportunities for use of sustainable transport modes, the suitability of access and the highway network in the vicinity of the site, including access to and from the primary route network, designated routes and vehicle operating times and works necessary to accommodate the development.</u></p>	For clarification.
Hearing	<p>Amend Further Proposed Change 26 and amend reference to Technical Report in order to be</p>	For clarification and

No. of Proposed Change	Proposed Change	Reason for Change
<u>Proposed Change 22</u>	<p>consistent with paragraphs 4.6 and 4.10 of the document. This is in the fourth sentence in paragraph 6.2 as follows:</p> <p>The technical report (Joint Waste DPD Development Plan Documents for the East London Waste Authority Boroughs Preferred Options technical report) provides a spreadsheet where the variables input (including apportionment, recycling and composting targets and existing facility capacity) calculate the estimated facility capacity needed.</p> <p>Para 6.3</p> <p>Planning for Waste Management Facilities: A Research Study, <u>ODPM (August 2004)</u></p> <p>Recycling and recovery facilities: Sites investigation in London, <u>Land Use Consultants and SLR Consulting Ltd for the GLA (July 2005)</u></p>	consistency.
<u>Further Proposed Change 27</u>	<p>Para 6.7 Amend Further Proposed Change 29, delete reference to GLG and replace with <u>CLG</u>.</p> <p>Amend Advertised Proposed Change 12 and amend Schedule 1 (Schedule 1 is appended to these Proposed Minor Changes as Annex 1)</p> <p>Amend Schedule 1 to include the SITA recycling facility in River Road and amend name of Rainham <u>Waste Recycling & Reclamation Centre</u>. Amended Schedule 1 (which is also amended as a result of Hearing Proposed Change 5) is appended to this Schedule of Proposed Minor Changes as Annex 1.</p> <p>This confirms that no changes are required to the Sustainability Appraisal following the Schedule of Advertised Proposed Changes and amendments to the Proposals Map. A statement confirming this is appended to this Schedule of Proposed Minor Changes as Annex 1.</p> <p>Change colour of Table 3 from magenta font to black font.</p>	For clarification.
<u>Hearing Proposed Change 24</u>		Updating document.
<u>Hearing Proposed Change 25</u>		For clarification and to correct typographical error.
<u>Hearing Proposed Change 29</u>		No changes made; note included for clarity.
<u>Hearing Proposed</u>		For consistency.

No. of Proposed Change	Proposed Change	Reason for Change
<u>Change 31</u> <u>Hearing Proposed Change 32</u>	Table 4. Note 2 should refer to Table 4 not Table 3	For clarification and to correct typographical error.
<u>Hearing Proposed Change 33</u>	Paragraph 4.11. Last line should refer to Table 5.	For clarification and to correct typographical error.
<u>Hearing Proposed Change 34</u>	Text Box, Paragraph 4.20 Under the heading Advanced Thermal Treatment. Insert the text "(See policy W3)" at the end of the third sentence which begins with the text "Within the ELWA area"	For clarification.
<u>Hearing Proposed Change 35</u>	Text Box, Paragraph 4.20 Delete the final sentence under the heading C,E&D Recycling which starts with the text "Permissions granted..." . Place the text after the second paragraph in policy W5 to create a new third paragraph.	Moving existing text into policy for clarity.
<u>Hearing Proposed Change 36</u>	Paragraph 2.20. "this Proposed Submission Document" should be changed to "the Proposed Submission Document...."	For clarification.
<u>Hearing Proposed Change 37</u>	Paragraph 3.4 "Borough Core Strategy's" should be "Borough Core Strategies"	For clarification and to correct typographical error.
<u>London Plan Proposed Change 5</u>	Amend Further Proposed Change 3 by amending the second and deleting the third bullet point under paragraph 1.6 which begins with the text " <i>Details of other documents referred to throughout this document are detailed below:</i> " <ul style="list-style-type: none"> • Planning Policy Statement 10: Planning for Sustainable Waste Management (ODPM, July 2005). Available at http://www.communities.gov.uk/index.asp?id=1143834 • The London Plan (GLA July 2011) (Consolidated with Alterations since 2004) (GLA, February 2004) including Alterations to the Plan's housing provision targets and waste and minerals policies (December 2006) and Draft further alterations to the London Plan (September 2006) and Draft minor alteration on borough level waste apportionment 	Update to reflect London Plan.

No. of Proposed Change	Proposed Change	Reason for Change
<p><u>London Plan Proposed Change 6</u></p>	<p>(December 2006). Available at http://www.london.gov.uk/mayor/strategies/sds/index.jsp</p> <ul style="list-style-type: none"> The London Plan Consultation Draft Replacement Plan (GLA October 2009) (including minor alterations to the Consultation Draft relating to Borough level waste arising and apportionments in December 2009) <p>Amend paragraph 2.6</p> <p>2.6 The London Plan (2011) Consolidated with Alterations since 2004 provides planning policies for waste management which boroughs must be in general conformity with, including the tonnages of municipal and commercial and industrial waste to be managed by each London borough, revised targets for recycling of municipal waste and new targets for recycling of commercial and industrial waste and recycling or reuse of construction and demolition waste.</p>	<p>Update to reflect London Plan</p>
<p><u>London Plan Proposed Change 7</u></p>	<p>Amend paragraph 2.9</p> <p>Adjoining regional or local policy</p> <p>2.9 It is important for the Joint Waste DPD to take into account the relevant strategies and plans of adjoining areas. The key waste planning policies from adjoining areas are detailed below:</p> <p>East of England Plan (RSS) Policy WM3 (Imported Waste) “The East of England should plan for a progressive reduction in imported waste. After 2015, provision for the management of imported waste from London should be restricted to the landfill of residual waste that has been subject to the maximum practical level of recovery and treatment, for which landfill is the only practical option”. This is supported by Thurrock Core Strategy Issues and Options Consultation where the proposal to reduce the use of landfill including importation of London’s waste to landfill residues by 2015 and only if landfill capacity is still available. It was favoured by 71% of respondents. The Essex Waste Development Plan is currently in preparation.</p>	<p>Update to reflect London Plan and RSS</p>

No. of Proposed Change	Proposed Change	Reason for Change
<u>London Plan Proposed Change 8</u>	<p>Amend paragraphs 2.16 and 2.17</p> <p>2.16 London Plan Policy 5.17 4A.25 requires the Joint Waste DPD to identify sufficient land to provide capacity to manage the apportioned tonnages of municipal solid waste (MSW) and commercial and industrial (C&I) waste. Waste is deemed to be managed in London if it is used for energy recovery in London, or it is compost or recycle sorted or bulked in London material recycling facilities for reprocessing either in London or elsewhere.</p> <p>2.17 Although the London Plan borough level apportionment does not include construction, excavation and demolition waste (C, D&E) or hazardous waste streams, these are addressed in London Plan Policies 4A.28 and 4A.29 5.18 and as such are included in the Joint Waste DPD.</p>	To reflect policy numbering change in London Plan
<u>London Plan Proposed Change 9</u>	<p>Amend paragraph 4.1</p> <p>4.1 The determination of how much waste will need to be managed by the ELWA boroughs was debated through previous public consultation. The London Plan (consolidated with Alterations since 2004) identifies the borough level apportionment of municipal solid waste (MSW) and commercial and industrial waste (C&I) to be managed. The apportionment for each ELWA boroughs is pooled for the purpose of this Joint Waste DPD.</p>	
<u>London Plan Proposed Change 10</u>	<p>Amend paragraph 4.3</p> <p>4.3 Graph 1 below show the tonnages of these waste streams to be managed by the ELWA boroughs to 2020. Municipal solid waste and commercial and industrial waste tonnages are as per London Plan (Consolidated with Alterations since 2004) Table 4A.6.¹⁸ Construction, excavation and demolition waste and hazardous waste projections for the ELWA boroughs are as set out in the</p>	

¹ The projections for municipal solid waste and commercial and industrial waste have been reduced in the latest version of the London Plan which was published in July 2011.

No. of Proposed Change	Proposed Change	Reason for Change																
	<p>Issues and Options Consultation Document. These projections have been will be subject to review during the preparation period covered by of the Waste Plan with the publication by the Mayor of London of a draft Replacement London Plan in July 2011</p>																	
<p><u>London Plan Proposed Change 11</u></p>	<p>Amend Graph 1 to reflect figures relate to London Plan 2008.</p> <p>Graph 1: Waste volumes projected to be managed by ELWA boroughs</p> <table border="1"> <caption>Waste Volumes (Tonnes)</caption> <thead> <tr> <th>Year</th> <th>MSW (London Plan 2008 Table 4A.6)</th> <th>C&I (London Plan 2008 Table 4A.6)</th> <th>Hazardous waste forecast</th> </tr> </thead> <tbody> <tr> <td>2005</td> <td>1,545,170</td> <td>991,933</td> <td>402,914</td> </tr> <tr> <td>2011</td> <td>1,281,221</td> <td>1,410,013</td> <td>97,731</td> </tr> <tr> <td>2020</td> <td>96,113</td> <td>760,541</td> <td>97,731</td> </tr> </tbody> </table>	Year	MSW (London Plan 2008 Table 4A.6)	C&I (London Plan 2008 Table 4A.6)	Hazardous waste forecast	2005	1,545,170	991,933	402,914	2011	1,281,221	1,410,013	97,731	2020	96,113	760,541	97,731	
Year	MSW (London Plan 2008 Table 4A.6)	C&I (London Plan 2008 Table 4A.6)	Hazardous waste forecast															
2005	1,545,170	991,933	402,914															
2011	1,281,221	1,410,013	97,731															
2020	96,113	760,541	97,731															

No. of Proposed Change	Proposed Change	Reason for Change
<u>London Plan Proposed Change 12</u>	<p>Amend paragraph 4.4</p> <p>What facilities will we need?</p> <p>4.4 <u>Taking into account the reduced apportionment in the London Plan (2011) the ELWA boroughs will need to provide sufficient waste management capacity for:</u></p> <ul style="list-style-type: none"> • 1.573 million tonnes of MSW and C&I waste at 2021 • 1.267 million tonnes of C,E&D waste at 2020; and • 0.095 millions tonnes of hazardous waste at 2020. <p>4.1</p>	<p>Update to meet London Plan</p>
<u>London Plan Proposed Change 13</u>	<p>Amend Advertised Proposed Change 1 and amend paragraph 4.11 (now paragraph 4.10) as follows:</p> <p>4-11 4.10 <u>The 2011 London Plan proposed current figures are lower than in the previous current London Plan (consolidated with alterations since 2004, see Table 3) and have resulted should they be published in this form following the examination of the replacement London Plan there would clearly be in increased flexibility within the Waste DPD in terms of site deliverability. Such flexibility recognises that in some cases a site may not come forward or be required to meet the apportionment during the plan period. Site delivery and capacity requirements will be monitored extensively through LDF Annual Monitoring Reports. Where it is apparent that surplus capacity has been identified it may be necessary to put back the delivery of a waste management facility to a later five year period, or review its allocation in the DPD and seek an alternative use. As set out in Policy W2, sites will only be approved where they are needed to contribute to meeting the London Plan apportionment figures for the ELWA boroughs, and capacity sought only where there is an identified need.</u>²</p>	
<u>London Plan</u>	<p>Amend Advertised Proposed Change 5 and amend paragraph 4.16 to take into account the adopted London Plan 2011</p>	

² Ibid.

No. of Proposed Change	Proposed Change	Reason for Change
<u>Proposed Change 14</u>	<p>The <i>London Plan, Spatial Development Strategy for Greater London</i> (Greater London Authority, 2008) noted that in 2007 around 300,000 tonnes of hazardous waste was produced in London, 50.35% from C&D waste (containing asbestos and contaminated soil), 29.1% from oil and oil/water mix waste, and 20.44% from chemical and other industrial processes. There are no figures for hazardous waste on an individual borough basis; however with 33 boroughs, the individual tonnages generated in each borough are likely to be low. ...</p>	
<u>London Plan Proposed Change 15</u>	<p>Amend paragraph 4.17 to reflect adopted policy in the <i>London Plan 2011</i>.</p> <p>4.17 The definition of hazardous waste includes substances that commonly make up household, commercial and industrial construction (including WEEE) and construction, excavation and demolition waste streams (including asbestos and contaminated soils). Whilst <i>London Plan Policy 4A-295.19</i> states that Development Plan Documents should make provision for hazardous waste treatment plants to achieve, at a regional level, the necessary waste management requirements there is no definition of such facilities. Any application for a waste management facility that manages hazardous waste would be determined in accordance with the policies of this Joint Waste DPD.</p>	
<u>London Plan Proposed Change 16</u>	<p>Amend Hearing Proposed Change 15 (which amends Further Proposed Change 17) to reflect adopted policy in the <i>London Plan 2011</i></p> <p>The agreed targets for the Joint Waste DPD intend to deliver sustainable waste development (Preferred Objective A) and are consistent with the Waste Strategy for England 2007 and the <i>London Plan as consolidated with alterations since 2004 (2011)</i>. are:</p> <ul style="list-style-type: none"> • Recycling & Composting of MSW - 40% by 2010, 45% by 2015, 50% by 2020 Waste Strategy for England (2007, page 11) • Recovery of MSW - 53% by 2010, 67% by 2015, 75% by 2020 Waste Strategy for England (2007, page 11) • Recycling and composting of C&I - 70% by 2020 <i>London Plan 2008</i> (consolidated with alterations since 2004) Policy 4A-21 5.16 (Waste strategy policy and targets Self-Sufficiency and the Draft <i>London Plan</i>) 	

No. of Proposed Change	Proposed Change	Reason for Change
	<ul style="list-style-type: none"> Recycling and reuse of C,E&D - 95% by 2020 	
<u>London Plan Proposed Change 17</u>	<p>Amend Policy W2 to reflect adopted policy in the London Plan 2011</p> <p>Policy W2: Waste Management Capacity, Apportionment & Site Allocation</p> <p>The London Plan identifies the amount of municipal and commercial waste to be managed by the ELWA boroughs as 1,394,847 1,228,000 tonnes at 2011; 1,395,000 tonnes at 2016 and 1,573,000 tonnes at 2020¹. The ELWA boroughs will meet this apportionment by:</p>	
<u>London Plan Proposed Change 18</u>	<p>Amend paragraph 5.8 and amend Hearing Proposed Change 16 to reflect adoption of the London Plan 2011</p> <p>5.8 The Councils recognised that before all the sites in Schedule 2 are operational it will need to treat carefully proposals which involve the loss of existing waste management facilities that are not safeguarded. This is necessary to ensure there remains sufficient capacity in place to meet the apportionment. The Councils will require appropriate compensatory provision to be made where this is not the case.³ Existing construction excavation and demolition waste management sites are safeguarded in line with Policy 4A.28 of the London Plan (consolidated with Alterations since 2004)</p> <p>5.</p>	

³ Advertised Proposed Change 15 in response to representation JWDPD 1220

No. of Proposed Change	Proposed Change	Reason for Change		
<u>London Plan Proposed Change 19</u>	<p data-bbox="347 1245 379 1861"><u>Amend item in the Acronyms and terms section</u></p> <table border="1" data-bbox="411 546 555 1861"> <tr> <td data-bbox="411 1379 555 1861">London Plan</td> <td data-bbox="411 546 555 1379">Refers to the current iteration of the London Plan (consolidated with Alterations since 2004), published in July 2011 the strategic spatial planning document <u>Spatial Development Strategy for Greater London.</u></td> </tr> </table>	London Plan	Refers to the current iteration of the London Plan (consolidated with Alterations since 2004) , published in July 2011 the strategic spatial planning document <u>Spatial Development Strategy for Greater London.</u>	
London Plan	Refers to the current iteration of the London Plan (consolidated with Alterations since 2004) , published in July 2011 the strategic spatial planning document <u>Spatial Development Strategy for Greater London.</u>			

Annexes

Annex 1

Note regarding Sustainability Appraisal, Habitats Regulations Assessment, PPS25 Sequential Test and Equalities Impact Assessment

This document represents a schedule of post-hearing amendments to the Joint Waste DPD, as submitted. These amendments represent minor and statutory provision changes and clarifications to the draft DPD following the Schedule of Proposed Advertised Changes consultation and examination; no significant changes to the policies or site allocations in the draft DPD are proposed. It is considered that the minor changes set out in this schedule do not change the findings of impact assessments prepared in conjunction with the draft DPD and submitted to the Secretary of State: the Sustainability Appraisal (SA); Habitats Regulations Assessments (HRA); PPS25 Sequential Test; and Equalities Impact Assessment (EqIA). These impact assessments can be accessed on LB Newham's website at <http://www.newham.gov.uk/planning/planningpolicy>.

Annex 2
Schedule 1⁴

⁴ Changes to this Schedule have been made in accordance with Hearing Proposed Change 25 which amends Advertised Proposed Change 12

Ref	Facility name	Borough	Facility type	Annual Permitted Tonnage
RECYCLING				
80090	Gerpins Lane Reuse & Recycling Centre	Havering	A13 - Household Waste Amenity Site	115,500
80679	Jenkins Lane Waste Management Facility	Newham	A13 - Household Waste Amenity Site	110,000
80106	Chigwell Road Reuse & Recycling Centre	Redbridge	A13 - Household Waste Amenity Site	28,600
80105	Frizlands Lane Reuse & Recycling Centre	Barking & Dagenham	A13 - Household Waste Amenity Site	80,000
80126	Bywaters	Newham	A15 - Material Recycling Treatment Facility	500,000
80518*	Ilford Recycling Centre	Redbridge	A15 - Material Recycling Treatment Facility	7,500
80734	Rainham <u>Waste Recycling & Reclamation Centre</u>	Havering	A15 - Material Recycling Treatment Facility	50,000
80734	Express Recycling & Plastics Limited	Havering	A15 - Material Recycling Treatment Facility	30,000
80704*	White Mountain Roadstone Ltd	Barking & Dagenham	A15 - Material Recycling Treatment Facility	12,000
BT 9364**	Rainham Waste Recycling & Reclamation Centre	Havering	A15 - Material Recycling Treatment Facility	131,000
BT 9372**	Jenkins Lane MRF	Newham	A15 - Material Recycling Treatment Facility	50,000
80759	Frog Island MRF	Havering	A15 - Material Recycling Treatment Facility	70,000
80759	Closed Loop Recycling	Barking & Dagenham	A15 - Material Recycling Treatment Facility	25,000
80120	<u>SITA UK Ltd, Barking Materials Recycling Facility</u>	<u>Barking and Dagenham</u>	<u>A15 - Material Recycling Treatment Facility</u>	<u>75,000</u>
80091	Reuse Collections Limited	Barking & Dagenham	A14 - Transfer Station taking Non-Biodegradable Wastes	260,000
80115	Jewometals (UK) Ltd	Barking & Dagenham	A20 - Metal Recycling (mixed MRSSs)	24,000
80125	The Remet Company Ltd	Newham	A20 - Metal Recycling (mixed MRSSs)	41,600
	Mayer Parry Recycling Ltd (EMR)	Newham	A20 - Metal Recycling (mixed MRSSs)	150,000
COMPOSTING				
80704*	Rainham Waste Recycling & Reclamation Centre	Havering	A22 - Composting Facility (in-vessel)	49,000
80704*	Rainham Waste Recycling & Reclamation Centre	Havering	A22 - Composting Facility (windrow/wood processing)	153,000
RECOVERY				
80704*	Rainham Waste Recycling & Reclamation Centre	Havering	A16 - Physical Treatment Facility (lamp processing)	24,000
80620	Hunts Wharf	Barking & Dagenham	A16 - Physical Treatment Facility	150,000
Potential	Clinical Waste Ltd (Goodmayes Hospital)	Redbridge	A18 - Incinerator (Clinical Waste)	7,000
	Novera Gasification (Frog Island)	Havering	A17 - Physico-Chemical Treatment Facility (gasification)	90,000
80662	Frog Island Bio-MRF	Havering	A23 - Biological Treatment Facility	490,000
BT 9364	Jenkins Lane Bio-MRF	Newham	A23 - Biological Treatment Facility	93,600
				99,840

Joint Waste Development Plan Document for the East London Waste Authority Boroughs

Final Proposed Development Plan Document following the Examination in Public and incorporating all changes

(Pre-adoption version)

November 2011



Local Development Framework

London Borough of Barking & Dagenham

London Borough of Havering

London Borough of Newham

London Borough of Redbridge

Joint Waste Development Plan Document for the East London Waste Authority Boroughs

**Final Proposed Development Plan
Document following the Examination in
Public and incorporating all changes**

November 2011

For further information please refer to your Councils website:

www.barking-dagenham.gov.uk

www.havering.gov.uk

www.newham.gov.uk

www.redbridge.gov.uk

Contents

1. Introduction	3
What is the Joint Waste Development Plan Document (DPD)?	3
Who is preparing the Joint Waste DPD?	3
Borough Local Development Frameworks	4
2. Background	6
Waste Policy Context	6
Scope of the Joint Waste DPD.....	9
Sustainability Appraisal	10
3. Strategic objectives	12
4. Future waste management requirements	14
How much waste will we need to manage at 2020?	14
What facilities will we need?	15
What waste management technologies and facilities?	19
Where should new facilities be located?	21
5. Policies	22
6. Monitoring and implementation	31
Looking ahead.....	31
Monitoring	31
Indicators and targets.....	33
Delivery organisations.....	36
Schedule 1	37
Schedule 2	39
Acronyms and terms	40
Appendix 1	
Appendix 2	

1. Introduction

What is the Joint Waste Development Plan Document (DPD)?

- 1.1 The Planning and Compulsory Purchase Act 2004 requires local authorities to replace the existing Unitary Development Plan (UDP) with the Local Development Framework (LDF). The LDF is made up of a portfolio of local DPDs, which must include specific waste policies which are consistent with PPS10 and in General Conformity with the London Plan.
- 1.2 The purpose of the Joint Waste DPD is to set out a planning strategy to 2021 for sustainable waste management which enables the adequate provision of waste management facilities (including disposal) in appropriate locations for municipal and commercial & industrial waste having regard to the London Plan Borough level apportionment and construction, excavation & demolition and hazardous wastes. The Joint Waste DPD will form part of the LDF for each borough and help deliver the relevant elements of the Community Strategy for each borough.

Who is preparing the Joint Waste DPD?

- 1.3 The Joint Waste DPD is being developed by the four East London Waste Authority (ELWA) boroughs of LB Newham, Barking & Dagenham, Havering and Redbridge. The decision to work together was established through the boroughs' Local Development Schemes and is intended to build on the positive working relationship already established between these boroughs as part of ELWA.



Map 1: East London Waste Authority boroughs, Olympic area (LB Newham) and the London Thames Gateway Development Corporation area

Borough Local Development Frameworks

- 1.4 The Joint Waste DPD will become part of each borough's Local Development Framework, however it will differ from other borough DPDs as it will set waste management targets and allocate sites suitable for waste development for implementation across all of the four boroughs. Table 1 below shows borough-specific DPDs prepared or currently under development. Additional DPDs may also be prepared for each borough as required.

Table 1: Summary of Development Plan Documents and status for each borough

Borough	Documents
Barking & Dagenham	<ul style="list-style-type: none"> • Core Strategy Adopted July 2010 • Borough Wide Development Policies DPD (Adopted March 2011) • Site Specific Allocations (Adopted December 2010) • Barking Town Centre Area Action Plan (Adopted February 2011)
Havering	<ul style="list-style-type: none"> • Core Strategy (Adopted, July 2008) • Site Specific Allocations (Adopted, July 2008) • Development Control Policies (Adopted, October 2008) • Romford Area Action Plan (Adopted, October 2008)
Newham	<ul style="list-style-type: none"> • Core Strategy Proposed Submission Document (Submitted March 2011)
Redbridge	<ul style="list-style-type: none"> • Core Strategy (Adopted, March 2008) • Borough Wide Primary Policies DPD (Adopted, May 2008) • Development Sites with Housing Capacity (Adopted, May 2008) • Development Opportunity Sites (Adopted, May 2008) • Ilford Town Centre Area Action Plan (Adopted, May 2008) • Gants Hill Area Action Plan (Adopted March 2009) • Crossrail Corridor Area Action Plan (Submitted) • Minerals DPD (Issues and Options)

- 1.5 All boroughs have an adopted Statement of Community Involvement. The consultation process for the development of the Joint Waste DPD is consistent with the requirements as set out in each borough's SCI.

- 1.6 Details of other documents referred to throughout this document are detailed below:

- **Planning Policy Statement 10: Planning for Sustainable Waste Management** (ODPM, July 2005).
- **The London Plan** (GLA July 2011)
- **Building the Evidence Base and Identifying the Issues & Options** Consultation Document (May 2007)

Technical Report (October 2006)
Sustainability Appraisal Interim Report: An appraisal of the Issues and Options (May 2007)
Report on Consultation (November 2007)

- **Preferred Options**

Preferred Options Report (April 2008)
Sustainability Appraisal of Preferred Options (April 2008)
Site Assessment to inform Preferred Options (June 2007)
Sustainability Appraisal of reasonable alternative sites (July 2007)
Preferred Options Technical Report (April 2008)

- **Proposed Submission Documents**

Proposed Submission Joint Waste DPD
Joint Waste DPD Map
Sustainability Appraisal of the Joint Waste DPD
Technical Report

2. Background

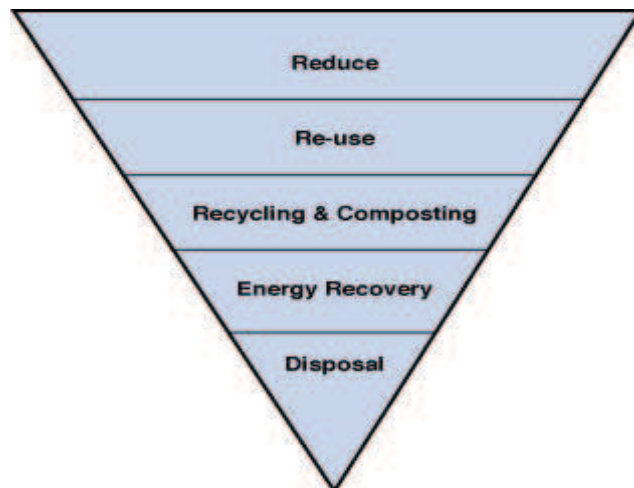
Waste Policy Context

2.1 The Joint Waste DPD is influenced by, and needs to have regard to, the relevant policies, plans and programmes at international, national, regional and local levels. A summary of the key policies, plans and programmes are detailed below.

EU legislation

2.2 The **Waste Framework Directive** [75/442/EEC] is the principal EU legislation for waste and requires measures to ensure that waste is recovered or disposed of without endangering human health or causing harm to the environment. A key principle of the directive is the waste hierarchy, with the objective to manage waste as near to the top of the hierarchy as possible.

The Waste Hierarchy



- The most effective environmental solution is often to reduce the generation of waste – **reduce**
- Products and materials can sometimes be used again, for the same or a different purpose – **re-use**
- Resources can often be recovered from waste – **recycling and composting**
- Value can also be recovered by generating energy from waste – **energy recovery**
- Only if none of the above offer an appropriate solution should waste be **disposed** of.

National Policy

2.3 The **UK Sustainable Development Strategy**¹ sets out the overarching approach to sustainable development. The **Waste Strategy for England 2007** was published following a comprehensive review of Waste Strategy 2000. The key objectives are to decouple waste growth from economic growth and put more emphasis on waste prevention and re-use; increase diversion of municipal and non-municipal waste from landfill; secure investment in waste infrastructure; and to get the most environmental benefit from the investment through increased recycling of

¹ Securing the Future - the UK Government Sustainable Development Strategy (March 2005)

resources and recovery of energy from residual waste. The Waste Strategy sets national targets for recycling and composting of household waste and the recovery of municipal waste.

- 2.4 **Planning Policy Statement 10: Planning for sustainable waste management** establishes key planning objectives through which planning authorities should prepare and deliver their planning strategies. PPS10 recognises that positive planning has an important role in delivering sustainable waste management through the development of appropriate strategies for growth, regeneration and prudent use of resources, and by providing sufficient opportunities for new waste management facilities of the right type, in the right place and at the right time.
- 2.5 PPS10 reflects many of the principles of the Waste Framework Directive and requires waste planning authorities to identify suitable site opportunities for waste management facilities.

Regional policy

- 2.6 **The London Plan** provides the strategic framework for the preparation of local development plan documents (DPD). The Plan identifies the waste management facilities required to satisfy the identified need and distribution across the region.
- 2.7 The London Plan (2011) provides planning policies for waste management which boroughs must be in general conformity with, including the tonnages of municipal and commercial and industrial waste to be managed by each London borough, revised targets for recycling of municipal waste and new targets for recycling of commercial and industrial waste and recycling or reuse of construction and demolition waste.
- 2.8 The London Plan encourages the regeneration of east London, concentrating development in '**Opportunity Areas**', of which Barking Reach, London Riverside, Ilford, Lower Lea Valley, Royal Docks and Stratford are located within the ELWA boroughs. Opportunity Areas are identified on the basis that they are capable of accommodating substantial numbers of new jobs and/or homes and their potential should be maximised.

Adjoining regional or local policy

- 2.9 It is important for the Joint Waste DPD to take into account the relevant strategies and plans of adjoining areas. The key waste planning policies from adjoining areas are detailed below:

The Thurrock Core Strategy Issues and Options Consultation

Proposes to reduce the use of landfill including importation of London's waste to landfill residues by 2015 and only if landfill capacity is still available. It was favoured by 71% of respondents. The **Essex Waste Development Plan** is currently in preparation.

North London Waste Plan - Issues & Options Consultation

Question 4 asks whether North London should identify just enough land to meet its apportionment or identify more land as good practice for contingency reasons and/or to achieve a greater level of self sufficiency within North London. If the North London Waste Plan identifies additional land it may result

in a reduced apportionment to East London boroughs if the London Plan apportionment is reviewed.

Local policy

- 2.10 **Planning Policy Statement 12: Local Development Frameworks** recognises the Local Development Framework as a key component in the delivery of each borough's **Sustainable Community Strategy** and requires Local Development Documents to express those elements of the Community Strategy that relate to the development and use of land.
- 2.11 The preparation of each borough Core Strategy reflects their Sustainable Community Strategy.

London Borough of Barking & Dagenham

Barking and Dagenham's Sustainable Community Strategy, The Community Plan (2009 Agreed Version) has six aims one of which is to work together for a clean, green and environmentally sustainable borough. As part of this the Partnership will be focusing on reducing the amount of waste that goes to landfill and reducing how much carbon dioxide is released into the environment. The rate of recycling (NI192) in 2008/09 was 25% increasing to 32% in 2009/10.

London Borough of Havering

Havering's Sustainable Community Strategy (2008 -2013) states that the Local Strategic Partnership (LSP) wishes to ensure a clean, safe and green borough. High recycling rates will reduce the burden we place on landfill and the Council will invest in new ways of improving recycling rates. The rate of recycling (NI192) in 2007/08 was 23.98%, increasing to 27.37% in 2008/09 and 34.35% in 2009/10.

London Borough of Newham

Newham Sustainable Community Strategy (2010-2030) states that the LSP wishes to help residents and businesses to minimise waste arisings and to recycle in the easiest and most cost effective way. The Council is examining ways to reduce the amount of waste produced, improve how it is disposed of and improve access to recycling. The rate of recycling (NI192) increased from 16% in 2008/9 to 19% between April and November 2009; the baseline (2007/8) rate was 15%.

London Borough of Redbridge

The Redbridge Sustainable Community Strategy (SCS) (2008-2018) sets an ambition to promote a positive attitude to the environment and have a cleaner, greener Redbridge. As part of this ambition the strategy makes a commitment to reduce waste production and increase recycling. The SCS provides the overarching framework for all Local Development Documents, and the Joint Waste DPD will assist with the delivery of its priorities. The 2009/10 AMR showed that the recycling and composting rate in Redbridge was 31.5%, which was an increase from 26.2% in 2008/09, but below the 40% national target.

- 2.12 This Joint Waste DPD must be in conformity with borough Core Strategy policies. Borough Core Strategy policies of specific relevance to the Joint Waste DPD are outlined below:

Barking &
Dagenham
(Adopted July
2010)

POLICY CR3: Sustainable Waste Management

<p>Havering (Adopted, July 2008)</p>	<p>Policy CP11- Sustainable Waste Management</p>
<p>Newham, Submission (31 March 2011)</p>	<p>Policy INF3</p>
<p>Redbridge (Adopted, March 2008)</p>	<p>Strategic Policy 11: Waste</p>

2.13 The ELWA **Joint Waste Management Strategy** details how the ELWA boroughs intend to manage municipal waste.

The Joint Waste Management Strategy set out below was approved by ELWA in February 2006.

This strategy shows how the East London Waste Authority, together with the Constituent Councils, intend to manage municipal solid waste by means of a Vision, Objectives and Targets.

Our vision is:

“To provide an effective and efficient waste management service that is environmentally acceptable and delivers services that local people value”

Our objectives are to:

- (i) Provide reliable and achievable services in terms of management and disposal of the waste
- (ii) Provide services that are environmentally and economically sustainable in terms of:
 - encouraging waste minimisation initiatives
 - seeking to maximise waste recycling and composting opportunities potentially supported by energy recovery
 - meeting national recycling and recovery targets whilst recognising regional waste strategies
 - complying with legislation on waste management
 - contributing to local economic development.
- (iii) Help promote the most cost effective delivery of services
- (iv) Ensure that the services shall be sufficiently diverse and flexible and not dependent upon a single method of waste treatment
- (v) Reduce biodegradable waste landfilled in order to meet the requirements of the Waste and Emissions Trading Act.

Our joint targets are to:

- stabilise or reduce the level of waste generated to below 515 kg per year per head of population
- achieve and where possible exceed, statutory recycling and composting standards
- recycle or compost 25% of our waste from April 2005, 30% from April 2010 and 33% from April 2015
- divert from landfill 40% of waste from April 2007, 45% from April 2010 and 67% from April 2015
- reduce biodegradable municipal waste sent to landfill to below 210,000 tonnes per year from April 2009, 140,000 tonnes per year from April 2012 and 100,000 tonnes per year from April 2019
- find the best methods to serve all households with a recycling collection of at least four materials by 2008.

We will achieve this by working in partnership across the councils, with our contractors and with other stakeholders, putting in place incentives to achieve targets where we can.

Joint Waste Management Strategy (ELWA, February 2006)

Scope of the Joint Waste DPD

2.14 **PPS10: Planning for sustainable waste management** requires the Joint Waste DPD to set out policies and proposals for waste management in line with the London Plan and ensure sufficient opportunities for the provision of waste management facilities in appropriate locations.

- 2.15 It is not necessary for the Joint Waste DPD to repeat or reformulate national or regional policies, nor to address issues adequately covered in the London Plan or borough Core Strategies².
- 2.16 London Plan Policy 5.17 requires the Joint Waste DPD to identify sufficient land to provide capacity to **manage** the apportioned tonnages of municipal solid waste (MSW) and commercial and industrial (C&I) waste. Waste is deemed to be managed in London if it is used for energy recovery in London, or it is compost or recycle sorted or bulked in London material recycling facilities for reprocessing either in London or elsewhere.
- 2.17 Although the London Plan borough level apportionment does not include construction, excavation and demolition waste (C, D&E) or hazardous waste streams, these are addressed in London Plan Policy 5.18 and as such are included in the Joint Waste DPD.
- 2.18 Further detail of these waste streams and their future management is in Chapter 4 of this document.

Sustainability Appraisal

- 2.19 Each stage in the preparation of the Joint Waste DPD has been subject to sustainability appraisal, as required by Section 5a and 5b of the Planning and Compulsory Purchase Act, the Environmental Assessment of Plans and Programmes Regulations 2004 and incorporating the requirements of EU Directive 2001/42/EC on the Assessment of the Effects of Certain Plans and Programmes on the Environment (commonly referred to as the Strategic Environmental [SEA] Directive). The Sustainability Appraisal documents form part of the evidence base to this Proposed Submission Document. The key recommendations of the Sustainability Appraisal are summarised below:

Sustainability Appraisal Recommendations

- Encourage the reduction, reuse and recycling of waste produced by the construction industry
- Secure an appropriate range of facilities for the management of waste
- Allocate sufficient resources to waste issues
- Help facilitate the provision of ongoing education and practical advice relating to waste
- Take into account proposals for an additional 54,000 new dwellings in the Thames Gateway London area
- Include sustainable transport factors - particularly encouraging the movement of waste by rail and water - in site assessment for facilities
- Consider environmental separation buffers around suitable sites for waste management facilities

Source: From Table 2.1: Key Messages from the Context Review, Sustainability Appraisal of the Joint Waste DPD Preferred Options, April 2008

² PPS12: Local Spatial Planning (2008) paras 4.30 and 5.1

2.20 The Sustainability Appraisal of Preferred Options³ tested the DPD objectives, policies and identified sites against the Sustainability Framework. The Appraisal suggested mitigation measures which were incorporated into the development of this Proposed Submission Document. A Final Sustainability Appraisal specifically relating to the Proposed Submission Joint Waste DPD has been produced.

Note: A Habitats Regulations Assessment of the Joint Waste DPD has been undertaken to determine whether the DPD will effect European biodiversity designations. The HRA was developed in consultation with officers at Natural England.

³ Joint Waste DPD Preferred Options - Sustainability Appraisal Report (Scott Wilson Ltd with Land Use Consultants, April 2008)

3. Strategic objectives

- 3.1 The evidence base revealed that there is a need to provide additional waste treatment capacity within the ELWA area to manage waste without endangering human health or the environment and to enable communities to take responsibility for the waste produced.

Vision Statement

The vision for the East London Joint Waste Development Plan Document is that it aims to manage waste produced in the boroughs of Barking and Dagenham, Havering, Newham and Redbridge in line with the growth set out in the boroughs' adopted and emerging Local Development Framework Core Strategies. It responds to East London's location within two Growth Areas (Thames Gateway and London-Stansted-Cambridge-Peterborough corridor), and identifies required levels of waste management capacity which can be delivered by 2021

The production of waste will be minimised, recycling and composting will be increased, and substantial reductions in the use of landfill will be achieved. This will be done in the unique context of East London, which is self-sufficient by having facilities in place to deal with its own waste. Boroughs will work with the Mayor of London to deliver his aspiration that no untreated waste will go directly to landfill, as set out in London's emerging Waste Strategy. The Joint Waste Plan will deliver sustainable development by addressing waste as a resource without endangering health or harming the environment. In dealing with waste boroughs will ensure that well designed, high quality waste facilities are developed, including the promotion of green industries, which integrate with and complement opportunities for regeneration across East London.
--

- 3.2 The Joint Waste DPD Objectives, as developed throughout the planning process, are to:
- A) Deliver sustainable development by driving waste management up the waste hierarchy, addressing waste as a resource and looking to disposal as the last option, while recognising that disposal must be adequately catered for;
 - B) Work towards meeting targets set out in the Waste Strategy for England 2007, and the London Plan;
 - C) Enable the provision of a range of waste technologies;
 - D) Enable the provision of facilities to allow for net self-sufficiency in the ELWA Boroughs in accordance with the London Plan;
 - E) Enable waste to be managed in one of the nearest appropriate installations without endangering health or harming the environment;
 - F) Integrate waste planning with other spatial concerns, including regeneration plans;
 - G) Reverse the historical trend of the ELWA area being the dumping ground for London's waste; and
 - H) Encourage our communities to take more responsibility for their waste.

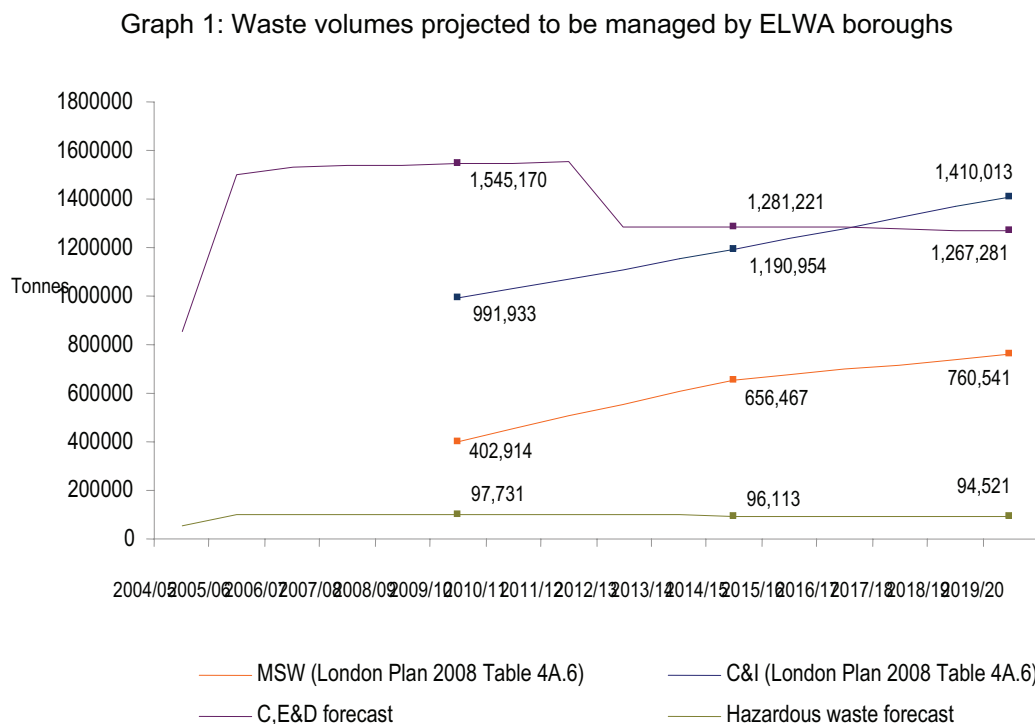
- 3.3 In addition to relevant European, national and regional policy, these objectives have also been developed to encompass the relevant principles from the borough *Sustainable Community Strategies*, *Core Strategies* and targets from the adopted *Joint Waste Management Strategy*. Implementation of these objectives will require action from the whole community, including producers, retailers, consumers, local authorities and the waste management industry - waste management is everybody's responsibility.
- 3.4 The four ELWA boroughs are at different stages in the preparation of their Local Development Framework Core Strategy. The London Boroughs of Barking and Dagenham, Havering and Redbridge have an adopted Core Strategy, and Newham's Core Strategy was submitted on 31 March 2011. The Borough Core Strategies each contain a strategic waste policy which sets the framework for the Joint Waste DPD including:
- encouraging movement up the waste hierarchy
 - suitable locations for waste management facilities
 - help deliver targets for recycling and composting
 - regard to the London Plan apportionment
 - Joint Waste DPD to identify amount of waste to be managed, the range and type of facilities needed, sufficient land to manage waste apportionment and suitable locations for these facilities.

4. Future waste management requirements

How much waste will we need to manage at 2020?

- 4.1 The determination of how much waste will need to be managed by the ELWA boroughs was debated through previous public consultation. The London Plan identifies the borough level apportionment of **municipal solid waste (MSW)** and **commercial and industrial waste (C&I)** to be managed. The apportionment for each ELWA boroughs is pooled for the purpose of this Joint Waste DPD.
- 4.2 The London Plan borough level apportionment does not include **construction, excavation, demolition waste (C,E&D)** or **hazardous waste**. Forecast scenarios and variables for construction and demolition waste and hazardous waste were consulted on at the Issues and Options stage and inclusion of these waste streams in the Joint Waste DPD are supported by representations received.
- 4.3 Graph 1 below show the tonnages of these waste streams to be managed by the ELWA boroughs to 2020. Municipal solid waste and commercial and industrial waste tonnages are as per London Plan (Consolidated with Alterations since 2004) Table 4A.6.⁴ Construction, excavation and demolition waste and hazardous waste projections for the ELWA boroughs are as set out in the Issues and Options Consultation Document.

Graph 1: Waste volumes projected to be managed by the ELWA boroughs



⁴ The projections for municipal solid waste and commercial and industrial waste have been reduced in the latest version of the London Plan which was published in July 2011.

What facilities will we need?

- 4.4 Taking into account the reduced apportionment in the London Plan (2011) the ELWA boroughs will need to provide sufficient waste management capacity for:
- 1.573 million tonnes of MSW and C&I waste at 2021
 - 1.267 million tonnes of C,E&D waste at 2020; and
 - 0.095 millions tonnes of hazardous waste at 2020.
- 4.5 A detailed list of current recycling, composting, recovery, disposal and transfer waste management facilities in the ELWA boroughs and individual annual permitted tonnages is included in the *Joint Waste DPD Technical Report*. A summary of the relevant facility types and their estimated capacity is shown in Table 2 below.

Table 2: Existing waste management capacity in the ELWA area

Facility type	Number of facilities	Annual permitted tonnage	Estimated actual capacity (75%)
A13 - Household Waste Amenity Sites (Reuse and Recycling Centres)	4	167,050	125,288
A15 - Material Recycling Treatment Facility	10	950,500	712,875
A20 - Metal Recycling Sites	5	488,080	366,060
A22 - Composting Facility	2	202,000	151,500
A16 - Physical Treatment Facility	3	174,000	130,500
A17 - Physico-Chemical Treatment Facility	1	90,000	67,500
A23 - Biological Treatment Facility	2	193,080	145,080
A11 - Household, Commercial and Industrial Waste Transfer Station	23	3,252,833	2,439,625
A18 - Incineration (Clinical Waste)	1	7,000	5,250
A09 - Special Waste Transfer Station	6	470,627	352,970
A12 - Clinical Waste Transfer Station	3	6,040	4,250
A14 - Transfer Station taking Non-Biodegradable Wastes	2	280,800	210,600
A05 - Landfill taking Non-Biodegradable Wastes	6	866,000	649,000

- 4.6 Waste management facilities that do not count toward meeting the capacity required to manage MSW and C&I wastes include transfer stations and landfill as these options do not support recycling. Vehicle dismantlers are also not included as it is a transfer-type operation. The existing capacity of ELWAs four Reuse and Recycling Centres is included as 50% of the annual permitted tonnage as this is the percentage of waste that is currently recycled or composted at these sites (as opposed to RRCs operating as transfer stations). As with all the other facilities (see paragraph 4.7 below), the *Joint Waste DPD technical report* then applies an actual throughput of 75% of this existing capacity at ELWA's four Reuse and Recycling Centres (i.e. 75% of 50% of the annual permitted tonnage). As almost all C,E&D waste is inert it is appropriate to include Landfill taking Non-Biodegradable (i.e. inert) waste.

4.7 It is generally accepted that most facilities are licensed for a throughput in excess of what they achieve in practice. As there is considerable uncertainty surrounding actual throughput and little available data, the *Joint Waste DPD technical report* uses an estimate for actual throughput of 75% of maximum available capacity to maintain consistency with data used in the London Plan.

4.8 The number and mix of facilities that will be required within the ELWA area is dependent not only on the amount of waste that will require treatment but also how it is treated. The Waste Strategy for England 2007 establishes the following targets for waste management:

Table 3

	MSW					C&I		C,E&D	
	Recycling	Composting	Recycling + Composting	Other recovery	Total recovery ¹	Recycling	Composting	Recycling & Composting	Recycling & Reuse
2010	27%	13%	40%	13%	53%	38%	18%	56%	-
2015	30%	15%	45%	22%	67%	43%	21%	64%	-
2020	33.5%	16.5%	50%	25%	75%	47%	23%	70%	95%

Note ¹ 'Recovery' means to obtain value from waste through one of the following means:

- Recycling
- Composting
- Other forms of material recovery (such as anaerobic digestion)
- Energy recovery (combustion with direct or indirect use of the energy produced, manufacture of refuse derived fuel, gasification, pyrolysis, or other technologies)

Source: Waste Strategy 2000 for England and Wales, DETR May 2000.

4.9 These targets highlight a commitment to drive waste management up the waste hierarchy and divert more waste from landfill and are endorsed in the National Waste Strategy 2007 and the London Plan.

4.10 In addition to the targets established in the Waste Strategy 2000 and the London Plan, the ELWA boroughs have planned on the basis of that waste which is not recycled or composted being recovered and therefore no waste going to landfill. Based on this approach for the management of waste in the ELWA area, and the existing waste management capacity in the ELWA boroughs (as detailed in Table 2) the ELWA boroughs need to provide capacity as summarised in Table 3 below in order to manage the apportionment of MSW and C&I waste in the London Plan (2011). A detailed explanation and spreadsheet of these calculations is included in the *Joint Waste DPD technical report*.

Table 4 Summary of average capacity surplus/deficit within the ELWA boroughs required to meet the London Plan (2011) apportionment for MSW and C&I waste.

Waste management route	Capacity Required		
	2011	2016	2021
Recycling (MSW and C&I)	<i>786,203 tpa</i>	<i>674,313 tpa</i>	<i>415,428 tpa</i>
Composting (MSW and C&I)	-47,440 tpa	-109,170 tpa	-320,255 tpa
Recovery (all facilities)	-262,710 tpa	-256,090 tpa	-269,370 tpa

NOTE 1 A deficit, or future capacity requirement, is shown in bold with a minus sign in front. Surplus capacity is shown in italic text.

NOTE 2 Table 4 is based on the assumption of 75% capacity utilisation of existing facilities (refer to paragraph 4.7)

- 4.11 The 2011 London Plan figures are lower than in the previous London Plan (consolidated with alterations since 2004) and have resulted in increased flexibility within the Waste DPD in terms of site deliverability. Such flexibility recognises that in some cases a site may not come forward or be required to meet the apportionment during the plan period. Site delivery and capacity requirements will be monitored extensively through LDF Annual Monitoring Reports. Where it is apparent that surplus capacity has been identified it may be necessary to put back the delivery of a waste management facility to a later five year period, or review its allocation in the DPD and seek an alternative use. As set out in Policy W2, sites will only be approved where they are needed to contribute to meeting the London Plan apportionment figures for the ELWA boroughs, and capacity sought only where there is an identified need.
- 4.13 **Construction, excavation and demolition waste:** It is estimated that a large portion of recycling and re-use of construction, excavation and demolition waste currently occurs on site rather than in designated licensed facilities, or is transferred out of London through inert transfer stations. As such it is not considered that additional permanent new C,E&D recycling facilities are required.
- 4.14 As an alternative to allocating sites for C,E&D recycling facilities, Joint Waste DPD Policy W1 encourages the reuse of C,E&D waste at or near to construction sites with on-site recycling wherever possible. There is increasing opportunity for the use of recycled aggregate (sourced from a variety of construction, excavation and demolition wastes) in a wide range of applications within the construction industry, and as a result of landfill legislation changes, on-site remediation of contaminated soils is increasing. Additionally, Policy W4 ensures that the potential benefits of landfilling inert C,E&D waste are maximised.
- 4.15 **Hazardous waste:** The *Study of Arisings and Management of Non-Municipal Wastes in the ELWA area* (ERM, 2005) considered it not appropriate for the ELWA boroughs to aim for self-sufficiency in the management of hazardous waste or to allocate specific sites suitable for hazardous waste management due to the variety

and nature of hazardous wastes and the specialist management techniques and facilities required. This is supported by Policy 5.19 of the London Plan which states that the Mayor will work with the Boroughs, the Environment Agency and industry to provide and maintain direction on the need for hazardous waste management capacity.

- 4.16 The *London Plan, Spatial Development Strategy for Greater London* (Greater London Authority, 2011) noted that in 2007 around 300,000 tonnes of hazardous waste was produced in London, 35% from C&D waste (containing asbestos and contaminated soil), 21% from oil and oil/water mix waste, and 44% from chemical and other industrial processes. There are no figures for hazardous waste on an individual borough basis; however with 33 boroughs, the individual tonnages generated in each borough are likely to be low. The types of hazardous waste arising in the ELWA area include such materials as televisions, computer monitors and fluorescent lighting (classified as hazardous wastes under the Hazardous Waste Directive list of wastes); thus households and businesses will also contribute towards hazardous waste arisings. Some hazardous waste can be reused, recovered or recycled - such as solvents, oils and metals. Others are incinerated or sent to landfill - however there are fewer landfill sites able to accept hazardous waste since implementation of the Landfill Directive in 2004. Whilst the London Plan recognises that there is a need to identify hazardous waste capacity for London's hazardous waste, due to the nature and quantities of this, the London sub-regions are unlikely to be self-sufficient. Detailed data on hospital/health care wastes across the ELWA area is not available. Current estimates from health service colleagues indicate that Newham General Hospital for example generates around 850 tonnes of waste pa - of which 380 tonnes are clinical waste and 380 tonnes general 'black bag' waste. Seventy tonnes of general waste is currently recycled - primarily card and paper - more recycling is planned, with the aim of recycling 50% of the domestic waste stream. Very little waste now requires incineration - e.g. the approximate clinical waste arising from health centres within Barking and Dagenham is 46 tonnes pa - of which some 2-3 tonnes requires incineration. In Havering St George's Hospital generates approximately 22 tonnes pa of clinical waste.
- 4.17 The definition of hazardous waste includes substances that commonly make up household, commercial and industrial construction (including WEEE) and construction, excavation and demolition waste streams (including asbestos and contaminated soils). Whilst London Plan Policy 5.19 states that Development Plan Documents should make provision for hazardous waste treatment plants to achieve, at a regional level, the necessary waste management requirements there is no definition of such facilities. Any application for a waste management facility that manages hazardous waste would be determined in accordance with the policies of this Joint Waste DPD.
- 4.18 The existing hazardous waste management capacity within the area is listed in Table 2 - special waste [470,000tpa] and clinical waste [6,000tpa] transfer stations and clinical waste incineration [7,000tpa]. On-site soil treatment facilities, including temporary facilities, provide additional capacity. While just the recovery (incineration) capacity is classified as 'treatment', special waste transfer stations play an important role in the storage and reprocessing of hazardous waste streams, especially as the Hazardous Waste Directive and Regulations require more sophisticated levels of separation of the different categories of hazardous, non-hazardous and inert waste.

4.19 **Electrical equipment:** The Waste Electrical and Electronic Equipment Directive (WEEE) aims to minimise the impacts of electrical and electronic equipment on the environment during their life time and when they become waste. The Directive applies to a wide range of products including fridges, washing machines, TVs, computers, fluorescent tubes and electronic games/toys and encourages and sets criteria for the collection, treatment, recycling and recovery of waste equipment. All four of ELWAs Reuse and Recovery Centres are Designated Collection Facilities (DCFs) which separate and recycle used electrical equipment with a current recycling rate in excess of 90% by weight.

What waste management technologies and facilities?

4.20 A range of facilities, including type, size and mix of technologies, will be necessary to meet the overall capacity requirements. Recycling, composting, recovery and processing facilities cover a range of technology types that will have specific site characteristics. A summary of existing and emerging waste technologies is set out below:

Materials Recycling Facility / Material Recovery Facility (MRF)

A MRF is designed to process source separated or co-mingled dry recyclables into individual materials prior to despatch to reprocessors who prepare the materials for manufacturing into new recycled products. The MRF is made up of a series of conveyor belts and a mix of manual and automatic machines to separate the materials and remove any items that can be recycled.

In-vessel composting (IVC)

In-vessel composting is used to cover a wide range of composting systems, all of which feature the enclosed composting of biodegradable material, therefore allowing a higher degree of process control. They are usually categorised into five types: containers, silos, agitated bays, tunnels, and enclosed halls. Many IVC systems involve the forced aeration of the feedstock and capture and manage process air to reduce potential nuisance, such as odour. The enclosed nature of these facilities allows for the further control of nuisance, including noise and dust. The compost produced is far more stable and sanitary than the biodegradable MSW input. Moreover, the material may be screened into particle sizes suited to its end-use, and may be blended with other materials, such as sand, to produce artificial topsoil.

Open-air composting

Open-air composting has quite different land use implications from other waste management techniques. The process involves mechanical turning of shredded biodegradable waste to enable effective degradation. Open windrow composting operations can take place outdoors or using minimal buildings and as such the operations are comparable to agricultural practices and may therefore be appropriate to locate in the open countryside or Green Belt. These facilities would not normally be compatible with a hi-tech business park or urban setting.

Mechanical Biological Treatment (MBT)

Mechanical biological treatment is a generic term for the integration of several processes commonly found in other waste management technologies, including MRFs, sorting and composting plants. A common aspect of all MBT plants used for MSW is to sort mixed waste using a range of techniques, including hand picking, mechanical sorting and magnetic separation, and to extract materials for recycling. The biological element of the process can take place prior to or after sorting. MBT plants can incorporate a number of different

processes in a variety of combinations, with the exact mix of technologies determined by the objectives of the plant.

Anaerobic digestion (AD)

Anaerobic digestion is a biological treatment where biodegradable wastes are converted to a 'digestate' (containing biosolids and a liquid) and biogas. The waste is decomposed by bacteria in the absence of air - a key difference from composting processes. Biodegradable waste is broken down in an enclosed vessel under controlled conditions. The methane rich biogas released during this process can be collected and burnt as a fuel to generate electricity.

Advanced Thermal Treatment (ATT)

Advanced thermal treatment is a general term primarily used for waste management technologies that use pyrolysis or gasification to process waste and generate power (and often to recover heat). ATT excludes the conventional incineration of waste. Within the ELWA area, a proposal for advanced thermal treatment (excluding conventional incineration) will be considered where the development will recover energy, and where it can be demonstrated that waste to be treated in this way cannot practically and reasonably be reused, recycled or processed to recover materials. This will ensure that the thermal treatment plant does not 'crowd out' other technologies with the potential for recycling or otherwise gaining benefit from the waste prior to its thermal treatment. Opportunities to include provision for Combined Heat and Power (CHP) and Combine Heat Power and Cooling (CHPC) will be supported.

C,E&D Recycling

Temporary C,E&D recycling facilities can potentially be located on development sites for the reprocessing of a range of C,E&D wastes (including concrete, tiles, brick, asphalt etc) into recycled aggregate for use in the construction industry. Further details are available at www.aggregain.org.uk (part of the WRAP Aggregates Programme).

C,E&D waste recycling and processing facilities can also be co-located on mineral sites. Broadly, the materials are similar in nature, as are the general processes that both C,E&D waste and raw materials undergo (including screening and grading of material, crushing and breaking), and there are potential transport-related savings through the use of heavy goods vehicle movements delivering C,E&D waste and removing minerals or secondary aggregate. Permissions granted for C,E&D waste management facilities on mineral extraction sites will be temporary and restricted to the operational life of the mineral site.

Where should new facilities be located?

- 4.21 In accordance with PPS10, the London Plan and borough Core Strategy policy, the Joint Waste DPD identifies sites suitable for recycling and waste treatment facilities. The process for determining these sites has been documented throughout the development of this Document and has been influenced by representations received.
- 4.22 The suitability of a site for a waste facility was based on criteria consistent with PPS10, the London Plan and sustainability objectives. Full details of the methodology used for the assessment of potential sites for waste management uses, as well as the findings of the site assessment and recommendations for preferred sites to be included in the Joint Waste DPD can be found in the *Site Assessment to inform Preferred Options* report⁵.
- 4.23 The site assessment procedure also considered the typical characteristics of modern waste management techniques and facilities and key local issues associated with the operation of each process.

⁵ East London Joint Waste DPD - Site Assessment to inform Preferred Options. Prepared by Land Use Consultants and Environmental Resources Management Ltd, June 2007.

5. Policies

POLICY W1: Sustainable Waste Management

The boroughs will aim to drive waste management up the waste hierarchy by promoting waste minimisation, materials reuse, recycling & recovery of resources and help the delivery of national and regional targets for recycling and composting set out in the Waste Strategy for England 2007 and the London Plan by:

- (i) working in partnership with the general public and the business community in the ELWA area to provide information and advice and raise awareness;
- (ii) working in partnership with local community and voluntary groups and social enterprises to encourage waste minimisation, materials reuse, recycling and recovery of resources;
- (iii) ensuring that developers and contractors design new housing, commercial and other developments to maximise opportunities for future occupiers to minimise, reuse, recycle and recover resources from waste, by providing adequate space and facilities for storage and handling of segregated waste; and
- (iv) require the reuse of construction, excavation and demolition waste during new developments, such as the Thames Gateway, with on-site recycling and use of recycled aggregate wherever possible and encourage use of sustainable transport modes where the movement of waste is necessary.

Justification

- 5.1 The objective of the Waste Framework Directive is to manage waste as near to the top of the waste hierarchy as possible with European, national and regional policies placing increasing emphasis on waste reduction. Achieving these objectives will require a concerted effort to decouple waste growth from economic growth, which will need a change in producer and consumer behaviour and current patterns of the manufacture and consumption of goods. There is increasing pressure both nationally and regionally for business to take the lead, especially with regard to packaging waste.
- 5.2 The agreed targets for the Joint Waste DPD intend to deliver sustainable waste development (Preferred Objective A) and are consistent with the Waste Strategy for England 2007 and the London Plan (2011). These are:
 - **Recycling & Composting of MSW** - 40% by 2010, 45% by 2015, 50% by 2020
Waste Strategy for England (2007, page 11)
 - **Recovery of MSW** - 53% by 2010, 67% by 2015, 75% by 2020
Waste Strategy for England (2007, page 11)
 - **Recycling and composting of C&I** - 70% by 2020
London Plan 2011 Policy 5.16 (Waste Self-Sufficiency)
 - **Recycling and reuse of C,E&D** - 95% by 2020
- 5.3 Achieving these targets will require investment in new infrastructure and technologies to treat the wastes generated within the ELWA area. Efforts will extend to the commercial and industrial (C&I) and construction, excavation and demolition (C,E&D) waste streams. The ELWA Boroughs will be supportive in generating, and encouraging others to generate, markets for recycled materials through working with public organisations, as well as local privately funded

initiatives. Other approaches include adopting green procurement practices and encouraging the use of recycled aggregate in the construction industry.

- 5.4 The Joint Waste DPD encourages the development of new and emerging advanced conversion technologies for waste. Such technologies might include recycling, composting, mechanical biological treatment, anaerobic digestion and gasification/pyrolysis, and where appropriate the co-location of these facilities to form resource recovery parks will be supported. By not prescribing preferred waste management technologies the Joint Waste DPD will maintain flexibility and allow industry to bring forward appropriate development proposals.
- 5.5 For proposed facilities lower down in the waste hierarchy, applicants will be expected to demonstrate satisfactorily how their proposals integrate into the sustainable approach to waste management sought by the ELWA Boroughs. Their proposals must take into account any opportunities for treatment of waste further up the hierarchy. New and innovative approaches to waste management will be supported where benefits are demonstrated.

Policy W2: Waste Management Capacity, Apportionment & Site Allocation

The London Plan identifies the amount of municipal and commercial waste to be managed by the ELWA boroughs as 1,228,000 tonnes at 2011; 1,395,000 tonnes at 2016 and 1,573,000 tonnes at 2021. The ELWA boroughs will meet this apportionment by:

- (i) Safeguarding the capacity of existing waste management facilities listed in Schedule 1 and encouraging increased processing of waste at these facilities, to run at a higher figure towards the licensed capacity; and
- (ii) Approving strategic waste management facilities where it will contribute to the ELWA boroughs meeting the London Plan apportionment on sites within the locations listed in Schedule 2.

Where the applicant can demonstrate there are no opportunities within these preferred areas for a waste management facility, sites within designated industrial areas as identified in borough Local Development Frameworks will be considered.

Planning permission will only be granted for new waste water and sewage treatment plant, extensions to existing works, or facilities for the co-disposal of sewage with other wastes, where development is either needed to treat waste arisings from within the East London Waste Authority area or in the case of arisings from elsewhere the need cannot practicably and reasonably be met at another site - subject to the relevant borough's policy/guidance and Policy W5 of this Plan. Wherever practical and economical, renewable energy generation will be encouraged as part of such waste management facilities.

In all cases applications will be required to meet the relevant boroughs design guidance and Policy W5.

Justification

- 5.6 PPS10 requires that the Joint Waste DPD identifies sites and areas suitable for the waste management facilities that support the apportionment as set out in the London Plan.
- 5.7 The loss of existing waste management capacity or suitable sites for future facilities to other development pressures will make waste recycling, diversion and recovery targets harder to achieve. PPS10 recognises that all local planning authorities have a responsibility to consider the impact of other development on existing waste management facilities and on sites and areas allocated for waste management. The London Plan requires that existing waste management sites should be safeguarded, unless appropriate compensatory provision is made. It is deemed that the sites listed in Schedule 1 and Schedule 2 satisfies this.
- 5.8 The Councils recognised that before all the sites in Schedule 2 are operational it will need to treat carefully proposals which involve the loss of existing waste management facilities that are not safeguarded. This is necessary to ensure there remains sufficient capacity in place to meet the apportionment. The Councils will require appropriate compensatory provision to be made where this is not the case.
- 5.9 A detailed explanation of the calculations of how the apportioned waste will be treated (as per the targets for municipal and commercial and industrial waste), existing capacity of existing waste management facilities in the ELWA boroughs, and new capacity which the JWDPD must plan for is included in the *Joint Waste*

DPD Technical Report. Table 5⁶ summarises the capacity required and estimated landtake that may be required to provide this capacity.

Table 5: Summary of average capacity required within the ELWA boroughs and land area required to meet the London Plan apportionment for MSW and C&I waste

Waste management route	Capacity Required	Land area required
Composting (MSW and C&I)	47,440 tonnes at 2011	3 - 6ha
	+61,730 tonnes at 2016	4 - 12ha
	+211,085 tonnes at 2021	6-12ha
Recovery (all facilities)	262,710 tonnes at 2011	3-5ha0ha
	-6,620 tonnes at 2016	
	+ 13,280 tonnes at 2021	1ha

5.10 Schedule 2 identifies a number of areas within which potentially available and suitable sites for waste management facilities can be located. These areas represent a refinement of the broad locations identified in the London Plan and borough Core Strategies. This builds flexibility into the Joint Waste DPD and the boroughs are confident that sufficient opportunities will arise within these areas.

5.11 Each of the identified sites was considered in the context of the type of waste treatment technology that could be suitable on that site based on the typical characteristics and key local issues published in *Planning for Waste Management Facilities* and *Recycling and Recovery Facilities*.

5.12 The sites identified in Schedule 2 provide sufficient potential capacity to manage the tonnages of waste presented above. In considering the need for development, the ELWA Boroughs will have regard to the remaining capacity of existing facilities, as well as other permitted waste facilities. It is important that the ELWA boroughs work together to ensure that new development does not constrain land that has been safeguarded for waste management facilities.

5.13 There is an established network of sewage facilities within East London, but upgrades may be required during the Plan period and this may involve new development. As the Landfill Directive introduces a ban on the disposal of liquid to other landfill facilities, this may result in additional pressure to find available space within operational sewage treatment plants to manage liquid wastes that were previously disposed of through landfill. Sewage treatment plants may also be appropriate locations for new facilities to manage domestic and other wastes.

⁶ Hearing Proposed Change 17

Policy W3: Energy recovery facilities

Opportunities for the incorporation of waste recovery and treatment facilities, where the energy produced from biological or thermal treatment can be utilised in local schemes, should be considered for all major new developments.

Applications for advanced thermal treatment facilities¹ will be considered only where the waste to be treated cannot practicably and reasonably be reused, recycled or processed to recover materials and where there is provision for energy recovery and co-location with complementary activities.

In all cases applications will be required to meet relevant design guidance and Policy W5.

¹ Advanced Thermal Treatment technologies exclude conventional incineration

Justification

- 5.14 While the Joint Waste DPD supports, in accordance with the waste hierarchy, that opportunities for recycling and composting are maximised before energy recovery is considered, energy recovery facilities will play an important role in the future management of London's waste.
- 5.15 Advanced thermal treatment (or advanced conversion) technologies including gasification, pyrolysis and anaerobic digestion provide opportunities for local renewable energy generation supported by the Renewables Obligation Certificates system and the Government's Energy White Paper. The Joint Waste DPD does not express a preference for technologies in order to maintain flexibility with regard to emerging technologies and allow proposals to be determined on their merits. The Joint Waste Plan supports the Defra Waste Infrastructure Delivery and New Technologies Demonstrator Programmes in developing UK specific examples of these technologies.
- 5.16 As any energy recovery technology is more beneficial if both heat and electricity can be recovered, particular attention is focussed on siting facilities in order to maximise opportunities for Combined Heat and Power (CHP) and Combined Cooling Heat and Power (CCHP). Potential co-location opportunities should be considered at the early stages of planning major new developments.

Policy W4: Disposal of inert waste by landfilling

The ELWA Boroughs will only grant planning permission for waste disposal by landfilling provided:

- (i) the waste to be disposed of cannot practicably and reasonably be reused; and
- (ii) the proposed development is both essential for and involves the minimum quantity of waste necessary for:
 - a) the purposes of restoring current or former mineral workings sites; or
 - b) facilitating a substantial improvement in the quality of land; or
 - c) facilitating the establishment of an appropriate after-use; or
 - d) improving land damaged or degraded as a result of existing uses and where no other satisfactory means exists to secure the necessary improvement; and

Where the above criteria are met, all proposals for landfilling should:

- (i) incorporate finished levels that are compatible with the surrounding landscape. The finished levels should be the minimum required to ensure satisfactory restoration of the land for an agreed after-use; and
- (ii) include proposals for high quality restoration and aftercare of the site, taking account of the opportunities for enhancing the overall quality of the environment and the wider benefits that the site may offer, including nature and geological conservation and increased public accessibility.

Justification

5.17 Due to the need for inert C,E&D waste landfill capacity the voids left by mineral working can be used for landfill to achieve restoration of the site. Policy W4 sets the requirements that will govern the circumstances under which these sites can be used for landfill materials.

5.18 To ensure that the potential benefits of landfill are maximised, such proposals must include consideration of final use of the land, including proposals for a high quality of restoration and long term management plans for the restored site. In accordance with sustainability objectives after-uses with open space and/or biodiversity conservation will be favoured. All restored landfills will be expected to incorporate high quality standards of restoration of the site that are appropriate to the surrounding landscape. In this regard Borough's LDF minerals policies must also be met.

Policy W5: General Considerations with regard to Waste Proposals

Planning permissions for a waste related development will only be granted where it can demonstrate that any impacts of the development can be controlled to achieve levels that will not significantly adversely affect people, land, infrastructure and resources.

Applications for new facilities that manage non-apportioned waste must demonstrate that there is not a more suitable site nearer the source of waste arising with regard to the factors listed below.

The information supporting the planning application must include, where relevant to a development proposal, assessment of the following matters and where necessary, appropriate mitigation should be identified so as to minimise or avoid any material adverse impact and compensate for any loss including:

- (i) the release of polluting substances to the atmosphere or land arising from facilities and transport;
- (ii) the amount of greenhouse gases produced;
- (iii) the development on sites that are likely to be at greater risk now, or over the lifetime of the development due to climate change;
- (iv) the likely increase in pressure on resources with climate change;
- (v) the contamination of ground and surface water;
- (vi) the drainage of the site and adjoining land and the risk of flooding;
- (vii) water consumption requirements and consideration of water management within operational plant;
- (viii) groundwater conditions and the hydrogeology of the locality;
- (ix) the visual and landscape impact of the development on the site and surrounding land, including townscape and agricultural land;
- (x) in the case of buildings, demonstration of high quality of design and sustainable construction and drainage techniques;
- (xi) adverse effects on neighbouring amenity including transport, noise, fumes, vibration, glare, dust, litter, odour and vermin;
- (xii) transport impact of all movements, including opportunities for use of sustainable transport modes, traffic generation, access and the suitability of the highway network in the vicinity, access to and from the primary route network;
- (xiii) adverse impacts of all movements including: traffic generation, an unsuitable highway network, inadequate accessibility to the site or the primary road network in the vicinity; and limited or no opportunities for the use of sustainable transport modes;
- (xiv) the loss or damage to significant biodiversity conservation interests;
- (xv) the loss or damage to the historic environment, archaeological and cultural resources of value and importance;
- (xvi) potential danger to aircraft from birdstrike and structures;
- (xvii) scope for limiting the duration of use; and
- (xviii) the management arrangements for residues arising from any waste management facility.

Justification

- 5.19 All planning applications for waste management facilities will need to cover all relevant matters in detail and are expected to include management and mitigation for potentially adverse effects resulting from the proposed development.
- 5.20 In assessing applications, due regard will be paid to prevailing national policy and guidance appropriate both to the areas and features of acknowledged importance and to the proposed means of dealing with waste. The assessment will also take into account whether any significant adverse impact identified can be controlled to acceptable levels. Consideration will also be given to relevant Borough specific DPDs in Barking and Dagenham, Havering, Newham and Redbridge, to ensure that policy conflict does not arise.
- 5.21 To maintain the principles of sustainable development and the right balance of waste facilities across London, proposals for new facilities managing waste which is not included within the London Plan apportionment for the ELWA area must undergo a sequential test. This will entail the applicant demonstrating as part of their application that there are no more suitable opportunities to manage the non-apportioned waste closer to its source. This is necessary to ensure that the distance waste is transported is minimised, to encourage communities to take more responsibility for managing their own waste, and to prevent an over-concentration of waste management facilities in east London.
- 5.22 The handling, treatment and disposal of waste should not give rise to pollution or have a significantly adverse environmental impact. Adequate monitoring and safeguards should be maintained to minimise the risk of problems in the future. These issues are the primary responsibility of the pollution control authorities, generally the Environment Agency, but planning should ensure that the location of proposed waste development is acceptable.
- 5.23 As reliance on landfill diminishes, waste management is increasingly expected to occur within purpose built structures. A high quality of building design and site layout in proposals for waste management facilities is expected.
- 5.24 The construction and operation of waste management facilities should not give rise to an unacceptable impact on the amenities of residents, or on the local and wider environment. Sufficient information from applicants will therefore be required to ensure adequate protection of these interests before granting planning permission. Adequate pollution control technology is expected to be installed and operated and best practice on site management and operations should be included with the planning application, as poor site management can lead to adverse amenity and environmental impacts.
- 5.25 Consideration of traffic generation characteristics will incorporate an assessment of the level and type of traffic generated and the impact of that traffic. This assessment will identify opportunities for use of sustainable transport modes, the suitability of access and the highway network in the vicinity of the site, including access to and from the primary route network, designated routes and vehicle operating times and works necessary to accommodate the development.

5.26 Residual wastes will arise from waste management facilities. These wastes will need to be managed and these management details are expected to be included with the planning application.

5.27 Developers are encouraged to contact the appropriate ELWA borough prior to submission of a planning application to discuss all relevant matters.

6. Monitoring and implementation

Looking ahead

- 6.1 The development of this Joint Waste Development Plan Document is based on a variety of assumptions, notably with regard to forecasting waste arisings, calculating future capacity requirements for recycling, composting, recovery and treatment facilities, and the type of facilities that may provide this capacity during the plan period. Details of these assumptions and how they have influenced each phase are documented in *Building the Evidence Base and Identifying Issues and Options* and *Preferred Options Report*.
- 6.2 As stated in Chapter 4, the London Plan identifies the borough level apportionment of municipal solid waste and commercial and industrial waste to be managed. Future amendments to this apportionment could change the amount of waste to be managed by the ELWA boroughs and therefore the facility capacity needed. In addition, changes to national or regional targets for recycling, composting and recovery could impact the type of facilities needed to manage the apportioned waste. The technical report (Joint Waste DPD technical report) provides a spreadsheet where the variables input (including apportionment, recycling and composting targets and existing facility capacity) calculate the estimated facility capacity needed. This spreadsheet will allow future calculations to be made should one or more of these variables change. It is anticipated that any future significant review of the waste chapter of the London Plan would coincide with a review of this DPD.
- 6.3 A range of facilities (type, size and mix of technologies) sited at a range of locations will be necessary to meet the overall capacity requirements. The estimated land take requirements and general siting criteria for new waste facilities were based on *Planning for Waste Management Facilities - A Research Study* ODPM (August 2004), *Recycling and recovery facilities - Sites investigation in London*, Land Use Consultants and SLR Consulting Ltd for the GLA (July 2005) and the Defra Waste Implementation Programme New Technologies publications and Waste Technology Data Centre. The Joint Waste DPD acknowledges that waste technology is constantly evolving and encourages the development of new and emerging technologies. The DPD does not prescribe preferred technologies in order to maintain flexibility and allow the waste management industry to bring forward appropriate waste facility proposals.
- 6.4 The sites identified in Schedule 2 provide sufficient potential capacity to manage the apportionment in accordance with PPS10 and the London Plan. The availability and future suitability of these sites will be reviewed and updated as part of the review of this DPD.

Monitoring

- 6.5 A key requirement of the Planning and Compulsory Purchase Act 2004 is for Planning Authorities to assess the extent to which policies in local development documents are being implemented. This chapter outlines how the policies in the Joint Waste DPD will be monitored against core output indicators as prescribed by the Communities and Local Government Department as well as local output indicators which have been established by the four authorities for the purpose of

this DPD and take into account the recommendations within the Sustainability Appraisal. To provide evidence that the policies are being implemented, targets are provided for both the core and local output indicators.

- 6.6 Where monitoring identifies serious/sustained failure to meet core and local targets, the four Planning Authorities will seek to understand the reasons why this is occurring and take effective management measures to correct any problems. In the case of failure to deliver new waste facilities in accordance with apportionment set out in the London Plan, key management actions may include:
- Re-assess existing designated sites and identify further sites suitable for new waste facilities, as required by PPS10 (paragraph 19).
 - Bring forward waste facilities through site planning briefs.
 - Use Compulsory Purchase Orders to assemble key sites where other delivery mechanisms have failed.
 - Working with the Greater London Authority on any future reviews of waste apportionment.
 - Continue to work closely with ELWA to ensure municipal waste facilities and infrastructure is being provided and resourced in line with the Integrated Waste Management Strategy.
 - Joint working with other London boroughs, local authorities from outside Greater London, the Greater London Authority and the Environment Agency. Continued membership and participation at the London Regional Technical Advisory Body (RTAB) will provide an appropriate platform for this.
- 6.7 Monitoring will be undertaken on an annual basis and coincide with preparation of each Borough's Annual Monitoring Report, which is submitted annually to CLG by 31 December, for the previous financial year.

Indicators and targets

Indicator	Source of indicator	Target	Related Policies	Related Strategy Objectives
Capacity of new waste management facilities by type (recycling and composting, recovery, treatment)	Core Output Indicator W1	Progressive year on year cumulative increase toward 450,000tpa capacity for municipal, commercial and industrial composting and 340,000tpa recovery and treatment	W1; W2; W3	B, C, D, E, G, H
Provision of 2 small scale IVC/AD facilities at Ferry Lane North, Havering	Local Output Indicator	Delivery within 2015-2020	W2	B, C, D, E, G, H
Provision of 2 medium and 1 small scale facility for IVC/AD/Recovery at Dagenham Dock, Sustainable Industries Park, Barking & Dagenham	Local Output Indicator	Delivery by 2020	W2	B, C, D, E, G, H
Provision of medium scale composting facility at Gerpins Lane, Havering	Local Output Indicator	Delivery within 2015-2020	W2	B, C, D, E, G, H
Provision of large scale composting facility at Hall Farm, Havering	Local Output Indicator	Delivery within 2015-2020	W2	B, C, D, E, G, H
Provision of medium to large scale facility for IVC/AD/MBT/Thermal (excl incineration) at Beckton Riverside, Newham	Local Output Indicator	Delivery within 2010-2015	W2	B, C, D, E, G, H
Type of waste (eg MSW, C&I, hazardous etc) managed (%) at each new facility	Local Output Indicator	n/a	W2; W3	B, C, D, E, G
Amount of municipal waste arising, and managed by management type (recycling and composting, recovery, treatment)	Core Output Indicator W2	Average amount of municipal waste recycled and composted meets targets of 40% (2010); 45% (2015); 50% (2020)	W1; W2	A, B, C, D, E, G

Number of planning permissions for waste facilities granted contrary to Environment Agency advice on flooding and water quality grounds	Core Output Indicator E1 (adapted)	Target = 0	W5(iii); W5(v); W5(vi)	E, F
Number of planning permissions for waste facilities granted contrary to the local advice of the local Environmental Health Officer or the Environment Agency on air quality grounds	Local Output Indicator	Target = 0	W5(i); W5(xi)	E
Renewable energy (MW) generated from waste facilities	Core Output Indicator E3 (adapted)	Progressive year on year increase as policies are applied	W3	E, F
Proportion of waste developments with planning permission, starting in operation within that year, with sustainable design and construction features	Local Output Indicator	Target = 75%	W1; W5(vii); W5(x)	A, F, H
Proportion of waste developments with planning permission, starting in operation within that year, with provision for transport of waste or recyclables within the UK by rail or water	Local Output Indicator	Progressive year on year increase as policies are applied 2001 - 2011: 5% increase in river freight traffic	W1; W5(xii)	A, E
Number of safeguarded waste sites (Schedule 1) developed for non-waste uses	Local Output Indicator	Target = 0	W2	C, D, F
Actual waste throughput of Schedule 1 sites (where data available)	Local Output Indicator	Annual Permitted Tonnage (Licensed Capacity)	W2	B, C, D, E, G, H
Number of planning permissions with a proportion of reuse or recycling of construction, demolition and excavation waste on site	Local Output Indicator	Progressive year on year increase as policies are applied	W1	A, E, F, H
Amount of construction, demolition and excavation waste disposed of at inert landfill sites	Local Output Indicator	Progressive year on year decrease in amount of waste landfilled	W4	A, C, E, F
Percentage of household waste sent for reuse, recycling and composting	National Indicator 192	Barking & Dagenham: 23.5% 2008/09; 25.5% 2009/10; 28% 2010/11 Haverling:	W1	A, B, H

Delivery organisations

6.8 It is anticipated that a number of organisations will work in partnership to implement the policies in the Joint Waste DPD. The schedule below outlines how each policy will be implemented. The organisations listed have contributed to preparation of the DPD and the actions required stem from Strategies and Plans they already have in place. All bodies therefore recognise their contribution to achieving delivery of the Joint Waste DPD.

Policy	Mechanisms	Lead Actors	Support Roles
W1	Encourage waste prevention and minimisation	Defra (WRAP); GLA; Borough Cleansing Services	Commerce and industry sectors
W1	Increase recycling and composting	ELWA; Borough Cleansing Services	
W1	Ensure planning applications for new developments have suitable recycling/composting facilities	Borough Planning Services; Borough Cleansing Services; development industry	
W1	Encourage re-use of construction, excavation and demolition waste in new development	Borough Planning Services; development industry	ODA, LTGDC
W2	Work in partnership to bring forward sites identified for new waste facilities	Borough planning services, waste management industry	GLA
W3	Encourage the co-location of facilities	Borough planning services, waste management industry	GLA
W4	Encourage use of recycled construction, excavation and demolition material in new development	Borough planning services, construction industry	GLA WRAP
W5	Apply sustainable design and construction principles to new waste development	Borough planning services, waste management industry	

Schedule 1

Ref	Facility name	Borough	Facility type	Annual Permitted Tonnage
RECYCLING				
80090	Gerpins Lane Reuse & Recycling Centre	Havering	A13 - Household Waste Amenity Site	115,500
80679	Jenkins Lane Waste Management Facility	Newham	A13 - Household Waste Amenity Site	110,000
80106	Chigwell Road Reuse & Recycling Centre	Redbridge	A13 - Household Waste Amenity Site	28,600
80105	Frizlands Lane Reuse & Recycling Centre Bywaters	Barking & Dagenham Newham	A13 - Household Waste Amenity Site A15 - Material Recycling Treatment Facility	80,000 500,000
80126	Ilford Recycling Centre	Redbridge	A15 - Material Recycling Treatment Facility	7,500
80518*	Rainham Waste Recycling & Reclamation Centre	Havering	A15 - Material Recycling Treatment Facility	50,000
80734	Express Recycling & Plastics Limited	Havering	A15 - Material Recycling Treatment Facility	30,000
	White Mountain Roadstone Ltd	Barking & Dagenham	A15 - Material Recycling Treatment Facility	12,000
80704*	Rainham Waste Recycling & Reclamation Centre	Havering	A15 - Material Recycling Treatment Facility	131,000
BT 9364**	Jenkins Lane MRF	Newham	A15 - Material Recycling Treatment Facility	50,000
BT 9372**	Frog Island MRF	Havering	A15 - Material Recycling Treatment Facility	70,000
80759	Closed Loop Recycling	Barking & Dagenham	A15 - Material Recycling Treatment Facility	25,000
	SITA UK Ltd, Barking Materials Recycling Facility	Barking and Dagenham	A15 - Material Recycling Treatment Facility	75,000
80120	Reuse Collections Limited	Barking & Dagenham	A14 - Transfer Station taking Non-Biodegradable Wastes	260,000
80091	Jewometals (UK) Ltd	Barking & Dagenham	A20 - Metal Recycling (mixed MRSs)	24,000
80115	The Remet Company Ltd	Newham	A20 - Metal Recycling (mixed MRSs)	41,600
80125	Mayer Parry Recycling Ltd (EMR)	Newham	A20 - Metal Recycling (mixed MRSs)	150,000
COMPOSTING				
80704*	Rainham Waste Recycling & Reclamation Centre	Havering	A22 - Composting Facility (in-vessel)	49,000
80704*	Rainham Waste Recycling & Reclamation Centre	Havering	A22 - Composting Facility (windrow/wood processing)	153,000
RECOVERY				
80704*	Rainham Waste Recycling & Reclamation Centre	Havering	A16 - Physical Treatment Facility (lamp processing)	24,000
80620	Hunts Wharf	Barking & Dagenham	A16 - Physical Treatment Facility	150,000
	Clinical Waste Ltd (Goodmayes Hospital)	Redbridge	A18 - Incinerator (Clinical Waste)	7,000

Potential 80662	Novera Gasification (Frog Island)	Havering	A17 - Physico-Chemical Treatment Facility (gasification)	90,000
	Frog Island Bio-MRF	Havering	A23 - Biological Treatment Facility	93,600
BT 9364	Jenkins Lane Bio-MRF	Newham	A23 - Biological Treatment Facility	99,840

* Please note that the Rainham Waste Recycling and Reclamation Centre Facilities are only safeguarded until 2018 when their existing planning permissions expire

** The Frog Island and Jenkins Lane Bio MRFs have a licensed capacity of 372,000 tonnes per year. The drying process reduces this by 20% and 10% of the waste is recycled. The remaining waste has three constituents; refuse derived fuel (89,280 tonnes), compost (89,280 tonnes) and rejected waste (89,280 tonnes). In line with the definition of waste deemed to be managed in London given in paragraph 5.75 of the London Plan, the rejected waste and refuse derived fuel cannot be counted and for this reason is not safeguarded

Schedule 2

Area	Borough	Approx ha	Scale of facility	Type of Facility	Existing Use	Landowner	Timescale	Implementation
Ferry Lane North	Havering	0.5 - 1.5ha	2 small scale facilities	IVC / AD	Waste Management	First London Environmental Ltd.	2015 - 2020	Modify / intensify waste management within the site through the provision of two small scale facilities.
Dagenham Dock Sustainable Industries Park	Barking & Dagenham	4.5 - 11.5 ha	2 Medium scale facility and 1 small scale facility	IVC / AD / Recovery	Strategic Industrial Location	Main landowner is London Thames Gateway Urban Development Corporation	2010- 2020	Dagenham Dock Sustainable Industries Park identified suitable for sustainable industries including waste industries 1 large scale facility: Application submitted in 2010 for by Thames Gateway Power for development of Thames Gateway Energy Facility - an energy generation facility to generate low carbon renewable combined heat and power. Would utilise 120,000 tonnes of non-recyclable waste using 3.34 ha of land in the northern part of the SIP. Further facilities: Awaiting applicants to come forward
Gerpins Lane - adjacent to Gerpins Lane RRC	Havering	1.5 - 5ha	Medium scale facility (composting only)	Composting	Greenfield site	ELWA	2015 - 2020	Site currently owned by ELWA. Implementation dependent on private operator coming forward.
Hall Farm - former landfill site	Havering	19ha	Large scale facility (composting only)	Composting	Greenfield site	ELWA	2015 - 2020	Site currently owned by ELWA. Implementation dependent on private operator coming forward.
Beckton Riverside	Newham	7ha (gross); 3.5ha (net)	Medium to large scale facility	IVC / AD / MBT / Thermal excl. incineration	Preferred Industrial Location	British Gas	2010 - 2015	Overall site area = 7 ha Located in close proximity to Jenkins Lane MRF Awaiting applicants to come forward

Acronyms and terms

Aerobic	In the presence of oxygen
Anaerobic	In the absence of oxygen
Anaerobic Digestion (AD)	A process in which biodegradable material is encouraged to break down in the absence of oxygen. Waste is broken down in an enclosed vessel under controlled conditions, resulting in the production of digestate and biogas
Biodegradable	Capable of being degraded by plants and animals. Biodegradable municipal waste includes paper and card, food and garden waste, and a proportion of other wastes, such as textiles
Biogas	Gas resulting from the fermentation of waste in the absence of air (methane/carbon dioxide)
Biological Material Recovery Facility (Bio-MRF)	Bio-MRFs dry and stabilise waste before sorting out further materials for recycling, energy recovery (production of a renewable fuel) and disposal
Biological treatment	A treatment technology that uses bacteria to consume organic waste
C&I	Commercial and industrial
Combined Heat and Power (CHP)/ Combined Cooling, Heat and Power (CCHP)	The combined production of electricity and usable heat. Steam or hot water, which would otherwise be rejected when electricity alone is produced, is used for space or process cooling or heating
Commercial waste	Waste from premises used wholly or mainly for the purposes of a trade or business, or for the purpose of sport, recreation, education or entertainment. Excludes household, agricultural or industrial waste
Composting	The biological decomposition of organic material by micro-organisms under controlled, aerobic conditions
Construction, excavation & demolition waste (C,E&D)	Waste building materials, packaging, rubble from construction and remodelling, repair and demolition operations on roads, houses, commercial buildings and other structures and excavation waste
DCLG	Department of Communities and Local Government
DEFRA	Department for Environment Food and Rural Affairs
Development Plan Document (DPD)	Spatial Planning documents within the portfolio of Local Development Documents in a Local Development Framework.
Digestate	Solid and liquid product resulting from anaerobic digestion
Disposal	Final placement or destruction of toxic, radioactive, or other wastes. Disposal may be accomplished through use of approved secure landfills, surface impoundments, land farming, deep-well injection, ocean dumping, or incineration
Dry recyclables	Dry recyclable household waste includes: papers (newsprint,

	pamphlets, envelopes, books), food tins (steel), drink cans (aluminium), milk and juice cartons & plastic bottles
EA	Environment Agency
ELWA	East London Waste Authority
Energy recovery	Obtaining energy from waste through a variety of processes (e.g. combustion)
Gasification	The process whereby carbon based wastes are heated in the presence of air or steam to produce fuel-rich gases. The technology is based on the reforming process used to produce town gas from coal
GLA	Greater London Authority
Green belt	The fundamental aim of green belt policy is to prevent urban sprawl by keeping land permanently open; the most important attributes of green belts is their openness
ha	hectare
Hazardous Waste	Waste which because of its characteristics poses a present or potential hazard to human health or the environment
Incineration	The controlled thermal treatment of waste by burning, either to reduce its volume or toxicity. Energy recovery from incineration can be made to produce heat and/or power
Inert waste	Waste that does not normally undergo any significant physical, chemical or biological change when deposited at a landfill site. It may include materials such as rock, concrete, brick, sand, soil or other material arising from construction, excavation or demolition
In-vessel composting (IVC)	The aerobic decomposition of shredded and mixed organic waste within an enclosed container, where the control systems for material degradation are fully automated. Moisture, temperature and odour can be regulated, and stable compost can be produced much more quickly than open windrow composting
Industrial Waste	Waste arising from the provision of public services and industrial activities. Excludes construction and demolition material
JWDPD	Joint Waste Development Plan Document
JWMS	Joint Waste Management Strategy
ktpa	kilo-tonnes per annum
Landfill	Disposal sites for non-hazardous solid wastes spread in layers, compacted to the smallest practical volume, and covered by material applied at the end of each operating day
Local Development Framework (LDF)	A portfolio of Local Development Documents providing the spatial planning framework for an area
London Plan	Refers to the current iteration of the London Plan, published in July 2011 the Spatial Development Strategy for Greater London.
Mechanical	A generic term for mechanical sorting/separation technologies

Biological Treatment (MBT)	used in conjunction with biological treatment processes, such as composting
Materials Recycling Facility/Material Recovery Facility (MRF)	Dedicated facility for the sorting/separation of recyclable materials
Mixed waste	Mixed waste can refer to any combination of waste types with different properties
Municipal Solid Waste (MSW)	Waste collected by local authorities. Mainly composed of household waste but also includes street cleaning waste, waste from reuse and recycling centres and commercial and industrial waste collected by local authority
Planning & Compulsory Purchase Act 2004	Planning Act that came into force in 2004 and introduce reforms to the UK Town and Country Planning system
Planning Policy Statements (PPS)	Statement of national planning policy to replace PPG notes under the Planning & Compulsory Purchase Act 2004
Proximity principle	This principle seeks to minimise the negative impacts of waste by dealing with waste as near as practical to its place of production
Pyrolysis	During pyrolysis organic waste is heated in the absence of air to produce a mixture of gaseous and liquid fuels and a solid, inert residue (mainly carbon)
Recovery	To obtain value from waste through recycling, composting, energy recovery or other forms of material recovery, such as anaerobic digestion
Recycling	Involves the processing of wastes, into either the same product or a different one
Refuse derived fuel	A fuel produced from combustible waste that can be stored and transported, or used directly on site to produce heat and/or power
Re-use	Can be practiced by the commercial sector with the use of products designed to be used a number of times, such as reusable packaging
Sustainability Appraisal (SA)	A tool for assessing policies to ensure that they reflect sustainable development objectives, including environmental, social and economic factors. The Planning and Compulsory Purchase Act 2004 requires local planning authorities to undertake a sustainability appraisal of all local development documents
Thermal treatment	The general term used for waste management technologies designed to generate power, and often to recover heat, through the combustion of waste
tpa	tonnes per annum
Transfer	The handling and transport of waste
Transfer station	Facility where solid waste is transferred from collection vehicles to larger trucks or rail cars for longer distance

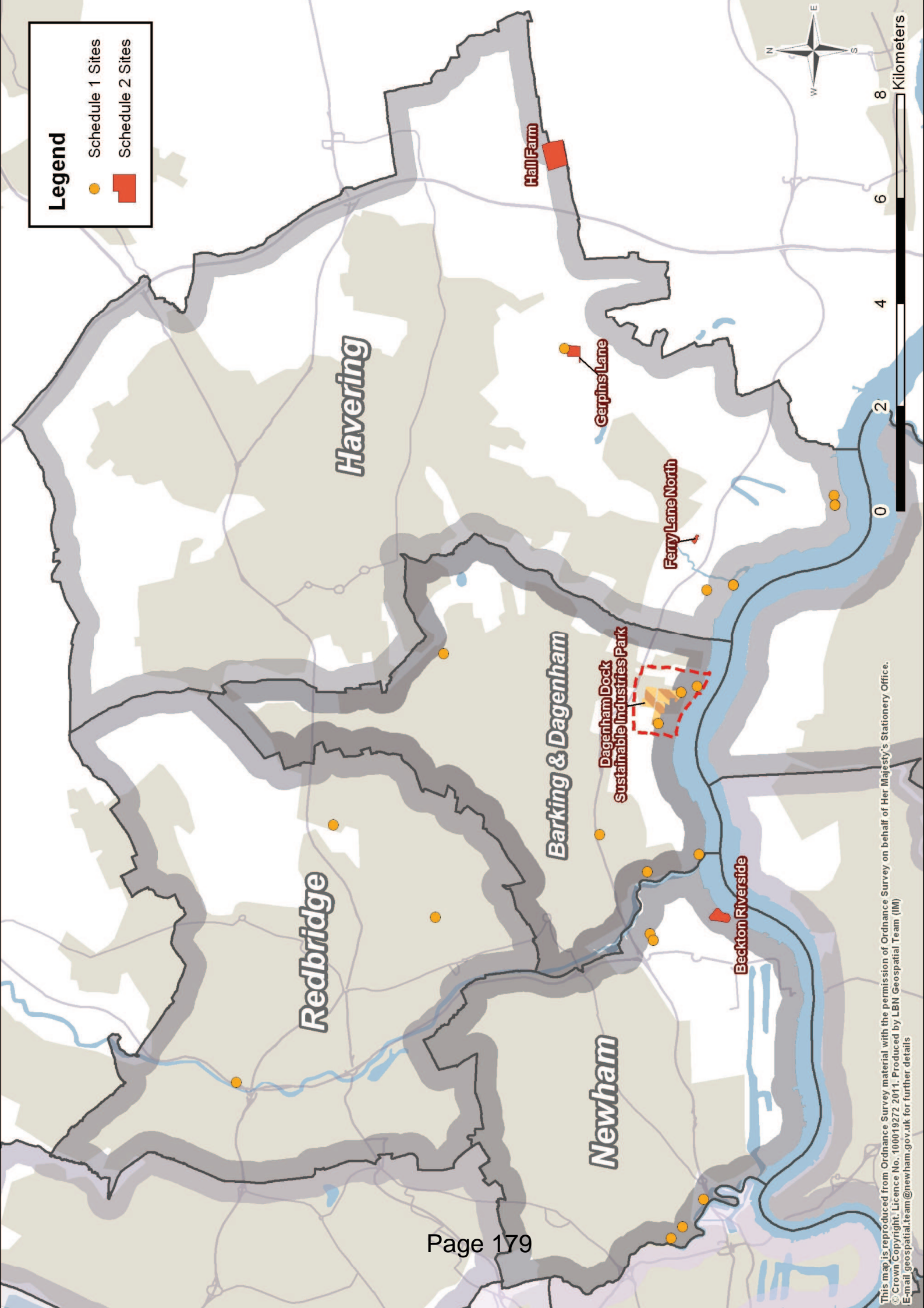
	transport
Treatment	Treatment is any process that changes the physical, chemical, or biological character of a waste to make it less of an environmental threat
Unitary Development Plan (UDP)	Statutory development plan prepared by Unitary Authorities. To be replaced by Local Development Framework under the Planning & Compulsory Purchase Act 2004
Waste hierarchy	The waste hierarchy acts as a guide when determining the most sustainable waste management options from the ideal of prevention and reduction to the last resort of disposal
Windrow composting	The aerobic decomposition of appropriate shredded biodegradable waste using long narrow piles, known as 'windrows'. The process involves mechanical turning and re-mixing of the material to enable effective degradation. This results in a bulk-reduced, stabilised residue known as compost. Windrow composting can take place outdoors or within buildings and the process takes around three months.

Appendix 1 – Proposals Maps and Insets

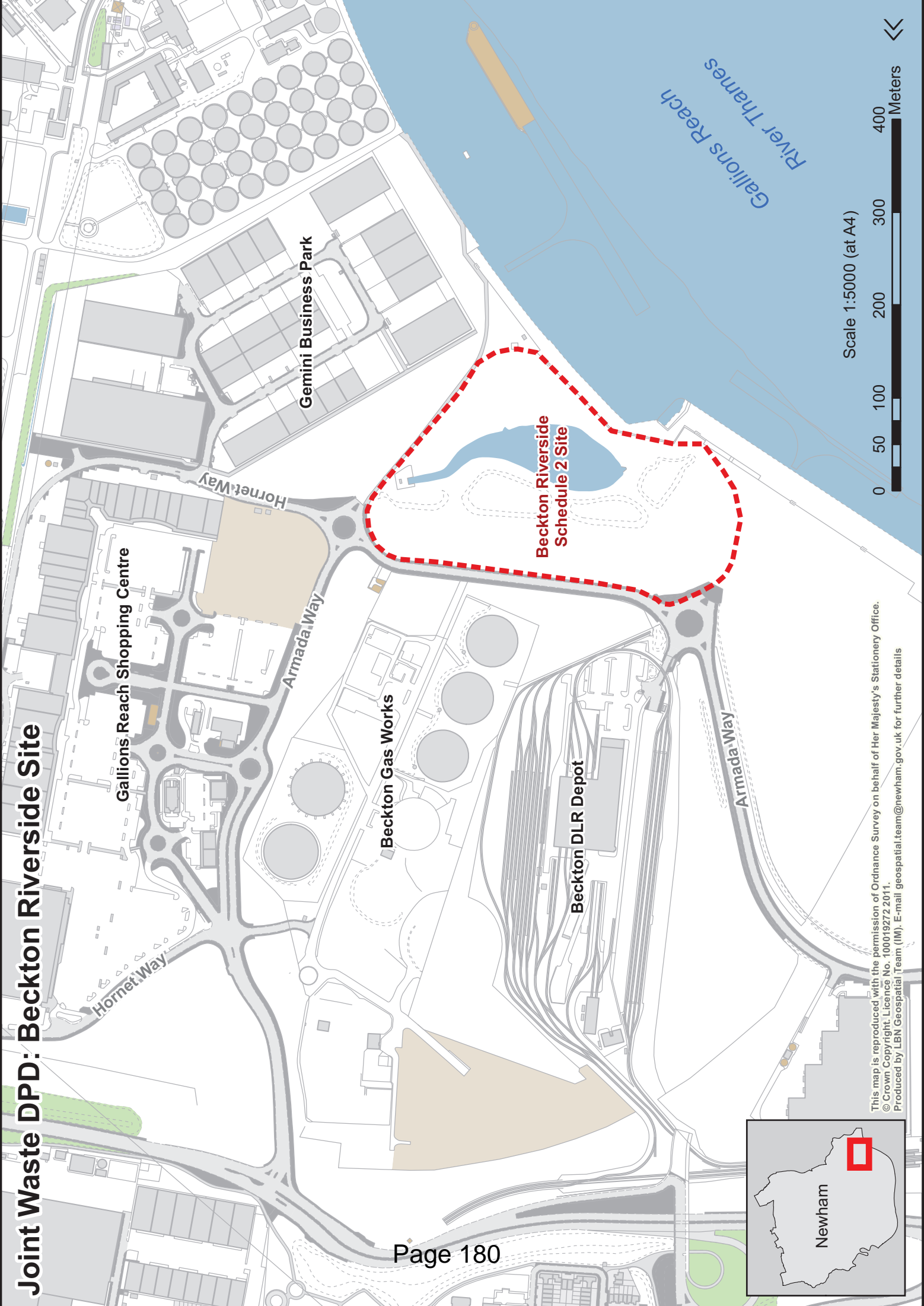
Legend

● Schedule 1 Sites

■ Schedule 2 Sites



Joint Waste DPD: Beckton Riverside Site



Gallions Reach Shopping Centre

Gemini Business Park

Beckton Riverside
Schedule 2 Site

Beckton Gas Works

Beckton DLR Depot

River Thames
Gallions Reach

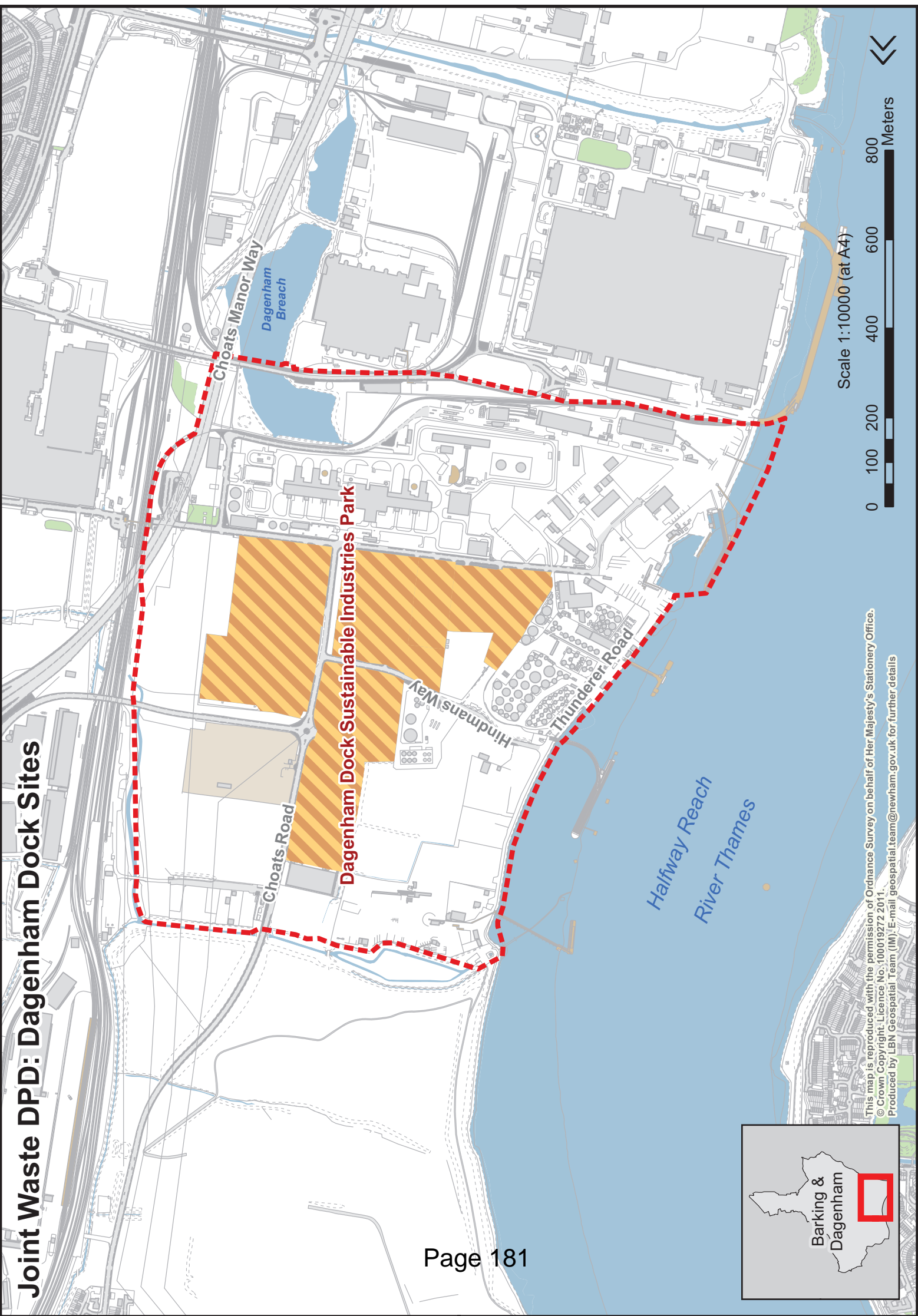
Scale 1:5000 (at A4)



This map is reproduced with the permission of Ordnance Survey on behalf of Her Majesty's Stationary Office.
© Crown Copyright. Licence No. 100019272 2011.
Produced by LBN Geospatial Team (IM). E-mail geospatial.team@newham.gov.uk for further details



Joint Waste DPD: Dagenham Dock Sites



Scale 1:10000 (at A4)

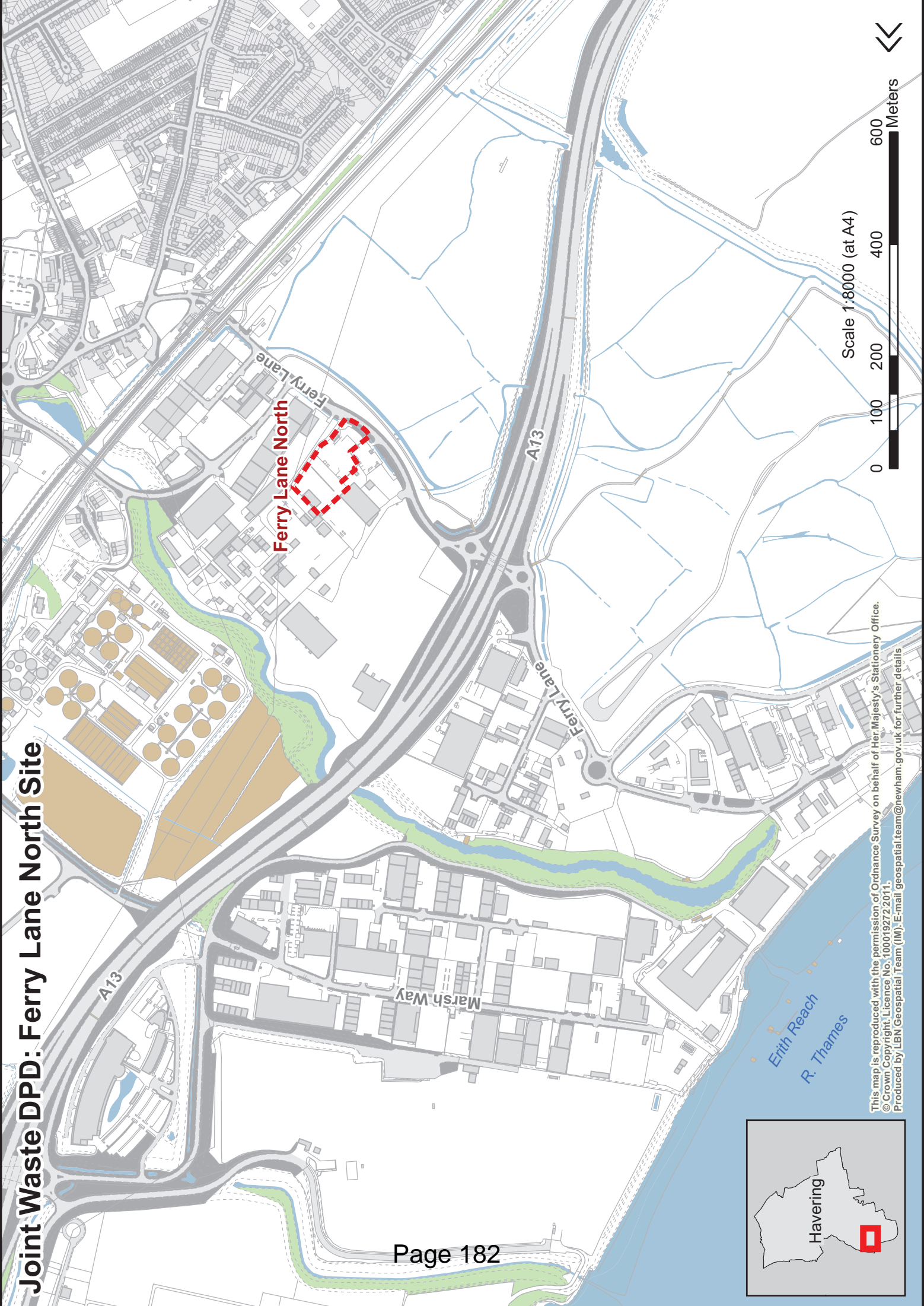


This map is reproduced with the permission of Ordnance Survey on behalf of Her Majesty's Stationery Office.
© Crown Copyright. Licence No. 100019272 2011.
Produced by LBN Geospatial Team (LW); E-mail geospatial.team@newham.gov.uk for further details

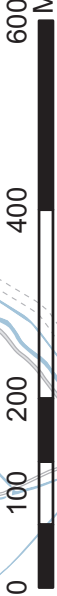


Joint Waste DPD: Ferry Lane North Site

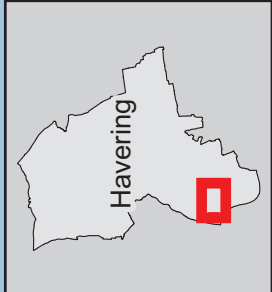
Ferry Lane North



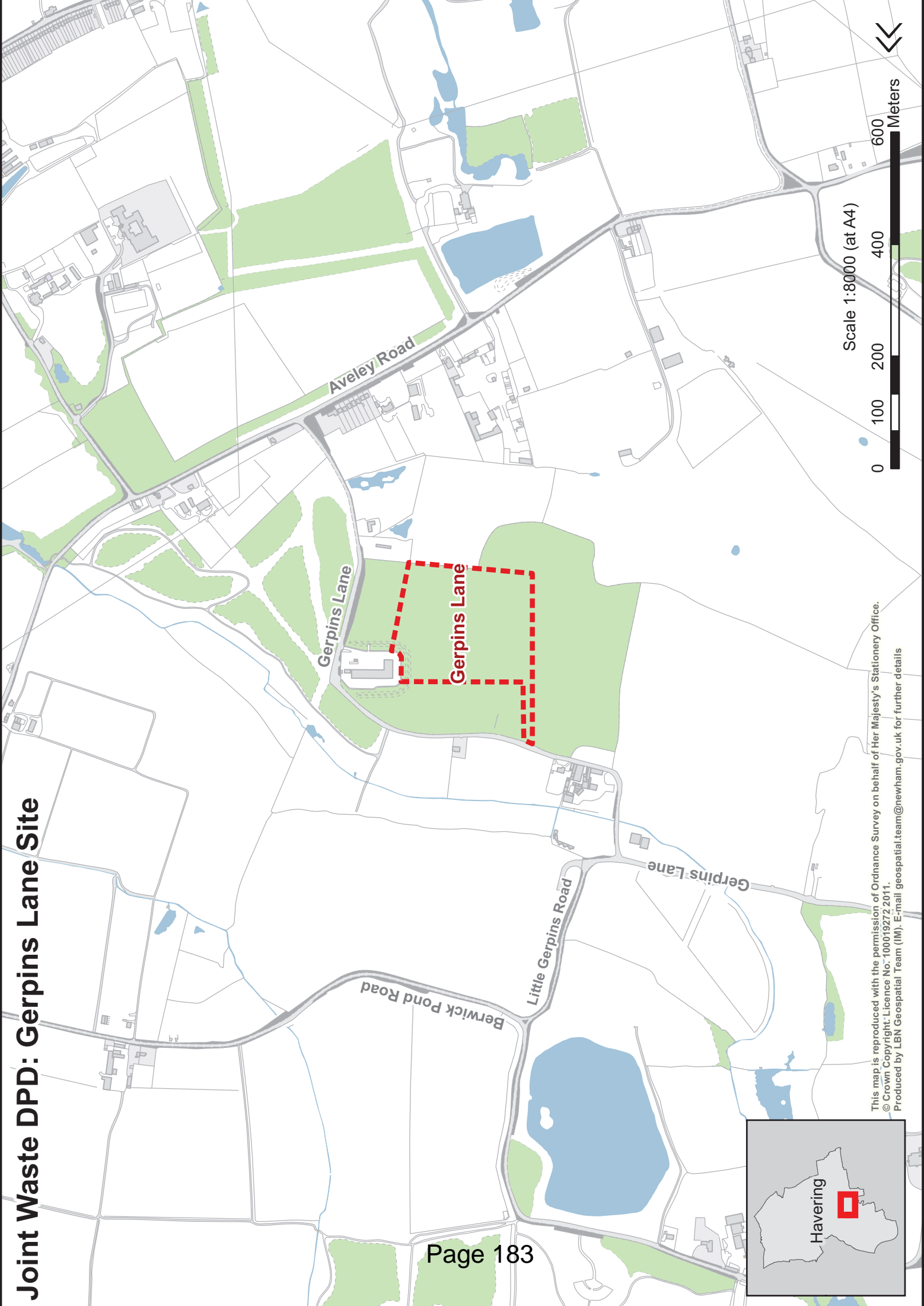
Scale 1:8000 (at A4)



This map is reproduced with the permission of Ordnance Survey on behalf of Her Majesty's Stationery Office.
© Crown Copyright. Licence No. 100019272 2011.
Produced by LBN Geospatial Team (IM). E-mail geospatial.team@newham.gov.uk for further details



Joint Waste DPD: Gerpins Lane Site



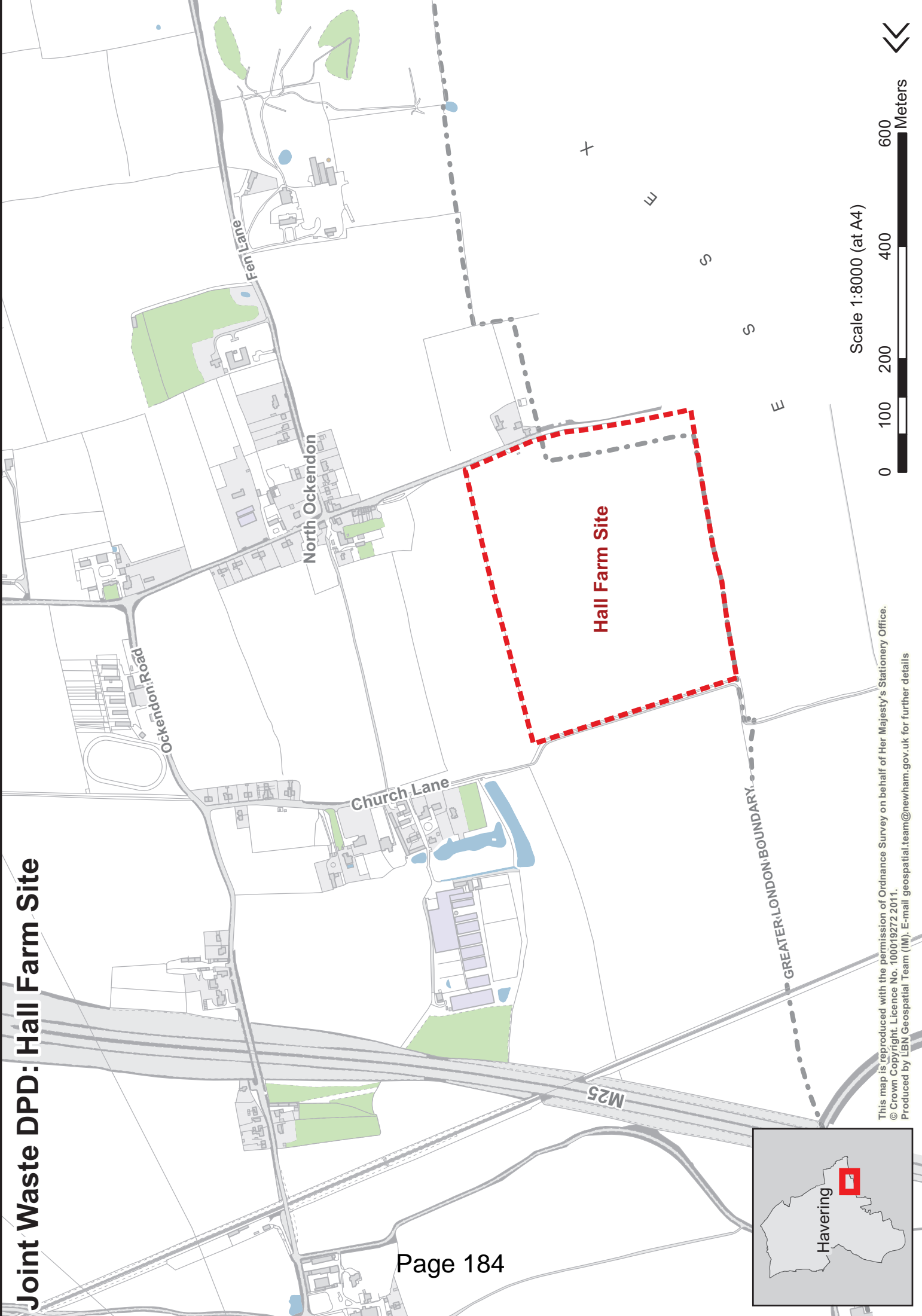
Scale 1:8000 (at A4)



This map is reproduced with the permission of Ordnance Survey on behalf of Her Majesty's Stationery Office.
© Crown Copyright. Licence No. 100019272 2011.
Produced by LBN Geospatial Team (IM). E-mail geospatial.team@newham.gov.uk for further details



Joint Waste DPD: Hall Farm Site



Scale 1:8000 (at A4)



This map is reproduced with the permission of Ordnance Survey on behalf of Her Majesty's Stationery Office.
© Crown Copyright. Licence No. 100019272 2011.
Produced by LBN Geospatial Team (LW). E-mail geospatial.team@newham.gov.uk for further details



Appendix 2: Schedule of saved policies to be superseded by the UDP

In accordance with the 2004 regulations (Reg 13(5) List of Superseded policies), the following schedule provides details of saved and subsequent policies that apply to the development plan documents forming the Local Development Plans for each of the East London Waste Authority Boroughs.

Saved policy	Superseded by, or continues to be saved until
LB Barking and Dagenham Unitary Development Plan (adopted)	• Joint Waste Development Plan Document (submission November 2010)
G29 Environment	
G30 Environment	
G31 Environment	
LB Newham Unitary Development Plan (adopted June 2001)	Development Plan Documents: •Core Strategy (submitted March 2011) •Joint Waste Development Plan Document (submission November 2010) •Development Management and Strategic Sites Development Plan Document (consultation draft commenced)
EQ54: Proposals for integrated waste management	INF3 identifies the JWDPD Schedule 1 site at Beckton Riverside. JWDPD Policy W2 safeguarding capacity of existing sites listed in Schedule 1; approving applications for strategic waste facilities in Schedule 2 subject to Policy W5.
EQ55: The Council has identified and safeguarded the East London Waste Authority's site at Jenkins Lane...	JWDPD Schedule 1 sites INF 3 which also identifies Bywaters MRF, Twelvetrees Cresc, Bow; The Remet Company Ltd, Cody Road, Canning Town; Mayer Parry Recycling Limited, Bidder Street, Canning Town. JWDPD Schedule 2 sites namely a 7ha site at Beckton Riverside for a 'medium sized waste management site' to manage the additional level of waste apportioned to Newham in the London Plan.
EQ56 Planning Applications for Waste sites require an impact assessment	JWDPD Policy W5 Permissions for waste related development only given where they can demonstrate that impacts are minimised.
EQ57 Rigorous controls to be placed on transfer, storage or disposal of special, hazardous, chemical and radioactive wastes...	INF3 JWDPD Policy W5 (i)
EQ58 Proposals for landfill	JWDPD Policy W4 which also identifies a suitable landfill site.
EQ60 Encouraging recycling and reuse of secondary aggregates	INF3 reference to waste hierarchy JWDPD Policy W1 (iv) requires reuse of secondary aggregates.

Monday - Friday
9.00am - 5.00pm



FPPO/08/18

For free translation phone

Për një përkthim falas telefononi
للترجمة المجانية الرجاء الاتصال هاتفياً.
বিনামূল্যে অনুবাদের জন্য টেলিফোন করুন

Za besplatne prevode pozovite
欲索取免費譯本，請致電。

Pour une traduction gratuite, téléphonez
Για δωρεάν μετάφραση, τηλεφωνήστε.

મફત ભાષાંતર માટે ફોન કરો.

निःशुल्क अनुवाद के लिए कृपया फोन कीजिए

بو ته رجومه كردنى به خورايى ته له فون بکه بو

Del nemokamo vertimo skambinkinte
സൗജന്യമായ തർജ്ജിമയ്ക്കായി ബന്ധപ്പെടുക

Po bezplatne tlumaczenia prosimy dzwonic
Para uma tradução grátis, telefone.

ਮੁਫਤ ਅਨੁਵਾਦ ਲਈ ਫੋਨ ਕਰੋ

Перевод – бесплатно. Звоните.

Para obtener una traducción gratuita llame al:
Turjubaan lacag la'aan ah ka soo wac telefoonka

இலவச மொழிபெயர்ப்புக்கு தொலைபேசி செய்யவும்.

Ücretsiz çeviri için telefon edin.

Điện thoại để được thông dịch miễn phí.

مفت ترجمے کے لئے ٹیلیفون کیجیے۔

For large print or braille phone

020 8430 6291

© Newham Language Shop

Published by

SPATIAL PLANNING AND REGENERATION POLICY

Strategy Division

Regeneration, Planning and Property

London Borough of Newham

CABINET 18 January 2012	REPORT

Subject Heading:	Havering Local Development Framework : Gypsy and Traveller Sites DPD Proposed Submission Document
Cabinet Member:	Councillor Robert Benham
CMT Lead:	Cynthia Griffin, Group Director Culture and Community
Report Author and contact details:	Peter Hall, Development Planning Team Leader Tel : 01708 432522 E-mail: peter.hall@havering.gov.uk
Policy context:	LB Havering Local Development Framework
Financial summary:	The costs of consultation are expected to be minor and will comprise the administrative tasks linked to publicising and consulting on the draft DPD. They will be met from existing budgets within the Development and Transport Planning Group
Is this a Key Decision?	No
Is this a Strategic Decision?	Yes
When should this matter be reviewed?	N/A
Reviewing OSC:	Towns and Communities

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

Ensuring a clean, safe and green borough	[✓]
Championing education and learning for all	[]
Providing economic, social and cultural activity in thriving towns and villages	[✓]
Valuing and enhancing the lives of our residents	[✓]
Delivering high customer satisfaction and a stable council tax	[]

SUMMARY

- 1.1 The Council has a legal responsibility to plan for the housing needs of all residents, including the Gypsy and Traveller community. Havering's statutory Local Development Framework (LDF) Core Strategy states that sites to meet the housing needs of Gypsies and Travellers will be identified by the Council in a separate Development Plan Document (DPD).
- 1.2 This report updates Members on the preparation of this and seeks approval for the Proposed Submission Document (the draft of the DPD which is submitted to the Secretary of State for public examination).
- 1.3 In summer 2011 the Council undertook public consultation on an Issues and Options report for the Gypsy and Traveller Sites DPD. The report included a needs assessment and set out proposed criteria for deciding whether pitches are suitable for use by gypsies and travellers. It emphasised that gypsy and traveller pitches are inappropriate development in the Green Belt and should only be permitted in very special circumstances under national planning policy. It noted however that many of the existing sites in Havering did not give rise to local planning objections and have been occupied by the same families for several years.
- 1.4 The report identified that there were 74 existing pitches at the time of the needs survey in 2010 on which the report was based. 12 pitches had permanent planning permission; 48 had temporary permission or expired temporary permission and 14 pitches were unauthorised.
- 1.5 The Council's preferred option for meeting the housing needs of gypsies and travellers was for 14 additional authorised pitches to be provided so that, taken together with the number of pitches which have or previously had permanent or temporary permission, the total number of authorised pitches would be sufficient to meet the needs of the gypsy and traveller households who were living in Havering at the time of the needs assessment. The report made clear however that not all the 48 pitches with temporary permission or expired temporary permission would necessarily be granted permanent planning permission and that this would be the subject of careful assessment

on a case by case basis. Nevertheless, this was considered the right number of pitches to plan for.

- 1.6 There were generally positive responses to consultation. In the light of this, officers have prepared the Proposed Submission Document for Member approval. Subject to this it will be the subject of public consultation and then submission to the Secretary of State for public examination.
- 1.7 The Proposed Submission Document proposes that 45 of the 48 existing pitches with temporary or expired temporary permission may be considered acceptable given the importance of meeting the needs of gypsies and travellers so far as possible while protecting the Green Belt. The two pitches with temporary permission at Maylands (the former Brook Street service station adjoining the A12 Trunk Road) were the subject of significant objections from Brentwood Council and local residents. Staff consider that, in the light of the planning issues associated with this site and the representations received, the Maylands pitches are unsuitable for permanent permission. In addition, a single pitch with temporary permission at Prospect Road is considered unsuitable for permanent permission due to planning issues associated the site including its location within a Site of Importance for Nature Conservation and it being visually intrusive within the Green Belt.
- 1.8 The Proposed Submission Document proposes that 17 further pitches are authorised – 14 to achieve the Councils preferred option for the number of pitches and 3 to compensate for not making the Maylands and Prospect Road sites permanent. Details of the sites to accommodate these pitches are set out in section 3 of this report.
- 1.9 Subject to Member approval, the Proposed Submission Document will be published for a six week period of consultation. It will then be submitted to the Secretary of State for examination.

RECOMMENDATIONS

- 2.1 That Cabinet:
 - (1) Recommend that the Council approves the Proposed Submission Gypsy and Traveller Sites Development Plan Document (attached as Appendix 1) for consultation.
 - (2) Recommend that Council approves the Report on Consultation (attached as Appendix 2).
 - (3) Delegate approval of the Final Sustainability Appraisal for the Gypsy and Traveller Sites DPD to the Cabinet Member for Community Empowerment.

- (4) Delegate to the Head of Regeneration, Policy and Planning, in consultation with the Cabinet Member for Community Empowerment, authority to make minor amendments to the wording which do not affect the substance of the Development Plan Document before formal submission, in the event that such changes are needed following consultation.

REPORT DETAIL

1 Background

- 1.1 Havering's Local Development Framework (LDF) is a suite of planning documents that collectively guide the future planning of the Borough to 2020. It is led by the Core Strategy and Development Control Policies DPD (2008) which sets out Havering's vision and objectives for the planning of the Borough, as well as detailed Development Control policies that apply across the whole of the Borough.
- 1.2 The Gypsy and Traveller Sites DPD will be a statutory document within the LDF that takes account of national policy considerations and has the purpose of allocating suitable and available sites for Gypsies and Travellers resident in Havering. As Development Control policy DC8 (Gypsies and Travellers) provides detailed criteria for the determination of planning applications for the provision of Gypsy and Traveller sites, the DPD will take the form of a site allocations document. It will identify suitable and available sites within Havering where, subject to planning permission, pitches meeting the criteria detailed in DC8 may be developed or retained for Gypsies and Travellers in Havering.
- 1.3 The DPD preparation has also been governed by the Planning and Compulsory Purchase Act 2004 (as amended). It must comprise: A 'Call for Sites', an Issues and Options report and a Proposed Submission Document.
- 1.4 This report addresses the final stage of the DPD preparation and the Proposed Submission Document.

2 Issues and Options Consultation

- 2.1 Comments received during the consultation have informed the preparation of the Proposed Submission Document. A full report on the consultation and the Council's responses to the representations made must be published with the Proposed Submission Document. This is attached as Appendix 1 to this report for Member approval.

2.2 A total of 66 stakeholders responded to the consultation including 21 representations from or on behalf of gypsies and travellers. The key points from the consultation are:

- **The majority of respondents felt that the accommodation needs of the Gypsy and Traveller community in Havering had been correctly identified in the report.**
- Two additional sites were put forward for consideration:
 - Mariecot Bungalow, Church Road, Noak Hill
 - Willow Tree Lodge, Brookmans Park Drive, Cranham

(In addition, to address an earlier oversight, an existing traveller site at Prospect Road in Hornchurch with temporary permission for one pitch until 2013 has been included. All these three sites have been assessed in line with the site assessment criteria set out by the Council.)

- The proposed site assessment methodology was considered to provide a reasonable and robust means of assessing the suitability of potential sites.
- The majority of respondents supported the view that any new [permanent] pitches should be on existing sites rather than on new locations in the Borough.
- Brentwood Borough Council and 30 local residents objected to the Maylands pitches
- 19 people - predominantly families living on the sites - suggested that the Church Road, Noak Hill sites would be suitable as permanent Gypsy and Traveller sites.
- The majority of respondents felt that no transit site should be provided in Havering.

2.3 Most responses from, and on behalf of, gypsies and travellers generally wanted more than a further 14 authorised pitches identified to allow for future growth of their households. However, staff remain of the view that the approach in the Issues and Options report struck the right balance between meeting the priority housing needs of gypsies and travellers – by permitting a sufficient number of pitches to accommodate all the households living in Havering at the time of the needs survey – and only allocating Green Belt land where this is justified by ‘very special circumstances’ – staff do not consider that the release of Green Belt land now to accommodate future demand resulting from household formation could be justified as ‘very special circumstances’. Accordingly, it is recommended that the overall number of additional authorised pitches should not be increased beyond 14, in line with

the Council's preferred approach in the Issues and Options document. This approach has been taken forward into the Proposed Submission Document.

3 Proposed Submission Document

- 3.1 Following the public consultation responses and in line with national planning policy officers have drafted the Proposed Submission Document which is attached as Appendix 2.

Assessment of existing sites

- 3.2 All the existing and additional sites submitted through the 'call for sites' and consultation stages have been assessed to determine which, if any, may be acceptable in terms of being considered for accommodating pitches for permanent planning permission. As well as physical and site issues, the assessment takes account of the planning history of the sites (in particular Inspector's reports and planning appeal decisions).
- 3.3 Following careful consideration and taking full account of the Green Belt policy issue, staff consider that all of the pitches with temporary or expired temporary permission are considered acceptable with the exception of the two pitches on the Maylands site and the single pitch with temporary permission at Prospect Road.
- 3.4 **This approach recognises the practical difficulties of accommodating sites in Havering within the built up area, the importance of minimising the effect on the Green Belt and the need to identify sufficient pitches in a way which, so far as possible, meets the needs of Havering's existing gypsies and travellers. All of the pitches have been occupied by travellers for some time and have generally not given rise to local planning objections and no additional land is being designated to accommodate these pitches.** Details of the sites to accommodate the 45 pitches are set out in section 5 of the Proposed Submission Document. This commits the Council in principle to the permanent use of these pitches by gypsies and travellers, but individual proposals for pitches will still be subject to careful assessment through the planning application process to replace their temporary or temporary expired planning permission with full permission(s).

Proposals for additional authorised pitches

- 3.5 In order to ensure that all existing gypsy and traveller families can be accommodated a further 17 pitches will need to be authorised (made up of 14 to meet the Council's preferred option for the number of pitches and 3 to compensate for not making the pitches on the Maylands and Prospect Road sites permanent). The report recommends making the following pitches authorised:

Vinegar Hill, Lower Bedfords Road (junction with Straight Road) (7pitches)

4 unauthorised pitches are already located on this site, which is generally well laid out and maintained, and could be made permanent. The site could also accommodate 3 pitches required as a result of the Maylands and Prospect Road site pitches being unacceptable.

This site previously had temporary permission for six pitches which are already located on the site. These pitches have been included in the 46 pitches with temporary or expired temporary permission considered acceptable for permanent permission (see para. 3.3 above).

In total this site is therefore identified for 13 pitches in the Proposed Submission Document.

Land between 66-72 Lower Bedfords Road (1 pitch)

This is a single unauthorised pitch which has been occupied since 1999, situated among other residential properties and is well maintained and screened.

This site is identified for 1 pitch in the Proposed Submission Document.

Willoughby Drive (off Dagenham Road) (1 pitch)

This single unauthorised pitch (WD1) is next to two other sites with temporary permission and to the west of a row of terraced houses. The area's contribution to the Green Belt is limited by other uses in the vicinity, including a waste transfer facility.

This site is identified for 1 pitch in the Proposed Submission Document.

Church Road, Noak Hill (8 pitches)

In addition to 4 pitches at Church Road with temporary permission there are eight unauthorised pitches at this site. These were refused permission on appeal primarily because the Inspector considered that they would intrude on the openness of the Green Belt.

As set out in the site assessment, the 2 unauthorised pitches (CR6 and CR11) which are closest to those with temporary permission could reasonably be allowed to remain and are proposed for retention in the Proposed Submission Document. The 6 other existing unauthorised pitches are not considered acceptable for permanent permission in their current location because of their impact on the openness of the Green Belt and visibility from Church Road and these two sites (CR5 and CR12) have not been allocated in the Proposed Submission Document.

However, the land at the existing Mariecot Bungalow (which adjoins these sites) is a new site in the same locality put forward by an agent for the landowner during the public consultation. Staff consider that its use for accommodating a specified number of pitches would have less visual impact than the existing unauthorised pitches and would on balance be an acceptable way to accommodate the need for 6 additional pitches. Mariecot Bungalow has, therefore, been identified for 6 pitches in the Proposed Submission Document.

The Church Road sites are therefore identified for a total of 12 pitches in the Proposed Submission Document.

- 3.6 As all of the sites identified in the Proposed Submission Document are privately owned it will be up to individuals to submit planning applications which will be assessed against their conformity with the Core Strategy and Development Control Policies DPD as well as any site specific criteria identified in the final Gypsy and Traveller Sites DPD following examination and adoption.
- 3.7 Staff consider that by allocating the sites set out in the Proposed Submission Document this will ensure that Green Belt land has only been allocated where this is justified by 'very special circumstances' in order to address the accommodation needs of Gypsy and Traveller families in Havering. With the exception of the land at Mariecot Bungalow, all the land allocated for permanent permission is within existing sites rather than new locations which will allow families to remain on – or close to, in the case of Church Road – established sites and is in line with the Council's preferred approach.

4 Sustainability Appraisal

- 4.1 DPDs are subject to a Sustainability Appraisal and a report must be prepared detailing the findings of the appraisal. The purpose of the appraisal process is to promote sustainable development through the improved integration of sustainability considerations into the preparation and adoption of Local Development Documents.
- 4.2 At the time of preparing this report, the Final Sustainability Appraisal is still being prepared. As with previous DPDs, to avoid delaying approval of the Gypsy and Traveller Sites DPD, it is recommended that the Cabinet Member for Community Empowerment is authorised to approve the Final Sustainability Appraisal Report.

5 Next Stages

- 5.1 Subject to Cabinet and Council approval of the Proposed Submission Document and completion of the supporting documents, these will be published for public consultation.

- 5.2 In order to deal with any minor changes resulting from comments received during consultation, which are needed to prepare the DPD for its public examination, it is recommended that the Head of Regeneration, Policy and Planning, in consultation with the Cabinet Member for Community Empowerment, be given delegated authority for minor amendments to the wording of the DPD prior to formal submission to the Secretary of State, provided that these do not affect the substance of the DPD policies.

REASONS AND OPTIONS

Reasons for the decision:

Havering's Local Development Scheme commits the Council to preparing the Gypsy and Traveller Sites DPD. This is also referred to in Havering's Core Strategy and Development Control Policies DPD as this supports its implementation.

Adoption of the DPD, with the appropriate level of site provision, will allow the Council to enforce successfully against future unauthorised sites.

Other options considered:

There are no alternative options as the requirements are set out in statute and subordinate legislation. Havering's Local Development Scheme (2010) commits the Council to preparing a Gypsy and Traveller Sites DPD, and public consultation is required under Regulation 27 of the Town and Country Planning (Local Development) (England) Regulations 2004 as amended.

IMPLICATIONS AND RISKS

Financial implications and risks:

The cost of preparing the consultation document and the costs of consulting on it are not expected to be significant and will be met from existing budgets within the Development and Transport Planning Group.

There are no wider financial implications for the Council. The land in question is owned by the travellers and other private landowners.

Legal implications and risks:

Section 20 of the Planning and Compulsory Purchase Act 2004 requires every DPD to be submitted to the Secretary of State for independent examination once the

Council is satisfied it has complied with the necessary regulations and the DPD is ready for independent examination.

Once a proposed DPD is prepared, before submitting it to the Secretary of State for approval, the Council must publicise it in accordance with Regulation 27 of the Town and Country Planning (Local Development) (England) Regulations as amended, seek representations on the soundness of the DPD in line with Regulation 28 and make a request for the Mayor of London's comments in accordance with Regulation 29.

Human Resources implications and risks:

Officers consider that the consultation on the Proposed Submission Document can be delivered within existing staff resources.

Equalities implications and risks:

The Equality Act 2010 provides a cross-cutting legislative framework that brings together many pieces of former legislation, including the Race Relations Act 1976. The Equality Act gives local authorities a general duty to eliminate unlawful discrimination, and to promote equality of opportunity and good relations between different groups in carrying out their functions.

Both Gypsies and Irish Travellers are recognised as ethnic minorities, which requires local authorities to consider fully their specific needs and to assess the impact and consult on proposed policies on Gypsies and Irish Travellers. Policy decisions must be fair in their balancing of the needs/rights of both the travelling and settled communities.

The proposals in the Proposed Submission Document will provide sufficient pitches for the existing number of gypsy and traveller households identified in the needs assessment. It will enable a large majority of households to remain on their existing pitches, and it will provide some of them with much greater security in their living arrangements by establishing a planning policy framework which enables permanent planning permission to be granted. At the same time the proposals are designed to minimise the risk of tensions between the travelling and settled communities by allocating pitches in locations where there are gypsies and travellers already living which have not given rise to significant public objections.

Two families at the Maylands site and one family at Prospect Road will be affected by the decision to not designate these sites for permanent permission in the DPD. However, these sites have temporary planning permission until 2016 and 2013 respectively and additional pitches have been identified on the Vinegar Hill site to enable the families to remain living in Havering if they wish to do so. In addition, two unauthorised sites at Church Road with six families have not been designated in the DPD for permanent permission. However, a new site at Church Road has been put forward by the landowner and identified in the DPD as suitable for 6 pitches which would enable the families to remain in the immediate vicinity of their current sites.

The Sustainability Appraisal Framework has been designed to reflect the Council's guidelines on conducting an Equality Impact Assessment of emerging policies, and further detailed consideration of the equalities impacts of the proposals will be contained in the appraisal of site allocation options against these Sustainability Appraisal objectives. A Final Sustainability Appraisal Report will be published for consultation alongside the Proposed Submission Document.

BACKGROUND PAPERS

Gypsy and Traveller Sites DPD: Issues and Options Report (June 2011)



Haverling
LONDON BOROUGH

Gypsy and Traveller Sites Development Plan Document

Report on Issues and Options Consultation

December 2011

Issues and Options Consultation

The Gypsy and Traveller Sites Development Plan Document (DPD) will be a statutory document within Havering's Local Development Framework (LDF). The DPD details how the Council will make provision for sufficient additional pitches for Gypsies and Travellers in the Borough.

Consultation on the Issues and Options Report of the Gypsy and Traveller Sites DPD took place from 27 June 2011 to 8 August 2011. Nine specific consultation questions were set out in the report along with an open question for any additional comments.

A total of 66 stakeholders commented on the Issues and Options Report. Respondents either completed the consultation questionnaire included in the report or submitted comments on the plan as a whole or individual sites identified in the report.

This report is set out in two sections. Section 1 sets out the responses to the nine specific consultation questions in the Issues and Options Report. Section 2 sets out all the written comments received during the consultation together with the Council's response to the representation.

Next stage

The comments received have been used to inform the preparation of the Gypsy and Traveller Sites DPD Proposed Submission Report. This will be published for further public consultation before being submitted to the Secretary of State prior to examination by a Planning Inspector.

1. Questionnaire responses

Identified Need

Q1: Have the accommodation needs of the Gypsy and Traveller community in Havering been correctly identified?

Yes	21
No	3

24 people responded to this question and the majority (21) felt that the accommodation needs of the Gypsy and Traveller community in Havering had been correctly identified in the report.

Call for Sites

Q2: Do you know of any additional suitable and available sites/land within Havering that should be considered for allocation as a Gypsy and Traveller site?

Two additional sites were put forward for consideration:

- Maricot Bungalow, Church Road, Noak Hill, Romford, RM4 1LB
- Willow Tree Lodge, Brookmans Park Drive, Cranham, Upminster, RM14 1LW

Both sites will be assessed by the Council in line with the site assessment criteria during the next stage of the DPD production.

In addition, an existing traveller site at Prospect Road in Hornchurch with temporary permission for one pitch was not included in the Issues and Options Report. This will also be assessed by the Council during the next stage of the DPD preparation.

Submitted Sites

Q3: Do you have any comments on the pitches/sites (included in Appendix E) submitted for consideration as a Gypsy and Traveller site?

53 people commented on the sites submitted for consideration as a Gypsy and Traveller. The majority of the comments related to the Maylands site (MY1) and the Church Road sites (CR1-13). All comments on the sites are included in Section 2 of this report.

30 respondents - all local residents - commented on the Maylands site and what they considered its unsuitability as a permanent Gypsy and Traveller

site. A large number of the respondents also commented on the initial site assessment of planning and environmental constraints on page 54 of the report and how this incorrectly stated that the Maylands site was not within or close to a locally valued area. The site is adjacent to a Local Site of Importance for Nature Conservation and this will be amended in the full site assessment to inform the Proposed Submission Report.

19 people – predominantly families living on the sites - commented on the Church Road sites and what they considered their suitability for consideration as permanent Gypsy and Traveller sites.

Proposed Site Assessment Methodology

Q4: Does the proposed site selection methodology and the range of factors to be considered therein provide a reasonable and robust means of assessing the suitability of potential sites?

Yes	25
No	1

26 people responded to this question and all but one felt that the proposed site assessment methodology provides a reasonable and robust means of assessing the suitability of potential sites.

Objectives for Gypsy and Traveller Sites

Q5: Do you agree with the proposed objectives for the Gypsy and Traveller Site Allocations DPD?

Yes	23
No	1

24 people responded to this question and all but one agreed with the five proposed objectives for the Gypsy and Traveller Site Allocations DPD.

Number of pitches

Q6: Which of the options 1A to 1C would you support, for the numbers of authorised pitches which should be allocated in the DPD?

1A – allocate land for a further 14 authorised pitches	3
1B – allocate land for a further 34 authorised pitches	0
1C – allocate land for a further 53 authorised pitches	21

24 people responded to this question and the majority (21) supported the allocation of land for a further 54 authorised pitches in the DPD. Three

respondents supported the [Council's preferred] option of allocating land for a further 14 authorised pitches.

Distribution of sites

Q7: Which of the options 2A or 2B would you support, for whether new pitches should either be dispersed or concentrated in the DPD?

2A – concentrated	23
2B – dispersed (new locations)	1
Both options	1

25 people responded to this question and the majority (23) supported the view that any new [permanent] pitches should be on existing sites rather than on new locations in the Borough.

Transit site

Q8: Which of the options 3A or 3B would you support, for whether a transit site should be considered for Havering in the DPD?

3A – no transit site in Havering	15
3B – provide a transit site in Havering	6
Both options	2
Neither option	1

24 people responded to this question. 15 people felt that no transit site should be provided in Havering. 6 people thought that a transit site should be provided in Havering if further investigation shows that it would meet a London-wide need.

Implementation and Monitoring

Q9: Are the two proposed indicators sufficient to assess the effectiveness of the Gypsy and Traveller Site Allocations DPD in meeting its stated objectives?

Yes	23
No	1

24 people responded to this question and all bar one felt that the two proposed indicators were sufficient to assess the effectiveness of the DPD in meeting its stated objectives.

Additional comments

All additional comments made during the consultation are included in Section 2 of this report.

2. All comments

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
1	Mike Allen	Q8 Additional comments	<p>Questionnaire completed</p> <p>There is a need [for a transit site] if all pitches that are currently being lived on do not get passed as this is our base for our Doctors and Health Visitors and somewhere to go if our children need hospital treatment or suchlike.</p> <p>I live on the plot known as CR3 [Church Road] when I'm not travelling. I feel that it is an ideal location as I have six children and it is near shops, laundrette, Doctors which is in close proximity but we are not bothering anybody where we are either. I feel we live in harmony with our surroundings. If I didn't have this base I don't know what I would do. Val Smith the Education teacher [Outreach Officer] has visited me on site and also health visitors which the babies need.</p>	<p>Comments noted.</p> <p>The Council does not consider there is a need to provide a transit site in the Borough. [The aim of the DPD is to identify an appropriate number of permanent sites in the Borough?]</p> <p>All the sites included in the Issues and Options Report will be fully assessed during the next stage of the plan production. The Proposed Submission Report will set out which sites the Council considers to be suitable for permanent gypsy and traveller sites.</p>	Questionnaire
2	Mr and Mrs Barlow	Q3	<p>It has come to my attention that you are considering the former car wash site near Maylands Fields as a permanent travellers site. I have contacted the Council in the past regarding the use of this site for several reasons. The position on the slip road makes this a very dangerous place for vehicles pulling on and off and I have witnessed several close encounters recently that could have ended very badly. Local people applied for a Right of Way in 2003 and Town Green status in 2007, both of which the Council have not acted upon. The adjoining fields are a Site of Metropolitan Importance for Nature Conservation. As such we think that no development should be allowed.</p>	<p>Comments noted.</p> <p>As noted in the comments submitted, this site (MY1) is adjacent to a Site of Metropolitan Importance for Nature Conservation (Ingrebourne Valley). The initial desk-based assessment of the site on page 54 of the Issues and Options Report incorrectly</p>	Email / Letter

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
3	Melanie Batchelor	Q3	<p>We have been made aware of a consultation on the location of a permanent traveller site in Havering, and have discovered that one of the sites suggested is the former car wash site at the corner of Maylands Fields. As a homeowner [Harold Park] within the immediate vicinity of the proposed location, we would like to record our strong opposition to any such site. We are particularly concerned by the offhand manner in which the London Borough of Havering appears to have assessed the original application. In reviewing the considerations of the Development Planning Team we were surprised and disappointed to note that the site was considered to be neither:</p> <ul style="list-style-type: none"> • within or close to an area valued for its heritage; nor • within or close to a locally valued area <p>The Council's views on both these points are factually incorrect. The site borders on Maylands Fields which are:</p> <ul style="list-style-type: none"> • within a Site of Metropolitan Importance for Nature 	<p>states that the Maylands site is not within or close to a locally valued area (such as nature conservation sites) which is covered by local planning policy designations. This will be corrected during the next stage of the plan production when we will be undertaking a full and comprehensive assessment of all the sites using the three levels of questions (Planning and environmental constraints; Infrastructure and location; and Impact and deliverability).</p> <p>Comments noted.</p> <p>As noted above (2) we will correct the error regarding the locally valued area designation during the comprehensive assessment of this site. We will also consider the other issues raised by the respondent in the full site assessment.</p>	Email / Letter

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
4	Stephen Bath	Q3	<p>Conservation (SMI); and</p> <ul style="list-style-type: none"> • within a Site of Importance for Nature Conservation (SINC) <p>The area has a unique and diverse, self-contained ecosystem which supports a number of protected species; most notably pippistrelle and noctule bats, water voles, kingfishers, great crested newts, slow worms, stag beetles and reptiles, to name but a few. Furthermore, the importance of this area to the local community can be seen by the initiatives which have been taken up in the recent past.</p> <ul style="list-style-type: none"> • Rights of Way on the fields were claimed in January 2003 and the Council has taken no action on them • The fields were claimed as a Town Green in November 2007 and the Council has taken no action on this • The Council itself valued the fields enough to protect its trees with Tree Protection Orders and to attempt to buy them for the purpose of their protection • Local residents have fought to protect the fields from inappropriate development for nearly a decade <p>There are many reasons why this site is entirely inappropriate for a permanent traveller site and this was recognised by the Planning Inspector when he gave only a temporary permit to the existing traveller families. We hope in considering the proposal again you will take into account the points I have listed above and recognise the importance of this area to the local community both now and into the future as urban development further encroaches onto our shrinking Green Belt sites.</p> <p>I would like to strongly object to a traveller site at Harold Park [Maylands]. This is ridiculous as I understand the former petrol garage was closed as it was a hazard to traffic coming off the M25 so surely this applies to the illegal car wash and the site where people appear to be squatting.</p>	<p>Comments noted.</p> <p>Please see above (2 and 3).</p>	Email / Letter

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
			<p>I have other issues with any change of use or with Havering's acceptance including the attached [below] from our Maylands preservation group.</p> <ul style="list-style-type: none"> • The fields are within a Site of Metropolitan Importance for Nature Conservation (SMI); • The fields are within a Site of Importance for Nature Conservation (SINC); • Local residents have fought to protect the fields from inappropriate development for nearly a decade; • The Council itself valued the fields enough to protect its trees with Tree Protection Orders and to attempt to buy them for the purpose of their protection; • The fields were claimed as a Town Green in November 2007 and the Council has taken no action on this. <p>I strongly object. Harold Park is a lovely place to live. The Council, along with Thames Chase or the Forestry Commission, should purchase the site for the community and add it to the existing new forest protect which is excellent.</p>		
5	Mr and Mrs Boddy	Q3	<p>We have lived in Maylands Way for nearly nine years and during that time we have actively fought to keep Maylands Fields the conservation area it has always been. It beggars belief that you are even contemplating turning the site into a permanent travellers site. During the last ten years the local residents have ascertained with the Council the following:</p> <ul style="list-style-type: none"> • The fields are within a Site of Metropolitan Importance for Nature Conservation (SMI); • The fields are within a Site of Importance for Nature Conservation (SINC); • Local residents have fought to protect the fields from 	<p>Comments noted. Please see above (2 and 3).</p>	Email / Letter

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
6	Mr and Mrs Brady	Q3	<p>inappropriate development for nearly a decade;</p> <ul style="list-style-type: none"> The Council itself valued the fields enough to protect its trees with Tree Protection Orders and to attempt to buy them for the purpose of their protection; The fields were claimed as a Town Green in November 2007 and the Council has taken no action on this. <p>When the car wash was in use, there were many accidents from traffic on the M25 entering onto the A12 slip road as the entrance to the car wash was almost immediate. I cannot imagine the increase in accidents with the extra traffic a travellers site would cause.</p> <p>My wife and I have lived in this area [Harold Park] since 1956, over 50 years and were amazed and shocked to hear that Maylands Fields has been mentioned as a possible site. Surely after all the upsets of 2002-5 this is not going to be so. When we first arrived in the area at Halidon Rise, the fields were freely accessible and a very popular area for people to exercise both themselves and dogs and even when we first arrived in Maylands Way in 1975 we were able to pass through our rear garden gate and into the fields. So wonderful to walk especially alongside the river and see the water voles and other wildlife at play. We know and you know that the fields are within a site of Metropolitan Importance for Nature Conservation (SINC). We have fought for years to protect the fields from inappropriate development. Rights of Way on the field were claimed as far back as January 2003 and the fields were claimed as a Town Green in November 2007 and there has been no action on either by the Council. The Council did however value the fields enough to protect its trees with a Tree Protection Order which I sincerely hope are still enforce. The local people particularly those in Maylands Way are worried and ready to fight for there rights and of course for the rights of the water voles etc, they don't vote but we do.</p>	<p>Comments noted.</p> <p>Please see above (2 and 3).</p> <p>The traveller site is adjacent to Maylands Fields not within the fields.</p>	Email / Letter
7	Brentwood Borough	Q3	<p>We oppose any expansion of sites at Benskins Lane and Church Road, Noak Hill since this would lead to Green Belt in the area overall</p>	<p>Comments noted. All sites in these areas will be considered</p>	Email / Letter

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
	Council		<p>being further compromised. More generally, we would not wish to see any expansion of Green Belt sites such as that recently given planning permission on appeal at Brook Street Service Station, Harold Hill [Maylands site] particularly if this resulted in the site extending across the River Ingrebourne into Brentwood's Green Belt in South Weald.</p> <p>The methodology appears reasonable and robust.</p> <p>Were site selection to follow the proposed site methodology proposed in Table 2, section 4.50 of the consultation document and referred to above, the location may well have a bearing on whether pitches should be dispersed or concentrated. For example, we would not want to see any further concentration of pitches or expansion of sites near Navestock. An extremely sensitive location within the Green Belt, rural and isolated from any nearby settlement; any expansion of sites here is likely to adversely affect residential amenity, adding to existing problems owing to there already being several pitches in the vicinity. There is a need to avoid any further reduction in the openness of the Green Belt by preventing a series of Green Belt pitches granted due to very special circumstances at appeal or otherwise running between Havering, Brentwood and Epping Forest District.</p>	<p>in line with the site assessment methodology set out in the Issues and Options Report.</p> <p>Comment welcomed.</p> <p>Comments noted. The Council's preferred option is for pitches to be concentrated on existing sites / areas. Each site will be assessed to determine the potential impact on the residential amenity and the openness of the Green Belt.</p>	
8	Charlie Brown	N/A	Questionnaire completed but no additional comments	Noted.	Questionnaire
9	Kathleen Brown	Additional comments	<p>Questionnaire completed</p> <p>Been living here [Church Road] for 4 years. Children in school and with local doctor. Cess pit and water [on site]. Very happy and get on well with everyone here.</p> <p>Questionnaire completed</p>	Comments noted.	Questionnaire
10	Rosie Brown		Questionnaire completed	Comments noted.	Questionnaire

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
11	Tom Brown	Additional comments	<p>Have lived here [Church Road] permanently for 5 years. Kids very happy and settled in local school and have registered with doctors. Temporary licence granted. Have electricity, water and cess pit and cannot be seen from the road. Get on well with local neighbours and other families that live here.</p> <p>Questionnaire completed</p>	Comments noted.	Questionnaire
12	Joanne Bruce	Q3	<p>I've lived at this address [Church Road] for 18 months. My children are settled in school and are very happy and making friends. We've registered with the local doctor and get on very well with neighbours and other families that live here. Two of my sisters live on other plots and other family members live just around the corner.</p> <p>I have just been informed that it is being suggested to have a traveller site at the former car wash on the corner of Maylands fields. I would like to oppose this. The reasons being:</p> <ul style="list-style-type: none"> • The fields are within a Site of Importance for Nature Conservation; • The residents have fought to protect the fields from inappropriate development for nearly a decade; • Right of Way on the fields was claimed in 2003; • The trees are protected with Tree Protection Orders; • The road I live in backs onto the fields and I would be concerned that they would use this as a 'cut through' with their vehicles 	Comments noted. Please see above (2 and 3).	Email / Letter
13	Kirsty Buckley	Additional comments	<p>Questionnaire completed</p> <p>I think the area that we are in [Church Road] is an ideal location as there is minimum impact on neighbours as we only have one neighbour who doesn't have a problem with us being here now he has got to know us. We work together maintaining the road and he stops to chat to us. We are not too close to people that don't understand our way of life - you couldn't have horses and chickens</p>	Comments noted. The Council will consider previous permissions and decisions by the Planning Inspectorate as part of the site assessment exercise.	Questionnaire

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
14	Deborah Butler	Q3	<p>and dogs in the middle of Harold Hill. It is English Travellers tradition to keep animals which keeps in with the Green Belt ethos. We are within walking distance to local shops etc. It was also noted in our first planning permission that the area in which we are located was recommended for a site by Planning Inspector Philip Major. I feel it would be best for us to stay here because all the electric, sewage etc has been paid by ourselves at no cost to the Council.</p> <p>I am writing to protest about the proposal to make the former car wash site next to Maylands Fields a permanent travellers site. Why temporary permission was granted in the first place is beyond belief as it is entirely inappropriate for anyone to live there. Apart from the environmental impact of dumping waste onto Maylands Fields it is too dangerous to have cars / caravans leaving and entering the site. Several times I have narrowly missed cars pulling out from the site onto the slip road from the motorway to the A12. It will only be a matter of time before there is a serious accident.</p> <p>I also find it incredible that the site is deemed not to be close to a locally valued area and not close to an area valued for its heritage. Maylands Fields are within a Site of Importance for Nature Conservation with protection orders placed on the trees. The Council are well aware of the local residents views in trying to protect the Maylands Fields and have ignored their claim for a Right of Way for the past ten years.</p> <p>I have lived in Maylands Way for over 20 years and most of my immediate neighbours have lived here since the houses were first built. I do value the area I live in and hope that my views and those of the other residents will be taken seriously.</p>	<p>Comments noted.</p> <p>Please see above (2 and 3).</p>	Email / Letter
15	Eileen Carlin	Q3	<p>I am writing to express my disgust at and to object to your decision to consider the Maylands Fields as a possible travellers site. This site is close to an area valued for its heritage and is within a locally valued area. The fields are within a SMI. The fields are within a SINC. We,</p>	<p>Comments noted.</p> <p>Please see above (2 and 3).</p>	Email / Letter

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
16	Mr and Mrs Clapham	Q3	<p>the local residents have fought to protect this area from inappropriate development for over a decade. You, the Council have placed Tree Protection Orders on this area. There are current right of way claims outstanding on this area. This area has been claimed as Town Green.</p> <p>We are writing to lodge our objection against the possible permanent traveller site on the former car wash site on the corner of Maylands fields. Our basis for objection is as follows; The fields are within a Site of Metropolitan Importance for Nature Conservation (SMI). The fields are within a Site of Importance for Nature Conservation (SINC). Local residents have fought to protect the fields from inappropriate development for nearly a decade. The Council itself valued the fields enough to protect its trees with a Tree Preservation Orders and to attempt to buy them for the purpose of their protection. Rights of Way on the fields were claimed in January 2003 and the Council has taken no action on them. The fields were claimed as a Town Green in November 2007 and the Council has taken no action on this.</p> <p>The former car wash site is the first thing that the public see when entering the boundary of Romford. This reflects badly on our town as the traveller site currently on the former car wash is unkempt and unsightly giving a bad first impression of the borough. This site was never meant as a place of residence and residential status should not be permitted in any way.</p>	<p>Comments noted.</p> <p>Please see above (2 and 3).</p>	Email / Letter
17	Alan Clark	Q3	<p>The alleged suggested planning approval for a Travellers Site on the old car wash site is totally unacceptable. My reasons for objection are as follows:</p> <ul style="list-style-type: none"> • The site is within an Area of Importance for Nature Conservation. • Tree Conservation Orders were ignored and the Council DID NOTHING to punish the offender. • Rights of Way on the fields were claimed and the Council 	<p>Comments noted.</p> <p>Please see above (2 and 3).</p>	Email / Letter

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
			<p>DID NOTHING.</p> <ul style="list-style-type: none"> The fields were claimed as a Town Green and the Council DID NOTHING yet again. Local residents have fought to protect the fields from inappropriate and unauthorised development for almost a decade now. What have the Council done? NOTHING 		
18	Coal Authority	N/A	No specific comments to make at this stage.	Noted.	Email / Letter
19	Jean Cobb	Q3	Your assessment of this site is completely wrong. It is close to an area valued for its heritage, and it is close to a locally valued area. The ex-car wash area is immediately adjacent to Maylands Field which is an SMI and a SINC ... Residents of Harold Park have made their views perfectly clear throughout the past eight years, which Havering Council has totally ignored. It is high time they supported their residents. We need a town green on Maylands Field without a permanent travellers site literally a few feet away.	Comments noted. Please see above (2 and 3).	Email / Letter
20	Mr and Mrs Cooke	Q3	Once again I am writing about Maylands Fields and the former car wash site, which only had a temporary permit to stay. The site is an eyesore with large slabs of concrete around it and in front of gates on highways land. We still have to be mindful of cars and vans coming out when using the slip road, which can be very dangerous. As for Maylands Fields they are important and valued areas. It was the Council itself that valued it enough to protect trees with Tree Protection Orders. Rights of Way on the fields were claimed in January 2003 and you have taken no action. The fields were also claimed as a Town Green in November 2007. Yet again the Council have chosen to take no action. These fields should be of benefit to the residents and for Nature Conservation.	Comments noted. Please see above (2 and 3).	Email / Letter
21	CPRE	General	<p>No local authority sites for temporary or permanent use should be designated within the Green Belt. Reasons:</p> <ul style="list-style-type: none"> In the interest of fairness and equitable treatment of all other residents and interested parties. To maintain the integrity of the permanent Green Belt 	The Council supports the view that local planning authorities should only ever allow development in the Green Belt in genuinely exceptional circumstances and that this	Email / Letter

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
			<p>boundary as consulted upon, approved as sound and set out in the Local Development Framework DPD.</p> <ul style="list-style-type: none"> • To prevent the growth of unplanned settlements within the Green Belt contrary to borough, regional and borough policies. • To protect the enjoyment of everyone using the Green Belt for recreation, leisure and other bona fide countryside-related purposes identified in borough, regional and borough policies. • To protect agricultural land and maximise food security for a rapidly growing population. • To protect existing, and possible future, Sites of Interest for Nature Conservation from damage. • To protect Green Belt landscape and views. <p>Approval of permanent and temporary residential sites should continue to be resisted by rigorous application of the test for very special circumstances. Site approvals, where unavoidable, should continue to be for specified temporary periods of time and restricted to named individuals. Positive evidence of search for sites within the urban area should be rigorously applied. Reason:</p> <ul style="list-style-type: none"> • These are the only means of control of gypsy and traveller Green Belt use available to the local planning authority. <p>Local authority sites should only be designated within the urban area and only at locations where the amenity of existing residents will not be affected. Reasons:</p> <ul style="list-style-type: none"> • It is possible to identify, and reasonable to designate, such sites; for example at industrial urban fringe locations. • In the interest of sustainable and efficient provision of local authority and other utility services. 	<p>should apply to gypsy and traveller sites as well as all other forms of development.</p> <p>Green Belt land should only be allocated for gypsy and traveller sites in 'very special circumstances'. The Council considers that Green Belt sites should only be designated in Local Development Documents for existing residents or locally connected travellers, solely for that purpose and with no business use on the site.</p> <p>The Council is not proposing any local authority run sites for gypsies and travellers. No sites within the urban area have been identified or put forward during the Call for Sites or Issues and Options consultation.</p>	

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
22	Craig and Sally Dearman	Q3	<ul style="list-style-type: none"> Access to all facilities and services is as good, or better than, access from Green Belt sites. <p>We write to you in objection to the proposal that the above mentioned location is given permanent traveller site status. What worries us most is that London Borough of Havering appears to have assessed the site in completely the wrong way, including:</p> <p>Is the site within or close to an area valued for its heritage?: NO Is the site within or close to a locally valued area?: NO</p> <p>It defies belief that the Council can make this assessment knowing that the site borders on Maylands Fields, and knowing:</p> <ul style="list-style-type: none"> The fields are within a Site of Metropolitan Importance for Nature Conservation (SMI). The fields are within a Site of Importance for Nature Conservation (SINC). Local residents have fought to protect the fields from inappropriate development for nearly a decade. The Council itself valued the fields enough to protect its trees with Tree Protection Orders and to attempt to buy them for the purpose of their protection. Rights of Way on the fields were claimed in January 2003 and the Council has taken no action on them. The fields were claimed as a Town Green in November 2007 and the Council has taken no action on this. The area in question appears unsightly and is not kept clean or tidy. <p>Residents' views on Maylands Fields have been totally ignored for a decade by the Council which has taken only very limited action only when forced to do so by intense pressure from residents. Now it</p>	<p>Comments noted.</p> <p>Please see above (2 and 3).</p>	Email / Letter

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
23	Jan Derewicz	Q1 Q3 Q4 Q6 Q7 Additional comments	<p>appears to be saying that Maylands Fields is not an area valued by residents - IT IS.</p> <p>What possible positive reasons can you give to grant this area permanent traveller site status? What benefit would it bring to nearby residents? What would be the impact on local wildlife and conservation issues?</p> <p>Questionnaire completed</p> <p>If the 25 unauthorised pitches are authorised then the additional 40 pitches required 2010 - 2027 seems correct. Pitches should only be used by families already living in the Borough.</p> <p>Sites close to locally valued areas should not be submitted or considered as a Gypsy and Traveller site.</p> <p>If all foregoing constraints above are strictly adhered to then it should be a reasonable assessment.</p> <p>We definitely agree that 1A [14 pitches] is the correct policy at this time.</p> <p>Option 2A is correct but the new pitches erected and area involved must be closely monitored by Havering.</p> <p>If the vital planning matters are adhered to and no development is permitted on the Green Belt (fringes or internal pockets).</p> <p>Only existing families already living in the Borough and their direct expansion should be accommodated within Havering.</p> <p>Existing sites should be considered first for this expansion; especially if there have been no relevant objections up to this point.</p>	Comments noted.	Questionnaire

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
24	P. Dessoy	Q3	<p>Whilst appreciating accommodation sites for Gypsy and Travellers must be met, Havering must insist on no overspill from other areas outside the Borough.</p> <p>Proposals for temporary permission for [Sites] UP1 and UP2 are on valuable Green Belt land and should be retained as Green Belt and under no circumstances should anybody be allowed to despoil, encroach or live on this land. This land is the lungs of London and surrounding areas. It is our duty to ensure it survives for future generations to come. Once taken from this purpose Green Belt land will never be released back to the people of the area.</p>	<p>Both sites have already been granted temporary permissions. They will be assessed in line with the criteria set out in the Issues and Options Report to consider their acceptability for permanent permission. Green Belt land will only be allocated for gypsy and traveller sites in 'very special circumstances'.</p>	Questionnaire
25	English Heritage	Appendix F	<p>We welcome as part of the Level 1: Planning and Environmental Constraints reference to the need to protect the Boroughs heritage assets and settings of conservation areas, listed buildings and schedule monuments. We would suggest for completion and compliance with Planning Policy Statement 5: Planning for the Historic Environment, that all designated heritage assets are included in the assessment process, such as registered parks and gardens and archaeology. In addition the broader historic environment should be carefully considered, especially buildings, structures, landscapes and townscapes of local historic interest, that could be classed as heritage assets (as defined by PPS5 and the new replacement London Plan (2011)).</p> <p>At the Level 3: Impact, Design and Deliverability, we would seek to ensure that a thorough analysis of the impact of the development upon the historic interest of the site and its surroundings is undertaken. This includes consideration of all heritage assets, in particular known or yet to be discovered archaeology.</p>	<p>Comments noted.</p> <p>The Council will consider all designated heritage assets in its assessment of the sites. In addition, we will consider the impact of proposed sites on local character and appearance of the surrounding area as set out in Level 3 of the site assessment criteria.</p>	Email / Letter

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
26	Environment Agency	<p>Para. 4.13</p> <p>Para. 4.20</p> <p>Para 4.21</p> <p>Q3</p>	<p>One of the key broad objectives of the DPD (paragraph 5.9) should be to conserve the Borough's heritage assets including their settings, in line with Core Strategy CP18, London Plan policy 7.8 and PPS5. It is noted that various options have been proposed with regards to the number of sites, their distribution and function. In general we would reiterate the need to conserve the Borough's heritage assets when identifying specific sites, and not to cause harm to their significance. This includes consideration of their setting and elements of the historic environment that may not be designated heritage assets, but still contain historic interest.</p> <p>We particularly support the following statements:</p> <p>Sites should not be located on [or] in close proximity to known hazards, such as contaminated land or areas at high risk of flooding.</p> <p>Gypsy and Traveller sites would not be acceptable where they would likely have and adverse impact on a SSSI.</p> <p>Flood Zones.</p> <p>Of the proposed sites, we have comments to make on three of them, we do not have any specific concerns or restrictions for the other sites.</p> <p>UP3 This site includes a pond and an ordinary watercourse. A 5 metre buffer zone should be created around the pond and along the ordinary watercourse. This zone should be left free of any structures or formal landscaping and should be delineated with a fence and native hedge.</p> <p>WD pitches</p>	<p>Support welcomed.</p> <p>Comments noted. These will be considered in the site assessments.</p>	Email / Letter

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
			<p>This site is located in a Source Protection Zone 1 around a potable water abstraction borehole. In such a location we would recommend planning conditions that would only allow clean roof drainage to drain to soakaway, and then only in areas where it has been demonstrated that there is no contamination. All other surface water and all foul drainage must be connected to public sewer.</p> <p>MY1 This site is adjacent to the river Ingrebourne. The current site is within 8 metres of the top of bank. Any permanent planning permission which grants the development of MY1 should ensure that the full 8 metre buffer zone is achieved including moving the current hardstanding back to provide the full width. The buffer zone should be demarcated with a fence and native hedge on the landward side of the fence. Although this site is partly in Flood Zone 2 and borders Flood Zone 3, we consider this site to fall in Flood Zone 1 based on the result of more detailed modelling which we are aware of. This site is a former petrol filling station. It is also located on a Secondary Aquifer and is adjacent to a surface watercourse. If permanent planning permission was applied for, we would recommend planning conditions to ensure that any necessary remediation was carried out and to ensure that the site drainage was acceptable.</p> <p>The buffer zones we mentioned under UP3 and MY1 should be appropriately managed for wildlife in the longer term. All proposed developments should seek to enhance biodiversity. Planning Policy Statement 9 (PPS9) requires that planning decisions should prevent harm to biodiversity interests and should seek to enhance biodiversity where possible. Article 10 of the Habitats Directive and paragraph 12 of PPS9 stress the importance of natural networks of linked habitat corridors to allow the movement of species between suitable habitats, and promote the expansion of biodiversity. River corridors are particularly effective in this way. Moreover, the Water Framework Directive (2000/60/EC) aims to improve the whole water environment.</p>		

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
		Q4	<p>We are the competent authority in England and Wales responsible for delivering the WFD through the Environment (WFD) (England and Wales) Regulations 2003. The WFD needs to be taken into account in the planning of all new activities in the water environment. The WFD requires that Environmental Objectives are set for all surface and ground waters in each EU Member State. The objectives are laid out in the Thames River Basin Management Plan and are divided into waterbodies.</p> <p>We feel that Table 2 should have a point to say that sites will be preferred in locations which will not have a detrimental effect on watercourses or biodiversity.</p> <p>In addition to the above we have the following suggestions and advice:</p> <p>We support the reference to steer these developments away from contaminated land and the use of planning conditions to remediate contamination. It would be useful to add that developments on contaminated land that pose a risk to polluting controlled waters could be required to remediate the land under planning conditions. This would be in addition to any requirements from a human health aspect.</p> <p>Planning Policy Statement 23 (PPS23: Planning and Pollution Control) and the Water Framework Directive should be added to the list of Further Guidance on page 32 [of the Issues and Options Report]. As each site goes through the planning process we would expect the development to follow the guidance of PPS23 and CLR11 with regards to the potential risk to groundwater, and the general requirements for land contamination and drainage. Sites should be connected to the foul sewer if possible. If this is not possible then they should be connected to a sewage package plant to treat the</p>	<p>Table 2 provides a summary of the factors to be considered in the site assessment methodology. Biodiversity and watercourse issues will be considered in the full assessment process.</p> <p>Noted. This will be considered in the site assessment and development of the Proposed Submission Document.</p> <p>Comments noted. Both will be added to the List of Further Guidance in the Proposed Submission Report.</p>	
	References and Further Guidance				

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
27	Epping Forest District Council	Q7	<p>effluent. Depending on the output of these sewage package plants and whether they go to land will determine whether they need to be registered with us. For more information please refer to our website at: http://www.environmentagency.gov.uk/research/planning/33710.aspx.</p> <p>The preferred option is 2A, i.e. concentration within the existing nine sites. This would also apply to any transit site in the Borough, should that become a reality. The main reason for this choice is that we have experienced some problems with Gypsy and Traveller sites on the boundary with Brentwood where different priorities for enforcement of unauthorised sites between the authorities can lead to unsatisfactory outcomes. Your option of concentration would prevent the possibility of this occurring on our shared boundary, as there are currently no Gypsy and Traveller sites in that area.</p>	<p>Comments noted.</p> <p>This is the Council's preferred approach.</p>	Email / Letter
28	Frances Fetterroll	Q3	<p>Havering appear to have assessed the [Maylands] site in completely the wrong way, including:</p> <p>Is the site within or close to an area valued for its heritage?: NO Is the site within or close to a locally valued area?: NO</p> <p>There are many reasons why this site is entirely inappropriate for a permanent traveller site, this was recognised by the Planning Inspector when he only gave a temporary permit to the existing traveller families, also the following are reasons not to grant permission on a site that borders on Mayland Fields:</p> <ol style="list-style-type: none"> 1. The fields are within a Site of Metropolitan Importance for Nature Conservation (SMI) 2. The fields are within a Site of Importance for Nature Conservation (SINC) 3. Local residents have fought to protect the fields from inappropriate development for nearly a decade. 	<p>Comments noted.</p> <p>Please see above (2 and 3).</p>	Email / Letter

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
29	Stephen and Rosalind Fraser	Q3	<p>4. The Council itself valued the fields enough to protect its trees with Tree Protection Orders and to attempt to buy them for the purpose of their protection.</p> <p>5. Rights of Way on the fields were claimed in January 2003 and the Council has taken no action on them.</p> <p>6. The fields were claimed as a Town Green in November 2007 and the Council has taken no action on this.</p> <p>7. Residents' views on Maylands Fields have been totally ignored for a decade by the Council which has taken only very limited action only when forced to do so by intense pressure from residents. Now it appears to be saying that Maylands Fields is not an area valued by residents.</p> <p>As the above points show we are concerned and have been for a very long time. Please reconsider the site for this purpose and at least reconsider the points 5 and 6 instead.</p> <p>We would like to raise a complaint that you are even considering this [Maylands site] after all the hard work done by the local community – whom you serve – to ensure that this area retains its Green Belt status. It is beyond belief that you have made an assessment of the site which answers 'no' to both questions;</p> <ul style="list-style-type: none"> • is the site within or close to an area valued for its heritage; • is the site within or close to a locally valued area? <p>You are aware that the site is within an SMI, SINC and that local residents have been fighting for 10 years to protect it. We have received no answers to our claims of Rights of Way to the fields (in January 2003). It appears you have taken no action on this and Town Green (November 2007) again no action ...The consequences of allowing this site to be a permanent residence will have disastrous knock-on effects in the future as follows:</p>	<p>Comments noted.</p> <p>Please see above (2 and 3).</p>	Email / Letter

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
			<ul style="list-style-type: none"> The destruction of the fields; The huge amounts of money it will cost to remove the inevitable illegal caravans that will arrive on the back of this. <p>Please think again and do not allow this to happen.</p> <p>Questionnaire completed</p>		
30	Annie Friend	Additional comments	<p>I have lived at this address [Church Road] for approximately 5 years. I have electric, water, cess pit and cannot be seen from the road. [We] get on well with local neighbours and the kids settled well into school. Also have temporary licence for 5 years.</p> <p>As you are aware, the Mayor in his London Plan 2011 has not set any specific target with regards to Gypsy and Traveller sites. It is considered that Boroughs are best placed to assess the needs of, and make provision for these groups at the local level. The Mayor is content that Havering Council proceeds with its development of its DPD with the purpose of allocating suitable sites for gypsies and travellers in Havering in line with national policy. The Mayor will issue his formal opinion on general conformity when requested at pre-submission stage.</p> <p>Questionnaire completed</p>	Comments noted.	Questionnaire
31	GLA	General		Noted.	Email / Letter
32	Heine Planning	Q1	<p>Questionnaire completed</p> <p>We have not been provided with a copy of the 2010 update report so it is not possible to comment in a meaningful way not knowing the details of this study. Without details of what pitches are being considered it is impossible to agree with the assessment. It is not clear what if any public consultation/scrutiny or sustainability assessment this study has been subject to. Not knowing what sites are referred to I am unclear how the Council can rely on sites with temporary permissions to meet need to 2015. I suspect the consents for most will expire before then and in the case of Ashlea on Tomkyns Lane the Council has only recently renewed (again) for a 2 years consent which will expire before 2015. Circular 1/2006 makes clear</p>	<p>The findings of the 2010 update to the Havering Gypsy and Traveller Needs Assessment are set out in the Issues and Options Report (paragraphs 3.39 - 3.41 and Table 1). Paragraphs 3.40 and 3.41 of the Issues and Options report state that the additional pitches are based on the best practice guidelines of 3% per</p>	Email / Letter

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
			<p>that temporary consents do not set a precedent and can not be relied on to meet need. The 31 pitches with temporary consent should be included as a current shortfall as there is no guarantee they will be renewed. The current immediate shortfall should be 31 (temporary) plus the 25 identified i.e. 56. The need to 2015 should be 56 plus household formation i.e. minimum 64. I am unclear where the 40 for household formation in para 6.3 comes from but presume it is family formation to 2015 of 8 and additional pitches 2016 to 2027 of 32. It is not clear from Table 1 that additional pitches 2016-27 of 32 pitches is all household formation. The assessment fails to include provision for:</p> <ul style="list-style-type: none"> • In migration-traditionally sites in Havering have had to be found to meet the needs of Travellers moving from other parts of Gt London and Essex; • Movement from families in housing to which some weight should be given due to the high number of families in housing in the metropolitan area; • Household formation from current unauthorised sites. <p>As such it may understate need generated from all sites. It should be made clear that any need identified is a minimum need and not a maximum figure which can not be exceeded. Recognition that there is a pressing, current unmet need which must be met immediately is welcomed.</p>	<p>annum household growth rate and this was applied to all sites in Havering, including unauthorised, at the time of the needs assessment.</p>	
		Q2	<p>Unaware of any other suitable sites but Maylands now has temporary consent.</p>	Noted.	
		Q3	<p>All sites occupied by gypsies and travellers are understood to be deliverable as they are available, affordable, accessible for the purposes sought and can be provided at no additional expense to the local authority.</p>	Noted.	

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
		Q4	<p>This all seems a bit false and academic seeing as how the call for sites identified only existing sites. All these sites would fail to meet the first consideration as they are all in the Green Belt. Some may struggle to meet other considerations such as environmental amenity for sites alongside the M25. Some are not well located to access services without reliance on a car but any journey in Havering is likely to be relatively short. This does not seem a very relevant consideration in such a small and compact district where no land is that far from services and amenities. I doubt any site would ever be rejected for this reason and question the need to include this. It is hard to reconcile a desire to be within settlements and protect the amenities of other residential properties. The Sustainability Appraisal fails to identify any other sites considered and rejected. The document may not be considered sound without this information. We are told in para 6.4 that the Council was unable to identify any suitable sites within the built up area but we are not provided with a list of the sites considered and rejected and/or why. Without this information applications for future sites in the Green Belt are likely to be challenged by those not convinced that all other options have been properly considered and rejected with good/ valid planning reasons.</p>	<p>Additional sites at Church Road (CR1-CR4 and CR13) and Willoughby Drive (WD2) were put forward during the Call for Sites and were included in the Issues and Options Report. These, together with additional sites put forward during the Issues and Options consultation will be considered in the preparation of the Proposed Submission Document.</p>	
		Q5	<p>I am not clear what the final objectives concerns, namely: To provide specific criteria about the form of development which will be allowed on each site to ensure the land use is appropriate within the constraints of the local area. It is not clear what you have in mind and why this could not be addressed by condition.</p>	<p>The Proposed Submission Document will set out site specific criteria. Conditions may still be imposed when determining any applications</p>	
		Q6	<p>1C - although I do not understand where the figure of 56 comes from. I am not sure I have understood your intentions but I simply cannot understand how or why you are suggesting that you only provide 14 new pitches during the plan period when your need assessment identifies a minimum need of 65 pitches To justify this concern to protect the Green Belt ignores the option of removing land from the</p>	<p>The Council is not proposing to release any land from the Green Belt. The DPD seeks to allocate sufficient land to meet the accommodation needs of gypsies and travellers living in</p>	

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
		Q7	<p>Green Belt or the significant weight to be attached under current policy to unmet need. The objectives of the exercise are to make proper and adequate provision to meet existing and projected need. How will this be achieved if you only identify land for 14 pitches when you identify a need for 65 pitches? Why bother doing a need assessment if you have no intention of meeting the need you identify? It is unclear why the Council is only considering Green Belt land. Surely land is to be found for housing within settlement boundaries. Why is this not being considered suitable for travellers? If sufficient land is not available the Council should consider removing land from the Green Belt. Why is this not an option? Several sites adjoin the settlement boundary and could easily be removed from the Green Belt. Option 1A would not address the first objective identified by the Council i.e. to support the removal of unauthorised development. PPS3 requires local authorities to identify land suitable to meet a five year supply. The DPD would not be policy compliant if it failed to allocate sufficient land for future growth and household formation. An option that fails to meet current need let alone future need is surely bound to fail at the first hurdle?</p> <p>It makes good sense to look to increase provision within existing sites or small extensions of existing sites where possible. But, as with housing provision there is a need to provide choice and the Council should also look to provide additional pitches in other areas that are not in the Green Belt, as part of housing allocations/ developments. Given the need for 65 additional pitches by 2021 it is unclear why you believe providing sites in other parts of the district could place a strain on infrastructure and other public services in the area. This needs to be explained. I doubt the same is said of housing need.</p>	<p>Having while protecting the Green Belt from inappropriate development except in very special circumstances. No non-Green Belt sites have been identified or put forward during the preparation of the DPD. The Council considers that its preferred approach strikes the right balance between housing gypsies and travellers living in Havering at the time of the needs assessment and only allocating Green Belt land where this is justified by very special circumstances. The Council does not consider that future growth and household formation does not amount to the very special circumstances for inappropriate development in the Green Belt.</p> <p>No additional sites outside of the Green Belt were put forward for consideration.</p>	

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
		Q8	<p>There is a need for transit provision. Few travellers now attempt to stop on the road side. Many will seek out family sites or private touring caravan sites where they exist and where owners will accept them. For this reason many Council's are unaware of the extent to which Travellers are passing through their district. Travellers rarely move in large groups any more due to the need to avoid detection. The Council should consider allowing an element of transit provision on existing sites. In my experience most Travellers try and stop with families and friends when travelling for obvious reason (no site fees, security and company). Small family sites should be allowed to have a small transit area for 1-3 touring caravans where family and friends could stop for up to 2-3 months. This would substantially reduce any need for transit provision, would avoid conflict with other land uses on whose land transit use may take place, and would be provided and managed by the travelling community at no expense to the Council.</p>	<p>As set out in the Issues and Options Report (see paragraph 6.8) the Council does not consider there to be a need for a transit site in Havering. The majority of respondents to the Issues and Options consultation, including a number of traveller families, supported this approach.</p>	
		Q9	<p>Monitoring should also include for the need to update the 2010 GTAA on a regular basis to address issues of overcrowding, concealed need and household formation otherwise you will not know of sufficient pitches are being created. This should be included as a third indicator as noted in para 7.7 but should not be linked solely to the review of the DPD which may take some time to be adopted. It is not clear what interim/ transitional arrangements are to be put in place until the site allocation DPD is adopted.</p>	<p>The two proposed indicators are considered appropriate measures to assess the effectiveness of the DPD. A review of the GTAA is considered to be undertaken in line with a review of the DPD (every five years).</p>	
		Additional comments	<p>The preparation of a site allocation DPD is welcomed but it is long overdue. I have had difficulty understanding the figures in this document. I suspect others, in particular Members of the Gypsy-Traveller community are expected to understand or follow this document and what is proposed. It would have been helpful if the sites referred to in Table 1 could be listed i.e. those with permanent consent, those with temporary consent (and until when), those likely to get temporary consent (and until when) and those not likely to get</p>	<p>Comments noted.</p>	

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
33	Highways Agency	N/A	<p>Without this information no one can comment in any meaningful way on the assessment made. Volume house builders can pay to retain consultants to comment on policy documents like this. The Gypsy community can not afford to do the same. This consultation process relies heavily on the goodwill of voluntary organisations/unpaid consultants like myself to take time out of our busy schedules to respond. It would be helpful if the process could be made easier. Some of this document and the accompanying Sustainability Appraisal seem irrelevant, superfluous and unnecessary. Crucial information appears to have been omitted. I feel the whole process is being made unnecessarily complicated. If, as would appear to be the case, the call for sites has identified no sites outside the Green Belt/not already occupied you are now vindicated to make permanent all existing sites. Let's not beat about the bush but do something positive, proactive and sensible to address this issue without further ado. There is a danger the process will become overcomplicated and will never be implemented.</p> <p>No comments on the document at this time.</p>	Noted.	Email / Letter
34	Colin Hunt	Q3	<p>This site [Maylands] is entirely inappropriate as it is close to an area valued for its heritage and a locally valued area. Also, access to and from the site is considered hazardous as it is on the slip road from the M25. We as local residents [Harold Park] have campaigned for 10 years to get Maylands Fields recognised as an area of Nature Conservation and a Town Green but have been ignored by the Council. Despite the fact the trees have been valued enough by the Council to have a Tree Protection Order placed on them.</p> <p>I have lived in this area [Harold Park] all my life and have always thought that this was Green Belt land and that, as such, nothing could be built on it. There are not enough open spaces in Havering and this site [Maylands] should be left alone. The caravans that are parked illegally on the former car wash site should be removed at once. Harold Wood and Harold Park are small, quiet areas and are</p>	<p>Comments noted.</p> <p>Please see above (2 and 3).</p>	Email / Letter
35	Carol Liuzzi	Q3	<p>I have lived in this area [Harold Park] all my life and have always thought that this was Green Belt land and that, as such, nothing could be built on it. There are not enough open spaces in Havering and this site [Maylands] should be left alone. The caravans that are parked illegally on the former car wash site should be removed at once. Harold Wood and Harold Park are small, quiet areas and are</p>	<p>Comments noted.</p> <p>Please see above (2 and 3).</p>	Email / Letter

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
36	Margaret and Terry Loveland	Q3	<p>not conducive to having a travellers' site in their midst ... The site is also very unsuitable as the entrance is on the slip road from the A25 and it would be very dangerous.</p> <p>We are very much against the suggestion that Maylands Fields should be used as a permanent Traveller Site. There are much better uses for it. The Council seems to have dragged its feet for almost 10 years over the use of this site. It allowed the car wash to remain in existence long after a warning had been given that the car wash must be removed and the site must not be used for commercial purposes. The field is between Havering and Brentwood and should be used for Nature Conservation. We know that trees on the site have a Protection Order on them. Rights of Way have been claimed on the fields and a Town Green was suggested in 2007. The Council have done nothing about either of these suggestions. It is difficult to understand why these fields are not being protected for public leisure and recreation purposes, as we understand that they are within a Site of Metropolitan Conservation. It seems that the owners of Maylands Fields are making a laughing-stock of Havering Council, as it must appear that the Council has little or no power to stop what must be a very unsuitable use of the site. It seems to be actively encouraging a course of action which is surely not in keeping with the wishes of the majority of Havering residents.</p>	<p>Comments noted.</p> <p>Please see above (2 and 3).</p>	Email / Letter
37	Maylands Action Group	Q3	<p>I think you will find that the vast majority of residents living in the immediate vicinity of this site [Maylands] would consider it wholly inappropriate for occupation by Travellers. Indeed I was extremely shocked and disappointed to learn that those Travellers already occupying the land had received a temporary stay there. Residents have been campaigning against the site's unauthorised use, and subsequent occupation by Travellers, for almost a decade – and have formed an Action Group to purposely highlight the value of the wider Maylands Fields area. Thus, given these factors, and the protracted correspondence Havering Council has had with residents/the Maylands Action Group on this matter, it is disappointing in the</p>	<p>Comments noted.</p> <p>Please see above (2 and 3).</p>	Email / Letter

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
			<p>extreme that it would still include this site in its consultation document - when clearly this proposal already has no support within this community. In view of the foregoing, I am especially disappointed that Havering Council has presented this proposal incorrectly. In your consultation you pose the following questions, and answer no to both:</p> <ul style="list-style-type: none"> • Is the site within or close to an area valued for its heritage? • Is the site within or close to a locally valued area? <p>Both answers are clearly incorrect and misleading, as the proposed site borders Maylands Fields, which is both a SMI and SINIC (Site of Metropolitan Importance for Nature Conservation and a Site of Importance for Nature Conservation). And as previously stated, the Fields adjoining the site are valued. The following examples of community action clearly demonstrate this:</p> <ul style="list-style-type: none"> • Local residents have fought to protect the fields from inappropriate development for nearly a decade; • The Council itself valued the fields enough to protect its trees with Tree Protection Orders and to attempt to buy them for the purpose of their protection; • Rights of Way on the fields were claimed in January 2003; • The fields were claimed as a Town Green in November 2007. <p>These issues alone should invalidate the sites selection, as its value has been understated in your consultation document. Moreover, slow moving vehicles (such as those towing caravans) entering and exiting the site, at such close proximity to the off slip from the M25 to A12, would seem foolhardy in the extreme. I would hope, upon review of the above, you would now remove the site in question from the consultation process.</p>		
38	Janet Mitchell		Questionnaire completed	Comments noted.	Questionnaire

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
39	Natural England	Additional comments Para. 4.13	<p>I've lived at this address [Church Road] for 4 years. It's a permanent home for me and my 4 children. [The site] cannot be seen from the main road. We have our own cess pit and water and the kids are happy and settled in school and registered with the local doctor. Very settled and get on very well with all other families.</p> <p>Paragraphs 4.13 to 4.19 refer to sites not being considered in areas that are generally inappropriate for residential use, including the Green Belt. This is welcomed and to be encouraged but seems to be at variance with the Sustainability Appraisal.</p> <p>Table 1: Summary of Identified Sustainability Environmental Section (g) Protection of designated areas (nature, conservation, heritage) Sites of conservation value and heritage designation should be protected, and criteria for site assessment clearly defined to ensure that development sites avoid these areas in particular, and minimise adverse effects on surrounding areas in general. Development pressure should be directed away from designated sites and encouraged on brownfield land; sites within the <u>Green Belt should only be authorised in exceptional circumstances.</u></p>	<p>The Issues and Options Report and Sustainability Appraisal both state that sites within the Green Belt will only be authorised in exceptional circumstances.</p> <p>No brownfield land has been identified or put forward during the Call for Sites or Issues and Options consultation.</p>	Email / Letter
		Para 4.20 Interim Sustainability Appraisal	<p>The Issues and Option Report provides greater clarity in respect of this issue, the Council may wish to consider revising this section to more fully comply with PPS 2 and the main consultation document.</p> <p>The reference to Sites of Special Scientific Interest (SSSI's) in paragraph 4.20 is also welcomed and supported.</p> <p>Table 1: Summary of Identified Sustainability Issues</p> <p>The Environmental issues referenced under sections G, H and I are acknowledged and welcomed subject to the comments above.</p> <p><u>Appendix C – Sustainability Appraisal Framework</u></p>	<p>Support welcomed.</p> <p>Support welcomed.</p>	

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
		Interim Sustainability Appraisal	<p>The seventeen objectives referenced here are broadly supported, especially;</p> <p>9) Maintain and enhance biodiversity; 11) Improve air quality and reduce contributions to Climate Change; 12) Improve the quality of the built and natural environment.</p> <p>Overall the approach and methodology used are appropriate and in line with the advice that would be offered by Natural England, this topics and issues covered is also in line with those that Natural England would wish to see considered in such a document.</p> <p>The following general information is offered to provide general advice to Havering Borough Council, rather than addressing any specific issues in respect of this document</p> <p>Local wildlife sites If any proposed sites are on or adjacent to local wildlife site, e.g. Site of Nature Conservation Importance (SNCI) or Local Nature Reserve (LNR) the county ecologist and/or local Wildlife Trust should be contacted.</p> <p>Protected species If representations from other parties highlight the possible presence, or the Council is aware of a protected or Biodiversity Action Plan (BAP) species on the site, the Council should request survey information from the applicant before determining the application. Paragraph 98 and 99 of ODPM Circular 06/2005 and Paragraph 16 of Planning Policy Statement 9 provide information on BAP and protected species and their consideration in the planning system.</p> <p>We would draw the Council's attention to our protected species standing advice [on the Natural England website], which provides guidance on when protected species may be impacted by a proposal.</p>	Support welcomed.	
		General		Comments noted.	

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
40	Stephen Nixon	Q3	It has just come to my attention that there is a possibility that you may be considering making the [Maylands] site a permanent gypsy site. I hope this is not the case as this will only confirm to me that no one at Havering Council takes the issues with this area seriously. Questionnaire completed	Comments noted. Please see above (2 and 3).	Email / Letter
41	Miles O'Connor	Q3 Q5	Sites at Lower Bedfords Road (LB1-4) recommended to be put forward. All are close to schools, buses and facilities (utilities). The plan needs to consider the individual circumstances of the families (Doctors, Hospitals, Medication etc.).	All these sites will be fully assessed during the next stage of the plan production. The plan is a land-use/spatial planning document which will designate sites in appropriate locations for gypsy and traveller families. The plan has to consider the principle of development. It is not the role of the plan to look at the individual medical circumstances of families currently living on sites. Comments noted.	Questionnaire
42	Steve Oxby	Q8 Additional comments	Transit sites can cause friction with the established traveller and local communities. Questionnaire completed I have lived on here [Church Road] for the best part of 30 years. During the War, prefabs were on this land. I look after all kinds of animals which I live alongside. This is the only home I have ever known. These people help me and feed me.	Comments noted.	Questionnaire

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
43	Victoria Porter	Additional comments	<p>Questionnaire completed</p> <p>In my view this site [Church Road] does not affect the neighbouring surroundings due to the fact that the site is not visible from the road. As this site at Church Road has and maintains its own private road it has no impact on local highways. This is a very friendly and peaceful site.</p> <p>Questionnaire completed</p>	<p>Comments noted.</p>	Questionnaire
44	Porter Glenny	<p>Q1</p> <p>Q3</p> <p>Q6</p> <p>Additional comments</p>	<p>We do not believe the accommodation needs of the community in Havering have been fully quantified and consider the Needs Assessment should be considerably in excess of the suggested 40 pitches.</p> <p>The site of the property known as Maricot Cottage, Church Road, Noak Hill, Romford and which adjoins an existing authorised site can be made available for such use and is available for purchase by the Council on terms to be agreed.</p> <p>As stated earlier, further land should be allocated to allow for future projected growth using land adjacent to existing sites to expand.</p> <p>The Issues and Options Report should make better provision for additional sites throughout the Borough and take up availability of additional land where adjoining existing authorised sites as opposed to planning new locations likely to disrupt adjoining properties and alienate home owners.</p>	<p>The needs assessment was undertaken in line with best practice guidelines of a household growth rate of 3% per annum (40 pitches up to 2027).</p> <p>The Council is not proposing to buy land for a gypsy and traveller site. However, this site will be assessed by the Council as part of the preparation of the Proposed Submission Document.</p> <p>The Council will assess additional sites put forward but does not consider that future household growth justifies 'very special circumstances' to designate and allow for additional sites in the Green Belt.</p>	<p>Email /Letter</p>

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
45	Michael Pudney	Q3	I am writing to object to the Councils proposal to allocate the [Maylands] site as a designated Travellers site.	Comments noted. Please see above (2 and 3).	Email /Letter
46	David Shepherd	Additional comments	Questionnaire completed I have been here [Church Road] for about 5 years. My son David is happy and settled here and is settled in a local school. We get on very well with the other families here. We are very happy and contented and would like to be more permanent.	Comments noted.	Questionnaire
47	Mrs M. Skinner	Q3	I understand this [Maylands] site is being included by you as a possible permanent traveller site, to which I strongly object. I am concerned as to how you ever reached the proposal as an option. You have disregarded local residents fight to protect the fields from inappropriate development. The fields are within a Site of Metropolitan Importance for Nature Conservation. The Council itself valued the fields enough to protect its trees with Tree Protection Orders and to attempt to buy them for the purpose of their protection. Rights of Way on the fields were claimed in January 2003 and the Council has taken no action on them. The fields were claimed as a Town Green in November 2007 and the Council has taken no action on this. As a resident since 1976 there have been many changes, e.g. A12/M25, local shops closed down, post office etc. This is vital for all local people to keep Maylands Field for the people.	Comments noted. Please see above (2 and 3).	Email /Letter
48	Linda Smith	Additional comments	Questionnaire completed Children in local school. Registered with Doctor. This is a permanent home [Church Road]. Have lived in this for four years. Have electric, water and cess pit. Was granted temporary licence for 5 years.	Comments noted.	Questionnaire
49	Stacey Smith		Questionnaire completed	Comments noted.	Questionnaire

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
50	Trina Smith	Additional comments	<p>To me and my family this site [Church Road] is in a perfect location. We don't bother anybody and nobody bothers us but we are close to the local shops which I often walk to with my Tommy in his buggy. We have our own sewage system and water and if allowed to stay here it would be good for the Council instead of building a site for us at great cost.</p> <p>Questionnaire completed</p>	Comments noted.	Questionnaire
51	K. Stewart	Q3	<p>I think that we cause the least amount of harm living here [Church Road]. I feel we have minimum impact on neighbours. Also living in caravans I feel we have a smaller carbon footprint than house dwellers which is in keeping with our surroundings. If you look at some other sites there is no green - it is all grey concrete everywhere unlike ours.</p> <p>There are many reasons why this site [Maylands] should not be considered as a suitable site for travellers, some being as follows:</p> <ul style="list-style-type: none"> • Access to the site is dangerous, as any traffic wishing to enter the site from the M25 roundabout slip-road, has to slow down in front of traffic accelerating to enter the A12 where the speed limit is 70 m.p.h. and any traffic entering the site from the A12, has to cross the slip-road and accidents have happened at this point. • There is the very real danger that any future occupants of the site will break into the main field area and use the area for their own purposes, as has happened in the past. • The whole area of Maylands Fields was used by local Harold Park residents between 1954 and 2003, without any restrictions, for recreational purposes and they still do not now have any access to the Fields. This was one of the reasons why a Rights of Way claim on the fields was made in 2003 and why an application was made in 2007 for the area 	Comments noted. Please see above (2 and 3).	Email / Letter

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
52	David Stovold	Q3	<p>to be made a Town Green.</p> <p>We are still awaiting a response on the Rights of Way claim and the Town Green application.</p> <p>I am writing to oppose the inclusion of Site MY1 (Maylands Fields) in the consultation process. There are many reasons why this site is entirely inappropriate for a permanent traveller site as was recognised by the Planning Inspector when he gave only a temporary permit to the existing traveller families. It was also recognised by the Council when it turned down a planning application submitted by residents on the site and opposed their appeal. The Environment Agency also opposed the appeal. I do not, therefore, feel it necessary to list them all again. I am very concerned, however, that London Borough of Havering appears to have assessed the site in completely the wrong way, including the following assessments:</p> <p>Is the site within or close to an area valued for its heritage? No Is the site within or close to a locally valued area? No</p> <p>It defies belief that the Council can make this assessment knowing that the site borders on Maylands Fields, and knowing:</p> <ul style="list-style-type: none"> • The fields are within a Site of Metropolitan Importance for Nature Conservation (SMI). • The fields are within a Site of Importance for Nature Conservation (SINC). • Local residents have fought to protect the fields from inappropriate development for nearly a decade. • The Council itself valued the fields enough to protect its trees with Tree Protection Orders and to attempt to buy the Fields for the purpose of their protection. • Rights of Way on the fields were claimed in January 2003 and the Council has taken no action on them. 	<p>Comments noted.</p> <p>Please see above (2 and 3).</p>	Email / Letter

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
53	Mrs V. Tawse		<ul style="list-style-type: none"> The fields were claimed as a Town Green in November 2007 and the Council has taken no action on this. <p>You have, therefore, promulgated misinformation about this site and we are concerned that this will affect responses. You should reissue the consultation on this site with the correct assessment or take MY1 out of the consultation, otherwise there must be grounds for an application for the consultation to be set aside. I also ask you to look again at the assessment which claims that the site is not within the high pressure gas pipeline safeguarding zone, as the main gas pipeline, currently being replaced, runs across the front of the site. Work is going on in front of the site at the moment.</p> <p>Questionnaire completed</p>	<p>National Grid is undertaking ongoing project work in the area but this site and wider area is not within the high pressure gas pipeline safeguarding zone.</p>	
		<p>Q1</p> <p>Q6</p> <p>Q7</p> <p>Q8</p> <p>Additional comments</p>	<p>49 legal pitches and 25 unauthorised pitches = 74 pitches being used. 40 more pitches required = 114 pitches in total in Havering without the 86 already on 32 separate sites.</p> <p>I believe a figure of 28 pitches would be advisable to bring total of 114 pitches in Havering.</p> <p>Why are 9 sites within the Green Belt?</p> <p>Where would the Transit Site be and how would it be monitored?</p> <p>I agree that we have to have allocated sites for Gypsy and Travellers as long as they are kept in reasonable order but not on Green Belt land.</p>	<p>Noted.</p> <p>A further 14 authorised pitches are required to accommodate gypsies and travellers already living in Havering. As set out in Option 1A in the Issues and Options Report, the Council considers this the</p> <p>All of the existing authorised and unauthorised sites are on Green Belt land.</p> <p>The Council is not proposing to designate a transit site.</p> <p>Green Belt land will only be designated for gypsy and traveller sites in 'very special circumstances'.</p>	<p>Email / Letter</p>

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
54	Esther Taylor	Additional comments	Questionnaire completed Me and my three children have lived on here [Church Road] for a number of years. We are settled and happy here with enough space. We are near to local shops, we have our own sewage system and in my opinion we co-exist with the Green Belt surroundings.	Comments noted.	Questionnaire
55	Julie and Geoffrey Taylor	Q3	We strongly object to the former car wash site, at the corner of Maylands Fields, being a suggested site and there are many reasons for this that were recognised by the Planning Inspector when he only gave a temporary permit to existing traveller families. However, the assessment of the site, by the borough, appears to be completely inaccurate. The fields are within a Site of Metropolitan Importance for Nature Conservation (SMI). The fields are within a Site of Importance for Nature Conservation (SINC). Local residents have fought to protect the fields from inappropriate development for nearly a decade. The Council itself valued the fields enough to protect its trees with Tree Protection Orders and to attempt to buy them for the purpose of their protection. Rights of Way on the fields were claimed in January 2003 and the Council has taken no action on them. The fields were claimed as a Town Green in November 2007 and the Council has taken no action on this. We feel that the residents' views on Maylands Fields have been totally ignored by the Council a long time and want to stress that Maylands Fields is valued by local residents and is not suitable for a travellers site.	Comments noted. Please see above (2 and 3).	Email / Letter
56	Tom Taylor	Additional comments	Questionnaire completed This site is ideal for us as we are all families here [Church Road]. My concern if the Council built a site would be that they would put all different types of travellers and gypsies together. I keep my horses here along with my other animals. The way of life we lead is along with the environment. We recycle our scrap metals such as the children's old bikes and suchlike. We are quiet people who just want some certainty in our lives and not be pushed around from pillar to	Comments noted.	Questionnaire

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
57	Tom Taylor		post. Questionnaire completed	Noted. This site will be fully assessed during the next stage of the plan production.	Questionnaire
		Additional comments	I feel the proposed areas (Church Road - CR13) are necessary for future growth and go along with the families growth so the children will have somewhere to live as they get married.		
58	Nigel Teelan	Q2	Willow Tree Lodge, Brookmans Park Drive, Front Lane, Cranham, Upminster, RM14 1LW. Ideal for a [new] site. Excess of 5 acres and readily available. Meets all criteria.	Noted. This site will be fully assessed during the next stage of the plan production.	Questionnaire
59	Mr P. Thomas	Q3	The [Maylands] site is totally inappropriate as it is close to an area valued for its heritage and a locally valued area. Also, access to and from the site is considered hazardous as it is on the slip road from the M25. We as local residents have campaigned for 10 years to get Maylands Fields recognised as an area of Nature Conservation and a Town Green but have been ignored by the Council despite the fact the trees have been valued enough by the Council to have a Tree Protection Order placed on them.	Comments noted. Please see above (2 and 3).	Email / Letter
60	Mrs B. Thompson		Questionnaire completed	Comments noted.	Questionnaire
		Additional comments	I cannot imagine the proposed plans would have any impact on surrounding areas and neighbours vehicle access (Church Road).		
61	Peter and Christine Thompson	Q3	There are many reasons why this site [Maylands] is entirely inappropriate for a permanent traveller site and this was recognised by the Planning Inspector when he only gave a temporary permit to the existing traveller families within the last few months. However, what worries us most is that London Borough of Havering appears to have assessed the site in completely the wrong way by not acknowledging that the site is within or close to an area valued for its heritage or that the site is within or close to a locally valued area. It is incredible that the Council can make this assessment knowing that the site borders on Maylands Fields, and knowing that:	Comments noted. Please see above (2 and 3).	Email / Letter

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
			<ul style="list-style-type: none"> • The fields are within a Site of Metropolitan Importance for Nature Conservation (SMI); • The fields are within a Site of Importance for Nature Conservation (SINC); • Local residents have fought to protect the fields from inappropriate development for nearly a decade; • The Council itself valued the fields enough to protect its trees with Tree Protection Orders and to attempt to buy them for the purpose of their protection; • Rights of Way on the fields were claimed in January 2003 and the Council has taken no action on them; • The fields were claimed as a Town Green in November 2007 and the Council has taken no action on this. <p>In light of all of this it would be totally the wrong decision to put a travellers site on this location and hope that reason and common sense prevail when the consultation is undertaken and another, more suitable site, is chosen.</p>		
62	Brian Todd	Q3	<p>I am a resident living close to Maylands Fields and am totally opposed to the proposal of a permanent travellers site to be located there.</p>	<p>Comments noted.</p>	Email / Letter
63	Tower Hamlets Council	General	<p>The London Borough of Tower Hamlets would like to take this opportunity to highlight the newly published London Plan (2011) policy 3.8 Housing Choice which suggests boroughs can work with neighbouring boroughs to deliver any identified need.</p>	<p>Noted. All neighbouring boroughs have been included in the consultation.</p>	Email / Letter
64	Councillor Linda van den Hende (LBH)	Q1	<p>Questionnaire completed</p> <p>The Needs Assessment is based on actual occupation rather than an analytical approach. The Fordham report in 2008 appeared to indicate that in Havering there was no unmet need. The Fordham study should be referred to.</p>	<p>Comments noted.</p>	Questionnaire

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
		Q2	No new sites should be in the Green Belt.		
		Q3	No specific comments other than Green Belt sites should not be considered.		
		Q4	Green Belt is the major consideration. Other factors such as appearance and effect on surroundings are equally important.		
		Q5	In addition active and meaningful consultation with residents directly affected must be undertaken before decisions are taken.		
		Q6	According to the original proposals in the Mayor of London's Plan, only 42 pitches were originally envisaged. Therefore the proposed total of 74 pitches far exceeds this figure and there should be no further increase above the 74 existing pitches.		
		Q7	No new sites.		
		Q8	No transit site. There is always the risk of permanence		
		Additional comments	As the London Mayor has decided not to set a target for pitch numbers, and given Havering's proposal is well above his original number, the total of 74 pitches on existing sites sets the right balance. The Fordham Research Groups analysis which takes account to growth to 2017 appears to support no need for growth in Havering. Given current occupation appears to cause little or no local difficulties, the pragmatic view should be to consider what we have with no further increase. The Green Belt must be protected.		
65	John Walsh	Q3	As a close resident of Maylands Fields I am extremely concerned that the Officers/Councillors of the London Borough of Havering appear to have totally overlooked the importance of this area as a site of nature conservation within the borough, and have disregarded the views of the local community about Maylands fields over the last few years,	Comments noted. Please see above (2 and 3).	Email / Letter

ID	Name / Organisation	Question / Paragraph	Comments	Council Response	Submission type
66	Lyn Watts	Q3	<p>i.e., the Town Green Scheme for one. I understand that sites need to be found for the travelling community, but am extremely concerned that by making this an official site it could result in the long term to an overspill situation into Maylands Fields so destroying them in the process, and leading to a situation similar to that at 'Crays Hill' which the authority there is having to spend vast sums of money to resolve.</p> <p>For many years there used to be quite a large permanent traveller site in Dennises Lane at the rear of Stubbers outdoor pursuits centre which unfortunately became run down and eventually closed. Could this site not be reinstated for use again? The residents of Harold Wood/Park have had to put up with a lot in recent times regarding planning and building in this area and many of their concerns have been overlooked by Havering Council. I hope that on this occasion that we are listened to, and our views respected as part of the community that already reside in Havering and have done so for many, many years.</p> <p>The site [Maylands] is totally unsuitable for any development due to its situation on the slip road from the M25. I was under the impression that dangerous access to and from this site was the main reason the original petrol garage was closed. Also it would make easy access onto Maylands Field which has been designated as a Site of Metropolitan Importance for Nature Conservation. The fields are within a Site of Importance for Nature Conservation. Local residents have fought to protect the field from all sorts of unsuitable development for nearly ten years. I was under the impression that there are Tree Protection Orders on the field and that the council tried to buy the field to protect it from misuse. Rights of Way on the fields were claimed in 2003 - no action taken - or on residents' wish to make the area a Town Green in 2007. The local residents, of which I have been one, for nearly 40 years, seem to be completely ignored.</p>	<p>Comments noted.</p> <p>Please see above (2 and 3).</p>	Email / Letter



Haverling
LONDON BOROUGH

Gypsy and Traveller Sites Development Plan Document

Proposed Submission Document

[DATE] 2012

Head of Regeneration, Policy and Planning
London Borough of Havering
Town Hall
Main Road
Romford
RM1 3BD

[DATE] 2012

Contents

- 1. Introduction**
 - Programme for production
 - Consultation
 - Site Assessment
 - Sustainability Appraisal
 - Appropriate Assessment
 - How to respond
- 2. Policy context**
- 3. Spatial Issues and DPD Objectives**
- 4. Requirement for Gypsy and Traveller pitches**
- 5. Site Allocations**
- 6. Monitoring**

Appendices

Appendix 1: Site Maps

Appendix 2: References and Further Guidance

1 Introduction

- 1.1 Havering's Local Development Framework (LDF) consists of a suite of planning documents that collectively guide the future planning of the borough over the long term. The LDF is led by the Core Strategy and Development Control Policies DPD, adopted in 2008, which sets out Havering's vision and objectives for the planning of the borough up to 2020, as well as detailed development control policies that apply across the whole of the borough.
- 1.2 The Council has a responsibility to plan for the housing needs of all residents, including the Gypsy and Traveller community. The 2004 Housing Act requires local housing authorities to assess the accommodation needs of Gypsies and Travellers in their area, as part of the wider assessment of housing needs, and produce a strategy on how these needs can be met.
- 1.3 In response to this requirement, the council is preparing a Gypsy and Traveller Sites Development Plan Document (DPD) that details how the Council will make provision for sufficient additional pitches for Gypsies and Travellers. This Proposed Submission Document sets out the Council's policy approach and list of sites for Gypsy and Traveller accommodation in the Borough.
- 1.4 The Gypsy and Traveller Sites DPD will be a statutory document within the LDF, with the purpose of implementing the provision within Core Policy CP2 Sustainable Communities to meet the accommodation needs of the Gypsy and Traveller community in Havering, within the overall framework of the Core Strategy which includes protection of the Green Belt.

Programme for Production

- 1.5 The DPD preparation process is governed by the Planning and Compulsory Purchase Act 2004 (as amended), and typically takes two years from evidence gathering to adoption. The overall process for the preparation of the Gypsy and Traveller Sites DPD has been split into four stages:
 - Call for Sites (July to October 2010)
 - Issues and Options Document (June to August 2011, as required by Regulation 25)
 - Proposed Submission Document (current stage, as required by Regulation 27)
 - Adopted Plan (DATE 2012)

Consultation

- 1.6 Through the Call for Sites process, the Council was able to undertake early consultation with key stakeholders prior to any plan documents being prepared, to ensure the views of those involved were taken into account. The Call for Sites encouraged landowners and other parties to put forward potential sites that may be available for use by the Gypsy and Traveller community, including unauthorised sites being used by Gypsies and Travellers without planning permission, or a site in another use that may be suitable for future authorised use by Gypsies and Travellers. All of the sites put forward for consideration have been assessed against the same criteria.

- 1.7 The publication of the Issues and Options Report comprised the second stage of the process and had three main components: the assessment of need for Gypsy and Traveller sites in Havering; the identification of the range of issues to be considered in identifying suitable locations for permanent Gypsy and Traveller sites, and the options for allocating sites which the public are being consulted. Interested parties were also invited to put forward sites within the consultation period for the Issues and Options Report.
- 1.8 The report considered the sites that had been put forward during the call for sites together or were existing tolerated sites or sites with temporary permission that were being considered for their suitability. The Council received 66 comments to the Issues and Options consultation and a report on consultation has been published that outlines how comments received have been taken into consideration. Two new sites were put forward for consideration during the Issues and Options consultation and have been assessed in the preparation of this Proposed Submission Document.

Site Assessment

- 1.9 In allocating sufficient sites to accommodate Gypsies and Travellers in Havering, the Council considers that land allocated within this DPD must be acceptable in sustainability terms, satisfactory to the settled and travelling community and capable of being delivered within the plan period. The Council has used a robust process for the assessment of potential sites that have allowed for a comparison of the relative merits of each site so that an informed decision can be made on the most appropriate sites to be allocated in the DPD.
- 1.10 The site assessment methodology used takes a sequential approach to determining if an area of land is suitable to be allocated as a Gypsy and Traveller site. Details of the site assessment methodology are set out in section 4 of the DPD. The full site assessment to inform allocation of the sites put forward for permanent permission is available as a Technical Report / supporting report to this DPD.

Sustainability Appraisal

- 1.11 The purpose of Sustainability Appraisal (SA) is to promote sustainable development through the plan-making process. Section 19(5) of the Planning and Compulsory Purchase Act 2004 requires DPDs to undergo SA as part of the process of ensuring that they will contribute to sustainable development. It is a key tool used to appraise the environmental, economic and social effects of plans, strategies and policies, and the results of the SA contribute to the reasoned justification of policies.
- 1.12 The SA process occurs in parallel with the production of the DPD; this integration is fundamental to sound plan making. It is a systematic and iterative process, and when carried out as recommended by government guidance fully incorporates the requirements of the EU SEA Directive. As with the DPD process, the SA process includes both ongoing engagement with stakeholders and statutory consultation periods.
- 1.13 A full Sustainability Appraisal has been undertaken for this report and is available on the Council's website.

Appropriate Assessment

- 1.14 European Directive (92/43/EEC) on the Conservation of Natural Habitats and Wild Flora and Fauna (known as the Habitats Directive) requires Appropriate Assessments of plans to assess whether they are likely to have an adverse impact on the integrity of internationally important sites designated under the Directive. European sites comprise of Special Areas of Conservation (SACs) and Special Protection Areas for birds (SPAs), collectively these are known as the Natura 2000 network.
- 1.15 An Appropriate Assessment of this Gypsy and Traveller Sites DPD has been carried out and has found that it is unlikely that there will be any adverse impacts on the Natura 2000 network arising from the proposals set out within the plan.

How to respond

- 1.16 The consultation on the Gypsy and Traveller Sites DPD Proposed Submission Document runs for six weeks from [DATE] 2012 to [DATE] 2012. Copies of the Proposed Submission Document, response form and supporting documents are available on the Havering website at: www.havering.gov.uk alternatively, you can request a copy from: LDF@havering.gov.uk or a printed copy from:

Development and Transport Planning
London Borough of Havering
Town Hall
Main Road
Romford
RM1 3BD

- 1.17 Responses may be sent by email to LDF@havering.gov.uk or by post to the above address.
- 1.18 Please note that comments made on the Proposed Submission Document cannot be treated as confidential and will be made available for public inspection.
- 1.19 All representations received will be carefully considered prior to submission of the Gypsy and Traveller Sites DPD to the Secretary of State. Following submission, the soundness of the Gypsy and Traveller Sites DPD will be tested at an Independent Examination. All parties who made representations on the Proposed Submission Document will be notified of the time and place of the examination and how they may be involved.

2 Policy Context

- 2.1 This Proposed Submission Document takes account of current and emerging national and regional planning policy and guidance on provision for Gypsy and Traveller sites in England, and is therefore consistent with national planning policy and in general conformity with the London Plan.

National Policy

- 2.2 The Government's key objective for planning for housing is to ensure that everyone has the opportunity of living in a decent home, with the associated rights and responsibilities the same for all citizens. PPS3 Housing defines housing need as "*the quantity of housing required for households who are unable to access suitable housing without financial assistance*". This definition of need applies to Gypsies and Travellers, but in determining need account must be taken of the differing context in which this need arises.
- 2.3 National policy relating to accommodation for the Gypsy and Traveller Community is laid out in Circular 01/2006: Planning for Gypsy and Traveller Caravan Sites. Provision for Travelling Show People is covered by CLG Circular 04/2007: Planning for Travelling Show People.
- 2.4 Circular 01/2006 seeks to create and support sustainable, respectful and inclusive communities where gypsies and travellers have fair access to suitable accommodation, education, health and welfare provision. The Circular sets states that local authorities should allocate sufficient sites for Gypsies and Travellers within DPDs, and identifies a set of criteria that should be considered when allocating sites:
- Site suitability
 - Impact on areas or features designated for their national landscape or conservation importance
 - Sustainability of the location
 - Impact on nearest settlement (including character and appearance of the locality; local amenity; and social and physical infrastructure)
 - Meeting the needs of Gypsies and Travellers
 - Site availability
- 2.5 In July 2010, the Coalition Government announced its intention to replace Circulars 01/2006 and 04/2007 with new light-touch guidance as part of a wider package of reforms in the planning system. In parallel, the Government plans to introduce stronger planning enforcement powers, including limiting the opportunities for retrospective planning applications, and will encourage local authorities to provide an appropriate number of traveller sites that reflect local and historic demand.
- 2.6 In April 2011 the Government published a draft new planning policy statement for traveller sites for consultation. This follows the commitment made by the Secretary of State to withdraw the planning circulars for traveller sites and replace them with a new, short, light-touch single policy.
- 2.7 The draft statement enables local authorities to make their own assessment of need and set their own local targets to address the likely permanent and transit accommodation needs of travellers in light of historical demand. In

preparing development plans the local authority should: identify specific sites for a 15 year period, protect the Green Belt from development, seek to reduce tensions between settled and traveller communities and protect amenity and the environment.

- 2.8 Consultation on the draft Planning Policy Statement for Traveller Sites closed in August 2011. It is intended that the final policy will be incorporated into the NPPF which currently does not cover provision of accommodation for Gypsy and Travellers. Until such time, Circulars 01/2006 and 04/2007 remain in force, although they carry comparatively less weight as a consideration in planning decisions as they have been selected for review.

The London Plan

- 2.9 Policy 3.8 of the London Plan 2011 recognises that Londoners should have a genuine choice of homes that they can afford and which meet their requirements for difference sizes and types of dwellings. Taking account of housing requirements identified at regional, sub-regional and local levels, boroughs should work with the Mayor and local communities to identify the range of needs likely to arise within their areas and ensure that the accommodation requirements of Gypsies and Travellers (including travelling show people) are identified and addressed in line with national policy.
- 2.10 The Mayor does not consider it appropriate to include detailed policies for the provision of sites for Gypsies and Travellers and Travelling Show People in the London Plan because of the level of locally-specific detail involved and the scale of the issue. Local authorities are responsible for determining the right level of site provision in their areas in consultation with local communities and setting targets for provision based on robust evidence of local need. The Mayor believes that the boroughs are best placed to assess the needs and make provision for these groups through new pitch provision, protection or enhancement of existing pitches, or by other means.

Havering's Core Strategy and Development Control Policies DPD

- 2.11 The strategy for meeting the accommodation needs of Gypsies and Travellers in Havering is set in the Core Strategy and Development Control Policies DPD, adopted in 2008. Core Policy CP2 (Sustainable Communities) states that *sustainable, attractive, mixed and balanced communities will be created by, among other things, identifying sites to meet the identified needs of Gypsies and Travellers in a Gypsy and Travellers DPD.*

CP2 - SUSTAINABLE COMMUNITIES

Sustainable, attractive, mixed and balanced communities will be created by:

- ensuring that the sizes, types and tenures of new housing meet the need of new and existing households at local and sub-regional level
- ensuring that the required sizes and types of new housing are of a density and design that is related to a site's access to current and future public transport and are compatible with the prevailing character of the surrounding area
- ensuring that, in total, borough-wide 50% of all homes from new residential planning permissions are affordable; of which 70% social rented for those on low incomes and 30% for those on intermediate

incomes

- safeguarding the existing stock of large homes in Emerson Park and Hall Lane
- ensuring that the needs of those households with special needs, including the elderly, are met
- ensuring that in their design and layout new homes provide for the lifetime needs of households
- securing the social, economic and environmental regeneration of priority housing areas
- ensuring that all development demonstrates that it supports improved health and well being
- identifying sites to meet the identified needs of gypsies and travellers in a Gypsy and Travellers DPD

2.12 Development Control Policy DC8 (Gypsies and Travellers) sets out the criteria under which planning permission will be granted for Gypsy and Traveller sites. In determining planning applications, the definition of Gypsies and Travellers as per Circular 01/2006 is used. DC8 states that sites within the Green Belt will only be acceptable in exceptional circumstances.

DC8 – GYPSIES AND TRAVELLERS

Planning permission will only be granted for gypsy/traveller sites provided all the following criteria are satisfied:

- The proposal meets identified need with regard to the traveller needs assessment/local housing needs assessment
- It is suitable for mixed residential and business uses and has no adverse impact on the safety and amenity of the occupants and their children and neighbouring residents
- It has safe and convenient access to the road network and would not cause a significant hazard to other road users
- It is located within reasonable distance of services and community facilities in particular schools and essential health services
- It has provision for parking, turning, service and emergency vehicles and servicing of vehicles
- It is capable of accommodating the number of caravans/mobile homes proposed with any equipment for business activities
- The site will be supplied with essential services such as water, power, sewerage and drainage, and waste disposal.

Sites within the Green Belt will only be acceptable in exceptional circumstances and where through their design, layout and landscaping they minimise its impact on the openness of the Green Belt, do not prejudice the purposes of including land in the Green Belt, do not prejudice the recreational usage of the Green Belt or involve the loss of high grade agricultural land.

3. Spatial Issues and DPD Objectives

- 3.1 The overall vision for planning for housing within Havering is provided within the Core Strategy:

Outside the town centres the borough's suburban character will be maintained and enhanced by sympathetic residential development which respects and makes a positive contribution to the existing context. All groups within the community will have good, affordable access to the housing they need, including those needing larger, family-sized accommodation.

- 3.2 To deliver this vision, the Core Strategy sets out Objective LV(A) for Places to Live:

Make Havering a place where people will want to live and where local people are able to stay and prosper, by ensuring that local and sub-regional housing need is address whilst maintaining and enhancing the character of Havering's residential environment which makes the borough such an attractive place to live.

- 3.3 Within the Core Strategy, policy CP1 (Housing Supply) stipulates that, outside town centres and the Green Belt, all non-designated land is prioritised for housing. As can be seen from the visual summary of the Core Strategy (Figure 1), over 50 percent of the borough falls within the Green Belt, and large areas of land within the built up area of the borough are designated for specific uses, such as public open space or employment.

- 3.4 As elsewhere in London, the Council must balance these competing land uses within the constraint of an urban area which is already densely developed. In general, land within the urban area which is suitable for residential development attracts a premium price.

- 3.5 The adopted Core Strategy and Development Control Policies provide the general criteria against which planning applications are assessed. The role of the Gypsy and Traveller Sites DPD in delivering the strategic objective is therefore the identification of preferred locations for provision of sufficient permanent residential Gypsy and Traveller sites to meet the locally identified need for pitches.

- 3.6 The main spatial issues to be addressed by the DPD therefore include:

- The requirement set out in the 2004 Housing Act and Circular 01/2006 for local authorities to assess and produce a strategy to meet the identified needs of Gypsies and Travellers permanently resident in the local area, including specific site allocations to meet the identified pitch requirement in a DPD.
- The distribution of sites throughout the borough to support the creation of mixed and balanced communities while protecting the open countryside and natural environment.
- The policy and other constraints on land use within the borough, specifically that over 50 percent of the borough is within the Green Belt and the urban area is well developed.

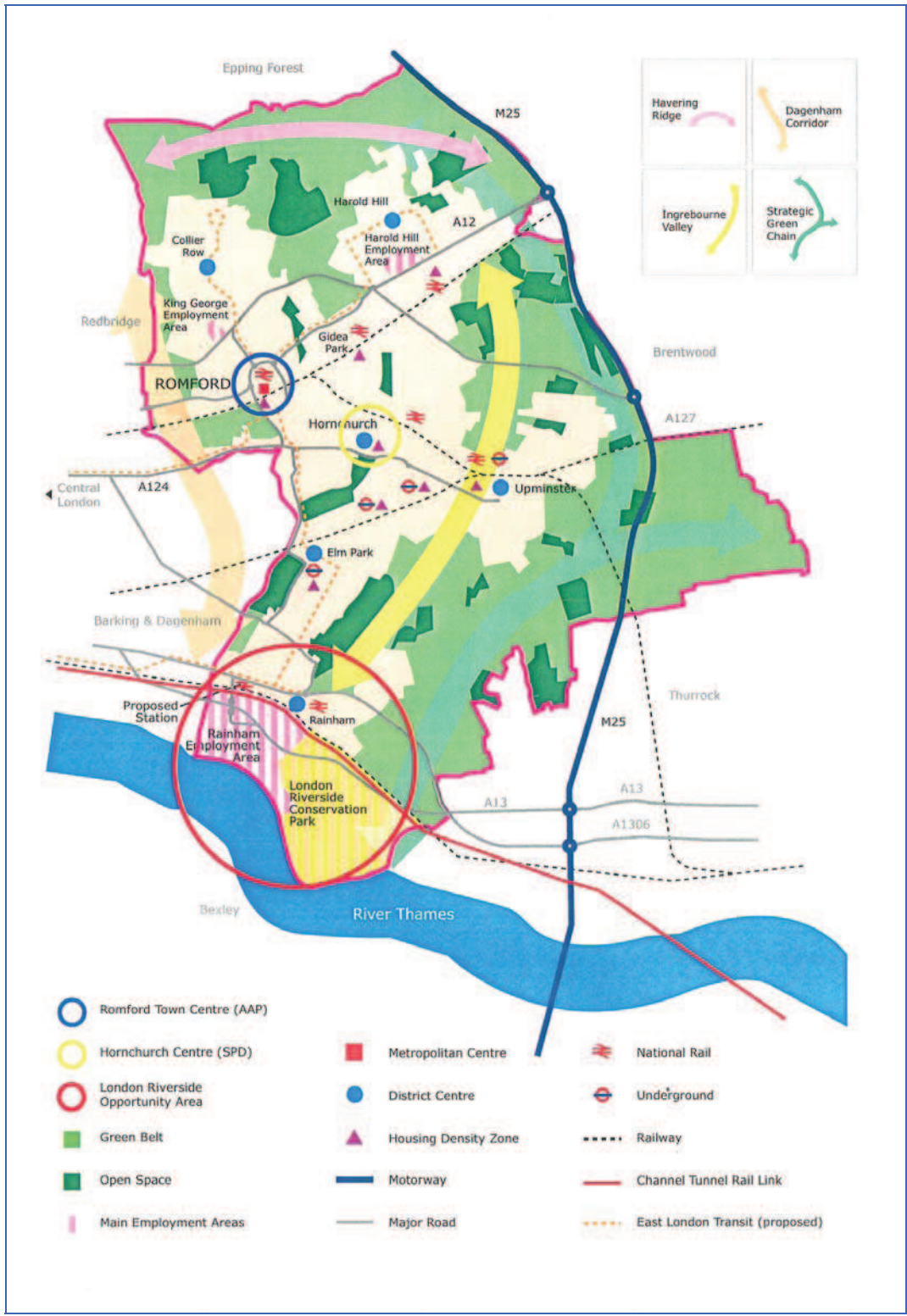


Figure 1: Visual summary of the Core Strategy

- 3.7 Based on the issues identified, specific objectives for the Gypsy and Traveller Sites DPD have been set, linked to the overall vision and objective of the Core Strategy, to ensure that the DPD contributes to the implementation of the Core Strategy. The broad objectives for the DPD are:
- To support the removal of unauthorised development in the borough, and strengthen the Council's ability to take enforcement action against unauthorised sites.
 - To allocate sufficient suitable sites to meet the needs of Gypsies and Travellers living in Havering, as determined by the 2010 Havering Needs Assessment.
 - To protect the Green Belt from inappropriate development, except in very special circumstances.
 - To set out a clear delivery strategy for the allocated sites that identifies how much development will happen, where, when and by whom it will be delivered.
 - To provide specific criteria about the form of development which will be allowed on each site to ensure the land use is appropriate within the constraints of the local area.

4. Requirement for Gypsy and Traveller pitches

Gypsy and Traveller Accommodation Assessments

- 4.1 Gypsy and Traveller Accommodation Assessments (GTAA) identify and quantify the accommodation needs of the Gypsy and Traveller community in the same manner as Strategic Housing Market Assessments do for the general population. A separate assessment is required because of the relatively small size of the Gypsy and Traveller population compared to other groups, the difficulties in accessing information about the community, and the particular lifestyle and culture of Gypsies and Travellers which gives rise to distinct accommodation needs.
- 4.2 In order to identify suitable locations for Gypsy and Traveller sites in Havering, a call for sites was undertaken as the first part of the production of the Gypsy and Traveller Sites DPD. The call for sites process was also used to update the findings of Havering's 2004 Needs Assessment. A refresh of the 2004 study was considered sufficient (appropriate) as the original study was carried out in line with best practice guidelines for GTAA.

Definition of a Pitch / Site

- 4.3 A pitch is defined as accommodating a household, and in Havering generally includes a large static trailer, touring caravan, amenity building and parking and turning space. A pitch can therefore accommodate several caravans belonging to an individual family; the number of caravans on a pitch is comparable to the number of bedrooms in a house.
- 4.4 A site can be made up of or more pitches. Site sizes proposed in the DPD range between one and 12 pitches. Sites have been identified based on land ownership, therefore pitches located in the same geographical area may be delineated into several sites despite forming a cohesive area of development.

Havering Gypsy and Traveller Needs Assessment: 2010 Update / Numbers of Pitches

- 4.5 The needs assessment showed that there were 74 pitches in Havering at the time of the Call for Sites. 12 of these had permanent permission. Of the other 62, 37 pitches had temporary permission, 11 had previously had or have since been granted temporary permission and 14 were unauthorised (see Table 1 below).

Table 1: Pitches with current / previous temporary permission, and unauthorised pitches (2010)

Site	Pitches with temporary permission	Pitches with previous temporary permission or have since been granted temporary permission	Unauthorised pitches
Church Road (CR7-CR10)	4	0	0
Benskins Lane (BL1-BL6)	12	0	0
Hogbar Farm (LB2)	8	0	0
Fairhill Rise (LB3)	3	0	0
Tyas Stud Farm (UP1)	1	0	0
Laburnham Stables (UP2)	3	0	0
Ashlea View (UP3)	3	0	0
Clemlev, Willoughby Drive (WD3)	1	0	0
Willoughby Drive (WD4)	1	0	0
Prospect Road (HC1)	1	0	0
Hogbar Farm West (LB1)	0	3	0
Vinegar Hill (LB4)	0	6	4
Maylands (former Brook Street service station) (MY1)	0	2	0
Church Road (CR5, CR6, CR11, CR12)	0	0	8
Land between 66-72 Lower Bedfords Road (LB5)	0	0	1
Willoughby Drive (WD1)	0	0	1
TOTAL	37	11	14

- 4.6 The needs assessment also projected a growth of a further 40 households though family formation by 2027, the end of the plan period.
- 4.7 The analysis of planning and environmental constraints showed that the Green Belt is the biggest obstacle to identifying suitable land for Gypsy and Traveller pitches in Havering. Gypsy and Traveller pitches are inappropriate development in the Green Belt and can only be permitted in very special circumstances. However, the Council has not been able to identify any suitable land within the built-up area and no such sites have been put forward during the preparation of the DPD.
- 4.8 When choosing how many pitches to allocate in this DPD, the Council has had to decide whether the unmet need for Gypsy and Traveller accommodation is strong enough to justify allocating land in the Green Belt.
- 4.9 Based on this, the Issues and Options Report set out three policy options for the number of pitches to be allocated in the Gypsy and Traveller Sites DPD.
- Option 1A – To allocate land for a further 14 authorised pitches so that there are enough for the gypsies and travellers already living in Havering.
 - Option 1B – To allocate land for a further 34 authorised pitches so that there are enough for the gypsies and travellers already living in Havering and half of the future projected growth up to 2027.

- Option 1C – To allocate land for a further 54 authorised pitches so that there are enough for the gypsies and travellers already living in Havering and all of the future projected growth up to 2027.

- 4.10 The report made clear that the Council's preferred option was for 14 additional authorised pitches so that all the existing families could be accommodated. The report made clear however that not all the pitches with temporary permission or expired temporary permission would necessarily be made permanent and would be assessed during the preparation of the DPD.
- 4.11 The Council gave careful consideration to the representations that supported Options 1B and 1C. However, the Council remains of the view that Option 1A to provide for 14 additional authorised pitches strikes the right balance between meeting the priority housing needs of gypsies and travellers – by permitting a sufficient number of pitches to accommodate all the households living in Havering at the time of the needs survey – and only allocating Green Belt land where this is justified by 'very special circumstances'.

Site Assessment

- 4.11 In allocating sufficient sites to meet the needs of the Gypsy and Traveller community in Havering, the Council considers that land allocated within this DPD must be acceptable in sustainability terms, satisfactory to both the settled and travelling community, and capable of being delivered within the plan period.
- 4.12 The site assessment methodology put forward in the Issues and Options Report proposed a sequential approach to determine if an area of land is suitable and available to be allocated as a Gypsy and Traveller site. This three tier approach has been used to assess all of the sites put forward for consideration to provide permanent Gypsy and Traveller pitches.
- 4.13 The first level of assessment determined the land use considerations applicable to each site, as set by national and local planning policies. The first level also investigates any environmental constraints that would make the site unsuitable for residential use. This stage is a high level process to determine if there are fundamental planning constraints on the site that make it inappropriate as a matter of principle.
- 4.14 The second level of assessment establishes that the required physical and social infrastructure required to support use as a Gypsy and Traveller site is available, or capable of being provided. The location of sites in relation to existing settlements is considered here, as is the capacity of existing service provision to ensure no detrimental impact would occur from the additional demand resulting from a site.
- 4.15 The third level of assessment relates to site-specific design considerations, to ensure that the character of the local area, the amenity of surrounding residents and the health and wellbeing of site residents is assured, and that proposed sites are deliverable within the 15 year timeframe of the DPD.
- 4.16 This sequential approach has allowed unsuitable sites to be filtered out early in the process. Sites must satisfy assessment at each level to pass on to the next level. Only sites which pass all three levels have been put forward by the

Council as a proposed site allocation. A full report on the site assessments has been published as a Technical Report to this Proposed Submission DPD. Details of the sites the Council proposes to allocate for permanent permission and the number of pitches to be allowed on each is set out in section 5 of this report.

5. Site Allocations

- 5.1 The Council has identified sites to accommodate a total of 62 pitches to meet the need for Gypsy and Traveller pitches in Havering. 45 of the pitches identified either have temporary, or expired temporary, planning permission. Two pitches with temporary permission at Maylands (the former Brook Street service station) and a single pitch with temporary permission at Prospect Road were not considered suitable for permanent permission. Sites to accommodate 17 further pitches have also been identified – 14 to achieve the Council's preferred option for the number of pitches and three to compensate for not making the Maylands and Prospect Road sites permanent.
- 5.2 The sites identified below and shown on the maps in Appendix 1 of this report have been allocated for the provision of Gypsy and Traveller pitches. Each site allocation includes the number of pitches allowed, how the site is to be developed and what mitigation or other measures are required to make its use as a Gypsy and Traveller site acceptable.

Note: Key issues for each site allocation

- Applications in line with adopted policies
- Highways access
- Residential amenity
- Site layout and landscaping
- Drainage
- No business uses allowed on any of the sites (all in Green Belt)

- 5.3 The majority of the identified need in Havering is immediate and the Council will encourage site residents on allocated sites to bring forward applications as soon as possible following adoption of the DPD (to help address this shortfall). All of the sites identified in the DPD are privately owned and it will be up to individuals to submit planning applications. All applications will be assessed against their conformity with the Core Strategy and Development Control Policies DPD - specifically Development Control Policy DC8 - as well as any applicable site specific criteria identified in this DPD.
- 5.4 Detailed information about site design is set out in the DCLG guidance document *Designing Gypsy and Traveller Sites: Good Practice Guide* (2008) and applicants are encouraged to consider this in any applications made.
- 5.5 The correct phasing of provision should remove the presence of unauthorised sites and in those areas where site residents do not submit applications the Council will consider enforcement action where expedient.
- 5.6 Due to the very special circumstances to allowing development in the Green Belt, proposals for additional gypsy and traveller sites beyond those set out in this DPD would not be granted planning permission in the Green Belt.
- 5.7 Similarly, it is likely that increases in the number of pitches would have an impact on the openness of the Green Belt on existing sites and would not be granted planning permission. However, in very exceptional circumstances, where it can be clearly shown through evidence and detailed layout and

landscaping proposals that there is a genuine need through family growth of existing residents from that pitch [and not relatives of] and that the openness of the Green Belt and amenity of the site would not be adversely affected, would proposals be considered.

Proposed sites / pitches

Site	Pitches
Church Road (CR6)	1
Church Road (CR7)	1
Church Road (CR8)	1
Church Road (CR9)	1
Church Road (CR10)	1
Church Road (CR11)	1
Mariecot Bungalow, Church Road (CR14)	6
Benskins Lane (BL1)	2
Benskins Lane (BL2)	2
Benskins Lane (BL3)	2
Benskins Lane (BL4)	2
Benskins Lane (BL5)	2
Benskins Lane (BL6)	2
Hogbar Farm West (LB1)	3
Hogbar Farm (LB2)	8
Fairhill Rise (LB3)	3
Vinegar Hill (LB4)	13
Land between 66-72 Lower Bedfords Road (LB5)	1
Tyas Stud Farm (UP1)	1
Laburnham Stables (UP2)	3
Ashlea View (UP3)	3
Willoughby Drive (WD1)	1
Clemlev, Willoughby Drive (WD3)	1
Willoughby Drive (WD4)	1

Policy GTS1: Provision of Permanent Gypsy and Traveller Pitches

The Council will make provision for 62 pitches to meet identified Gypsy and Traveller needs in Havering.

OR

The Council will make provision for 17 pitches to meet identified Gypsy and Traveller needs in Havering. In addition, the Council will make provision for 45 [existing] pitches which have, or have previously had, temporary planning permission

All planning applications for Gypsy and Traveller sites will be considered against Policy DC8 and other relevant policies in Havering's Core Strategy and Development Control Policies DPD.

Business uses will not be allowed on Green Belt sites [they are all GB sites]

Site specific criteria are set out in the individual site allocations / policies in this DPD.

Church Road (CR7–CR10)

These sites are situated off Church Road, in Noak Hill. Access is via an unmade road which runs northwards from Church Road. The sites form a compact, well contained grouping adjacent to Mariecot Bungalow to the north and all have temporary permission for 1 pitch. A large single storey building, Crown Farm Kennels, is situated to the west of the site. To the east is open land towards Benskins Lane off which there is sporadic development including residential properties, stables, kennels caravans and a number of business uses. To the south of the sites towards Church Road are a number of unauthorised pitches and buildings and open land.

Each of the following sites is allocated for 1 pitch: CR7, CR8, CR9 and CR10.

The four sites are privately owned and occupied and will be privately managed by the current owners.

Policy GTSXX: Church Road

Church Road sites (CR7-CR10) are each allocated for 1 pitch. Proposals for development will be required to provide the following:

- Suitable site design;
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of / Details of foul and surface water drainage.

- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]

- Safeguard amenity

- Appropriate materials for the means of enclosure and surfacing

[Level of detail for each site to be considered especially boundaries and landscaping]

Church Road (CR6 and CR11)

These sites are situated off Church Road, in Noak Hill. Access is via an unmade road which runs northwards from Church Road. These sites are currently unauthorised with 1 pitch on each. The sites are adjacent a group of sites with temporary permission comprising a total four pitches, with Mariecot Bungalow situated to the north. A large single storey building, Crown Farm Kennels, is situated to the west of the site. To the east is open land towards Benskins Lane off which there is sporadic development including residential properties, stables, kennels caravans and a number of business uses. To the south of the sites towards Church Road are two further sites with number of unauthorised pitches and buildings and open land.

The following sites are allocated for 1 pitch: CR6 and CR11.

Policy GTSXX: Church Road

Church Road sites (CR6 and CR11) are each allocated for 1 pitch. Proposals for development will be required to provide the following:

- Suitable site design;
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of foul and surface water drainage.

- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]

- Safeguard amenity

- Appropriate materials for the means of enclosure and surfacing

Mariecot Bungalow, Church Road (CR14)

This site was put forward at the Issues and Options stage and is currently in residential use, comprising a bungalow and garden. The site is situated off Church Road, in Noak Hill. Access is via an unmade road which runs northwards from Church Road.

The property is adjacent to a group of pitches form a compact, well contained site/grouping adjacent to Mariecot Bungalow to the north and all have temporary permission for 1 pitch. A large single storey building, Crown Farm Kennels, is situated to the west of the site. To the east is open land towards Benskins Lane off which there is sporadic development including residential properties, stables, kennels caravans and a number of business uses. To the south of the sites towards Church Road are a number of unauthorised pitches and buildings and open land.

This site (CR14) is allocated for 6 pitches.

Development of this site will be dependent on the sale of this land.

Policy GTSXX: Mariecot Bungalow, Church Road

Mariecot Bungalow, Church Road (CR14) is allocated for 6 pitches. Proposals for development will be required to provide the following:

- Suitable site design;
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of foul and surface water drainage.

- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]

- Safeguard amenity

- Appropriate materials for the means of enclosure and surfacing

Benskins Lane (BL1–BL6)

The six sites on Benskins Lane each have temporary permission for 2 pitches. Benskins Lane is a roughly surfaced road off which there is sporadic development including residential properties, stables, kennels caravans and a number of business uses. The sites lie at the northern end of Benskins Lane and are bordered on the northern side by the embankment of the M25 motorway. An area of established dense woodland lies to the west of the sites and alongside the motorway embankment. The sites previously comprised part of this woodland which was cleared to facilitate development of the sites.

Each of the following sites is allocated for 2 pitches: BL1, BL2, BL3, BL4, BL5 and BL6.

The six sites are privately owned and occupied and will be privately managed by the current owners.

Policy GTSXX: Benskins Lane

Benskins Lane sites (BL1-BL6) are each allocated for 2 pitches. Proposals for development will be required to provide the following:

- Suitable site design;
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of foul and surface water drainage.

- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]

- **Contributions towards the restoration of woodland in adjacent areas**

- Safeguard amenity

- Appropriate materials for the means of enclosure and surfacing

Hogbar Farm West (LB1)

The site is at the western end of four adjacent gypsy and traveller sites that lie along the southern side of Lower Bedfords Road, immediately to the west of Straight Road, and within the Metropolitan Green Belt. The site has previously had temporary permission for 3 pitches.

To the south-west of the site lies open countryside. To the east on the opposite side of Straight Road is the former Whitworth Centre site which has been designated for residential development. North of the site on the opposite side of Lower Bedfords Road is a large mobile home park known as Sunset Drive. West of this is open countryside. To the south of the site is a residential cul-de-sac called Stanwyck Gardens.

This site (LB1) is allocated for 3 pitches.

The site is privately owned and occupied and will be privately managed by the current owner.

Policy GTSXX: Hogbar Farm West

Hogbar Farm West (LB1) is allocated for 3 pitches. Proposals for development will be required to provide the following:

- Suitable site design;
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of foul and surface water drainage.

- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]

- Safeguard amenity

- Appropriate materials for the means of enclosure and surfacing

Site layout to consider proximity to and overlooking from Stanwyck Gardens ...

Hogbar Farm (LB2)

The site is one of four adjacent gypsy and traveller sites that lie along the southern side of Lower Bedfords Road, immediately to the west of Straight Road, and within the Metropolitan Green Belt. The site has temporary permission for 8 pitches.

To the south-west of the site lies open countryside. To the east on the opposite side of Straight Road is the former Whitworth Centre site which has been designated for residential development. North of the site on the opposite side of Lower Bedfords Road is a large mobile home park known as Sunset Drive. West of this is open countryside. To the south of the site is a residential cul-de-sac called Stanwyck Gardens.

This site (LB2) is allocated for 8 pitches.

The site is privately owned and occupied and will be privately managed by the current owner.

Policy GTSXX: Hogbar Farm

Hogbar Farm (LB2) is allocated for 8 pitches. Proposals for development will be required to provide the following:

- Suitable site design;
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of foul and surface water drainage.

- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]

- Safeguard amenity

- Appropriate materials for the means of enclosure and surfacing

Site layout to consider proximity to and overlooking from Stanwyck Gardens ...

Fairhill Rise (LB3)

The site is one of four adjacent gypsy and traveller sites that lie along the southern side of Lower Bedfords Road, immediately to the west of Straight Road, and within the Metropolitan Green Belt. The site has temporary permission for 3 pitches.

To the south-west of the site lies open countryside. To the east on the opposite side of Straight Road is the former Whitworth Centre site which has been designated for residential development. North of the site on the opposite side of Lower Bedfords Road is a large mobile home park known as Sunset Drive. West of this is open countryside. To the south of the site is a residential cul-de-sac called Stanwyck Gardens.

This site (LB3) is allocated for 3 pitches.

The site is privately owned and occupied and will be privately managed by the current owner.

Policy GTSXX: Fairhill Rise

Fairhill Rise (LB3) is allocated for 3 pitches. Proposals for development will be required to provide the following:

- Suitable site design;
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of foul and surface water drainage.

- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]

- Safeguard amenity

- Appropriate materials for the means of enclosure and surfacing

Site layout to consider proximity to and overlooking from Stanwyck Gardens ...

Vinegar Hill (LB4)

The site is at the eastern end of four adjacent gypsy and traveller sites that lie along the southern side of Lower Bedfords Road, immediately to the west of Straight Road, and within the Metropolitan Green Belt. The site has previously had temporary permission for 6 pitches but currently has 12 pitches on site.

To the south-west of the site lies open countryside. To the east on the opposite side of Straight Road is the former Whitworth Centre site which has been designated for residential development. North of the site on the opposite side of Lower Bedfords Road is a large mobile home park known as Sunset Drive. West of this is open countryside. To the south of the site is a residential cul-de-sac called Stanwyck Gardens.

This site (LB4) is allocated for 13 pitches.

The site is privately owned and occupied and will be privately managed by the current owner.

Policy GTSXX: Vinegar Hill

Vinegar Hill (LB4) is allocated for 13 pitches. Proposals for development will be required to provide the following:

- Suitable site design;
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of foul and surface water drainage.

- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]

- Safeguard amenity

- Appropriate materials for the means of enclosure and surfacing

Site layout to consider proximity to and overlooking from Stanwyck Gardens ...

Land between 66-72 Lower Bedfords Road (LB5)

The site is located on the southern side of Lower Bedfords Road between Risebridge Close to the west and Chase Cross to the east. Along this side of Lower Bedfords Road within the Green Belt there is a ribbon of development consisting mostly of bungalows with some gaps in the continuity of the frontage. On the north side of Lower Bedfords Road is open countryside leading Bedfords Park. This is currently an unauthorised site with 1 pitch.

This site (LB5) is allocated for 1 pitch.

The site is privately owned and occupied and will be privately managed by the current owner.

Policy GTSXX: Land between 66-72 Lower Bedfords Road

The land between 66 and 72 Lower Bedfords Road (LB5) is allocated for 1 pitch. The Proposals for development will be required to provide the following:

- Suitable site design;
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of foul and surface water drainage.

- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]

- Safeguard amenity

- Appropriate materials for the means of enclosure and surfacing

Tyas Stud Farm (UP1)

The site lies to the east of Upminster and within the Metropolitan Green Belt. It is set back some distance from St Mary's Lane behind Latchford Farm and is accessed along an unmade track. An elevated section of the M25 motorway runs along the western boundary while the London Fenchurch Street to Southend railway line passes to the north.

This site has temporary permission for one pitch and for a stable block. The farm is a rectangular parcel of land. The site for the caravans and the stables is located at the southern end. The remainder of the land is given over to paddocks.

This site (UP1) is allocated for 1 pitch.

The site is privately owned and occupied and will be privately managed by the current owner.

Policy GTSXX: Tyas Stud Farm

Tyas Stud Farm (UP1) is allocated for 1 pitch. Proposals for development will be required to provide the following:

- Suitable site design;
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of foul and surface water drainage.

- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]

- Apart from the applicant's breeding and rearing of horses no trade or business may be carried out on the site and no materials associated with such uses shall be stored on the site.

- Safeguard amenity

- Appropriate materials for the means of enclosure and surfacing

Laburnham Stables (UP2)

The site is within the Metropolitan Green Belt and is part of a corridor of open land that lies between the built up area of Cranham to the west and the M25 motorway to the east. The site lies at the eastern end of Laburnham Gardens from which access is gained. Within the site is a stable block, with planning permission, comprising 10 stables. The site has temporary permission for 3 pitches

This site (UP2) is allocated for 3 pitches.

The site is privately owned and occupied and will be privately managed by the current owner.

Policy GTSXX: Laburnham Stables

Laburnham Stables (UP2) is allocated for 3 pitches. Proposals for development will be required to provide the following:

- Suitable site design;
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of foul and surface water drainage.

- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]

- No commercial activity will be allowed other than the use of the site as stables [or for agricultural purposes]

- Safeguard amenity

- Appropriate materials for the means of enclosure and surfacing

Ashlea View (UP3)

This site is situated on Tomkyns Lane in Upminster. Tomkyns Lane has sporadic development along its length including residential properties and agricultural buildings.

The site has had a number of temporary permissions since 1998 and has been occupied by the same family throughout this time. The site has temporary permission for 3 pitches.

Residential accommodation is situated at the end of a private road/drive off Tomkyns Lane and is set back from the road and screened by vegetation.

This site (UP3) is allocated for 3 pitches.

The site is privately owned and occupied and will be privately managed by the current owner.

Policy GTSXX: Ashlea View

Ashlea View (UP3) is allocated for 3 pitches. Proposals for development will be required to provide the following:

- Suitable site design;
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of foul and surface water drainage.

- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]

- Residential accommodation should only be located in the present location in order to retain the openness of the site

- Safeguard amenity

- Appropriate materials for the means of enclosure and surfacing

Willoughby Drive (WD1)

This is one of three gypsy and traveller sites adjacent to each other on the northern side of Willoughby Drive. This site lies at the eastern end of the three and is currently an unauthorised site with 1 pitch.

The sites are surrounded by a mixture of uses. To the west, on the corner of York Road, is a waste transfer station. There are a number of storage yards on the southern side of Willoughby Drive together with open land for horse grazing fronting onto Dagenham Road. To the east of the site is a small residential enclave of six terraced houses. Immediately to the north is the Bretons Outdoor Centre.

This site (WD1) is allocated for 1 pitch.

The site is privately owned and occupied and will be privately managed by the current owner.

Policy GTSXX: Willoughby Drive

Willoughby Drive (WD1) is allocated for 1 pitch. Proposals for development will be required to provide the following:

- Suitable site design;
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of foul and surface water drainage.

- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]

- Safeguard amenity

- Appropriate materials for the means of enclosure and surfacing

Willoughby Drive (WD3)

This is one of three gypsy and traveller sites adjacent to each other on the northern side of Willoughby Drive. This site is the middle of the three and has temporary permission for one pitch.

The sites are surrounded by a mixture of uses. To the west, on the corner of York Road, is a waste transfer station. There are a number of storage yards on the southern side of Willoughby Drive together with open land for horse grazing fronting onto Dagenham Road. To the east of the site is a small residential enclave of six terraced houses. Immediately to the north is the Bretons Outdoor Centre.

This site (WD3) is allocated for 1 pitch.

The site is privately owned and occupied and will be privately managed by the current owner.

Policy GTSXX: Willoughby Drive

Willoughby Drive (WD3) is allocated for 1 pitch. Proposals for development will be required to provide the following:

- Suitable site design;
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of foul and surface water drainage.

- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]

- Safeguard amenity

- Appropriate materials for the means of enclosure and surfacing

Willoughby Drive (WD4)

This is one of three gypsy and traveller sites adjacent to each other on the northern side of Willoughby Drive. This site lies at the western end of the three and has temporary permission for one pitch.

The sites are surrounded by a mixture of uses. To the west, on the corner of York Road, is a waste transfer station. There are a number of storage yards on the southern side of Willoughby Drive together with open land for horse grazing fronting onto Dagenham Road. To the east of the site is a small residential enclave of six terraced houses. Immediately to the north is the Bretons Outdoor Centre.

This site (WD4) is allocated for 1 pitch:

The site is privately owned and occupied and will be privately managed by the current owner.

Policy GTSXX: Willoughby Drive

Willoughby Drive (WD4) is allocated for 1 pitch. Proposals for development will be required to provide the following:

- Suitable site design;
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of foul and surface water drainage.

- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]

- Safeguard amenity

- Appropriate materials for the means of enclosure and surfacing

6. Monitoring

6.1 All of the Council's adopted planning policies are monitored through the Annual Monitoring Report (AMR) the purpose of which is to assess and review the extent to which the policies in Local Development Documents are being implemented. Provision of Gypsy and Traveller pitches is monitored under Core Policy CP2 (Sustainable Communities):

- Net additional pitches granted planning permission

6.2 One of the key objectives of the Gypsy and Traveller Sites DPD is to reduce the level of unauthorised development within the Borough. Therefore to ensure that the achievement of all objectives is monitored an additional indicator will be added to the annual monitoring framework:

- Number and size of unauthorised developments

Monitoring indicators

GT1	Net additional pitches granted planning permission
GT2	Number and size of unauthorised developments

Appendices

Appendix 1: Site Maps

Church Road (including Mariecot Bungalow)

7 sites and 12 pitches (6 x 1 pitch and 1 x 6 pitches)

Benskins Lane

6 sites and 12 pitches (6 x 2 pitches)

Hogbar Farm West

1 site (3 pitches)

Hogbar Farm

1 site (8 pitches)

Fairhill Rise

1 site (3 pitches)

Vinegar Hill

1 site (13 pitches)

Land between 66-72 Lower Bedfords Road (Roseview Cottage)

1 site (1 pitch)

Tyas Stud Farm

1 site (1 pitch)

Laburnham Stables

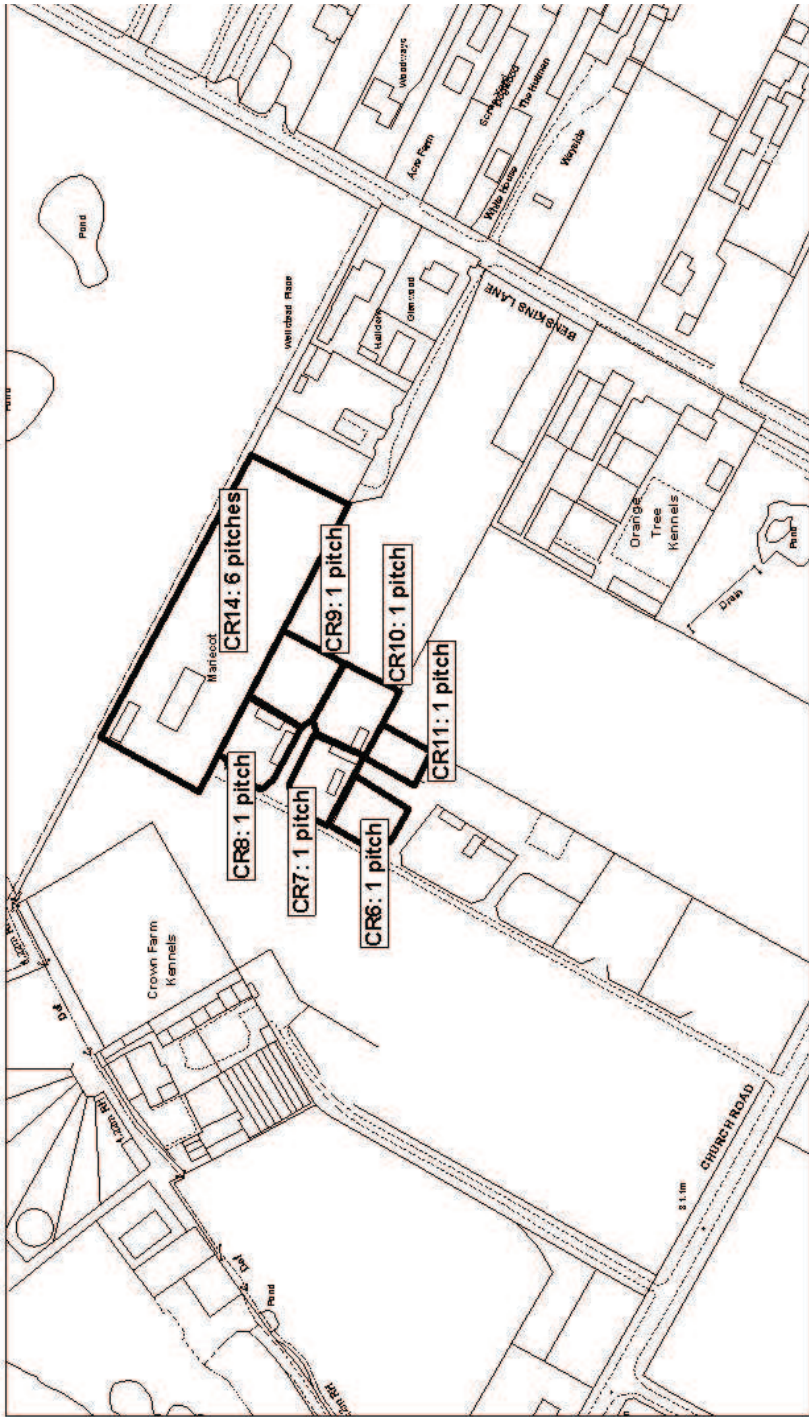
1 site (3 pitches)

Ashlea View

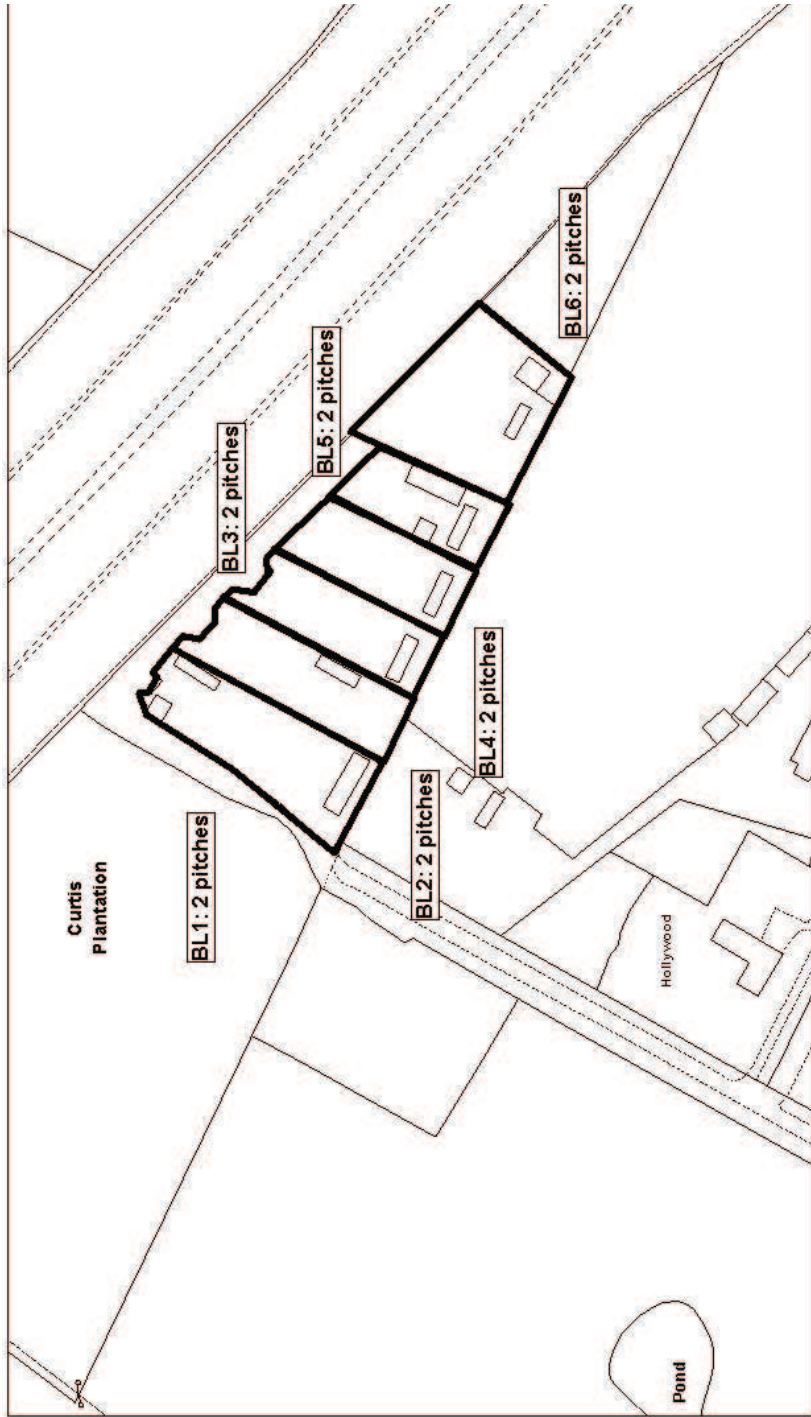
1 site (3 pitches)

Willoughby Road

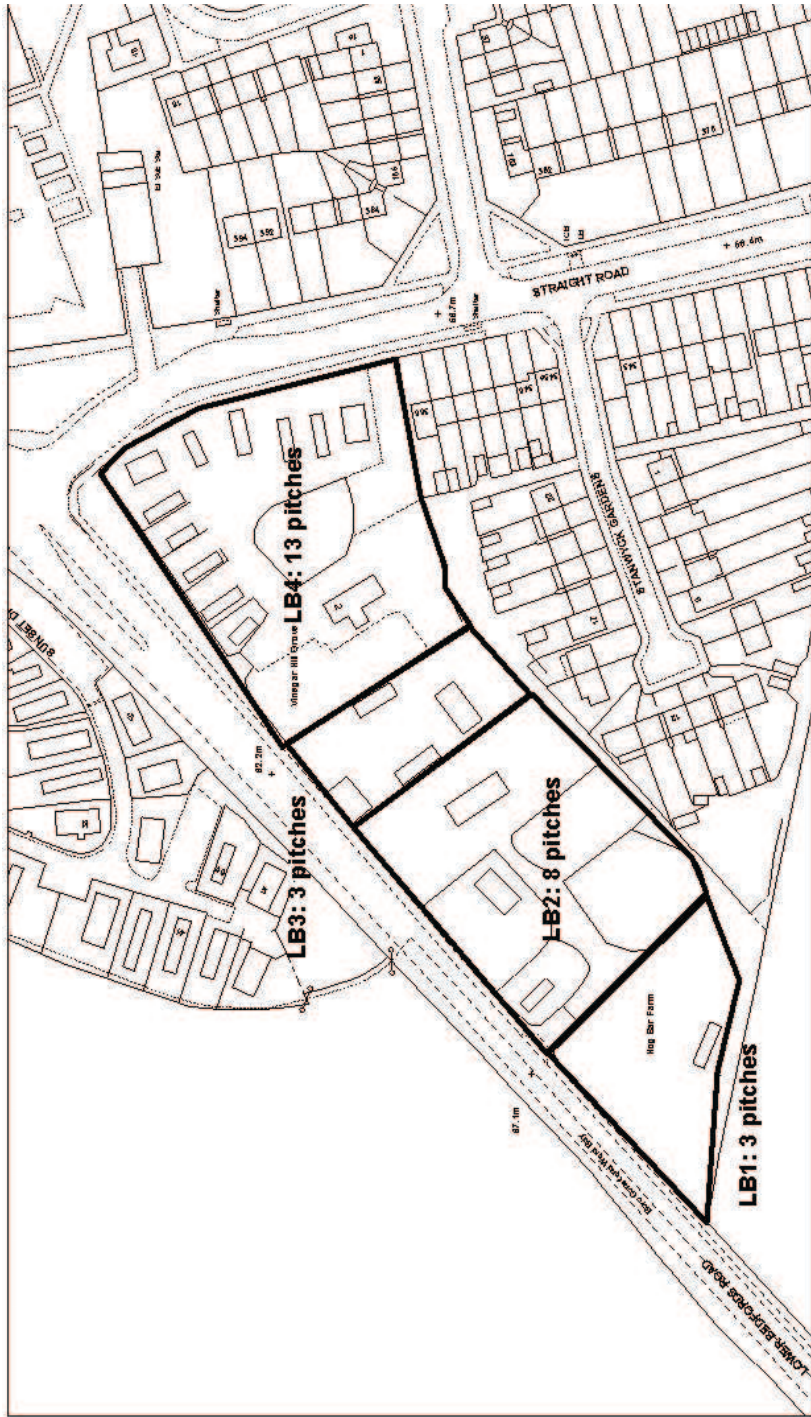
3 sites and 3 pitches



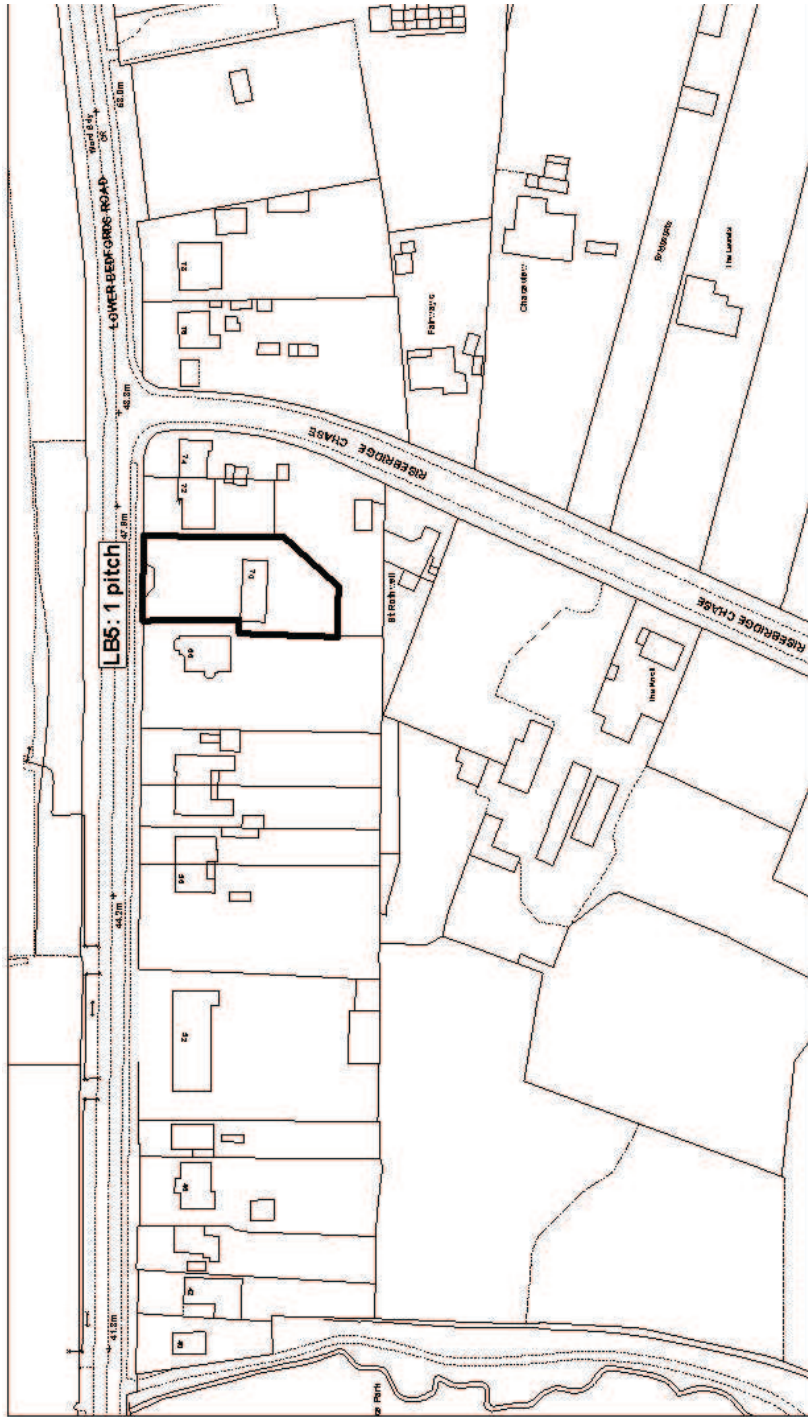
<p>Church Road</p> <p>London Borough of Havering Town Hall, Main Road Romford, RM1 3BD Tel: 01708 434343</p>	<p>Map Reference: TG6394SE Date: 19/12/2011</p>	<p>Scale @ A4 1:2000</p> <p>Scale 0 15 30 45 60 75 m</p>
<p>Havering <small>London Borough of Havering</small></p>	<p>nlpig <small>NATIONAL LAND INFORMATION GROUP</small></p>	<p>Ordnance Survey <small>NATIONAL SURVEY LICENSED PARTNER</small></p> <p>© Crown copyright and database rights 2011 Ordnance Survey 100024327</p>



<p>Benskins Lane</p>	<p>Map Reference: TG5494NW Date: 19/12/2011</p>	<p>Scale @ A4 1:1250</p> <p>Scale 0 10 20 30 40 50 m</p>
<p>London Borough of Havering Town Hall, Main Road Romford, RM1 3BD Tel: 01708 434343</p>	<p>nlpig NATIONAL LANDSCAPE PARTNERSHIP</p> <p>Ordnance Survey Licensed Partner</p>	<p>© Crown copyright and database rights 2011 Ordnance Survey 100024327</p>



<p>Lower Bedfords Road</p> <p>London Borough of Havering Town Hall, Main Road Romford, RM1 3BD Tel: 01708 434343</p> 	<p>Map Reference: TQ6292SE Date: 05/01/2012</p> <p>Scale @ A4 1:1250</p>  	<p>Scale 0 10 20 30 40 50 m</p> <p>© Crown copyright and database rights 2012 Ordnance Survey 100024327</p>  
---	--	---



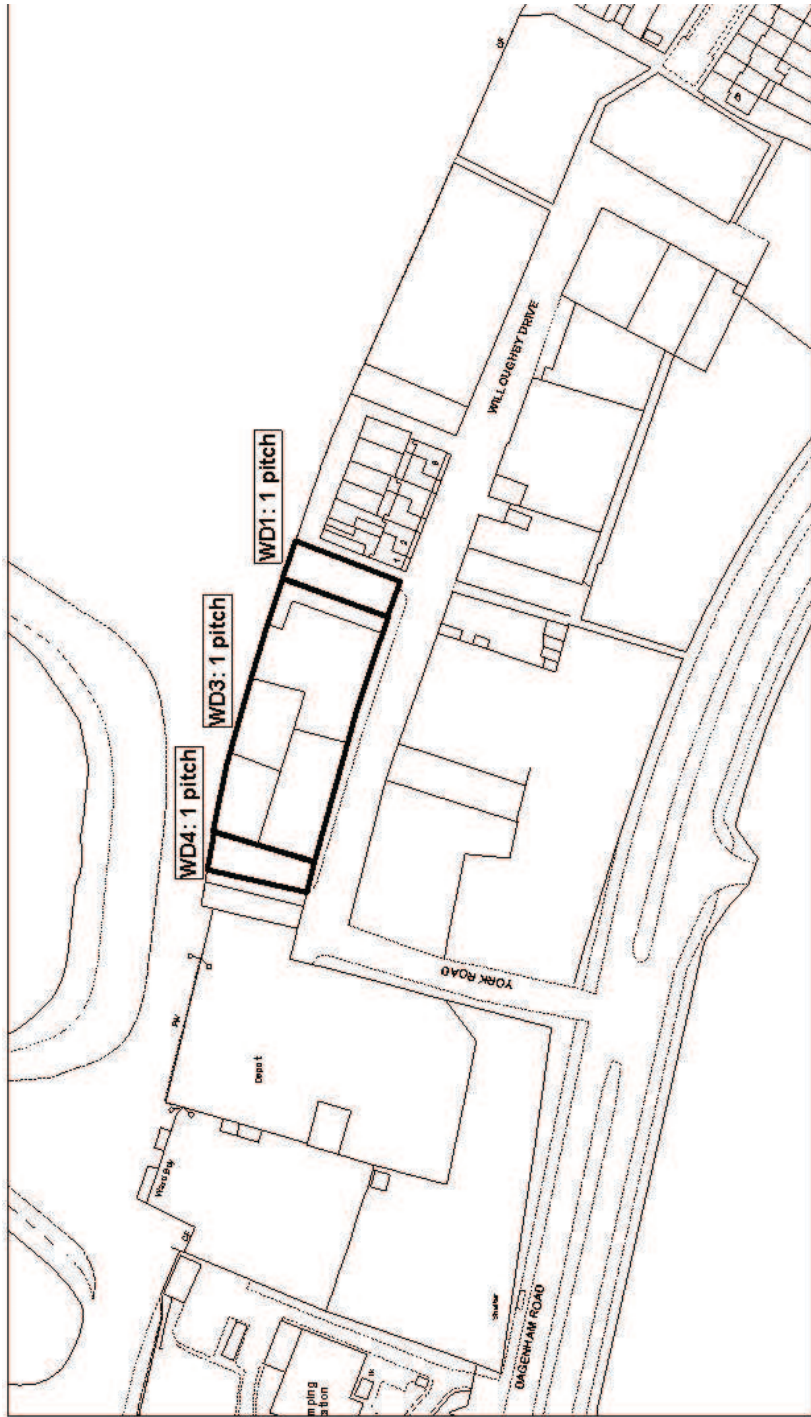
<p>Lower Bedfords Road</p>	<p>Map Reference: TG5191NE Date: 20/12/2011</p>	<p>Scale @ A4 1:1250</p> <p>Scale 0 10 20 30 40 50 m</p>
<p>nlpg NATIONAL LANDSCAPE PARTNERSHIP</p>	<p>Ordnance Survey National Survey Licensed Partner</p>	<p>© Crown copyright and database rights 2011 Ordnance Survey 100024327</p>
<p>London Borough of Havering Town Hall, Main Road Romford, RM1 3BD Tel: 01708 434343</p>	<p>Havering 020 8314 4000</p>	



<p>Tyas Stud Farm / Laburnham Stables</p> <p>Map Reference: TG6887 Date: 20/12/2011</p> <p>Scale @ A4 1:4000</p> <p>Scale 0 25 50 75 100 125 m</p>	<p>London Borough of Havering Town Hall, Main Road Romford, RM1 3BD Tel: 01708 434343</p> <p>Havering 01708 434343</p>
<p>© Crown copyright and database rights 2011 Ordnance Survey 100024327</p> <p>nlpig NATIONAL PLANNING INFORMATION GROUP A Local Authority Partnership</p> <p>Ordnance Survey NATIONAL SURVEY SERVICE Licensed Partner</p>	



<p>Ashlea View</p>	<p>Map Reference: TG5689NE Date: 20/12/2011</p>	<p>Scale @ A4 1:2500</p> <p>Scale 0 20 40 60 80 100 m</p>
<p>London Borough of Havering Town Hall, Main Road Romford, RM1 3BD Tel: 01708 434343</p>	<p>nlpig NATIONAL LAND INFORMATION GROUP NATIONAL SURVEY LICENSED PARTNER</p>	<p>© Crown copyright and database rights 2011 Ordnance Survey 100024327</p>



<p>Willoughby Drive</p>	<p>Map Reference: TG5184SW Date: 19/12/2011</p>	<p>Scale @ A4 1:1250</p>	<p>Scale 0 10 20 30 40 50 m</p>
<p>London Borough of Havering Town Hall, Main Road Romford, RM1 3BD Tel: 01708 434343</p>	<p>nlpig NATIONAL LAND PUBLIC INFORMATION GROUP</p>	<p>Ordnance Survey NATIONAL LICENSED PARTNER</p>	<p>© Crown copyright and database rights 2011 Ordnance Survey 100024327</p>

Appendix 2: References and Further Guidance

Housing Act 2004, Sections 225 and 226

Equality Act 2010

Planning Policy Statement 1: Delivering Sustainable Development (ODPM 2005)

Planning Policy Guidance 2: Green Belts (ODPM 1995, amended 2001)

Planning Policy Statement 3: Housing (CLG 2010)

Planning Policy Statement 5: Planning for the Historic Environment (CLG 2010)

Planning Policy Statement 9: Biodiversity and Geological Conservation (ODPM 2005)

Planning Policy Statement 23: Planning and Pollution Control (ODPM 2004)

Planning Policy Statement 25: Development and Flood Risk (CLG 2010)

Circular 01/2006: Planning for Gypsy and Traveller Caravan Sites (ODPM 2006)

Draft National Planning Policy Framework (CLG 2011)

Planning for traveller sites: Consultation draft (CLG 2011)

European Water Framework Directive (Directive 2000/60/EC)

Designing Gypsy and Traveller Sites: Good Practice Guide (CLG 2008)

Manual for Streets (Department for Transport 2007)

The London Plan: Spatial Development Strategy for Greater London (GLA 2011)

LBH Core Strategy and Development Control Policies DPD (LBH 2008)

London Borough of Havering Traveller Needs Assessment: Stage 1 (Niner 2004)

London Borough of Havering Traveller Needs Assessment: Stage 2 (Niner 2005)