



CABINET

7.30 pm	Wednesday 5 August 2020	Council Chamber - Town Hall
----------------	------------------------------------	--

Members 9: Quorum 3

Councillor Damian White (Leader of the Council), Chairman

Cabinet Member responsibility:

Councillor Robert Benham

Cabinet Member for Education, Children & Families

Councillor Osman Dervish

Cabinet Member for Environment

Councillor Joshua Chapman

Cabinet Member for Housing

Councillor Jason Frost

Cabinet Member for Health & Adult Care Services

Councillor Roger Ramsey

Cabinet Member for Finance & Property

Councillor Viddy Persaud

Cabinet Member for Public Protection and Safety

Andrew Beesley
Head of Democratic Services

For information about the meeting please contact:

Debra Marlow tel: 01708 433091

e-mail: debra.marlow@onesource.co.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.**

Protocol for members of the public wishing to report on meetings of the London Borough of Havering

Members of the public are entitled to report on meetings of Council, Committees and Cabinet, except in circumstances where the public have been excluded as permitted by law.

Reporting means:-

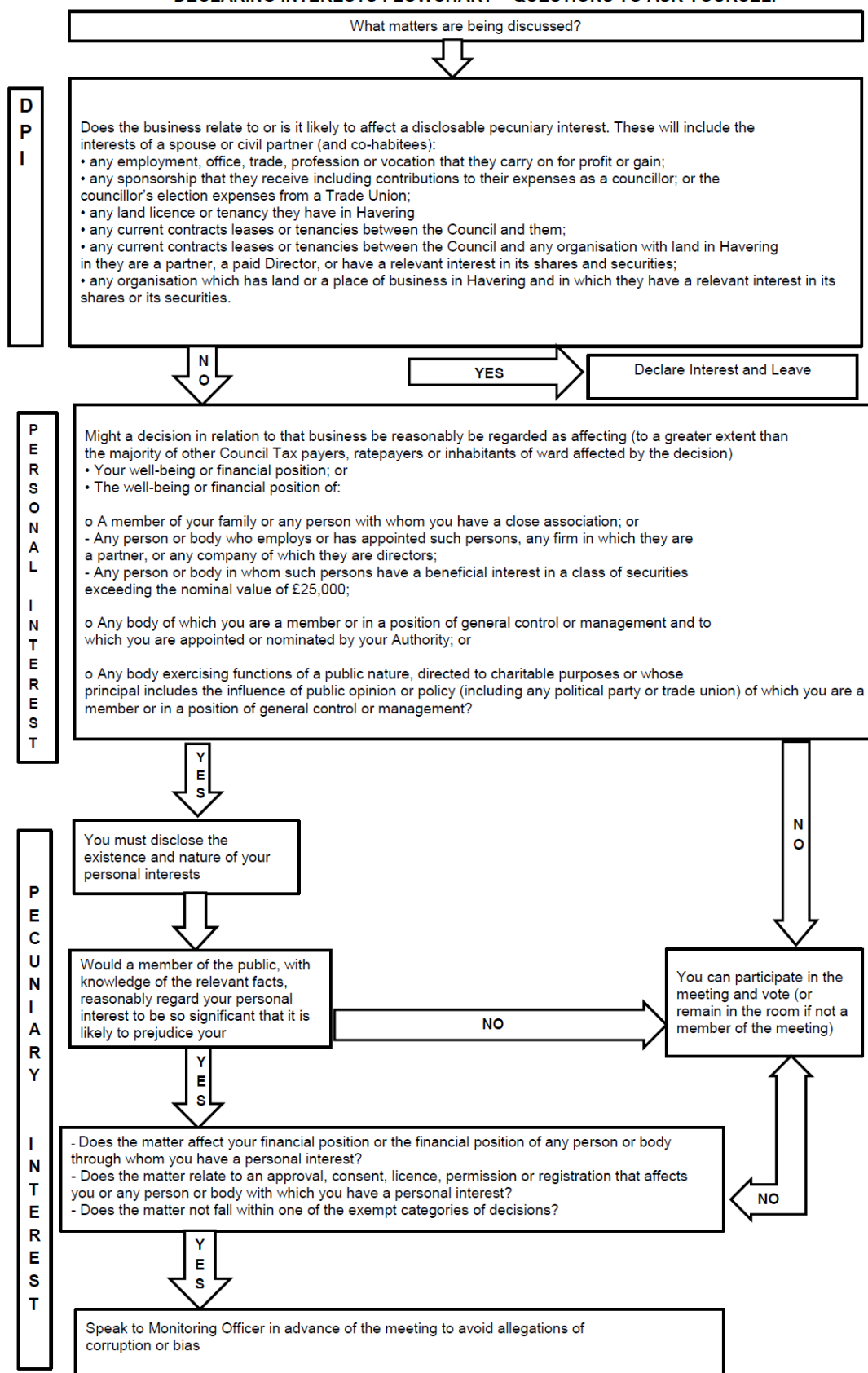
- filming, photographing or making an audio recording of the proceedings of the meeting;
- using any other means for enabling persons not present to see or hear proceedings at a meeting as it takes place or later; or
- reporting or providing commentary on proceedings at a meeting, orally or in writing, so that the report or commentary is available as the meeting takes place or later if the person is not present.

Anyone present at a meeting as it takes place is not permitted to carry out an oral commentary or report. This is to prevent the business of the meeting being disrupted.

Anyone attending a meeting is asked to advise Democratic Services staff on 01708 433076 that they wish to report on the meeting and how they wish to do so. This is to enable employees to guide anyone choosing to report on proceedings to an appropriate place from which to be able to report effectively.

Members of the public are asked to remain seated throughout the meeting as standing up and walking around could distract from the business in hand.

DECLARING INTERESTS FLOWCHART – QUESTIONS TO ASK YOURSELF



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 PROTOCOL ON THE OPERATION OF CABINET MEETINGS DURING THE COVID-19 PANDEMIC RESTRICTIONS (Pages 1 - 2)

3 APOLOGIES FOR ABSENCE

(if any) - receive

4 DISCLOSURES OF INTEREST

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

5 MINUTES

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

6 LICENSING POLICY CONSULTATION (Pages 3 - 76)

7 LOCAL PLAN CONSULTATION ON MAIN MODIFICATIONS AND PUBLICATION OF TEMPORARY CHANGES TO THE STATEMENT OF COMMUNITY INVOLVEMENT (Pages 77 - 820)

8 EXCLUSION OF THE PUBLIC

To consider whether the public should now be excluded from the remainder of 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 those items 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, if it is decided to exclude the public on those grounds, the Committee to resolve accordingly on the motion of the Chairman.

9 REMODELLING OF ONESOURCE SERVICES: NEW ARRANGEMENTS FOR THE FINANCE FUNCTION ACROSS HAVERING, NEWHAM AND BEXLEY (Pages 821 - 832)

Report for consideration. Exempt Appendix 1.

10 HAVERING AND WATES REGENERATION COVID-19 OPTIONS PAPER (Pages 833 - 866)

Report for consideration. Exempt Appendices 1 and 2.

This page is intentionally left blank

LONDON BOROUGH OF HAVERING

PROTOCOL ON THE OPERATION OF CABINET MEETINGS DURING THE COVID-19 PANDEMIC RESTRICTIONS

1. Introduction

In accordance with the Local Authority and Police Crime Panels (Coronavirus) (Flexibility of Local Authority and Police and Crime Panels Meetings (England and Wales) Regulations 2020, all Cabinet Meetings held during the Covid-19 restrictions will take place using a 'virtual' format. This document aims to give details on how the meetings will take place and establish some rules of procedure to ensure that all parties find the meetings productive.

2. Prior to the Meeting

Once the date for a meeting has been set, an electronic appointment will be sent to all relevant parties. This will include a link to access the virtual meeting as well as guidance on the use of the technology involved.

3. Format

For the duration of the Covid-19 restrictions period, all Cabinet meetings will be delivered through conference call, using Zoom software. This can be accessed using a PC, laptop or mobile/landline telephone etc. and the instructions sent with meeting appointments will cover how to do this.

4. Structure of the Meeting

Although held in a virtual format, Cabinet Meetings will follow the usual procedure.

5. Technology Issues

An agenda setting out the items for the meeting will be issued in advance, to all parties in accordance with statutory timetables. This will include details of reports to be considered and any other relevant documents. The agenda will also be published on the Council's website – www.havering.gov.uk in the normal way.

All parties should be aware that the sheer volume of virtual meetings now taking place across the country has placed considerable strain upon broadband network infrastructure. As a result, Zoom meetings may experience intermittent faults whereby participants lose contact for short periods of time before reconnecting to the call. The guidance below explains how the meeting is to be conducted, including advice on what to do if participants cannot hear the speaker and etiquette of participants during the call.

Members and the public will be encouraged to use any Zoom video conferencing facilities provided by the Council to attend a meeting remotely. If this is not possible, attendance may be through an audio link or by other electronic means.

Remote access for members of the public and Members who are not attending to participate in the meeting, together with access for the Press, will be provided via a webcast of the meeting at www.havering.gov.uk.

If the Chairman is made aware that the meeting is not accessible to the public through remote means, due to any technological or other failure of provision, then the Chair shall temporarily adjourn the meeting immediately. If the provision of access through remote means cannot be restored within a reasonable period, then the remaining business will be considered at a time and date fixed by the Chairman. If he or she does not fix a date, the remaining business will be considered at the next scheduled ordinary meeting of Cabinet.

6. Management of Remote Meetings for Members

The Chairman will normally confirm at the outset and at any reconvening of an Cabinet meeting that they can see and hear all participating members. Any Member participating remotely should also confirm at the outset and at any reconvening of the meeting that they can see and hear the proceedings and the other participants.

The attendance of Members at the meeting will be recorded by the Democratic Services Officer. The normal quorum requirements for meetings as set out in the Council's Constitution will also apply to a remote meeting.

If a connection to a Member is lost during a meeting of the Board, the Chair will stop the meeting to enable the connection to be restored. If the connection cannot be restored within a reasonable time, the meeting will proceed, but the Member who was disconnected will not be able to vote on the matter under discussion given that they would not have heard all the discussion.

Any Member participating in a remote meeting who declares a disclosable pecuniary interest, or other declarable interest, in any item of business that would normally require them to leave the room, must also leave the remote meeting. The Democratic Services Officer or meeting facilitator, will confirm the departure and will also invite the relevant Member by link, email or telephone to re-join the meeting at the appropriate time, using the original meeting invitation,

7. After the Meeting - Public Access to Meeting Documentation following the meeting

Members of the public may access minutes, decisions and other relevant documents through the Council's website. www.havering.gov.uk



CABINET

Subject Heading:

Consultation on Statement of Licensing Policy 2021-2026

Cabinet Member:

Councillor Viddy Persaud

Lead Member for Public Protection and Safety

SLT Lead:

Barry Francis

Director of Neighbourhoods

Report Author and contact details:

Louise Watkinson Group Manager Public Protection
01708 432771

Keith Bush Public Protection Manager
Licensing & Trading Standards
01708 433425

Policy context:

The Licensing Act 2003 requires the Licensing Authority to consult on and publish a Statement of Licensing Policy. This document must be reviewed every 5 years.

Financial summary:

It is anticipated that the cost of the consultation will be less than £0.01m which is currently budgeted for and will be funded from existing budgets. It will be funded from A26210.651780

Is this a Key Decision?

Yes, Significant impact on two or more Wards.

When should this matter be reviewed?

The Policy needs to be reviewed every 5 years. A policy review is needed by 2026.

Reviewing OSC:

Towns and Communities

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

Communities making Havering
Places making Havering
Opportunities making Havering
Connections making Havering

[X]
[X]
[X]
[]

SUMMARY

To authorise the commencement of a consultation on the Draft Statement of Licensing Policy 2021-2026

RECOMMENDATIONS

Part 3, Section 2.1 General Functions of Cabinet

Policy matters

(c) To determine all substantial policy matters and strategic decisions and those minor matters which are referred by the Leader at the request of an individual Cabinet Member as being particularly contentious.

REPORT DETAIL

Section 5 of the Licensing Act 2003 (hereafter termed 'the 2003 Act') requires all Licensing Authorities to prepare and publish a Statement of Licensing Policy that they propose to apply in exercising their functions under the Act during the five year period to which the policy applies.

The current policy expires on the 6th January 2021 and therefore a new policy will need to be adopted.

The Statement of Licensing Policy is the primary document for setting out the Council's local approach to regulation of the 2003 Act and ensuring that the licensing objectives are met. The licensing objectives are:

- Prevention of crime and disorder
- Public safety
- Prevention of public nuisance
- Protection of children from harm

Nothing in the Statement of Licensing Policy will override the right of any person to make an application under the 2003 Act and have that application considered on its individual merits. Equally, nothing in the Statement of Licensing Policy will undermine the right of any person to make representations to an application, or seek a review of a licence where there is a legal power to do so.

Before the Statement of Licensing Policy can be adopted Section 5(3) of the 2003 Act requires the licensing authority to undertake a statutory consultation. This requires the authority to consult with:

- The chief officer of police for the licensing authority's area
- The fire and rescue authority for that area
- The Local Health Board for an area
- Each local authority in England whose public health functions within the meaning of the National Health Service Act 2006 are exercisable in respect of an area any part of which is in the licensing authority's area.
- Such persons as the licensing authority considers to be representatives of holders of premises licences issued by that authority
- Such persons as the licensing authority considers to be representatives of holders of club premises certificates issued by that authority
- Such persons as the licensing authority considers to be representatives of holders of personal licence holders
- Such other persons as the licensing authority considers to be representative of businesses and residents in its area.

There is no statutory time period for the consultation process. The proposed policy is a review and update to the existing policy and the amendments are relatively small. However due to the large number of premises that are licensed under the 2003 Act across the borough (approximately 600) the draft Statement of Licensing Policy will be subject to a 12-week consultation period. All comments will be carefully considered and appropriate amendments made.

The Statement of Licensing Policy will then go to Full Council for final approval.

A copy of the draft Statement of Licensing Policy to be consulted on is included as Appendix 1.

The main changes proposed are:

- Havering's vision has been added to the updated policy.
- An equalities and diversity section has been added
- A section on the use of remote hearings has been added
- The cumulative impact zone for Romford has been reviewed but remains unchanged
- The cumulative impact zone for Hornchurch has been reviewed and amended.
- The cumulative impact zone for Gooshays ward has been reviewed and amended.
- A section on mental health and wellbeing has been added
- A section on counter terrorism has been added
- A section on COVID 19 has been added
- Some additional model conditions have been added

The main changes in the document are highlighted in yellow.

REASONS AND OPTIONS

To undertake a consultation on the proposed Draft Statement of Licensing Policy. No other options were considered as the Licensing Act 2003 requires that the local authority has a Statement of Licensing Policy.

IMPLICATIONS AND RISKS

LEGAL IMPLICATIONS AND RISKS

The Council is required by section 5 of the Licensing Act 2003 to have an adopted Statement of Licensing Policy for each 5 year period and to review the policy from time to time.

The Council is also required by section 5A of the Licensing Act 2003 to review its Cumulative Impact Assessment every 3 years.

The Statement of Licensing Policy must set out the how authority will give effect to the 4 licensing objectives of the 2003 Act and must have regard to the Statutory Guidance published under section 182 of the Act.

Public Consultation

The Statement of Licensing Policy must be reviewed every 5 years and the Council must undertake statutory consultation as required by section 5 of the 2003 Act. The consultation must include the prescribed individuals and organisations and anyone else that the Council considers to be representative of businesses and residents in its area. Government Guidance recommends a wide ranging consultation in addition to the statutory consultees.

This consultation will fulfil the Council's statutory duty. Once responses are received these will have to be carefully considered before any decision is taken

Some of the usual consultation methods may not be possible to carry out in the face of the current coronavirus pandemic.

However, the courts are unlikely to interfere with policy decisions if the best practical means are used to reduce prejudice to any party the council correctly follows central government policy and regulations. These may include maintaining a Licensing page on the Council's website with a public consultation section or a link to a separate page where people and organisations can make their observations. This could be advertised on local newspaper' websites

Remote Hearings

The coronavirus pandemic has necessitated the use of remote licensing hearings. However, the Licensing Act 2003 (Hearings) Regulations 2005 apply equally to hearings held “in person” and remote hearings. Therefore under Regulation 14(1) a remote hearing shall still take place in public and the local authority shall determine the procedure to be followed at the hearing under Regulation 21. A participant may also still be excluded on the grounds of public interest (Regulation 14(2)) and if they are disruptive (Regulation 25)

In addition *The Local Authorities and Police and Crime Panels (Coronavirus) Flexibility of Local Authority and Police and Crime Panel meetings (England and Wales) Regulations 2020* (“Flexibility Regulations”) make it clear that licensing hearings can be both public and remote.

Regulation 5(1) of the Flexibility Regulations states that a meeting (which under Regulation 3 includes a meeting of a local authority sub-committee) is not limited to a meeting of persons all of whom, or any of whom, are present in the same place. Any reference to a “place” where a meeting is held, or to be held, includes more than one place including electronic, digital or virtual locations such as internet locations, web addresses or conference call telephone numbers.

The Statement of Licensing Policy is a Council function and may only be approved and adopted by Full Council.

FINANCIAL IMPLICATIONS AND RISKS

It is anticipated that the cost of the consultation will be less than £0.010m (£10,000) which is budgeted for and will be met from existing budgets. Fees are set by statute under the Licensing Act 2003 to cover the costs of processing licence applications. The fee levels are intended to provide full cost recovery of all licensing functions including the preparation and publication of a statement of licensing policy. It will be funded from A26210.651780

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

There are no direct Human Resources implications arising from this report.

EQUALITIES AND SOCIAL INCLUSION IMPLICATIONS AND RISKS

The Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010 requires the Council, when exercising its functions, to have due regard to:

- (i) The need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (ii) The need to advance equality of opportunity between persons who share protected characteristics and those who do not, and;

(iii) Foster good relations between those who have protected characteristics and those who do not.

Note: 'Protected characteristics' are age, sex, race, disability, sexual orientation, marriage and civil partnerships, religion or belief, pregnancy and maternity and gender reassignment.

The Council is committed to all of the above in the provision, procurement and commissioning of its services, and the employment of its workforce. In addition, the Council is also committed to improving the quality of life and wellbeing for all Havering residents in respect of socio-economics and health determinants.

An Equality and Health Impact Assessment (EqHIA) has been undertaken and we will collect information during the consultation however it is anticipated that the policy, if adopted, will have a positive effect on the borough by encouraging operators to consider the impact of their premises on the local area and conducting local area risk assessments before they apply for new licences to ensure the protection of vulnerable residents from harm.

There are no negative impacts against any protected characteristics by the consultation on this policy. The decision to award a licence will be guided by the main aims and principles of the legislation which ultimately seek to protect vulnerable persons.

HEALTH AND WELLBEING IMPLICATIONS AND RISKS

The legislative framework for the Licensing Act 2003 recognises the sale of alcohol by retail, late night refreshment and regulated entertainment such as music and dance as a legitimate leisure activity that many people enjoy. It can be social, fun and as such might have positive impacts on wellbeing. In addition, it generates income, employment and tax revenue, creating employment, which is an important determinant of health and wellbeing.

However, set against this, it can generate significant dis-benefits such as working days lost through alcohol misuse, or the cost of treatment for ill-health. Less easily measured are potentially very significant impacts such as the negative effects of some alcohol addiction on family relationships, and the psychological and social development of children.

The proposed statement of licensing policy is intended to address this negative issue by promoting responsible retailing.

It expects the applicant to have considered:

- The layout of the local area and physical environment including crime and disorder hotspots, proximity to residential premises and proximity to areas where children congregate.
- Any risk posed to the local area by the applicants' proposed licensable activities;

- Steps to protect vulnerable residents
- Any local initiatives (for example, local crime reduction initiatives or voluntary schemes including local taxi-marshalling schemes, street pastors and other schemes) which may help to mitigate potential risks.
- Any other relevant policies that the local authority has adopted.

The policy also requires applicants to take appropriate measures to protect children from harm including considering the location of the premises in relation to premises frequented by children.

BACKGROUND PAPERS

None

This page is intentionally left blank



Haverling

LONDON BOROUGH

Statement of Licensing Policy 2021-2026

Document Control

Document details

Title	Statement of Licensing Policy 2021-2026
Version number	V5.0
Status	draft
Author	Keith Bush
Lead officer	Andrew Blake Herbert
Approved by	Full Council
Review date	2026
Supersedes	<i>Statement of Licensing Policy</i>
Target audience	<i>Applicants, Residents, Licensing Committee, Councillors.</i>
Related to	

Version history

Version	Status	Date	Dissemination/Change
V1.0	<i>Initial draft</i>	<i>9th August 2019</i>	
V2.0	<i>Updated</i>	<i>3rd October 2019</i>	<i>Cumulative Impact zones reviewed and reworded. Change of wording following discussions with other service areas.</i>
V3.0	<i>Updated</i>	<i>21st April 2020</i>	<i>Mental health & wellbeing added</i>
V4.0	<i>Updated</i>	<i>19th May 2020</i>	<i>Comments from legal services incorporated</i>
V5.0	<i>Updated</i>	<i>21st July 2020</i>	<i>COVID 19 section added</i>

Approval history

Version	Status	Date	Approved by

Equality Impact Assessment record

Date	Completed by	Review date
15/10/2019	Keith Bush	2026

DRAFT

The Statement of Licensing Policy of London Borough of Havering the Licensing Authority for the London Borough of Havering prepared under section 5 of the Licensing Act 2003 with due regard and weight to Guidance issued by the Secretary of State for the Home Office under section 182 of the Licensing Act 2003.

The policy is determined for a five year period commencing (tbc)

DRAFT

Contents

1. Executive summary	7
2. Introduction	9
3. About the London Borough of Havering	10
4. Expectation of Applicants	15
5. Determination of Applications	17
6. Cumulative Impact	19
7. Cumulative Impact Assessment	20
8. Special Cumulative Impact Policy for Romford Town Centre	21
9. Special Cumulative Impact Policy for Hornchurch Town Centre	23
10. Special Cumulative Impact Policy for Gooshays	25
11. Development Management	27
12. Licensing Hours	28
13. Standards of Management	29
14. Alcohol induced crime and disorder and antisocial behaviour	30
15. Use of toughened glass and polycarbonates	30
16. Drugs Policy	31
17. Noise	32
18. Smoking, Drinking and eating outside	32
19. Dispersal policies	33
20. Deliveries	34
21. Children and Licensed premises	34
22. Children and Alcohol	35
23. Mental Health and Wellbeing	36
24. Adult Entertainment	37
25. Illicit Goods	38
26. Counter Terrorism	38

27. Temporary events	39
28. Provisional statements	40
29. Enforcement	40
30. COVID 19	41
30. Scheme of delegation	42

Appendices

1. Glossary of terms	43
2. Responsible Authorities and Useful Contact Details	47
3. Questions for applicants to consider when making an application	50
4. Mandatory Conditions	54
5. London Borough of Havering Pool of Model conditions	59

1. Executive Summary

1.1 The Licensing Act 2003 came into effect in 2005.

1.2 Section 5 of the Licensing Act 2003 hereafter referred to as 'the Act' requires each Licensing Authority to prepare a Statement of Licensing Policy that it will apply in exercising its functions pursuant to the Act. The Statement of Licensing Policy is valid for a term of 5 years when it must be revised again. The Licensing Authority may also review and revise the Statement of Licensing Policy within the statutory 5-year period. All revisions and reviews are subject to the statutory requirement for consultation. The document is made up of the Statement of Licensing Policy and supporting appendices. The appendices provide useful information for applicants and may be updated during the life of the Policy without consultation for example to include legislative changes.

1.3 The Licensing Act 2003 sets out 4 licensing objectives which are:

- The prevention of crime and disorder
- Public safety
- The prevention of public nuisance
- The protection of children from harm

1.4 The Authority is required to make decisions based on these objectives and to promote them through its actions. Licensed premises are required to conduct their activities with reference to the promotion of these objectives.

1.5 Each of the licensing objectives is of equal importance in terms of licensing actions and decision-making. This means that each has equal weight under the legislation.

1.6 The Act identifies five other key aims that are important for all those involved in licensing to support and promote through good practice. These are:

- Protecting the public and local residents from crime, anti-social behaviour and noise nuisance caused by irresponsible licenced premises;
- Giving the police and licensing authorities the powers they need to manage and police the night time economy effectively and take action against those premises that are causing problems;
- Recognising the important role which pubs and other licensed premises play in our local communities, and minimising the regulatory burden on business, encouraging innovation and supporting responsible premises;
- Providing a regulatory framework for late night refreshment, and regulated entertainment which reflects the needs of local communities and empowers local authorities to make and enforce decisions about the most appropriate licensing strategies for their area; and

- Encouraging greater community involvement in licensing decisions and giving local residents the opportunity to have their say regarding licensing decisions that may impact upon them.

1.7 The Policy covers the licensable activities as specified by the Licensing Act 2003 which are:

- Sale by retail of alcohol
- The supply of alcohol by or on behalf of a club to, or to the order of, a member of the Club
- Regulated entertainment
- Late night refreshment

1.8 This policy only relates to licensable activities under the Licensing Act 2003. It does not cover other areas of licensing such as gambling and special treatments.

1.9 The Act provides for four different types of authorisation or permission, as follows:

- Premises licences
- Club premises certificates
- Personal licences
- Temporary event notices (TENs)

1.10 A glossary of terms is included at Appendix 1.

1.11 The Policy must have due regard to the guidance issued by the Secretary of State under section 182 of the Licensing Act 2003 and other local strategies.

1.12 Applicants for premises licences should be aware of the expectations of the licensing authority and the responsible authorities as to the steps to be taken for the promotion of the licensing objectives, and to demonstrate knowledge of their local area when describing the steps they propose to take to promote the licensing objectives.

1.13 Nothing in this policy is intended to undermine the rights of any person to apply under the 2003 Act for any of the variety of permissions and have that application considered on its individual merits.

1.14 Equally, nothing in this policy is intended to override the right of any person to make representations on any application or seek a review of a licence or certificate where they are permitted to do so under the Act.

1.15 Local people, businesses and Members of the Council are able to comment through public consultation on this Policy.

2. Introduction

2.1 The purpose of this Licensing Policy is to inform both applicants and residents about the way in which the Licensing Authority will implement the Licensing Act 2003 in Havering. The Policy along with national guidance and primary legislation forms the basis on which decisions are made.

2.2 In preparing this Policy the Council has consulted with and considered the views of a wide range of people and organisations including:

- Representatives of local business
- Local residents and their representatives
- Councillors
- Local Members of Parliament
- Members of the Business Improvement District
- Representatives of existing licence holders
- The responsible authorities namely:
 - Metropolitan Police Service
 - London Fire and Emergency Planning Authority
 - London Borough of Havering-Director of Public Health
 - London Borough of Havering-Environmental Health Service
 - London Borough of Havering-Planning Service
 - London Borough of Havering-Trading Standards Service
 - London Borough of Havering-Havering Children Social Care (CSC)
 - The Local Enforcement Agency with responsibility for enforcing the Health and Safety at Work etc. Act 1974 (this will be either the Health and Safety Executive or the Health and Safety team, Environmental Health London Borough of Havering, dependent upon the nature of the premises)
 - Home Office (Immigration enforcement)
- Other Council Departments
- Charitable organisations that deal with the social impact of alcohol misuse

2.3 The contact details for the Responsible Authorities and other useful contact details are given in Appendix 2.

3. About the London Borough of Havering

3.1 Havering is one of the largest boroughs in Greater London, with a population of around 256,000 (Based on ONS UK statistics 2017) and an area approaching 40 square miles, half of which is in the Green Belt.

3.2 Havering is located on the periphery of North East London. The area has good road and rail links. To the north and east the borough is bordered by the Essex countryside, to the south by a three mile River Thames frontage, and to the west by the neighbouring boroughs of Redbridge and Barking & Dagenham.

3.3 Havering has a lively cultural scene, centred on the Queen's Theatre and the Fairkytes Arts Centre. There is also a museum and Brookside Theatre in Romford town centre. The borough is also a great place to shop. In addition to Romford there are smaller local shopping centres across the borough.

3.4 The main centres of night time economy are:

- Romford town centre
- Hornchurch town centre
- Upminster town centre

3.5 A map of the London Borough of Havering is shown in Figure 1 below:

Figure 1: London Borough of Havering Transport Links & Shopping Hubs



3.6 Havering continues to have an aging profile which is older than London as a whole.

3.7 Havering together with Bromley are London's least diverse Boroughs. However, of all London Boroughs, Havering has had the highest percentage increase between the 2001 Census and the 2011 Census as the percentage of ethnic minority population has more than doubled, with the following ethnic groups seeing the highest increase:

- Black or Black British: African
- White Other, and
- Asian/ Asian British: Indian.¹

3.8 Havering Council views the changing demographics of the borough as a positive and will be proactive in helping all community groups to feel a sense of belonging.

Other Policies and Objectives

3.9 Other statutory obligations which fall outside the requirements of the Licensing Act 2003 may apply to the provision of any regulated activities at a premises and the responsibility for compliance lies with the licence holder

3.10 In October 2018 the Council adopted the following Community Cohesion and Equality Objective:

'To nurture and promote a cohesive, healthy and optimistic Borough underpinned by mainstreamed inclusive British values, where everyone experiences dignity and equal life chances, and where neighbours, colleagues and different community groups interact, respect and value each other, regardless of: age, class, colour, disability, education, ethnicity/race, gender, gender reassignment, health status, marital status, nationality, political perspective, religion, sexuality, or socio-economic status.'

Equality Act 2010

3.11 The Licensing Authority expects all operators to run their venues in an inclusive manner. It is recommended that licensees make themselves familiar with the requirements of the Equality Act 2010 for the access and provision of services for persons within the protected groups identified by the legislation.

3.12 The Equality Act 2010 provides a legal framework to protect the rights of individuals and advance equality of opportunity for all.

¹ Demographic and Diversity Profile of Havering's Population January 2015

3.13 As a public authority the Council must adhere to the Equality Act 2010. The Act also applies to any business that provides goods, facilities or services to members of the public including licensed premises such as pubs, bars, nightclubs and restaurants.

3.14 Under the Equality Act It is against the law to discriminate against someone because of:

- Age
- Pregnancy and Maternity
- Race
- Disability
- Gender
- Gender Identity
- Sexual Orientation
- Religion
- Marriage & Civil Partnerships

These are known as “Protected Characteristics”

3.15 Discrimination can come in one of the following forms:

- direct discrimination - treating someone with a protected characteristic less favourably than others
- indirect discrimination - putting rules or arrangements in place that apply to everyone, but that put someone with a protected characteristic at an unfair disadvantage
- harassment - unwanted behaviour linked to a protected characteristic that violates someone's dignity or creates an offensive environment for them
- victimisation - treating someone unfairly because they've complained about discrimination or harassment

3.16 Under section 20 of the Equality Act 2010 operators of licensed business such as pubs, bars, nightclubs and restaurants are also required to make reasonable adjustments to ensure that their premises are accessible to disabled people. A failure to do so will also amount to discrimination

3.17 It is important to note that the duty to make reasonable adjustments cannot wait until either a complaint is received or when someone with a disability wants to visit a particular your venue.

3.18 Havering's Vision

The Havering Plan is 'Cleaner, Safer, Prouder-Together'. Its vision from 2019 to 2020 is split across four priorities, opportunities, communities, places and connections.

Opportunities

Helping people get on in life by creating jobs and skills opportunities and building genuinely affordable homes

- Jobs and skills training
- Business growth
- Value for money
- Town centre improvements

Communities

Helping young and old fulfil their potential through high-achieving schools and by supporting people to live safe, healthy and independent lives

- Best start in life
- Stronger families
- Healthy and active
- Supporting the vulnerable

Places

Making sure that our neighbourhoods are a great place to live by investing in them and keeping them clean, green and safe with access to quality parks and leisure facilities

- Clean and safe
- Quality leisure facilities
- Great parks
- Genuinely affordable homes

Connections

Making it easier for people to get around and online by investing in road, transport links, faster internet and free Wi-Fi in town centres

- Road improvements
- Better public transport
- Broadband investment
- Digital access and skills

3.19 The Mayors Vision for London as a 24-hour City

3.20 Since the publication of the last Statement of Licensing Policy the Mayor of London has outlined his vision for London as a 24-hour city and has also appointed a Night Czar and a Night Time Commission to encourage the development of London as a vibrant, diverse, cultural city with a night time economy that is of global significance.

3.21 Currently Havering as an outer London Borough does not have a 24-hour economy and whilst the Mayor's vision will be considered and reflected in the licensing system in Havering, the authority recognises that these ambitions need to be balanced against the needs and wishes of the residents and other businesses and that the Authority's overriding duty is to promote the licensing objectives.

DRAFT

4. Expectations of applicants

4.1 The licensing objectives are at the heart of the licensing regime. Applicants must demonstrate in their operating schedules as part of an application how they will address each objective. The Licensing Authority will make decisions about applications, variations and reviews based on the promotion of the same objectives. Those making representations to the licensing sub-committee must base them on the licensing objectives.

4.2 It is for these reasons that Havering expects detailed and meaningful operating schedules that will enable all parties to understand what is being sought by an application, and if granted how the premises will operate. In completing the operating schedule, applicants are expected to have regard to this Statement of Licensing Policy which sets out the expectations of the Authority as to the steps that are appropriate for the promotion of the licensing objectives.

4.3 The completion of a full and detailed operating schedule will give those reading the application greater confidence that the applicant seeks to make a positive contribution and is demonstrating a commitment to both those living in the vicinity and the licensing objectives. Applicants are expected to:

- Demonstrate knowledge of the local area when describing the steps they propose to take to promote the licensing objectives;
- Undertake enquiries about the area in which the premises are situated to inform the content of the application;
- Obtain sufficient information to enable them to demonstrate, when setting out the steps they propose to take to promote the licensing objectives, that they understand;
 - The layout of the local area and physical environment including crime and disorder hotspots, proximity to residential premises and proximity to areas where children congregate.
 - Any risk posed to the local area by the applicants' proposed licensable activities;
 - Steps to protect vulnerable residents
 - Any local initiatives (for example, local crime reduction initiatives or voluntary schemes including local taxi-marshalling schemes, street pastors and other schemes) which may help to mitigate potential risks.
 - Any other relevant policies that the local authority has adopted.

4.4 Applicants are also expected to include positive proposals in their application as to how they will manage any potential risks.

4.5 Where specific policies apply in the area (for example, a Cumulative Impact Policy), applicants are also expected to:

- Demonstrate an understanding of how the Policy impacts on their application,
- Identify any measures they will take to mitigate the impact, and
- Confirm why they consider their application should be an exception to the Policy.

4.6 It is expected that enquiries about the locality will assist applicants when determining the steps that are appropriate for the promotion of the licensing objectives. For example, premises close to residential properties should consider how this will impact upon their smoking, noise management and dispersal policies, to ensure the promotion of the public nuisance objective. Applicants must consider all factors which may be relevant to the promotion of the licensing objectives and where there are no known concerns, acknowledge this in their application.

4.7 Lists of questions which should be considered in operating schedules are included in Appendix 3. A pool of model conditions which can also be of assistance is included at Appendix 4. Whilst applicants are strongly encouraged to consider these they should not be regarded as standard conditions and should be tailored according to the individual application and location and be used to inform the operating schedule. The mandatory conditions which are applicable to all licences depending on what is being licenced are attached as Appendix 5. By the use of a carefully considered operating schedule applicants can demonstrate that they have given thought to their application and the impact on the local environment.

4.8 An operating schedule forms the basis for conditions that will be placed on the licence. It should contain details relating to the promotion of the licensing objectives that are capable of being translated into enforceable conditions as, if there are no representations against the grant of the licence these will form the basis of the conditions. Conditions should not be added that duplicate other regulatory regimes as far as possible.

4.9 The failure by an applicant to clearly and fully demonstrate in the operating schedule that they have properly considered the promotion of the four licensing objectives is a legitimate concern should the application come before the licensing sub-committee.

5. Determination of Applications

5.1 This Licensing Authority when determining applications, authorisations and notices that have attracted relevant representations and review applications, will normally work within the framework of this Policy and also take into account the Guidance issued by the Department of Culture, Media and Sport under section 182 of the Act. However, this Licensing Authority reserves the right to depart from this Policy and the Guidance whenever it considers it correct and appropriate to do so.

5.2 If, during the period of this Policy new Guidance is issued by the Government such Guidance will be taken into account by the Licensing Authority even if it is not referred to in this Policy.

5.3 When an application has not attracted relevant representations, the Licensing Authority is compelled under the provisions of the Act to automatically grant the application without regard to this Policy. The only exceptions to this are applications for:

- The review of a Premises Licence or Club Premises Certificate;
- A minor variation of a Premises Licence or Club Premises Certificate; and an
- An application for the mandatory alcohol condition requiring a Designated Premises Supervisor in respect of a premises licence to be dispensed with for a community premises

5.4 In considering applications for new licences, club premises certificates, variations to existing licences and licence reviews the Licensing Authority will take the matters listed below into account:

- whether the premises is located in an area of cumulative impact;
- the type of premises and their cumulative impact on the area and the mix of premises in the area;
- the location of the premises and the character of the area;
- the views of the responsible authorities;
- the views of other persons;
- past compliance history of current management;
- the proposed hours of operation;
- the type and number of customers likely to attend the premises;
- whether the applicant is able to demonstrate commitment to a high standard of management, for example through active participation in Safe and Sound meetings.

5.5 All opposed applications (with the exception of certain minor variations) will be determined by the Licensing Authority's Licensing Committee or one of its Licensing Sub-Committees.

Remote Hearings

5.6 The coronavirus pandemic has necessitated the use of remote licensing hearings. However, the Licensing Act 2003 (Hearings) Regulations 2005 apply equally to hearings held "in person" and remote hearings. Therefore under Regulation 14(1) a remote hearing shall still take place in public and the local authority shall determine the procedure to be followed at the hearing under Regulation 21. A participant may also still be excluded on the grounds of public interest (Regulation 14(2)) and if they are disruptive (Regulation 25)

5.7 In addition *The Local Authorities and Police and Crime Panels (Coronavirus) Flexibility of Local Authority and Police and Crime Panel meetings (England and Wales) Regulations 2020* ("Flexibility Regulations") make it clear that hearings before a licensing sub-committee can be both public and remote.

5.8 Regulation 5(1) of the Flexibility Regulations states that a meeting (which under Regulation 3 includes a meeting of a local authority sub-committee) is not limited to a meeting of persons all of whom, or any of whom, are present in the same place. Any reference to a "place" where a meeting is held, or to be held, includes more than one place including electronic, digital or virtual locations such as internet locations, web addresses or conference call telephone numbers.

5.9 The council will conduct its remote licensing hearings in accordance with its "Protocol on the Operation of Licensing Sub-Committee Hearings during the COVID-19 Pandemic Restrictions". The protocol will be subject to regular review.

6. Cumulative Impact

6.1 The Licensing Authority will not adopt a 'cumulative impact' policy in relation to a particular area without having considered individuals and organisations listed in Section 5(3) of the Licensing Act 2003, i.e. those who have been consulted about this policy.

6.2 Having published a cumulative impact assessment the Licensing Authority must, within three years, consider whether it remains of the opinion set out in the assessment under section 5A of the Licensing Act 2003.

6.3 For areas where a cumulative impact policy is adopted, it creates a rebuttable presumption that applications for new premises licences, club premises certificates, or variation applications that will add to the existing cumulative impact, will normally be refused, unless the applicant can demonstrate why the operation of the premises involved will not add to the cumulative impact and not impact adversely on the promotion of the licensing objectives. The exception to this policy will be for applications for restaurants where alcohol is sold ancillary to a table meal and the terminal licensing hour is in line with the Policy.

6.4 It must be stressed that the rebuttable presumption created by the cumulative impact policy does not relieve responsible authorities or other persons of the need to make relevant representations. If there are no representations, the Licensing Authority must grant the application consistent with the operating schedule submitted.

6.5 This cumulative impact policy is not absolute. The circumstances of each application within the cumulative impact area will be considered upon its own merits and the Licensing Authority shall permit licences and certificates that are unlikely to add to the cumulative impact and not impact adversely on the licensing objectives.

6.6 Upon receiving representations in relation to a new or variation application the Licensing Authority will consider whether it would be justified departing from the cumulative impact policy in the light of the individual circumstances of the case. The impact of an application is expected to be different for premises with different formats and characteristics. If the Licensing Authority decides that an application should be refused, it will still need to show that the grant of the application would undermine one or more of the licensing objectives and that conditions or restrictions would be an ineffective solution.

6.7 Examples of applications that the Licensing Authority may consider as exceptional may include, though not are limited to:

- Small premises with a capacity of 50 persons or less only intending to operate during hours specified in section 12.

- Premises which are not alcohol led and operate only within the hours specified in section 12 such as coffee shops.

6.8 Examples of factors the Licensing Authority will **not** consider as exceptional include:

- Premises will be well managed and run
- Premises will be constructed to a high standard
- Applicant operates similar premises elsewhere without complaint
- Similar premises operate in the area.

7. Cumulative Impact Assessment

7.1 The Havering Community Safety Partnership produced a report titled 'London Borough of Havering Non Domestic Abuse Violence with Injury Problem Profile, May 2018'. The report was a twelve-month analysis and overview of Violence with Injury (Excluding Domestic Abuse) Offences, particularly outlining problematic hotspots and issues. The problem profile used the VLO (Victim, Location, and Offender) method of analysis.

7.2 This report has been used as the basis for the cumulative impact assessment. The report itself is not produced as an appendix to this policy as it is protectively marked confidential. However, its findings are summarised in sections 8, 9 and 10.

8. Special Cumulative Impact Policy for Romford Town Centre

8.1 The majority of late night licensed premises are concentrated within Romford Town Centre. A cumulative impact policy was adopted for this area under the previous Statement of Licensing Policy adopted on 7th January 2016.

8.2 The Havering Community Safety Partnership produced a report titled London Borough of Havering Non Domestic Abuse Violence with Injury Problem Profile, May 2018. It recognised that Romford is changing and that the night time economy is diversifying and growing. However, Romford Town ward was identified as the ward with the highest volume of violence with intent (VWI) offences in Havering. The timings and locations of the reported incidents indicated that many of these problems were linked to licensed premises.

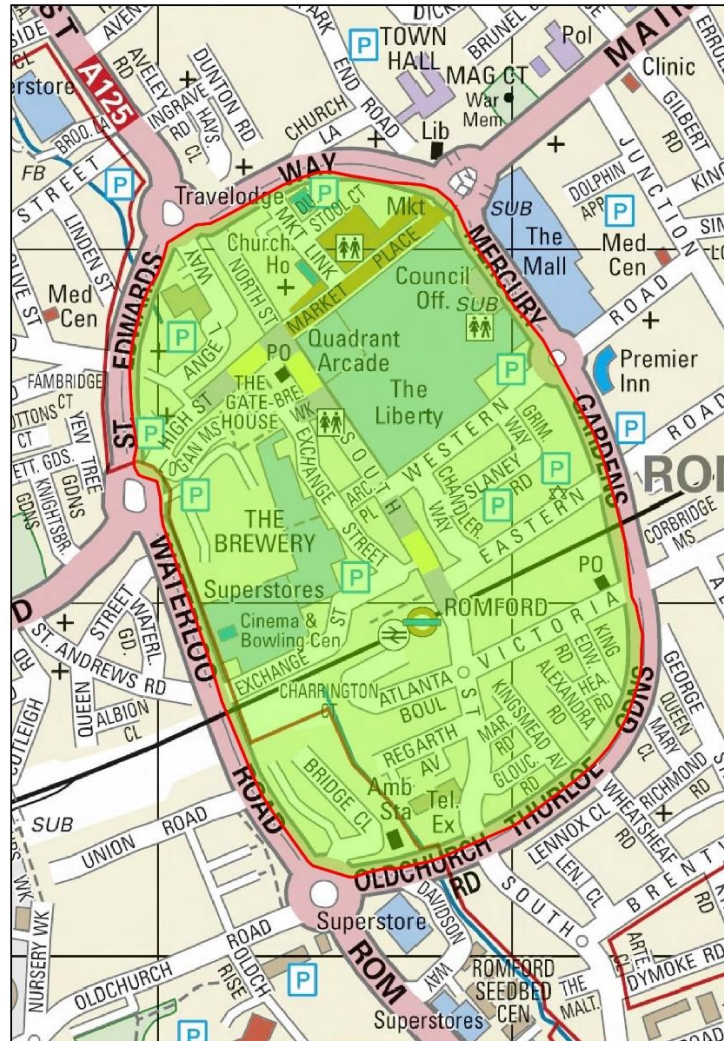
8.3 Common assault committed in Romford Town centre accounted for 20% of all incidents in the borough. 15% of those common assault offences occurred between peak hours of 2100hrs and 0400hrs on Friday, Saturday and Sunday.

8.4 In January 2017, Romford Town/Havering was chosen as one of 33 areas to work with the Home Office as part of a 'Local Alcohol Action Area' to target alcohol related harms. A Public Spaces Protection Order (PSPO) is also in force within Romford Town Centre which seeks to restrict alcohol related nuisance.

8.5 On the basis of the above evidence the Licensing Authority is of the view that the number, type and density of premises selling alcohol for consumption on and off the premises and the provision of late night refreshment within the ring road is having a cumulative impact and undermining the licensing objectives. It is likely that granting further licences would be inconsistent with the authority's duty to promote the licensing objectives and a cumulative impact policy has been adopted in this area.

8.6 The area covered by the policy is shown in figure 2 overleaf.

Figure 2-Romford Town Cumulative Impact Zone



© Crown copyright and database rights 2019 Ordnance Survey 100024327

9. Special Cumulative Impact Policy for Hornchurch Town Centre

9.1 Hornchurch Town Centre houses the second biggest day and night time economy in Havering. A cumulative impact policy was adopted for this area under the previous Statement of Licensing Policy adopted on 7th January 2016 which covered all of the St Andrews Ward.

9.2 In the Havering Community Safety Partnership report, London Borough of Havering Non Domestic Abuse Violence with Injury Problem Profile, May 2018, temporal analysis showed that 46% of VWI offences in Hornchurch occurred between 2100hrs and 0200hrs. 57% of offences occur on Friday, Saturday and Sunday.

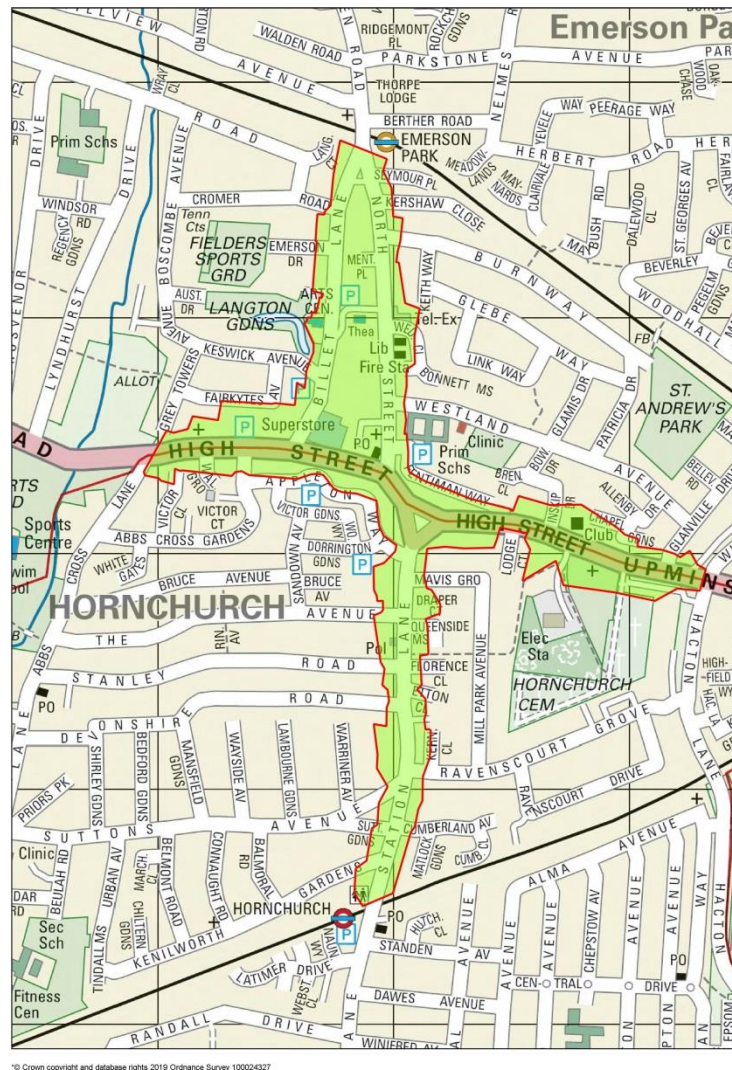
9.3 It identified the main hotspot as the High Street which locates a number of bars and pubs. A large proportion of the offences were reported in, and in close proximity to, licensed pubs and clubs.

9.4 On the basis of the above evidence the Licensing Authority is of the view that the number, type and density of premises selling alcohol for consumption on and off the premises and the provision of late night refreshment around the High Street is having a cumulative impact and undermining the licensing objectives. It is likely that granting further licences would be inconsistent with the authority's duty to promote the licensing objectives and a cumulative impact policy has been adopted in this area.

9.5 The size of the cumulative impact zone has been reduced from the previous Licensing Policy and rather than cover all of the St Andrews ward is now focussed on Hornchurch Town Centre. It covers the High Street, Station Lane, Billet Lane, North Street and part of Upminster Road.

9.6 The area covered by the policy is shown in figure 3 overleaf.

Figure 3- Hornchurch Cumulative Impact Zone



10. Special Cumulative Impact Policy for Gooshays

10.1 Unlike Hornchurch and Romford, Gooshays is not a major night time economy. A cumulative impact policy was adopted for this area under the previous Statement of Licensing Policy adopted on 7th January 2016

10.2 In the Havering Community Safety Partnership report, London Borough of Havering Non Domestic Abuse Violence with Injury Problem Profile, May 2018 Gooshays was identified as the ward with second highest amounts of VWI reports to the police in 2017.

10.3 As this area does not house a night time economy environment it is important to understand why this area ranks high in the number of incidents. It also shows as a hotspot in London Ambulance assault data. A hypothesis is that this area is one of Havering's areas which has the lowest deprivation index and thus this has an impact of the level of violent crime experienced in this area.

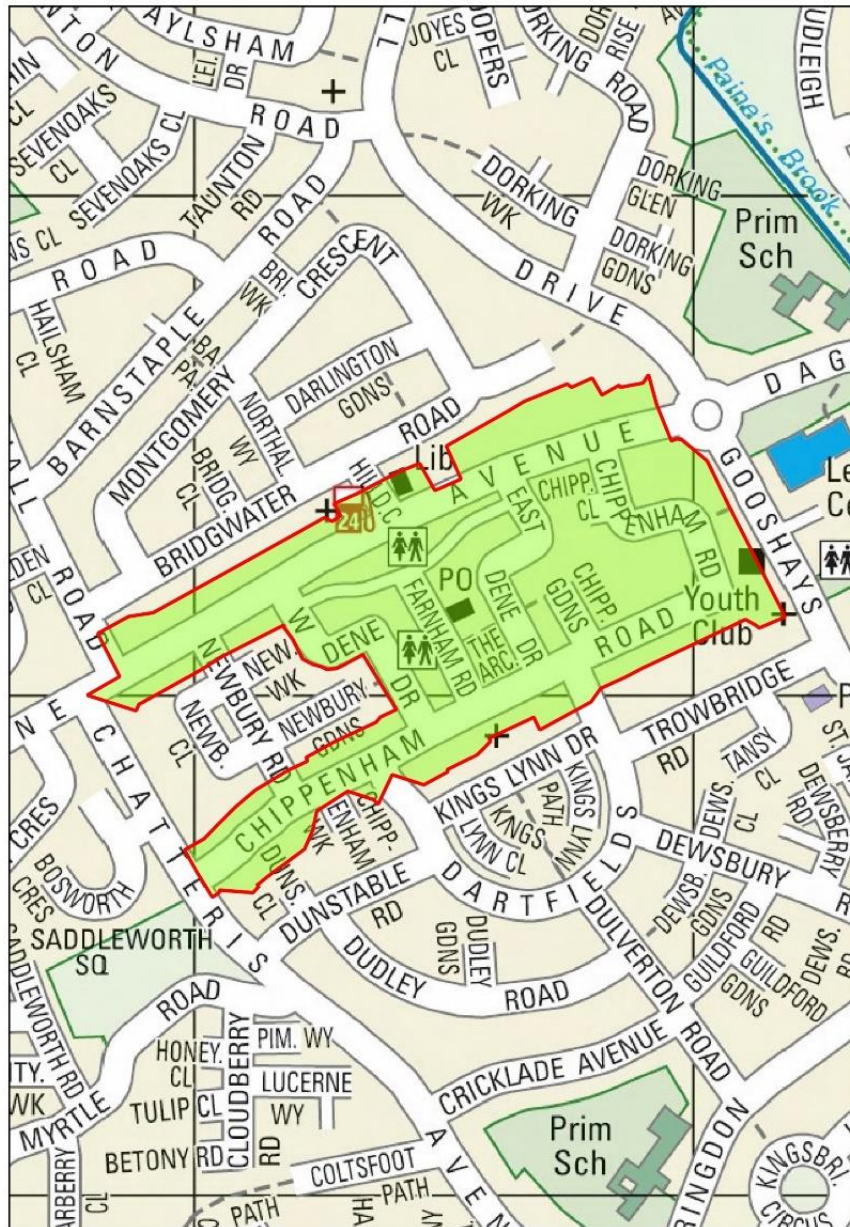
10.4 One hotspot was identified within the Gooshays ward where incidents appeared linked to licensed premises. This was the Farnham Road/ Hilddene Avenue where a number of assaults were reported within licensed retail establishments.

10.5 On the basis of the above evidence the Licensing Authority is of the view that the number, type and density of premises selling alcohol for consumption off the premises around the Farnham Road/Hilddene Avenue area is having a cumulative impact and undermining the licensing objectives and a cumulative impact policy has been adopted in this area. It is likely that granting further licences would be inconsistent with the authority's duty to promote the licensing objectives and a cumulative impact policy has been adopted in this area.

10.6 None of the premise identified in the report relate to on sales or late night refreshment and therefore the cumulative impact policy for the Gooshays area is restricted to off sale premises only.

10.7 The area covered by the policy is shown in figure 4 overleaf.

Figure 4 Gooshays Cumulative Impact Zone



© Crown copyright and database rights 2019 Ordnance Survey 100024327

11. Development Management

11.1 The Licensing Authority considers that, in the interests of clarity and transparency, applicants should normally have in place the relevant planning consent for the intended use and hours of operation, or otherwise have lawful planning status, before making an application for a premises licence. However, every application will be considered on its merits on a case by case basis.

11.2 Licensing and planning controls are two different regimes which operate independently and licensing committees are not bound by decisions made by a planning committee and vice versa.

However the relationship between the two, especially as seen by the community, can cause confusion and lack of confidence in the fairness of process and outcome. That is particularly so where there results a mis-match between controls with which the operator is obliged to comply within the respective regimes. For example, if there is a variance between the hours given under the licence and those permitted by the planning permission the earlier hours will apply.

11.3 This Policy is simply to promote clarity of process and so complies with the Guidance. Generally, any premises for which a licence is required must also have an appropriate authorised use under planning law

The planning permission for a premise determines its use and often its hours of operation. If this is not in place at the time the licence application is heard, there may be a conflict between the two and the applicant will be required to comply with any planning permission granted.

11.4 Applicants for Premises Licences should include information in respect of planning permission for the subject premises. Where there is no planning permission for the proposed use in place, applicants should include information regarding any planning applications being submitted, or any outstanding appeal or appeals against the refusal of planning consent.

11.5 Applicants are also advised to seek planning advice before submitting applications for a Premises Licence where there is no planning permission in place for the proposed use. Planning advice may also be appropriate before an application to vary an existing Premises Licence is made. Where no planning consent is in place, applicants should, in appropriate circumstances, consider seeking a Provisional Statement under section 29 of the Licensing Act 2003.

11.6 Applicants should note that the grant of a Premises Licence is not also the grant of Planning Permission. Where premises are being used without the benefit of Planning Permission, the Local Planning Authority will take enforcement action by the service of an Enforcement Notice, Breach of Condition Notice, seeking an Injunction, or the service of a Stop Notice and will consider all other measures available to the

Authority to abate the unlawful use without planning consent, including Closure Orders under the Anti-Social Behaviour Act 2014.

11.7 Applicants are advised that the Local Planning Authority is a Responsible Authority under the 2003 Act and is able to make representations against all applications on planning grounds and thereby make representations in respect of any of the 4 overriding objectives of the Licensing Act 2003.

11.8 In framing this policy the Council acknowledges that it must ensure the lawful operation and independence of the Licensing and Planning control regimes.

12. Licensing Hours

12.1 When dealing with new and variation applications the Licensing Authority will give more favourable consideration to applications with the following closing times:

Public Houses and Bars	23:00 hours Sunday to Thursday Midnight Friday and Saturday
Nightclubs	01:00 hours Sunday to Thursday 02:00 hours Friday and Saturday
Restaurants and Cafes	23:00 hours Sunday to Thursday Midnight- Friday and Saturday
Off licences	23:00 Monday to Sundays
Hot food and drink supplied by takeaways, fast food premises	Midnight- Sunday to Thursdays 01:00 Friday and Saturday
Hotel residents only	24 hours sale of alcohol for on sales only

12.2 Consideration will also be given to the type of area that the premises is located in with regulated activities normally being permitted until 23.30 in residential areas and 00.30 in mixed use areas.

12.3 These hours are not pre-determined and each application will be considered on its merits.

12.4 The above hours are intended to guide applicants on the Licensing Authority's expectations when preparing their operating schedules. The above hours are not pre-determined and each application will be considered on its merits. The evidence to support these hours is from the Licensing Strategy and front line officer reports.

12.5 For applications within the above hours there is no presumption that the application will automatically be granted in all cases where a relevant representation has been made. If no representations are received, the application will be granted by the licensing authority under delegated powers.

12.6 Applicants who wish to provide licensable activities outside the hours specified above should ensure that the operating schedule specifies detailed measures to militate against crime, disorder and public nuisance taking into account:

- The location of the premises and the character of the area in which they are situated
- The proposed hours during which licensable activities will take place
- The adequacy of the applicant's proposals to prevent crime and disorder and prevent public nuisance
- Whether customers have access to public transport when arriving at or leaving the premises
- The proximity of the premises to other licensed premises in the vicinity and the hours of operation of those other premises policies and proposals for the orderly dispersal of customers.

13. Standards of Management

The Operating schedule

13.1 When assessing the applicant's or licence holder's ability to demonstrate a commitment to high standards of management the Licensing Authority will take into account whether they

- Can demonstrate comprehensive knowledge of best practice
- Has sought advice from the responsible authorities
- Has implemented any advice that has been given by the responsible authorities
- Is able to understand verbal and written advice and legal requirements
- Can demonstrate knowledge of the licensing objectives, relevant parts of the Licensing Policy and their responsibilities under the Licensing Act 2003
- Is able to run their business lawfully and in accordance with good business practices
- Is able to demonstrate a track record of compliance with legal requirements.

13.2 Where there is a history of non-compliance associated with the premises applicants will need to establish evidence of improvement in management standards and procedures.

13.3 The Licensing Authority seeks to promote mixed use premises with alcohol sales being offered to customers alongside food. Applications for premises providing

a seated environment for customers are encouraged. Applications for premises whose predominant offer is vertical drinking are not encouraged and the operating schedule for such applications will be expected to demonstrate robust arrangements for promoting the licensing objectives.

14. Alcohol induced crime and disorder and antisocial behaviour

14.1 The Licensing Authority expects licence holders to operate to the highest standards of management, and to cooperate with responsible authorities to prevent:

- The sale of alcohol to underage children;
- Drunkenness on premises;
- Irresponsible drinks promotions.

14.2 Where the Licensing Authority receives representations from responsible authorities that the management of a premise is supporting such activities, or that there is strong evidence linking patrons with alcohol related crime, disorder or antisocial behaviour the Licensing Authority will consider reviewing the licence.

14.3 Licensing enforcement is a multi-agency activity and it is important that work is coordinated between agencies to deliver solutions. The need for intervention will be risk based and take full account of data, intelligence and information available to both the Council and partners.

14.4 Where appropriate the Licensing Authority will consider imposing controls on products sold where representations indicate localised problems. This provision could include removing the sale of super strength beer, lager and cider in premises as part of a package of measures to deal with the problems associated with street drinking.

15. Use of toughened glass and polycarbonates

15.1 The Licensing Authority seeks to encourage the use of toughened glassware and polycarbonate on a risk based approach in licensed premises.

15.2 The Licensing Authority will consider imposing a condition prohibiting the sale of alcohol in annealed glass containers (glasses and bottles) and require the use of polycarbonate or other safer alternatives where:

- Local needs dictate
- A relevant representation is received
- The premises is operating beyond midnight
- The licence permits drinking outside.

15.3 Evidence indicates that the majority of incidents with lacerations from annealed glass occurring inside licensed premises are accidents. However some are malicious and cause horrific injuries and lifetime scarring.

15.4 Outside premises, glass containers, as well as being potential weapons, add to street debris, pose risks to street cleaners and pedestrians and generally undermine the objective to minimise public nuisance.

15.5 The Licensing Authority believes that the use of safer alternatives to annealed glass will help promote public safety and the prevention of crime and disorder in licenced venues.

15.6 The Licensing Authority will take into account the nature of the venue when considering imposing conditions restricting the use of glass, including the uses of bottled drinks. Considerations will include:

- The type of venue
- The customer base
- The hours of operation
- The standard of management demonstrated by the current licensee
- The history of alcohol related crime and disorder associated with the premises
- The extent to which drinking is permitted outside
- The licensee's risk assessment
- The views of the local police

16. Drugs Policy

16.1 The Licensing Authority will normally expect the submission of a Drugs Policy as part of the operating schedule for applications for new premises licences and for variations to existing premises.

16.2 The Licensing Authority requires licensees of all venues to take reasonable steps to:

- Prevent entry of drugs into licenced premises
- Prevent drugs changing hands within the premises
- Understand the signs of drug misuse in people so that practical steps can be taken to deal with any instances that occur
- Have appropriately trained staff to deal with drug related incidents.

17. Noise

17.1 The Licensing Authority is committed to protecting the amenity of residents and businesses in the vicinity of licenced premises, particularly when late hours have been sought. Where relevant representations are received, the Licensing Authority will request appropriate restrictions or controls on the licence to support the prevention of undue noise disturbance from licensed premises.

17.2 The Licensing Authority will seek to balance the protection of residents from undue disturbance against noise and the activity that is the natural by-product of people going about their business, entertainment or leisure.

17.3 The Licensing Authority expects that premises intended for the provision of noise-generating licensable activities are acoustically controlled and engineered to a degree where the noise from the premises when compared to the ambient noise level will not cause undue disturbance. The Licensing Authority recognises specific difficulties associated with premises structurally linked to would be licensed premises and the limit of sound insulation performance that can be achieved. In some circumstances licensed premises adjoining residential properties may not be appropriate.

18. Smoking, Drinking and eating outside

18.1 The Licensing Authority recognises that where gardens and tables and chairs are provided for smoking, eating and drinking outside, users can cause nuisance.

18.2 Where smoking, eating and drinking take place outside, the Licensing Authority expects applicants to provide comprehensive details in their operating schedule on:

- The location of outside areas to be available for use
- How the outside areas will be managed to prevent noise, smell and pavement obstructions

18.3 The provision of tables and chairs outside the premises, either on the highway or private land, and the provision of beer gardens, can enhance the attractiveness of the venue. It can have the benefit of encouraging a continental style café culture and family friendly venues. However, late at night, tables and chairs and beer gardens can cause significant public nuisance to residents whose homes overlook these areas.

18.4 The London Borough of Havering has yet to adopt a Street Trading Policy but is considering one in the future. Applicants must ensure that outdoor areas comply with any Street Trading Policy in force and that structures on the highway have the necessary planning permissions.

18.5 Where the Licensing Authority receives representations or a review application regarding the use of an outside area it may seek restrictions or conditions that are appropriate for preventing a public nuisance.

19. Dispersal policies

19.1 The Licensing Authority will normally require all licensed premises to be cleared of patrons within a reasonable period, usually 30 minutes, after the end of the time permitted for licensable activities. A dispersal policy is recommended for an application for a new late night premises licences or variation application but each application will be considered on its own merits.

19.2 The general principle will be that the carrying on of licensable activities at premises should cease some time before the end of the operational hours to allow for the premises to be cleared of patrons in a gradual and orderly manner. The Licensing Authority recognises that the time required for clearing premises of patrons will differ from business to business depending on the type of licensable activities provided and the nature of the clientele. It is for applicants themselves to judge what time scale is reasonable however, the Licensing Authority recommend that between 30 minutes and one hour would be sufficient for the majority of businesses. Operating schedules should detail the applicant's proposals for clearing the premises which could include arrangements such as:

- The provision of food
- Issuing customers leaving the premises with lollipops and boiled sweets
- The management of the lighting as well as the nature and tone of the music
- The balance between the continued sale of alcoholic drinks and the availability of non-alcoholic beverages
- Arrangements for accessing transport for customers
- Signage advising patrons to leave premises quietly

19.3 It is recognised that licensing law is not the primary mechanism for the general control of nuisance and anti-social behaviour by individuals once they are away from the licensed premises and, therefore beyond the direct control of the individual, club or business holding the licence, certificate or authorisation concerned.

20. Deliveries

20.1 Licence holders and applicants are encouraged to consider whether early morning deliveries and collections at their premises could potentially result in public nuisance and to introduce measures to minimise the impact where appropriate. The Licensing Authority recognises that refuse collection times can sometimes be outside the control of the premises licence holder.

20.2 When representations have been received from residents in the vicinity of licensed premises stating that they are being disturbed by early morning collections and deliveries, the applicant or premises licence holder is encouraged whenever possible to renegotiate different times with the relevant contractor and to liaise with local residents where appropriate to seek agreement on acceptable hours.

21. Children and Licensed premises

21.1 The Licensing Authority will require measures to protect children from harm to be reflected in the operating schedule, having regard to their type of premises or licensable activities.

21.2 Applicants for premises licences and club premises certificates authorising the admission of children without accompanying responsible adults will be required to submit a safeguarding children protection policy detailing the steps to be taken to ensure that children in their charge will be protected from harm when on licensed premises or engaged in activities relating to the licence.

21.3 The Licensing Authority is keen to promote family friendly licensed premises and to encourage premises where families are welcomed and where suitable entertainment is provided. The Licensing Authority supports the provision of entertainment specifically for children, and wishes to encourage both occasional events for children and licensees making their premises available for hire to organisations for this purpose.

21.4 When considering applications from premises intending to offer regulated entertainment, where it will be lawful and not contrary to this Policy for children to be admitted without an accompanying responsible adult, the licensee will be required to provide adequate numbers of adult staff to ensure the safety and wellbeing of the admitted children during an emergency. Details of the licences arrangements must be included in the operating schedule.

21.5 Where appropriate, operating schedules must detail steps taken to limit unobserved contact between employees and children and to limit or prevent access to inappropriate websites where internet access is offered.

21.6 The Licensing Authority recognises that children are one of the most vulnerable groups in our society and that some activities associated with licensed premises are not appropriate for children. The Licensing Authority will be looking for management arrangements to be in place to address this. Following relevant representations, it will consider the imposition of additional controls by way of licence conditions where activities take place on the premises may present a risk of physical, moral or psychological harm to children. It will also look for strict controls in place to prevent the sale of alcohol to underage children.

21.7 The following circumstances are considered to present a risk to children, and therefore may be subject to additional controls following relevant representations:

- Where the current management, personnel working at the premises or licences have been associated with convictions for serving alcohol to underage children or have a reputation for allowing underage drinking;
- Where there are concerns about drug taking or drug dealing on the premises;
- Where there is a strong element of gambling on the premises;
- premises where events in which entertainment of an adult or sexual nature is provided;
- Premises where the supply of alcohol for consumption on the premises is the exclusive or primary purpose.

21.8 Requirements may include:

- Limitations on the hours when children, or children under certain age limits will be allowed access;
- Limitations on the parts of premises that children will be allowed access;
- Limitations or exclusion when certain activities are taking place
- Full exclusion of people under 18 from the premises where any licensable activities are taking place
- The need for accompanying adults at all or various times
- The requirement for proof of age cards or other age identification to prevent the purchase of alcohol by minors;
- A safeguarding children policy;
- All staff to hold an up to date disclosure and barring record checks (DBS).

22. Children and Alcohol

22.1 The Licensing Authority is committed to tackling the illegal sale of alcohol to children, including proxy sales when adults buy alcohol for children.

22.2 The Licensing Authority expects licence holders to implement measures such as Challenge 25, the use of till prompts, refusal registers and regular staff training to reduce the likelihood of underage sales from their premises. It will take appropriate action, including review of licenses, where sales persist.

22.3 Premises within 400 metres of schools or colleges should consider licence conditions to control the products being offered for sale and the items on display in windows that may be viewed by passers-by.

23. Mental Health and Wellbeing

23.1 Havering's licensing authority seeks to operate wherever possible in accordance with the s.182 Guidance to the Licensing Act 2003 and other relevant guidance on related issues. Further to public health, the Licensing Authority aligns itself with Havering Health and Wellbeing Board Strategy. This is a multiagency partnership established under the Health and Social Care Act 2012, with representation from LBH, CCG, Healthwatch Havering, Barking, Havering and Redbridge University Hospitals NHS Trust (BHRUT) and the North East London NHS Foundation Trust (NELFT). The role of the Director of Public Health is as statutory chief officer of the local authority and principal adviser on all health matters to elected members and officers and includes helping to promote the health and wellbeing of the borough's population. Such a role also includes activities conducted in commercial premises and particularly licensed premises.

23.2 The Licensing Authority recognises its duty to promote the four licensing objectives. This duty also extends to the licence holders who operate in the borough. We all need to ensure the successful promotion of the licensing objectives.

23.3 Licensed premises often have regular and repeat customers who, over time, may demonstrate behaviour that might suggest they have care and support needs. Havering's Licensing Authority does not expect all staff members on licensed premises to have expert knowledge with regard to assessing the mental health of its customers. The Licensing Authority does expect, however, that an application for a premises licence should acknowledge this duty and provide positive proposals further to assessing the general wellbeing of its customers.

23.4 An adult with care and support needs is someone who is in need of community care services due to disability, age or illness. They may be unable to take care of or protect themselves against significant harm or exploitation. Havering's Licensing Authority therefore expects that licence holders and staff who work in licensed premises should ask themselves the following questions when coming into contact with children, young people or adults with apparent care and support needs:

- Does your customer have any physical signs of abuse or neglect?
- Does the appearance of the customer lead you to suspect they may be homeless?
- Are they a regular customer? Do you see changes in their behaviour or mood?
- Has the customer told you they are having difficulties with someone else?
- Has the customer told you they have concerns about someone else?

- Has the customer told you they have harmed someone else?
- Do you know something that causes concern about someone else's welfare?
- Have you seen worrying behaviour towards someone else?

23.5 If the answers to any of the questions above gives any staff member cause for concern it may be necessary to take action to protect the adult or child concerned.

23.6 The first priority will be for the welfare of the adult or child, to ensure their safety. This may include reporting concerns to the police if immediate action is required or to Havering's Adult Social Services, Safeguarding Adults Team on 01708 433550 or the Child Protection Team on 01708 433222. Out of hours referrals can be made on 01708 433999. In an emergency contact the police (999) or non-emergency 101.

24. Adult Entertainment

24.1 The Licensing Authority expects all applicants and licensees intending to provide adult entertainment to include the relevant details in their operating schedule, including controls they intend to put in place.

24.2 When considering applications which include adult entertainment, the Licensing Authority will take into account the nature of the area, the marketing, advertising arrangements and external views of the premises together with other factors proposed by the proprietor to militate against concerns.

24.3 Premises providing adult entertainment on a regular basis will be subject to the licensing regime for Sexual Entertainment Venues. Applicants should refer to the current national guidance and the London Borough of Havering Sex Establishment Licensing Policy for more information. Premises licensed under the Licensing Act 2003 that are exempt from this regime will be subject to the following paragraphs of this Policy.

24.4 The location of the premises will be an important factor as it can impact on all four of the licensing objectives. The Licensing Authority will consider whether applications for new and variation premises licences that are located in close proximity to sensitive premises should be granted, such as:

- Residential accommodation,
- Schools,
- Children's and vulnerable persons' centres,
- Religious centres and public places of worship,
- Youth and community centres,

24.5 Each application will be decided on its own merits and will depend upon the type of adult entertainment that is proposed and the applicant's ability to demonstrate the high standards of management.

24.6 The Licensing Authority considers adult entertainment to include activities such as topless servers, striptease and table dancing or any activity performed partially clothed or naked.

24.7 If relevant representations are received, the Licensing Authority will not normally grant a licence unless:

- The premises operating schedule specifies adequate arrangements for prohibiting children under the age of 18 from entering the premises;
- The premises operating schedule specifies adequate arrangements for preventing crime and disorder and preventing public nuisance;
- The adult entertainment cannot be seen from the street
- The adult entertainment is in a designated area of the premises with segregation from the audience
- The adult entertainment is in a position where the performers will have direct access to dressing room without passing through or come into close proximity to the audience
- There is no external advertising of adult entertainment either at the premises or in its immediate vicinity.

25. Illicit Goods

25.1 The Licensing Authority will consider licence review applications where there is evidence that illicit alcohol has been offered for sale on the premises. Where other illicit goods, such as tobacco, have been found this may be considered by the Licensing Authority as evidence of poor management.

25.2 The Licensing Authority's approach is that the supply of illicit goods will be taken seriously as these matters undermine the licensing objectives. Licensees supplying illicit goods can expect the Licensing Authority to impose additional controls and run the risk of losing their licence.

26. Counter Terrorism

26.1 The Licensing Authority expects applicants to have protective security plans that demonstrate how they will manage the threat from a terrorist attack. This is particularly important for venues that operate as part of the night-time economy.

26.2 As part of these plans the Licensing Authority expects applicants to have training in place for its staff in relation to counter terrorism.

26.3 Up to date guidance on increasing the protection of crowded places from terrorist attack can be found on the gov.uk website.

27. Temporary events

27.1 Where events qualify for a temporary events notice (TENS), applicants are encouraged to submit notifications at least four weeks prior to, but not more than 12 weeks before the date of the proposed event.

27.2 When considering objections to temporary event notices from the Police or Environmental Health, the Licensing Authority will take the following factors into account:

- Circumstances of the objection
- The applicant's willingness to comply with the conditions attached to the premises licence
- History of complaints
- The track record of the applicant
- Any other proposed control measures.

27.3 The Licensing Act 2003 provides for certain occasions when events organised for less than 500 people and each lasting for no more than 168 hours can take place, following the notification of such events to the Licensing Authority, Environmental Health and the Police. Only Environmental Health and the Police can object to the temporary event notice if they are of the opinion that the event is likely to undermine the licensing objectives.

27.4 Although the statutory legal minimum time required for notification of a temporary event to the Licensing Authority and the Police is 10 working days, or 5 days for a late temporary event notice, it is essential that adequate notice is given to allow for proper consideration of the proposed event in order to ensure that all the legal requirements for the authorisation have been met. Statutory guidance allows the Licensing Authority to publicise its preferred timescale for notification and this is indicated above. The increased timescale will allow more time to resolve issues rather than see organisations faced with the cost of cancelling late because there is insufficient time to address representations.

27.5 "Ten working days" notice means ten working days exclusive of the day on which the event is to start and exclusive of the day on which notice is given. Five working days in respect of late TENS means five working days exclusive of the day on which the event starts and exclusive of the day on which the notice is given.

28. Provisional statements

28.1 In considering an application for a provisional statement the LA will, as far as is reasonably practicable, apply the same standards as required for the grant of a premises licence.

28.2 Provisional statements provide limited assurance to prospective proprietors of licensed premises that an application for a premises licence in respect of specific premises or licensed activities will be likely to succeed. The Licensing Authority recognises that these may be necessary for the promotion of investment and employment opportunities in the borough. Applications for provisional statements must include the particulars of the premises (including plans), describe the works to be done and the licensable activities planned.

28.3 The granting of a provisional statement has the effect of precluding representations from being made to the subsequent premises licence application save in very exceptional circumstances. Applicants are encouraged to seek to convert their provisional statements to premises licences at the earliest opportunity. The longer the delay before a premises licence is applied for the greater the potential for representations made in respect of an application for a premises licence not to be excluded.

29. Enforcement

29.1 The Authority will adopt a risk-based inspection programme as recommended by the Guidance issued under 182 of the Licensing Act 2003 for Licensing Authorities. This will be based on:

- The licensing objectives
- Relevant codes of practice
- Guidance issued by the Home Office
- The principles set out in this statement of licensing policy
- The enforcement policy, intelligence and complaints.

29.2 High risk rated premises may be those where there are factors such as reports of underage sales or previous breaches of premises licence conditions and codes of practice. Low risk rated premises will generally be those which have demonstrated compliance with premises licence conditions and codes of practice.

29.3 The Licensing Authority will consider the full range of powers available to it when a review of a premise licence becomes necessary, including:

- Restricting hours of operation
- Removing licensable activities from the premises licence
- Imposing additional conditions
- Requiring the removal of a designated premises supervisor

- Suspending a licence
- Revoking a licence

29.4 The Licensing Authority believes that the promotion of the licensing objectives is best achieved by mutual cooperation between all stakeholders. Reviews will therefore be mainly reserved for circumstances where early warnings of concerns and the need for improvement have gone unheeded by the management of the licensed premises.

29.5 Reviews of licences may be triggered at any stage by responsible authorities or interested parties because of a matter arising at the licensed premises and relating to one or more of the four licensing objectives. Reviews may also become necessary following the service of a closure order by the police or any formal enforcement action by officers of the local authority.

29.6 Where a licence is revoked, any new application for the premises will be considered against the Policy and will be considered on its own merits.

30. COVID 19

30.1 The United Kingdom is currently experiencing a public health emergency as a result of the COVID 19 pandemic. As such it is critical that businesses take a range of measures to keep everyone safe.

30.2 To help you decide which actions you must take you must carry out an appropriate COVID 19 risk assessment just as you would for other health and safety hazards.

30.3 Up to date guidance can be found on the gov.uk website which details what steps are needed to ensure your premises are COVID secure. Failure to complete a risk assessment which takes account of COVID 19, or completing a risk assessment but failing to put in place sufficient measures to manage the risk of COVID 19, could constitute a breach of health and safety law.

31. Scheme of delegation

MATTER TO BE DEALT WITH	FULL-COMMITTEE	SUB-COMMITTEE	OFFICERS
Application for personal licence	N/A	If a representation made	If no representation made
Application for personal licence, with unspent convictions	N/A	If police objection made	All other cases
Application for premises licence/club premises certificate	N/A	If a representation made	If no representation made
Application for provisional statement	N/A	If a representation made	If no representation made
Application to vary premises licence/club registration certificate	N/A	If a representation made	If no representation made
Application to vary designated premises supervisor	N/A	If a police representation	All other cases
Determination of request to be removed as designated premises supervisor	N/A	If a police representation	All other cases
Application for transfer of premises licence	N/A	If a police representation	All other cases
Application for Interim Authorities	N/A	If a police representation	All other cases
Application to review premises licence/club premises registration	N/A	All cases	N/A
Decision on whether a representation is irrelevant, frivolous, vexatious, etc	N/A	N/A	All cases
Determination of a police or environmental health representation to a temporary event notice	N/A	All cases	N/A
Determination as to what constitutes an application for a Minor variation to vary premises license/club premises certificates and determination of such applications	N/A	N/A	All cases

Appendix 1

Glossary of Terms

These definitions are provided to aid understanding of the draft Policy. They do not replace the meaning given to the terms in the Act or the statutory guidance.

Reference should therefore be made to these publications to clarify any of these terms for legal purposes.

- **Adult entertainment.** It is not possible to give an exhaustive list of what amounts to entertainment or services of an adult or sexual nature. Applicants and responsible authorities need to apply common sense to this matter. However, such entertainment or services, for example, would generally include topless staff, striptease, lap dancing, table dancing or pole dancing, performances involving significant violence or horrific incidents, feigned or actual sexual acts or fetishism, or entertainment involving strong and offensive language.
- **Alcohol** includes spirits, wine, beer, cider, or any other fermented, distilled, or spirituous liquor of or exceeding 0.5% alcoholic strength at the time of sale
- **Children.** There are several definitions of children under the Licensing Act 2003. A child is defined for the purposes of section 145 of the Act as an individual aged under 16. For the purposes of the Act, children are considered to be unaccompanied if they are not in the company of an individual aged 18 or over. The Act makes it an offence to allow unaccompanied children on premises used exclusively or primarily for the supply of alcohol for consumption on the premises. It is also an offence to allow unaccompanied children under 16 at other premises supplying alcohol for consumption on premises with a premises licence, club premises certificate or temporary event notice between 00:00 and 05:00. Section 146 of the Licensing Act 2003 on sale of alcohol to children makes it clear that the sale of alcohol to any individual under 18 is an offence. In section 20, for the purposes of the exhibition of film, children mean persons under 18.
- **Club Premises or Qualifying Clubs** can supply alcohol to members or guests and can provide regulated entertainment. These clubs must comply with general and specific conditions in relation to size, membership and the nature of their operations.
- **Combined use premises.** Premises that operate as multi-use premises where there is more than one use and the uses are not dependent on, or part of, the other uses, i.e. ancillary to them. Examples include: café/bar/nightclub; restaurant/nightclub; public house/restaurant; bar/performance venue, etc. These types of premises sometimes operate in different ways throughout the day and night and may vary their operation over the days of the week.

- **Designated Premises Supervisor** is a personal licence holder who is for the time being specified in the premises licence as the Premises Supervisor. This may be the premises licence holder or another person.
- **Karaoke.** Singing by members of the public to musical backing or accompaniment. This usually involves pre-recorded music and members of the public singing in series.
- **Late night refreshment** premises a person providing late night refreshment at any time between the hours of 23:00 and 05:00. This consists of the supply of hot food or hot drink to members of the public, or a section of the public, on or from any premises, whether for consumption on or off the premises. (Schedule 2, Licensing Act 2003).
 - Licensable activities those activities under the Licensing Act 2003 which require a licence from the Licensing Authority (Council) include the following:
 - The sale by retail of alcohol
 - The supply of alcohol by or on behalf of a club to, or to the order of, a member of a club
 - The provision of regulated entertainment
 - The provision of late night refreshment.
- **Licensing Committee** is a committee of 10 to 15 councillors, appointed by the Council.
- **Licensing Sub-Committee** is a committee of three councillors appointed from the licensing committee to whom the functions of the licensing committee can be delegated under the Act.
- **Personal Licence** permits individuals to supply, or to authorise the supply of alcohol. The licensing of individuals separately from the licensing of premises permits the movement of personal licence holders from one premise to another, allowing greater flexibility. It ends the outdated regime where publicans are tied by licence to the premises they manage.
- **Qualifying club** these clubs are organisations where members have joined together for particular social, sporting or political purposes and have then combined to buy alcohol in bulk as members of the organisation for supply to the club. There are technically no sales of alcohol by retail at such premises except to guests when guests make a purchase. Such clubs have traditionally not been “licensed”; they have registered with the magistrates’ courts having established that they qualify to be treated exceptionally. The 2003 Act preserves this special treatment and requires the club to “qualify” to be outside the normal premises licence arrangements. The new authority for the supply of alcohol and provision of other licensable activities on qualifying club premises is a club premises certificate and this is issued by the Licensing Authority. A qualifying club will normally be permitted under the terms of a

club premises certificate to sell and supply alcohol to its members and their guests only. In order to be a qualifying club, instant membership is not permitted and members must normally wait at least two days between their application and their admission to the club. Any qualifying club may choose to obtain a premises licence if it decides that it wishes to offer its facilities commercially for use by the general public, including the sale of alcohol to them. Such qualifying clubs should not be confused with proprietary clubs, which are clubs run commercially by individuals, partnerships or businesses for the purposes of profit and which require a premises licence and are not eligible to be qualifying clubs.

- **Rebuttable presumption** is an assumption made by a court. It is taken to be true unless someone comes forward to contest it and prove otherwise. For example, a defendant is presumed innocent until proved guilty.
- **Regulated entertainment** Includes both entertainment and the provision of entertainment facilities. Subject to qualifying conditions, definitions and exemptions as set out in Schedule 1 of the Licensing Act 2003, where the following regulated entertainment takes place in the presence of an audience and is provided for the purpose of entertaining that audience. This includes:
 - A performance of a play
 - An exhibition of a film
 - An indoor sporting event
 - A boxing or wrestling entertainment (indoors and outdoors)
 - A performance of live music
 - Any playing of recorded music
 - A performance of dance
 - Entertainment of a similar description to that falling within the performance of live music, the playing of recorded music and the performance of dance.
- **Representations** are complaints or comments on applications by responsible authorities (e.g. police) or interested parties (e.g. residents). They must be made in writing and will only be relevant if they relate to the likely effect of the grant of the licence on the promotion of at least one of the licensing objectives. Representations by interested parties will not be relevant if they are considered by the licensing authority to be frivolous (i.e. not serious) or vexatious (i.e. arising out of unrelated disputes).
- **Security Industry Authority (SIA)** the Security Industry Authority was set up by the Private Security Industry Act 2001. The key role for the SIA involves the managing and issuing of licences for people working in particular areas of the private

security business. Another crucial area for the future is developing an approved contractor scheme. More details are available at www.the-sia.org.uk

- **Temporary Events** – relatively small-scale events held in or on any premises involving no more than 499 people at any one time. Each event, which must be covered by a Temporary Event Notice, can last up to 168 hours, and no more than twelve events can be held at any particular premises in a year (15 with effect from 1/1/16).
- **Variation** – changes in the operation of a premises, club or event, including variation of operating hours and modification of the premises or the specification of another person as the Designated Premises Supervisor.
- **Vicinity** – usually taken to mean the area immediately around the licensed premises but where there is reasonable evidence to suggest that problems are directly linked to licensed activity or customers of a particular premises, can be extended.
- **Vertical drinking** premises are premises with high capacities which are used primarily or exclusively for the sale and consumption of alcohol and have little or no seating for patrons.

Appendix 2 Responsible Authorities and Useful Contact Details

Responsible Authorities:

Metropolitan Police, Licensing Office, Romford Police Station, 19 Main Road,
Romford RM1 3BJ

Fire Safety Regulation, North East Area 2, London Fire Brigade, 169 Union Street,
London, SE1 0LL

Licensing, Public Protection, London Borough of Havering, c/o Town Hall, Main
Road, Romford, RM1 3BD

Telephone: 01708 432777

E-mail: licensing@haverling.gov.uk

Website: www.haverling.gov.uk

Health and Safety Section, Public Protection Service, London Borough of Havering,
c/o Town Hall, Main Road, Romford, RM1 3BD

Telephone: 01708 432777

E-mail: environmental.health@haverling.gov.uk

Website: www.haverling.gov.uk

Public Health Section, Public Protection Service, London Borough of Havering, c/o
Town Hall, Main Road, Romford, RM1 3BD

Telephone: 01708 432777

E-mail: environmental.health@haverling.gov.uk

Website: www.haverling.gov.uk

Environmental Protection, Public Protection Service, London Borough of Havering,
c/o Town Hall, Main Road, Romford, RM1 3BD

Telephone: 01708 432777

E-mail: environmental.health@haverling.gov.uk

Website: www.haverling.gov.uk

Trading Standards Service, London Borough of Havering, c/o Town Hall, Main Road,
Romford, RM1 3BD

Telephone: 01708 432777

E-mail: trading.standards@haverling.gov.uk

Planning Control and Enforcement Service, London Borough of Havering, c/o Town
Hall, Main Road, Romford, RM1 3BD

Telephone: 01708 434800

E-mail: planning@haverling.gov.uk

Children and Families' Service, Safeguarding and Service Standards, c/o Town Hall,
Main Road, Romford, RM1 3BD

Practice Improvement Lead, Havering Clinical Commissioning Group, c/o Town Hall,
Main Road, Romford, RM1 3BD

Other Useful Contact Details:

Health and Safety Executive, FOD London Division, Rose Court, 2 Southwark Bridge
London, SE1 9HS

Telephone: 020 7556 2100

Website: www.hse.gov.uk

Streetscene, London Borough of Havering, c/o Town Hall, Main Road, Romford, RM1 3BD

Telephone: 01708 432563

E-mail: StreetSceneEnforcement@haverling.gov.uk

Community Safety Section, London Borough of Havering, Town Hall, Main Road, Romford, RM1 3BD

Telephone Number: 01708 432028

E-mail: communitysafety@haverling.gov.uk

Havering Magistrates' Court, The Court House, Main Road, Romford, RM1 3BH

Telephone: 0300 303 0645

Security Industries Authority, Security Industry Authority, PO Box 74957, London E14 1UG

Website: www.sia.homeoffice.gov.uk

London Borough of Havering public register of licensed premises.

<https://www.haverling.gov.uk/Pages/ServiceChild/PublicRegister-LGSL-797.aspx>

Appendix 3 Questions for applicants to consider when making an application.

The following questions should be considered, although they will vary according to the use of each premise, the following list is not exhaustive and is intended to act as a prompt for matters to consider. Licensees/applicants should use their own experience and knowledge of their customers and location to add or amend to these and form them into an operating schedule. The content of an operating schedule subsequently becomes the basis of conditions on the licence and should be in a form that can be expressed as an enforceable condition. Failure to do this may lead to a representation from the Licensing Authority, a responsible authority or other person.

Crime and Disorder

- Is there CCTV, if so what are the areas covered, does it have the ability to see clear full face recording of patrons entering, does it record the patron search area at the entrance, what is the period for retention of recordings and the provision of instant access to the Police and Authority officers, the ability to produce copies or download images?
- Are SIA door staff employed, numbers of door supervisors, door supervisors wearing high visibility clothing, use of search arches/wands, location of such searches, all such staff to have their details recorded and checks made with SIA website to ensure that licences are current, staff to sign in when commencing work and out when they leave. Is any induction/training given to new door staff?
- Are female door supervisors deployed?
- Do door staff receive any venue specific training to enable them to deal effectively with the clientele of the venue?
- Is there use of ID scanning and recording systems, if so what are the hours during which such systems will be in place, that all patrons will be required to use the system?
- Will there be a “No ID No entry” Policy?
- Are any measures proposed to prevent possession, supply or consumption of illegal drugs and possession of weapons? For example, designing out areas or surfaces where there is a likelihood of drug use;
- Is there a clear written Policy regarding persons caught using/supplying drugs? Is there provision of safe storage for any seized drugs?
- Has the use of plastic or toughened glass for the serving of alcohol been considered, will glass bottles be handed across the bar?
- Any restrictions on patrons taking drinks outside the premises?

- Any restrictions on numbers of patrons using outside smoking area?
- Are patrons searched on re-entering from smoking areas if there is potential for patrons to have contact with non-patrons?
- Location of lighting inside/outside the premises?
- Is there a proof of age scheme to be introduced, if so what and is there any dress code used at the premises?
- How is the number of patrons in the premises managed, including reference to any capacity restriction?
- How is capacity counted if appropriate?
- What is the frequency of staff training, what training is given, availability of completed training records and details of the content of training?
- What measures are used to manage queuing?
- Any dispersal Policy?
- Is there a drinking up time before the terminal time of the licence?

For premises selling alcohol for consumption off the premises the following should be considered;

- Should beers, ales, lagers and ciders and anything similar that are sold/supplied in a can only be sold in multiple packs in order to discourage street drinkers?
- Will there be a restriction on the sales /supplies of beers, ales, lagers or ciders or anything similar of 6.5 ABV or above, excluding the sale of specialist branded alcoholic beverages?
- Will there be a restriction on the sale/supply of miniature bottles of spirits of 50ml or less at any time?
- Will ales, lagers and cider be supplied only in bottles of 2 litres and above in capacity?

Public Safety

- What staff training will there be? Will it include an awareness of selling alcohol to those already drunk?
- The potential impact of drunkenness on levels of violence?
- For premises operating to later hours what is the availability of taxis and public transport?

- Is a scheme such as “cabwise” promoted?
- Is a telephone available inside the premises for patrons to call taxis?
- Are staff given training to recognise and deal with vulnerable persons and is there a written Policy?
- Any measures to combat drink spiking?
- Is there a dispersal Policy to reduce queuing for taxis and transport?

Public Nuisance

- Is an acoustic report needed if application involves live or recorded music and later hours?
- Can details of the location and types of any schemes designed to attenuate noise from the premises be provided?
- Can details of any measures to minimise the noise caused by patrons outside the premises be provided?
- The location and availability of any taxi ranks, bus stops, train or tube stations in relation to the premises which are operational at or just after the terminal hour of the licence?
- Provide details of the location and management of any outdoor areas within the property boundary for use by patrons drinking, eating, smoking, queuing or congregating outside, and the hours of use of such areas. The hours of use should also be included:
- Include details of dispersal policies and consider the role of door supervision and winding down periods;
- Will you reduce music sound levels and temp towards the end of the evening?
- Will lighting be increase towards the end of the evening?
- Will there be an area for patrons to use whilst waiting for taxis?
- Any wind down/chill out areas?
- Any use of outside areas such as tables and chairs on the highway or smoking areas?
- If the operation of the venue will attract additional litter such as food cartons or publicity flyers what measures will be put in place to deal with this?
- Will there be litter patrols for takeaways?

Protection of Children

Venues that are family friendly are particularly welcome; applicants are encouraged to make this clear in their application and to make this explicit in the operating schedule.

- Adoption of a proof of age schemes, details of which should be provided;
- Details of which proofs of age will be accepted;
- Any regular training of all staff, details of which should be recorded;
- Will new staff be trained on induction?
- Will a refusals register be used to record instances when sales have been refused?
- The frequency with which the refusals register will be checked to see if it is consistently used;
- Any restrictions on the hour's children may be present?
- Any requirements for accompanying adults to be present?
- Compliance with the BBFC film classification system

Appendix 4 Mandatory Conditions Correct as of August 2019

All Premises Licence authorising supply of alcohol

The licence is granted subject to the Mandatory conditions for sale of alcohol as set out in the Licensing Act 2003 as amended by the Licensing Act 2003 (Mandatory Licensing Conditions) Order 2010 and Order 2014.

1. No supply of alcohol may be made under the Premises Licence –
 - (a) At a time when there is no Designated Premises Supervisor in respect of the Premises Licence; or
 - (b) At a time when the Designated Premises Supervisor does not hold a Personal Licence or his Personal Licence is suspended.
2. Every supply of alcohol under the Premises Licence must be made, or authorised by a person who holds a Personal Licence.
3. (1) The responsible person must ensure that staff on relevant premises do not carry out, arrange or participate in any irresponsible promotions in relation to the premises.
 - (2) In this paragraph, an irresponsible promotion means any one or more of the following activities, or substantially similar activities, carried on for the purpose of encouraging the sale or supply of alcohol for consumption on the premises.
 - a) games or other activities which require or encourage, or are designed to require or encourage, individuals to –
 - (i) drink a quantity of alcohol within a time limit (other than to drink alcohol sold or supplied on the premises before the cessation of the period in which the responsible person is authorised to sell or supply alcohol), or
 - (ii) drink as much alcohol as possible (whether within a time limit or otherwise);
 - b) provision of unlimited or unspecified quantities of alcohol free or for a fixed or discounted fee to the public or to a group defined by a particular characteristic in a manner which carries a significant risk of undermining a licensing objective;
 - c) provision of free or discounted alcohol or any other thing as a prize to encourage or reward the purchase and consumption of alcohol over a period of 24 hours or less in a manner which carries a significant risk of undermining a licensing objective;
 - d) selling or supplying alcohol in association with promotional posters or flyers on, or in the vicinity of, the premises which can reasonably be considered to

condone, encourage or glamorise anti-social behaviour or to refer to the effects of drunkenness in any favourable manner.

e) dispensing alcohol directly by one person into the mouth of another (other than where that other person is unable to drink without assistance by reason of disability).

4. The responsible person must ensure that free potable water is provided on request to customers where it is reasonably available.

5. (1) The premises licence holder or club premises certificate holder must ensure that an age verification Policy is adopted in respect of the premises in relation to the sale or supply of alcohol.

(2) The designated premises supervisor in relation to the premises licences must ensure that the supply of alcohol at the premises is carried on in accordance with the age verification Policy.

(3) The Policy must require individuals who appear to the responsible person to be under 18 years of age (or such older age as may be specified in the Policy) to produce on request, before being served alcohol, identification bearing their photograph, date of birth and either:-

(a) a holographic mark or

(b) an ultraviolet feature.

6. The responsible person shall ensure that –

(a) where any of the following alcoholic drinks is sold or supplied for consumption on the premises (other than alcoholic drinks sold or supplied having been made up in advance ready for sale or supply in a securely closed container) it is available to customers in the following measures –

(i) beer or cider: ½ pint;

(ii) gin, rum, vodka or whisky: 25 ml or 35 ml; and

(iii) still wine in a glass: 125 ml; and

(b) these measures are displayed in a menu, price list or other printed material which is available to customers on the premises; and

(c) where a customer does not in relation to a sale of alcohol specify the quantity of alcohol to be sold, the customer is made aware that these measures are available.

Minimum Drinks Pricing

1. A relevant person shall ensure that no alcohol is sold or supplied for consumption on or off the premises for a price which is less than the permitted price.

2. For the purposes of the condition set out in paragraph 1 –

(a) “duty” is to be construed in accordance with the Alcoholic Liquor Duties Act 1979

(b) “permitted price” is the price found by applying the formula –

$$P = D + (D \times V)$$

Where –

(i) P is the permitted price

(ii) D is the amount of duty chargeable in relation to the alcohol as if the duty were charged on the date of the sale or supply of the alcohol, and

(iii) V is the rate of value added tax chargeable in relation to the alcohol as if the value added tax were charged on the date of the sale or supply of the alcohol;

(c) “relevant person” means, in relation to premises in respect of which there is in force a premises licence –

(i) The holder of the premises licence

(ii) The designated premises supervisor (if any) in respect of such a licence, or

(iii) The personal licence holder who makes or authorises a supply of alcohol under such a licence;

(d) “relevant person” means, in relation to premises in respect of which there is in force a club premises certificate, any member or officer of the club present on the premises in a capacity which enables the member or officer to prevent the supply in question; and

(e) “value added tax” means value added tax charged in accordance with the Value Added Tax Act 1994.

3. Where the permitted price given by Paragraph (b) of paragraph 2 would (apart from the paragraph) not be a whole number of pennies, the price given by that sub-paragraph shall be taken to be the price actually given by that sub-paragraph rounded up to the nearest penny.

4. (1) Sub-paragraph (2) applies where the permitted price given by Paragraph (b) of paragraph 2 on a day (“the first day”) would be different from the

permitted price on the next day (“the second day”) as a result of a change to the rate of duty or value added tax.

(2) The permitted price which would apply on the first day applies to sales or supplies of alcohol which take place before the expiry of the period of 14 days beginning on the second day.

If the Premises Licence allows Exhibition of Films

1. Where a premises licence authorises the exhibition of films, the licence must include a condition requiring the admission of children to the exhibition of any film to be restricted in accordance with this section.

2. Where the film classification body is specified in the licence, unless subsection (3)(b) applies, admission of children must be restricted in accordance with any recommendation by that body.

3. Where

(a) The film classification body is not specified in the licence, or

(b) The relevant licensing authority has notified the holder of the licence that this subsection applies to the film in question,

admission of children must be restricted in accordance with any recommendation made by that licensing authority.

4. In this section “children” means any person aged under 18; and

“film classification body” means the person or persons designated as the authority under section 4 of the Video Recordings Act 1984(c39) (authority to determine suitability of video works for classification).

If the Premises Licence has conditions in respect of Door Supervision

except theatres, cinemas, bingo halls and casinos

1. Where a premises licence includes a condition that at specified times one or more individuals must be at the premises to carry out a security activity, each such individual must:

(a) be authorised to carry out that activity by a licence granted under the Private Security Industry Act 2001; or

(b) be entitled to carry out that activity by virtue of section 4 of the Act.

2. But nothing in subsection (1) requires such a condition to be imposed:

(a) in respect of premises within paragraph 8(3)(a) of Schedule 2 to the Private Security Industry Act 2001 (c12) (premises with premises licences authorising plays or films); or

(b) in respect of premises in relation to:

(i) any occasion mentioned in paragraph 8(3)(b) or (c) of that Schedule (premises being used exclusively by club with club premises certificate, under a temporary event notice authorising plays or films or under a gaming licence), or

(ii) any occasion within paragraph 8(3)(d) of that Schedule (occasions prescribed by regulations under that Act).

3. For the purposes of this section:

(a) “security activity” means an activity to which paragraph 2(1)(a) of that Schedule applies, and, which is licensable conduct for the purposes of that Act, (see section 3(2) of that Act) and

(b) paragraph 8(5) of that Schedule (interpretation of references to an occasion) applies as it applies in relation to paragraph 8 of that Schedule.

Appendix 5

London Borough of Havering

Pool of Model conditions

Conditions attached to a licence or certificate are steps or actions the holder of the premises licence or club premises certificate will be required to take, or refrain from taking, at all times when licensable activities are taking place at the premises in question.

Conditions are required to be clear, appropriate and enforceable and must be expressed in terms that are unambiguous. Further, such conditions should be open transparent and reasonable

Conditions must not be applied universally and treated as standard conditions. Licensing conditions are to be tailored to the size style characteristics and activities taking place at the premises concerned.

License conditions are not required where other regulatory regimes provide sufficient protection to the public e.g. Fire safety legislation.

The pool of model conditions is neither exclusive nor exhaustive. The model conditions relate to the four licensing objectives and can be used where appropriate to the particular circumstances of individual premises.

The pool of model conditions does not restrict any applicant, responsible authority, or other persons from proposing any alternative conditions nor would it restrict a licensing sub-committee from imposing any reasonable condition on a licence it considered appropriate for the promotion of the licensing objectives.

Further information relating to conditions can be found in the guidance issued under section 182 of the Licensing Act 2003 which can be found at

<https://www.gov.uk/government/publications/explanatory-memorandum-revised-guidance-issued-under-s-182-of-licensing-act-2003>

Prevention of Crime and Disorder.

CCTV

CD01 The premises shall install and maintain a comprehensive digital colour CCTV system. All public areas of the licensed premises, including all public entry and exit points and the street environment, will be covered enabling facial identification of every person entering in any light condition. The CCTV cameras shall continually record whilst the premises are open to the public and recordings shall be kept available for a minimum of 31 days with date and time stamping. A staff member who is conversant with the operation of the CCTV system shall be present on the premises at all times when they are open to the public. This staff member shall be able to show the Police or the Licensing Authority recordings of the previous two days immediately when requested.

(n.b. The above condition is an example of the wording that could be used for premises where the customers might commit serious crime. The CCTV requirements would be expected to be 'scaled down' accordingly for smaller premises or those premises which are unlikely to prove as troublesome.)

Promoted events

CD02 There shall be no promoted events on the premises. A promoted event is an event involving music and dancing where the musical entertainment is provided at any time between 23.00 and 07.00 by a disc jockey or disc jockeys one or some of whom are not employees of the premises licence holder and the event is promoted to the general public.

Incident Management

CD03 An incident log shall be kept at the premises and made available on request to the Police or an authorised officer of the London Borough of Havering. The log will record the following:

- All crimes reported to the venue
- All ejections of customers
- Any incidents of disorder (disturbance caused by either one person or a group of people). (There is no requirement to record the above incidents where they do not relate to a licensable activity).
- Seizures of drugs or offensive weapons
- Any faults in the CCTV system or searching equipment or scanning equipment

- Any refusal of the sale of alcohol during the hours the premises is licensed to sell it.

CD04 There must be at the premises a lockable 'Drugs Box' to which no member of staff except the DPS and/or XX shall have access. All controlled drugs (or items suspected to be or to contain controlled drugs) found at the premise must be placed in this box as soon as practicable. Whenever this box is emptied, all of its contents must be given to the Metropolitan Police Service for appropriate disposal.

Door supervisors

CD05 On any occasion that regulated entertainment is provided, not less than **SIA registered door supervisors shall be engaged to control entry.

CD06 At least ** female door supervisor(s) shall be engaged at the premises at such times as door supervisors are required to be provided.

CD07 When the premises is carrying on licensable activities after **.**. hours, at least ** registered door supervisor(s) is (are) to be on duty at each door used for entry or exit.

CD08 A written search Policy that aims to prevent customers or staff bringing illegal drugs, weapons or other illegal items onto the premises at any time shall be in place and operate at the premises.

Late night provisions

CD09 There shall be no admission or readmission of customers to the premises after **.**. hours save for customers using the agreed smoking area at the premises.

CD10 On occasions where licensable activities are carried on past **.**. hours admission of customers will be restricted to (enter restriction e.g. a particular entrance, a particular area of licence premises etc.).

Public Safety

PS01 All glasses in use at the premises shall be either toughened glass or polycarbonate material.

PS02 No drinks of any sort are to be supplied to customers in glass bottles.

The Prevention of Public Nuisance

Noise (regulated entertainment)

PN01 All doors and windows shall remain closed at all times after **.**. hours during the provision of regulated entertainment except for entry or exit, or in the event of an emergency.

PN02 Loudspeakers shall not be located in the entrance lobby (specify another location if appropriate) or outside the premises.

Noise (persons)

PN03 A written dispersal Policy shall be in place and implemented at the premises to move customers from the premises and the immediate vicinity in such a way as to cause minimum disturbance or nuisance to the neighbours.

PN04 Prominent signage shall be displayed at all exits from the premises requesting that customers leave quietly.

PN05 Customers permitted to temporarily leave and then re-enter premises eg, to smoke, shall not be permitted to take drinks or glass containers with them.

PN06 There shall be no sale of alcohol in unsealed containers for consumption off the premises.

PN07 The Licence holder shall make available a contact telephone number to nearby residents and the London Borough of Havering Licensing team to be used in the event of complaints arising.

The Protection of Children from Harm

PC01 A log shall be kept at the premises and record all refused sales of alcohol for reasons that the person(s) is(are) .or appears to be , under ** years of age. The log shall record the date and time of the refusal and the name of the member of staff who refused the sale. The log will be made available on request by the Police or an authorised officer of the London Borough of Havering.

PC02 A 'Challenge **' Scheme shall operate to ensure that any person attempting to purchase alcohol who appears to be under the age of ** shall provide documented proof that he/she is over 18 years of age. Proof of age shall only comprise a passport, a photo card driving licence, an EU/EEA national ID card or similar document, or an industry approved proof of identity card.

PC03 Children under the age of ** years shall not be allowed on the premises after **. ** hours unless accompanied by an adult.

PC04 Children under the age of ** years shall not be allowed on the premises.

PC05 No single cans or bottles of beer or cider shall be sold at the premises.

Staff Competence and Training:

PC06 The Licensee to keep a written record of all staff authorised to sell alcohol, the record to contain the full name, home address, date of birth and national insurance number of each person so authorised. The staff record to be kept on the licensed premises and made available for inspection by the Licensing Officer, Trading Standards or the Police.

PC07 The Licensee to ensure that each member of staff authorised to sell alcohol has received adequate training on the law with regard to age restricted products and that this has been properly documented and training records kept. The training record to be kept on the licensed premises and made available for inspection by the Licensing Officer, Trading Standards or the Police.

PC08 The Licensee to ensure that each member of staff authorised to sell alcohol is fully aware of his /her responsibilities in relation to verifying a customer's age and is able to effectively question purchasers and check evidence of proof of age.

PC09 The Licensee to ensure that each member of staff authorised to sell alcohol is sufficiently capable and confident to confront and challenge under - 18s attempting to purchase alcohol.

General

GC01 Any designated queuing area shall be enclosed within appropriate barriers to ensure that the highway is kept clear.

GC02 There shall be no admission after **. ** other than to

- Residents of the hotel and their bona fide guests
- Persons who have pre-booked to attend a function at the premises

GC03 No entertainment, performance, service, or exhibition involving nudity or sexual stimulation shall be permitted.

Controls for Sales of Alcohol

GC04 Alcohol shall only be sold to a person sitting down eating a meal and for consumption with that meal.

GC05 Alcohol shall be sold to customers by waiter/waitress service only.

GC06 There shall be no sales of alcohol for consumption off the premises.

GC07 Sales of alcohol for consumption off the premises shall only be supplied with a meal.

GC08 Beers, lagers, stout and ciders sold at the premises should not exceed (insert e.g. 5.0 or 5.5 or 6%) alcohol volume.

GC09 Sprints should not be sold in bottles of less than 35cl/70cl.

GC10 Beers, lagers, stout, ciders and alcholpops shall be sold in packs of no less than four

CDGPG1 All occasions when persons have been refused service shall be recorded in writing and kept at the premises for six months.

CDGPG2 Prominent, clear notices shall be displayed at the premises about the supply of alcohol to minors and the relevant offences involved

Restrictions on drinking areas

It may be necessary to restrict the areas where alcoholic drinks may be consumed in premises after they have been purchased from a bar. An example would be at a sports ground where the police consider it necessary to prevent the consumption of alcohol on the terracing of sports grounds during particular sports events. Such conditions may not only specify these areas, but also indicate the circumstances and times of such a restriction. Such a measure may also be relevant to promote public safety.

CDGPG3 No outside area shall be used for consumption of alcohol or provision of Regulated Entertainment unless the area is clearly marked or defined

Crime prevention notices

Notwithstanding reluctance from the trade it may be necessary at some premises to support local crime prevention initiatives by displaying notices that warn customers of the prevalence of crime which may target them. For example, warning about pickpockets or bag snatchers or warnings about leaving bags unattended because of concerns about terrorism.

CDGPG4 Crime prevention notices and advice shall be displayed (if advised by Havering Police) in order to support local crime prevention initiatives.

Other signage

To deter those who might seek admission in breach of conditions subject to which a licence or certificate is granted, it may be considered appropriate to require signage to be displayed setting out such conditions.

CDGPG5 Prominent, clear notices shall be displayed at every public entrance stating the actual operating hours of the premises.

CDGPG6 Prominent, clear notices shall be displayed at every public entrance stating any restrictions relating to the admission of children to the premises or other admission restrictions.

Door supervisors

Conditions relating to the provision of Door Supervisors and security teams may be valuable in:

- preventing the admission and ensuring the departure from the premises of the drunk and disorderly, without causing further disorder;
- keeping out excluded individuals (subject to court bans or imposed by the licence holder);
- searching and excluding those suspected of carrying illegal drugs, or carrying offensive weapons; and
- maintaining orderly queuing outside venues prone to such queuing.

Conditions may also be needed to deal with the number of such Door Supervisors, the displaying of name badges, the carrying of proof of registration, where and at what times they should be stationed on the premises, and whether at least one female Door Supervisor should be available (for example, if female customers are to be the subject of body searches). Door Supervisors also have a role to play in ensuring public safety.

Unless the Operating Schedule comprehensively provides a valid reason why door supervision would not be required, Door Supervisors shall be expected at premises where:

- the licensed activities includes the sale of alcohol by retail, and
- the premises trade after midnight on any day of the week or has an approved capacity of over 200 persons.

Premises should detail the times and days of the week when Door Supervisors shall be employed.

CDGPG7 Premises which have a Policy that includes the searching of persons shall have Door Supervisors of both sexes on duty at all times.

CDGPG8 All Door Supervisors working outside the premises or whilst engaged in the dispersal of patrons at the close of business shall wear 'High Visibility Clothing'.

Safe and Sound Partnership

The Safe and Sound Partnership, which exists between the London Borough of Havering, Havering Police, Havering Fire and Rescue Service, and licensed premise operators is already a significant factor in reducing crime and disorder in the Borough. It is recommended that in those areas of the Borough covered by the Partnership, existing and proposed licensed operators should participate in this scheme.

CDGPG9 The Licence Holder shall sign up to the Safe and Sound approved charter.

CABINET

August 5 2020

Subject Heading:

Havering Local Plan - Agreement to consult on Local Plan Main Modifications, make minor alterations and send formal response back to Planning Inspector and agreement to publish temporary changes to the Council's Statement of Community Involvement in response to Government guidance relating to Covid 19 and public consultations on planning documents.

Cabinet Member:

Councillor Damian White
Leader of the Council

SLT Lead:

Barry Francis
Director of Neighbourhoods

Report Author and contact details:

Martyn Thomas
Head of Spatial Planning
Martyn.thomas@haverling.gov.uk

01708 432845

Policy context:

National Planning Policy Framework (2019)
London Plan (2017)
Havering Corporate Plan 2019/20
Havering Local Development Framework (2008)

Financial summary:

The Cabinet report on the MTFS Update (September 2019) included details of the budget for Local Plan work in 2020/2021 and 2021/2022 (£0.557m and £0.200m, respectively).

Residual business risk reserve funding of £0.434m not utilised in 2019/20 has been carried into 2020/21.

Is this a Key Decision?

Yes

When should this matter be reviewed? August 2022

Reviewing OSC: Towns and communities

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

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

SUMMARY

The new Havering Local Plan will assist the Council in the delivery of its planning and regeneration objectives and programmes and help ensure that Havering remains a place where people wish to live, visit and work and where businesses can prosper. It will also set a framework for the timely and effective delivery of infrastructure needed to support Havering's communities.

Havering submitted its new Local Plan for formal Examination by an independent Inspector in March 2018 following statutory and non-statutory public consultation in 2015 - 2017.

Following Examination hearings in 2018 and 2019, and the undertaking of work required by the Local Plan Inspector, proposed Main Modifications have been prepared that the Inspector considers are necessary to find the Local Plan 'sound'.

The report outlines the progress through the Local Plan Examination process and sets out details of the proposed Modifications including those linked to parking, housing and gypsy and traveller matters.

Members are asked to note the proposed Main Modifications and changes to some elements in the evidence base supporting the Local Plan. Members are also asked to agree to these being the subject of a further period of public consultation in line with the regulations and legislation for the preparation of Local Plans.

The Government has emphasised the importance of plan-making continuing during the Covid 19 pandemic as it wants to see Local Plans progressing through the plan-making system as a vital means for supporting the economic recovery. In line with this, the report brings forward recommended temporary changes to the Council's adopted Statement of Community Involvement to set out how the Council will ensure that the public consultation is meaningful, open and accessible to all stakeholders including residents in Havering.

Subject to the outcomes from the public consultation and the final report from the Local Plan Inspector and Member approval, it is anticipated that the Local Plan may be adopted in winter 2020/2021. In line with the instructions from the Local Plan Inspector, and as reflected in the Proposed Main Modifications, the Council will be required to initiate work to bring forward an immediate update of the Local Plan immediately after its adoption.

The Local Plan will be important in helping the community in Havering to move forward from the adverse effects of the Covid 19 virus.

The report also notes that the opportunity will be taken following the adoption of the Local Plan to revise and update the Local Development Scheme document which sets out the Council's planned work in bringing forward planning policies and guidance.

RECOMMENDATIONS

That Cabinet/Members:

- (1) note and consider the proposed Main Modifications and changes to the supporting evidence base documents resulting from the Local Plan Examination including, specifically, the Proposed Main Modification for car parking.
- (2) agree the Proposed Main Modifications and changes to supporting documents resulting from the Local Plan Examination (as set out in Annexes 2 – 16) being the subject of public consultation
- (3) agree the proposed ‘minor’ changes following the Local Plan Examination and publish these for information (as set out in Annex 17)
- (4) agree to publish a ‘composite’ Local Plan document (including Proposed Main Modifications and proposed ‘minor’ changes) for information (as set out in Annex 18)
- (5) agree the recommended temporary amendments to the Council’s Statement of Community Involvement (as set out in Annex 19) which sets out how the Council will undertake public consultation when preparing Local Plans and publish this
- (6) note / agree the Equalities Impact Assessment informing the amended Statement of Community Involvement (as set out in Annex 20)
- (7) delegate responsibility to the Director of Neighbourhoods in consultation with the Leader of the Council, for the Council’s formal response to the Local Plan Inspector following the consultation (including the agreement of any further changes to the Main Modifications and supporting documents considered necessary)
- (8)** agree to publish the outcomes of the public consultation
- (9) to note that the current Local Development Scheme document will be revised and updated following the adoption of the Local Plan

REPORT DETAIL

4.0 The background to this report and what it covers

1.1 Members were originally scheduled to consider a report at the April 2020 Cabinet meeting on the:

- outcomes from the Local Plan Examination hearings in 2018/19; and
- the next steps towards the adoption of the new Havering Local Plan including the requirements for public consultation

1.2 The April Cabinet meeting was cancelled as a result of the 'lock-down' resulting from the Covid 19 pandemic. Additionally, the restrictions in place as a result of the 'lock-down' would have prevented the Council undertaking the necessary public consultation in a manner which would satisfy its commitments as set out in its adopted Statement of Community Involvement (SCI). The SCI sets out the detail of how the Council will ensure that stakeholders (including residents) are able to engage in the plan-making process. This includes, for example, copies of documents being available in places visited by the public such as libraries and the Public Advice and Service Centre in Romford in the recognition that not everyone has access to on-line facilities and / or may prefer to use 'hard copies' of items.

1.3 This report seeks approval for Proposed Main Modifications and evidence base updates to the Local Plan submitted to the Government and which has been the subject of an Examination by an independent Local Plan Inspector. The Proposed Main Modifications and evidence base updates are considered in Sections 4 – 10 of this report.

1.4 Additionally, in line with the latest requirements set out by the Government, and in response to the constraints imposed by the 'lock-down' linked to the Covid 19 pandemic, the report brings forward recommended temporary changes to the Council's Statement of Community Involvement. These will set out how the Council will address its commitments and responsibilities in regard to providing stakeholders with an effective opportunity to be involved in plan-making in Havering.

1.5 The need for these changes arises because the Government wishes to ensure that plan-making continues during the current pandemic because it sees Local Plans as a key 'tool' in securing economic recovery. The recommended approach to undertaking public consultation is set out in Section 12 of this report. Members are asked to approve these changes and their publication in line with the latest Government planning guidance.

- 1.6 Finally, the report notes in Section 14 that following the adoption of the Local Plan the Council will revise and update its current Local Development Scheme 2019-2021 document. The Local Development Scheme sets out the Council's programme for preparing planning policy documents and guidance and is required by legislation to be up to date. Having an up to date LDS is also 'best practice' and enables the community and other stakeholders to understand what plan-making activities the Council will undertake.

2.0 What is the Havering Local Plan and why it has been prepared

- 2.1 It is a statutory requirement that local planning authorities have an up to date Local Plan. Havering has prepared a new Local Plan to update and replace the Havering Local Development Framework (2008) and to set out its planning and regeneration objectives.
- 2.2 The new Local Plan will provide planning policies to guide development and to help ensure that the borough remains a place where people wish to live, work and visit and where businesses wish to invest and can prosper.
- 2.3 The Local Plan will also provide an important context for securing and guiding the provision of the infrastructure necessary to support the community in Havering over the Local Plan period including transport connections, schools and health facilities and utilities.
- 2.4 The Council will use the Local Plan (and supporting evidence such as the Infrastructure Delivery Plan) in its engagement with third parties concerned with the provision of infrastructure to ensure that there is a good 'fit' between the change and growth set out in the Local Plan and the infrastructure needed to support that.
- 2.5 The new Local Plan will provide an up to date planning framework to help Havering emerge from the 'downturn' associated with the Covid 19 pandemic particularly in regard to helping ensure that Havering has a robust and resilient economy that will be well suited to the new circumstances and opportunities.

3.0 Earlier public consultation on the Local Plan

- 3.1 The Local Plan has been the subject of extensive public consultation over the course of its preparation in line with the legislation and regulations for the preparation of Local Plans.
- 3.2 These comprised:
- statutory consultations in Spring 2015 and Summer 2017 (Regulation 18 and 19 stages, respectively)

- non-statutory consultation on a 'Direction of Travel' document in Autumn 2016
 - a specific public consultation linked to gypsy and traveller matters in Spring 2019 at the request of the Local Plan Inspector following the initial Examination hearings in Autumn 2018
- 3.3 Members have had the opportunity to comment on the Local Plan throughout its preparation including informal workshops/'drop-in sessions' with officers in spring 2017 before the Local Plan was finalised for submission.
- 3.4 A briefing on the Examination into the Havering Local Plan was provided on March 3 2020 for all Members. Its purpose was to bring all Members up to speed on the progress with the Local Plan and main modifications proposed ahead of the planned Cabinet meeting in April 2020 and enable Members to be fully appraised of the key outcomes from the Examination to date.
- 3.5 More than twenty Members attended the event and were able to ask questions to officers on the position with the Local Plan and the Examination. The Legal Counsel (Planning Barrister) who has supported and guided the Council throughout the Examination process attended the briefing and responded to several Member questions.
- 3.6 In line with the Council's Statement of Community Involvement and 'best practice', the Council's website has provided extensive information about the preparation of the Havering Local Plan and comprehensive coverage of the Examination in Public from when the Local Plan was submitted to the Secretary of State in March 2018 (see below).

4.0 Overview of the Local Plan Examination in Public and its outcomes

- 4.1 Following public consultation in 2017, the Local Plan was submitted to the Secretary of State in Spring 2018 to enable its independent review by a Local Plan Inspector appointed by the Secretary of State.
- 4.2 In October 2018, the first part of the Havering Local Plan Examination in Public (EIP) took place over 6 days of Examination hearings. The initial Examination hearings addressed twelve Matters as previously identified by the Inspector:
- Legal compliance and Duty to Cooperate
 - Spatial Strategy and Strategic Development Areas
 - Housing
 - Gypsy and Traveller accommodation
 - Green Belt
 - Economy and employment
 - Town Centres and communities
 - Connections

- High Quality Places
 - Green Places
 - Minerals
 - Infrastructure, implementation and monitoring
- 4.3 Prior to the Examination hearings commencing, the Council provided written statements (responses) to around 150 questions that the Inspector had raised across these topics.
- 4.4 Following the initial hearings in October 2018, the Inspector:
- requested additional information across the topics identified above; and
 - the commencement of the preparation of proposed modifications in relation to a number of matters including housing, Gypsy and Travellers and parking which would be linked to, and reflect the outcomes from, the further work required by the Inspector
- 4.5 The Council submitted substantial and robust responses to the Local Plan Inspector in December 2018 and March 2019. As mentioned above, details of these were included on the Council's website and in the relevant Calendar Briefs.
- 4.6 A further 2 days of Examination hearings took place in May 2019. These focussed on housing, Gypsy and Travellers and parking.
- 4.7 Following these hearings, the Inspector required:
- that the Council modify **Policy 24: Parking provision and design** to accord with the comments of the London Mayor to ensure that the Local Plan will be in 'general conformity' with the current London Plan (which has provided the planning policy context for the Local Plan Examination)
 - further information on the housing data underpinning the Local Plan including 'refreshing' and updating the Housing Position Statement and its Housing Trajectory) and linked revisions and updates to the relevant policy in the Local Plan (**Policy 3: Housing supply**)
 - further information relating to Gypsy and Traveller and Travelling Show people matters including a full update of the Gypsy and Traveller Accommodation Needs Assessment to reflect the position as at July 2019. This involved extensive engagement with the Gypsy and Traveller community and detailed appraisals of each of the sites proposed to be allocated for use by Gypsy and Traveller households and, subsequently, once this information was agreed, linked revisions to the relevant policy in the Local Plan (**Policy 11: Gypsy and Traveller Accommodation**)
 - evidence base updates (for example, to the retail study)

- the preparation of a comprehensive schedule of draft Proposed Main Modifications to the Local Plan
- updates to technical supporting material such as the Habitats Regulations Assessment, the Health Impact Assessment and the Sustainability Appraisal to reflect the changes set out by the Inspector from the Examination hearings

4.8 In late November 2019, the Inspector also asked the Council for an assessment of the implications for the Havering Local Plan arising from the report (published in early October 2019) from the Panel of Inspectors responsible for the Examination in Public into the London Plan.

4.9 A response was prepared by Council officers and submitted to the Local Plan Inspector who has advised that she has now 'closed' this matter. Further brief commentary on the current position with the London Plan is set out below (in Section 12 of this report).

5.0 The outcomes from the Examination in Public so far

5.1 The Inspector concluded in January 2020 that the Council has supplied her with all the information she requires. The Inspector has advised that as it was submitted the Local Plan is 'unsound' but she is minded to recommend that the Local Plan could be found 'sound', subject to it including a number of Main Modifications.

5.2 The approach whereby a Local Plan Inspector determines that a Local Plan (as submitted) is 'unsound' but could be found 'sound' subject to including an agreed package of Main Modifications is typical of the way that Local Plans are progressed by Local Plan Inspectors.

5.3 Section 20 of the National Planning Policy Framework (2019) requires that a Local Plan is 'sound'. Paragraph 35 of the Planning and Compulsory Purchase Act 2004 explains that to be 'sound' the Local Plan must be:

- positively prepared
- consistent with national policy
- justified and effective

5.4 The Inspector now requests that the Proposed Main Modifications that she has required be published for public consultation along with a number of other 'supporting' items (including evidence base items that have been updated over the course of the Local Plan Examination).

6.0 Overview of the proposed Main Modifications

6.1 In general, and to address the requirements to be 'sound', the Inspector is requiring Proposed Main Modifications for the Havering Local Plan that will:

- bring a policy in the submission Local Plan into line with national planning policy and /or the London Plan
- ensure a policy reflects the latest evidence underpinning the Local Plan
- respond to third party representations (during the previous consultation(s) or at the Local Plan Examination hearings

6.2 The proposed Main Modifications that the Inspector wants taken forward take account of evidence by the Council and third parties (such as developers and their professional advisers) which was considered at the Examination in Public sessions.

6.3 The legislation requires that Proposed Main Modifications are identified in a comprehensive and detailed schedule highlighting specific changes and the reasons for those changes. The Inspector has advised that they should be progressed without prejudice to her conclusions in relation to the 'soundness' of the Plan.

6.4 In line with the Regulations covering the preparation of Local Plans, and subject to Member approval, public consultation on the proposed Main Modifications and specific updates to the evidence supporting the Local Plan (as also required by the Inspector) must now be undertaken.

6.5 This report seeks agreement:

- to undertake public consultation on the Proposed Main Modifications as well as specific updates to some parts of the evidence base supporting the Local Plan. Commentary on the recommended public consultation is set out in Section 12 of this report.
- that following the public consultation, the results of the consultation along with any comments from the Council on these (including any further changes to the proposed Main Modifications or the supporting documents that the Council considers appropriate) are submitted to the Local Plan Inspector in order to proceed further with the Local Plan examination process and to progress the Local Plan towards its adoption subject to Member approval at forthcoming Cabinet and Council meetings.

7.0 What the proposed Main Modifications comprise

7.1 In total, 28 Main Modifications are proposed by the Local Plan Inspector. No Main Modifications are proposed to Policies: 8, 9, 14, 16, 18, 25 - 27, 29, 32 - 35, 37 and 39 of the submission Havering Local Plan.

- 7.2 For the convenience of Members, the Local Plan text and policies proposed to be subject to proposed Main Modifications are listed for information purposes in **Annex 1** to this report. **Annex 2** to this report comprises the formal schedule of Proposed Main Modifications required following the Local Plan Examination hearings which is recommended for approval. **Annex 3** details proposed changes to the Proposals Map linked to the Proposed Main Modifications which are recommended for approval. A schedule of the remaining Annexes (numbers 4-16) that includes evidence and supporting items recommended to be approved for public consultation is set out later in this report in Section 11 in paragraph no.11.6.
- 7.3 It will be seen from **Annex 2** that in most cases, the proposed Main Modifications from the Local Plan Inspector involve relatively modest changes to a policy or its reasoned justification (ie the supporting explanatory text to the policy). These changes are to address the matters highlighted above in Section 5.0 (in paragraph no. 5.3) and in Section 6.0 (in paragraph 6.1).
- 7.4 Annex 2 shows that the proposed Main Modifications to Policies 3, 11 and 24 (dealing with Housing supply, Gypsy and Traveller accommodation and Parking provision and design, respectively) are more wide-ranging.
- 7.5 Section 8 of this report looks at the proposed Main Modifications for these policies in more detail including the reasons for the Proposed Main Modifications and the background to them.
- 7.6 Officers consider that notwithstanding the Proposed Main Modifications to the policies identified above (and those considered in more detail below), that the outcome(s) for the new Havering Local Plan from the Examination are broadly favourable.
- 7.7 Importantly, the overall thrust and direction of the Local Plan as submitted for Examination in March 2018 has been retained. Subject to the outcomes from the forthcoming public consultation and the final Inspector's report, it is considered that when it is formally adopted the Local Plan will have a positive role in the delivery of the Council's planning and regeneration objectives and programmes and contribute significantly to the Council's place-making roles and responsibilities. In line with Government intentions about the role of Local Plans, it will assist communities and businesses in Havering to emerge strongly and well placed from the challenging past few months.
- 8.0 The proposed Main Modifications in the Local Plan for Policies 3, 11 and 24 (housing supply, Gypsy and Traveller Accommodation and Parking provision and design, respectively)**
- 8.1 The following section of the report looks at the changes ('Main Modifications') required by the Local Plan Inspector to these policies.

- 8.2 The review considers the proposed Main Modification for Policy 24 first because the outcome(s) from this policy being implemented with the Proposed Main Modification to the policy are significantly different to those that would arise from the implementation of the policy as it was included in the submission Local Plan.

a) Policy 24: Parking provision and design

- 8.3 In its submission Local Plan, the Council set out a minimum parking provision in the 'most accessible' areas of Havering of 0.5 car parking spaces per residential unit.
- 8.4 In this context, 'most accessible' encompasses sites being close to/served by 'dense' public transport provision. Such provision offers users a choice of modes/routes and destinations. In practical terms, this typically means living close to transport 'hubs' such as several bus routes and/or train and underground services.
- 8.5 In contrast, to what was included in the submission Local Plan, the current London parking standard says that residential units in these 'most accessible' areas should have significantly less than 1 parking space per residential unit.
- 8.6 The Council robustly maintained its position throughout the Examination hearings (and subsequent to that) that it was appropriate for the Local Plan to address parking provision in these areas as set out in the submission Local Plan (ie a minimum of 0.5 car parking spaces per residential unit).
- 8.7 In preparing the submission Local Plan, the Council took this position because it has robust and up to date evidence through its own parking study (undertaken specifically to support the submission Local Plan) that residents in town centres in Havering have higher levels of car ownership.
- 8.8 The Council considers, therefore, that its approach in the submission Local Plan (minimum parking provision of 0.5 spaces per unit) reflects transport circumstances in this borough compared to other parts of London especially inner and Central London where there is better public transport provision and lower levels of car ownership and use. The Council was also strongly of the view that by requiring a minimum of 0.5 spaces per residential unit in its proposed policy that this is well within the London Plan standards of significantly less than 1 parking space per unit.
- 8.9 Following the Examination hearings and, in the light of representations from the London Mayor (through Transport for London), **the Inspector has rejected the Council's approach as set out in its submission Local Plan.** The Council has carefully considered the scope to take forward a legal challenge against this outcome. In the light of informal advice from the legal Counsel who has assisted with the Local Plan at its Examination, it has reluctantly concluded that a challenge would not be in the best interests of

Havering and it does not propose to take a challenge forward for the following reasons:

- the likelihood of a successful outcome from a legal challenge is very small
- it would be costly to prepare and progress a legal challenge at a time when the Council's resources need to be carefully prioritised
- the Council wishes to see the Havering Local Plan adopted as soon as possible in order that its wider planning and regeneration objectives can be delivered and a challenge would delay adoption

8.10 Instead, the Inspector is requiring a Proposed Main Modification to this policy that will apply the current London Plan standard of less than 1 space per residential unit to those areas in Havering that Transport for London considers have the highest levels of public transport accessibility. In the view of the Local Plan Inspector, this Proposed Main Modification is required to ensure that the Local Plan is in 'general conformity' with the London Plan as required by the planning legislation for the preparation of Local Plans.

8.11 The Council considers that an approach that requires new development to provide such low levels of parking provision is very unsatisfactory since it is likely to result in residential developments coming forward with no car parking or very little parking. It will be wholly unsuited to circumstances in Havering having regard to how people live and travel which is itself a reflection of the practical limitations of public transport provision in Havering leaving residents little option but to use a private vehicle. It will create adverse impacts on pedestrian and highway safety, adverse environmental implications and be visually intrusive in residential areas. It would fail to recognise that like many other Outer London boroughs, Havering has higher levels of car ownership and new residential developments need to make proper provision for these in their layout and design. As mentioned above (paras. 8.3-8.9), the Inspector has discounted the Council's approach which sought to secure a minimum provision (of 0.5 vehicle spaces per residential unit) which the Council considered would better reflect local circumstances and would help to ensure that developments are provided with at least some car parking.

8.12 Notwithstanding this unsatisfactory outcome in regard to town centre developments, through its evidence work and responses to the Inspector, the Council has secured some welcome flexibility for the parking standards applicable in Havering for areas of lower PTALs which includes the residential and rural areas of the borough which are further away from established centres. Specifically, the Inspector has agreed a proposed modification to the policy that secures more generous parking provision for those areas assessed as PTAL0-2 and are more than 800m away from existing or planned London Underground or railway stations.

8.13 The **Proposed Main Modification for this policy is MM22** in the schedule included in Annex 2.

b) Policy 3: Housing supply

8.14 The additional work informing the Proposed Main Modification to Policy 3: Housing supply has been required by the Inspector and/or to address third party concerns from landowners and developers and specific bodies such as the Home Builders Federation.

8.15 The work has been aimed at ensuring that the Local Plan can demonstrate robustness of data and confidence in the Council being able to show a 5 year housing land supply (as required by the National Planning Policy Framework).

8.16 As previously advised, to support and inform Policy 3, the Inspector has also required the preparation of individual appraisals for each of the sites addressed through the Council's Housing Trajectory which shows anticipated housing delivery over the period of the Local Plan.

8.17 The outcome of this extensive work is a Proposed Main Modification to Policy 3: Housing Supply that:

- clarifies that due to the nature of housing supply in the Local Plan, the Council has adopted a 'stepped target' approach to housing delivery over the first 10 years of the Plan period so that there are different annual housing targets for housing delivery over specific phases of the Local Plan period. A new table is included to set out the 'stepped' targets over the periods 2016/17 - 2020/2021, 2021/22 – 2025/2026 and 2026/2027-2030/2031
- provides updated housing numbers expected to be delivered for key areas of change and growth in Havering including the Strategic Development Areas of Romford and Rainham, the Council's Twelve Estates Regeneration programme(s) and other major sites encompassing potential capacity overall to deliver at least 13,095 new homes over the first 10 years of the Plan period
- Explains the Council's approach to assessing its 5 year land supply and highlights that the Local Plan now shows 5.34 years supply at adoption of the Local Plan based on using a 'stepped' annual housing target
- reflects the 'linked' revisions to the Housing Position Statement document which supports and informs the Havering Local Plan and, in particular, Policy 3: Housing Supply

8.18 The **Proposed Main Modification for this policy is MM6** in the schedule included in Annex 2. The supporting items recommended for approval are set out in Annexes 8, 9, 10 and 11.

c) Policy 11: Gypsy and traveller accommodation

8.19 The additional work on **Policy 11: Gypsy and Traveller accommodation policy** has been required by the Inspector to:

- better reflect the requirements set out in national planning policy guidance specifically 'Planning Policy for Traveller Sites' (2015); and
- Establish that the accommodation needs of this part of the community over the period of the Local Plan have been accurately assessed as is required by the legislation.

8.20 The work required by the Inspector encompassed the Council's consultants (Opinion Research Services – ORS) undertaking further extensive additional survey work (in the form of face to face interviews) with the Gypsy and Traveller and Travelling Showpeople households and their representatives.

8.21 This work took place in summer 2019 following the May 2019 Local Examination hearings and included many site visits and detailed discussions with the households.

8.22 Subsequently, extensive mapping work was done by the consultants and Council officers using the household survey information secured from the households to assess the capacity/suitability of sites to accommodate the necessary number of households/pitches/plots in line with the identified household growth.

8.23 Importantly, the approach in the proposed Main Modification has recognised the advantages arising from the households being able to contribute meaningfully to the survey work. It has helped to ensure that their views and choices about living arrangements have been reflected in the proposed site layouts and accommodation units etc.

8.24 In line with national planning policy in 'Planning Policy for Gypsy and Traveller Sites (2015)', the Inspector has required that the Council show that accommodation needs for Gypsies and Travellers and Travelling Showpeople can be met over specific periods in the Local Plan period. The Local Plan shows this can be done on existing identified sites in the first five years and then household growth between 2021-2026 can be met at seven existing sites that have the capacity to accommodate further growth.

8.25 The outcome of this work is a re-modelled policy which robustly maintains the overall approach included in the submission Havering Local Plan for Gypsy and Traveller accommodation (Policy 11).

8.26 The proposed changes:

- bring the policy more into line with national planning policy requirements

- take account of the latest Gypsy and Traveller Accommodation Assessment report (July 2019 update) in regard to numbers of pitches required for Gypsies and Travellers and plots for Travelling Showpeople
- identify accommodation needs for Gypsies and Travellers and Travelling Showpeople over the Local Plan period as a whole and for specific 5 year periods within that as required by national planning policy
- identify how pitches for Gypsy and Traveller pitches and plots for Travelling Showpeople could be accommodated across the existing sites (including those previously identified in the submission Local Plan) and pitches at some further existing sites. The proposed sites to be allocated do not include two existing unauthorised sites at Benskins Lane and Willoughby Drive
- remove the sites proposed to be allocated for Gypsies and Travellers and Travelling Showpeople from the Green Belt and limit the use of these sites to accommodation for Gypsy and Travellers and Travelling Showpeople. The proposed modification to the policy makes clear that in the event that any of the sites are not used by gypsy and traveller or travelling showpeople households, then the level of protection afforded to them through planning will revert to if the sites had remained in the Green Belt
- clarify the detailed criteria that all sites proposed to be allocated for Gypsies and Travellers and Travelling Showpeople and any others for these groups coming forward must satisfy to secure planning permission
- re-iterates that the households will be required to 'regularise' the position at their respective sites by the submission and approval of appropriate planning applications
- re-affirm that national planning policy will be used to determine proposals that come forward later in the Plan period.

8.27 The **Proposed Main Modification for this policy is MM12** in the schedule included in Annex 2. The supporting items recommended for approval are set out in Annexes 12, 13, 14 and 15.

9.0 Overview of the changes to Policies 3, 11 and 24 (Proposed Main Modifications numbers: MM6, MM12 and MM22, respectively)

9.1 In summary, the revisions required by the Local Plan Inspector are:

- to more closely align the Local Plan with requirements in national planning policy (relevant to Policies 3 and 11 on housing supply and gypsy and travellers, respectively)
- because the Local Plan must be in 'general conformity' with the adopted London Plan (relevant to Policy 24 on parking provision)

10.0 Other work supporting the proposed Main Modifications

- 10.1 Aside from the documents which support and inform the Proposed Main Modifications (as discussed above), the Local Plan Inspector has also required that the Council review and update as necessary, some specific technical documents supporting the Local Plan comprising the:
- Sustainability Appraisal (SA)
 - Habitat Regulation Assessment (HRA); and
 - Health Impact Assessment (HIA)
- 10.2 Each of these was originally submitted to Secretary of State in March 2018 as part of the evidence base for the draft Local Plan. This latest review has been to reflect any positive or negative impacts because of the proposed Main Modifications.
- 10.3 The review of all of these documents concluded there were no negative impacts that were not already mitigated for in other parts of the Local Plan and therefore there was no need to undertake full and revised versions of the SA, HRA and HIA documents. The updated versions of these items which are recommended for approval are included in Annexes 4, 5 and 6.
- 10.4 Members are also recommended to approve updated evidence base items on older persons housing accommodation and a supplementary retail note (Annexes 7 and 16, respectively).

11.0 What documents will be included in the public consultation?

- 11.1 The legislation for the preparation of Local Plan requires that the Proposed Main Modifications (and other 'linked' items that support and inform the Proposed Main Modifications) are the subject of further public consultation.
- 11.2 In summary, the key items to be included in the public consultation will be:
- a proposed Main Modifications schedule setting out the proposed Main Modifications on a policy by policy basis and with a short explanation for the modification proposed. This item will be supported by a Schedule of Changes to the Proposals Map.
 - several updated evidence base documents (especially those linked to housing evidence and gypsy and traveller accommodation/sites)
- 11.3 At the direction of the Local Plan Inspector, the Council undertook some public consultation in April 2019 with the Gypsy and Traveller and Travelling Showpeople community on the emerging work supporting Policy 11. This work included revisions to the Gypsy and Traveller Accommodation Assessment and factual information relating to the individual sites in the form of a pitch deliverability matrix for each site. This work is included in Annex 14 to this report. The Inspector has requested that this information

also be included as part of the consultation on the proposed Main Modifications notwithstanding that parts of it have been superseded by the latest accommodation assessment in July 2019, further work on assessing the capacity of each site and the subsequent proposed modifications to the policy.

- 11.4 During the Examination, officers prepared and agreed a number of ‘minor’ changes with the Local Plan Inspector. These comprised small corrections, factual updates and ‘consequential’ adjustments linked to the Proposed Main Modifications. These items are in addition to a number of ‘minor’ changes that were delegated to officers in the course of preparing the submission Local Plan. A schedule of all the proposed ‘minor’ changes is included as Annex 17 to this report and is recommended for approval. The recommended proposed ‘minor’ modifications do not form part of the public consultation and any comments submitted on these will be discounted.
- 11.5 In order to assist understanding of the outcomes from the Local Plan Examination, the documents included in the overall suite of documents to be published will also include a ‘composite’ document comprising the submission Local Plan document with all the Proposed Main Modifications and all of the proposed ‘minor’ changes. This document which is also an **‘information only’ item will be outside of the public consultation** and is identified as Annexe 18. This document will be prepared and published after the Cabinet meeting since its content must reflect Annexes 2 and 17.
- 11.6 The schedule below sets out a list of the annexes for this report including those for formal approval. The schedule is repeated at the start of the annexes for convenience.

Schedule of the annexes to this report setting out items recommended to be approved for public consultation (other than Annexes 1, 17, 18, 19 and 20 which will not be subject to public consultation)

Annex Number	Title and content of annex
Annex 1	Summary table of text and/or policies with Proposed Main Modifications
Annex 2	Schedule of Proposed Main Modifications
Annex 3	Proposals Map Changes Booklet Addendum December 2019 (in light of Proposed Main Modifications)
Annex 4	Habitats Regulations Assessment: Havering Local Plan Proposed Main Modifications (April 2020)
Annex 5	Health Impact Assessment Review 2019: Report responding to Proposed Main Modifications to Local Plan (April 2020)

Annex 6	Sustainability Appraisal (SA) for the Havering Local Plan: SA Report Addendum to accompany the Proposed Main Modifications (April 2020)
Annex 7	Review of 2018 Review of Specialist Older Persons' Housing
Annex 8	Housing Position Statement 2019 – Technical Update (October 2019)
Annex 9	Update to Annex 8 of the Housing Position Statement
Annex 10	Updates to Annexes 14.1, 14.2, 14.3 and 14.4 of the Housing Position Statement (comprising housing completions in Financial Years 2014 - 2017 (inclusive))
Annex 11	Housing Trajectory October 2019 (Update for the Local Plan Inspector)
Annex 12	Revised Gypsy and Traveller Accommodation Assessment Update report (July 2019)
Annex 13	Site Layouts Drawings (Supporting site layout material for revised Policy 11 Gypsy and Traveller accommodation)
Annex 14	Pitch Deliverability Assessments (Matrixes) (February 2019)
Annex 15	Gypsy and Traveller Accommodation and Proposals Map Changes (January 2020)
Annex 16	Supplementary retail note for the Havering Local Plan (December 2018)
Annex 17	Schedule of Proposed 'Minor' modifications to the submission Havering Local Plan
Annex 18	'Composite' revised submission Havering Local Plan document (including Proposed Main Modifications and 'Minor' changes) [This item will be published after Cabinet following approval of Annexes 2 and 17]
Annex 19	Amended Statement of Community Involvement (Covid 19 Update)
Annex 20	Equalities Impact Assessment for the amended Statement of Community Involvement

11.7 It should be noted that:

- Annexes numbers 1-7 and 9 -13 of the Housing Position Statement 2019 Technical Update May 2019 (October 2019 amendment) remain unchanged from those submitted at the May 2019 hearing sessions
- The pitch assessments set out in the Pitch Deliverability Assessment matrixes (February 2019) for each site are superseded by the latest Gypsy and Traveller Accommodation Assessment Update report (July 2019). The supporting information in the Pitch Deliverability Assessments remains appropriate.

12.0 What the public consultation will encompass and what comments can address

12.1 At this late stage in the Local Plan preparation process, the public consultation on draft Proposed Main Modifications is, in effect, being undertaken on behalf of the Local Plan Inspector. It is a statutory requirement of the Local Plan preparation process. Notwithstanding this, the Council considers very strongly itself that providing opportunities for the community to view and comment on the preparation of planning policies is a fundamental part of the planning process and must be facilitated throughout each stage of the plan making process. The Council is committed to safeguarding the interests of the community in having opportunities to view consultation material and to comment upon it. Most importantly, the public consultation is only concerned with the Proposed Main Modifications and linked evidence base updates (see para. 12.14 below).

12.2 In doing this, the Council must ensure that the public consultation takes place in line with the previous consultation(s) on the Local Plan at the Regulations 18 and 19 stages and, importantly, in line with the commitments in its adopted Statement of Community Involvement.

12.3 The Council's current adopted Statement of Community Involvement (SCI) says public consultation at this stage will comprise:

- informing all stakeholders on the Local Plan database
- website publicity
- Statutory notice
- 'deposit' of copies of the documents at all Havering libraries and the Public Advice and Service Centre (PASC) in the Liberty Shopping Centre in Romford

12.4 The current circumstances on ensuring public health is safeguarded during the Covid 19 pandemic has required the Council to consider some adjustments to its approach to ensuring that the community can be fully engaged during this stage of the Local Plan preparation. For its part, the Government has made it clear that it sees Local Plans and plan-making

activities as being a key part of its 'exit strategy' from the Covid 19 pandemic and essential to helping to restore the economy. It is committed to ensuring, as far as is possible, that plan making continues during the pandemic.

- 12.5 In order to maintain momentum on plan-making, the Government has published guidance to local authorities about them making temporary changes to their SCIs to 'promote effective community engagement' and facilitate public consultation through 'means which are reasonably practicable'. Local authorities are not required to consult on any proposed changes to their SCIs brought forward to address the current 'unprecedented circumstances' but they should publicise them.
- 12.6 In the light of this, this report recommends that Members approve the publication of a number of temporary amendments to the Council's adopted SCI that will facilitate meaningful public consultation and engagement during this important stage in the plan preparation process. A recommended amended version of the SCI is included as Annex 19.
- 12.7 The proposed amendments to the SCI will help enable the Council to progress its Local Plan towards adoption at the earliest opportunity. In line with the guidance, it is proposed that the proposed amendments to the SCI will remain in place until the Government advises that authorities can safely revert to their usual public consultation measures as set out in their current SCIs.
- 12.8 The recommended amendments take account of the Government guidance that in considering 'new' approaches to consultation and engagement, authorities are strongly encouraged 'to use on-line engagement methods to their full potential'. The guidance also suggests that 'authorities will also need to take reasonable steps to ensure sections of the community that don't have internet access are involved and consider alternative and creative ways to achieve this'. These factors have been fully considered in the recommended approach set out below. The Council's website has already been updated to indicate that changes to the SCI are being considered.
- 12.9 It is recommended that putting in place the following amendments to the current SCI will optimise the opportunity for the community to be involved in the plan making process and be in line with the Government advice:
- direct notification of all consultees on the Havering planning policy database by email/letter and this will include representatives from local residents associations
 - advertising on the Council's website as well as marketing and profile raising via currently used social media platforms
 - Statutory Notice placed in 'Romford Recorder' newspaper

- 'hard' copies of documents provided on request
 - specific engagement with households in the Gypsy and Traveller community to explain the proposed modifications to the specific policy in the Local Plan for gypsy and traveller accommodation and to recognise that this is often a 'hard to reach' sector of the wider community who may also not be familiar with the detail of Local Plan preparation. Another reason for specific engagement with this part of the community is that it will better enable households within the community to start to consider the preparation of planning applications for their sites as required by the proposed modified policy (Policy 11: Gypsy and traveller accommodation). This approach will accord with the emphasis that the Local Plan Inspector has given to the plan making process engaging with this part of the community throughout the Examination process
- 12.10 In order to ensure that the public consultation on this latest stage in the Local Plan preparation is effective, fair and accessible, it is also recommended that the public consultation will be extended from the statutory 6 weeks period to 8 weeks to ensure that the community has adequate opportunity to be involved.
- 12.11 At the request of the Local Plan Inspector, the review of the Statement of Community Involvement has included a specific equalities impact assessment on this item. It will be submitted to the Local Plan Inspector. Members are asked to approve this item (included as Annex 20).
- 12.12 In the course of preparing this report, the Council initiated work to re-open its library services and libraries. It is understood that libraries are currently scheduled to re-open from mid-July on a phased basis and with robust protocols in place for users and staff. The availability of all libraries to be open with normal hours and their full facilities available to users to provide the 'deposit' locations for Local Plan documents as set out in the current SCI is not possible.
- 12.13 It is understood that in order to safeguard the health of library visitors and staff, the libraries which open will have reduced staff numbers, will be strictly controlled in regard to matters such as opening hours, numbers of visitors, duration of visitor stays and availability of documents and IT equipment. Whilst it is welcome that libraries are re-opening, it is considered that it will not be feasible for the libraries to have any role in 'hosting' public consultation linked to the Local Plan. It will be very impractical for the libraries to remove any Local Plan documents after they have been used by a library visitor and then placed in quarantine before being returned for public use since this may involve each library having a 'stockpile' of many copies of the individual documents and these being available on rotation to replace copies placed in quarantine.
- 12.14 In accordance with the existing requirements for the preparation of Local Plans, comments will only be allowed on the proposed Main Modifications in

Annexe 2 (and linked updated evidence/supporting items set out in Annexes 3-16) and not on the rest of the Local Plan (which is effectively 'closed').

- 12.15 No other comments will be considered. Earlier comments from third parties will not need to be re-submitted and the Inspector will not be re-opening debate/discussion on topics that are not within the proposed Main Modifications.
- 12.16 At this stage in Local Plan preparation, comments can be made by anyone but only on matters of 'soundness' and legal compliance of the proposed Main Modifications and evidence base updates.
- 12.17 Any comments submitted as a result of the forthcoming public consultation will be primarily for the consideration of the Inspector (although the Council will have to provide its own views on them).
- 12.18 At this stage, it is not possible to anticipate the scale or content of third party responses to the consultation so the potential impact of these on the programme for the adoption of the Local Plan and any further work required cannot be firmly identified.
- 12.19 Council officers have continued to maintain close liaison with the Local Plan Inspector and Programme Officer throughout the Examination period (including during the Covid 19 pandemic). The Local Plan Inspector has indicated her informal agreement to:
- the steps that the Council is being recommended to take in respect of publishing changes to its SCI
 - how the Council is now proposing to undertake public consultation on the Proposed Main Modifications and evidence base updates in order to maintain progress towards the adoption of the Local Plan whilst affording proper opportunities for engagement

13.0 Other matters linked to the Local Plan

- 13.1 It will be noted from the proposed Main Modifications (Annex 2) that the Inspector is likely to expect that the Council will commence an immediate update of the Local Plan following its adoption.
- 13.2 The Council envisages that it will be preparing further planning guidance in due course that will be linked to the Havering Local Plan. Work on a Masterplan for Romford to guide development is well advanced.
- 13.3 The Local Plan has to be in general conformity with the London Plan. The London Plan forms part of the development plan context for the purposes of planning in Havering. For the purposes of the Local Plan Examination, the Local Plan was considered against the then current adopted London Plan notwithstanding that at the time of the Examination, the Mayor was in the

later stages of finalising his draft London Plan ahead of the Examination in Public for that in the first part of 2019.

- 13.4 The Examination in Public into the draft London Plan concluded in mid - 2019. The Mayor responded to the report from the Panel of Inspectors by publishing his 'Intend to publish' version of the new London Plan and that was submitted to the Secretary of State in late 2019.
- 13.5 In response, the Secretary of State has identified a number of significant concerns linked to the preparation and delivery of the Mayor's planning strategy including particularly the delivery of housing.
- 13.6 The Secretary of State issued a number of Directions that the Mayor of London must address before the London Plan can be adopted. These Directions are in order to ensure that the London Plan is consistent with national planning policy as set out in the National Planning Policy Framework (2019).
- 13.7 Additionally, the Secretary of State has identified a number of specific areas where he considers that the London Plan has 'fallen short of best serving Londoners'. These include its ambition, policy for small sites, industrial land, housing mix, optimising density of development and aviation.
- 13.8 The Secretary of State requires that, along with the several Directions, these matters are addressed in the further work on the London Plan. He has asked the Mayor to take a collaborative approach to this and to work with Government officials to revise the London Plan. He expects the work to have a particular focus on housing delivery.
- 13.9 At the time of preparing this report, the Mayor had not responded to the Secretary of State.

14.0 Revisions and updates to the Local Development Scheme

- 14.1 The Council is required to set out its planned intentions regarding the preparation of planning policy and planning guidance in its Local Development Scheme (LDS). Cabinet at its meeting in July 2019 approved the current Local Development Scheme (2019 – 2021).
- 14.2 In order to ensure that the LDS accurately reflects the Council's intentions in regard to further work on planning documents, it is intended to revise and update the LDS once the Local Plan has been adopted. It will enable the LDS to include up to date programmes for the planned update of the Local Plan (as required by the Local Plan Inspector) and other work such as the Romford Masterplan and the preparation of any Supplementary Planning Documents to support and inform the interpretation of the new Local Plan.

15.0 Next Steps

- 15.1 Subject to approval, the Council will need to undertake public consultation for eight weeks on the Proposed Main Modifications and evidence base updates. It will need to consider the consultation responses to the consultation and advise the Inspector of its views on these including any changes it considers necessary and appropriate.
- 15.2 Subsequently, the Inspector will present her findings and recommendations on the examination in a final report.
- 15.3 The Inspector's report is 'binding' on the Council and the Council cannot change the contents. It is likely that the timing of this being received by the Council will be dependent upon the Inspector's other commitments with the Planning Inspectorate.
- 15.4 If the Inspector finds the Local Plan 'sound' and legally compliant, the Council will be able to proceed to formal adoption by means of Cabinet and Council approval(s). It is anticipated that this will be later in 2020 subject to the outcome from the public consultation and timing of the Inspector's further work and Member approval.
- 15.5 The recommended Proposed Main Modifications will make clear, at the instruction of the Local Plan Inspector, that the Council will initiate an immediate update of the Local Plan once it is adopted.

REASONS AND OPTIONS

Reasons for the decision:

The option of not going out to consultation on the proposed Main Modifications was rejected because:

- It is a statutory requirement for boroughs to have up to date Local Plans and not providing this additional information would mean the Inspector may not be able to make a decision on whether the Havering Local Plan is 'sound' and should be approved
- An adopted Local Plan will better enable the Council to maintain effective local control over planning in Havering to ensure that development is in the best interests of Havering. In the absence of an up to date and adopted Havering Local Plan, planning decisions would be taken with reference to the Government's National Planning Policy Framework and the London Plan. These strategies do not reflect local circumstances as well as a Local Plan prepared specifically for Havering

- An adopted Local Plan will better enable Havering to respond positively to the challenges resulting from the Covid 19 pandemic and this accords with the latest Government guidance

Having an up to date Local Plan will:

- enable the Council to bring forward other linked pieces of work such as Masterplans for Romford and Rainham
- support other planning and regeneration programmes
- assist the Council in its infrastructure planning necessary to support change and growth in Havering

It would not be possible to undertake the necessary public consultation on the Proposed Main Modifications and updated evidence base in line with the approach set out in the adopted Statement of Community Involvement (SCI) as specified locations for 'hosting' consultation documents (such as Havering's libraries and the Public Advice and Service Centre) have been closed during the 'lock-down'. In particular, not placing the consultation items at the required locations (Havering libraries and the Public Advice and Service Centre in Romford) would be contrary to the commitments set out in the Council's Statement of Community Involvement (which sets out how the Council will undertake public consultation on planning matters).

If consultation took place during the 'lock-down' and the community was not able to have reasonable access to consultation documents, there would be a risk that the Local Plan Inspector may consider that the Local Plan failed to meet requirements around legal compliance and the Local Plan could be found 'unsound'.

Bringing forward the recommended changes to the SCI (including lengthening the consultation period and using other tools and platforms) will enable the Council to ensure that stakeholders have the opportunity to have a meaningful engagement in the preparation of the Local Plan in line with the Council's commitment to engaging with the community in its plan-making work.

IMPLICATIONS AND RISKS

Financial implications and risks:

The submission of material to the Inspector following the Examination in Public (EIP) and the recommendations stated within this report has no direct financial implications.

The Cabinet report on the MTFS Update (September 2019) included details of the budget for Local Plan work in 2020/2021 and 2021/2022 (£0.557m and £0.200m, respectively).

An allocation £0.600m was identified from the Business Risk Reserve for Local Plan work in 2019/20. A residual amount of unspent monies (£0.434m from this has been carried over into 2020/21.

The costs of undertaking the public consultation can be met within the above budget.

There is a risk that final costs exceed the current funding provision available for this plan, and any overspend would therefore need to be contained within the service budget.

Legal implications and risks:

It is a statutory requirement for the Council to have a Local Plan in place and ensure the Local Plan is relevant and up to date. The statutory provisions under which a Local Plan is made are within the Planning and Compulsory Purchase Act 2004 (as amended) and regulations made under the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Environment Assessment of Plans and Programme Regulations 2004. To not prepare a Local Plan runs the risk that the Secretary of State will 'step in' and prepare a Local Plan on behalf of the Council.

The Submission version of the Local Plan has been the subject of an assessment of the legal implications and risks in the original report to Cabinet dated 19 July 2017 and those legal comments do not alter as a result of this report.

The Local Plan was submitted to the Secretary of State for examination, along with the Sustainability Appraisal, evidence base and a statement of representations and main issues in line with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Following submission of the Local Plan to the Secretary of State an Independent Inspector during the assessment of the plan requested further information in order to be able to determine whether it has been prepared in line with section 20 of the Planning and Compulsory Purchase Act 2004 and Regulations 23 – 24 of the Local Plan Regulations 2012

If the Inspector considers that the Local Plan has not been prepared in accordance with the Regulations then the Inspector may direct the Council to repeat part of the pre-submission process or start the process again. Exceptionally, under Section 21(9) (a) of the Planning and Compulsory Purchase Act 2004 the Secretary of State has the power to direct a local planning authority to withdraw its submitted plan.

The main modifications set out in the appendix have been through legal review and it is recommended that public consultation commences in line with the proposed changes to the Statement of Community Involvement set out in Section 12 of the main report. The proposed changes to the SCI have been prepared to accord with the latest planning guidance from the Government.

In due course, following the adoption of the Local Plan, the revisions and updates to the Local Development Scheme will be undertaken as set out in the July 2019 Cabinet report and will enable the Council to evidence its further plan making work in line with legislative requirements and 'best practice.'

Human Resources implications and risks:

A full Human Resources Assessment was undertaken of the Local Plan as set out the Cabinet and Council reports for the Proposed Submission Havering Local Plan in July 2017.

There are no further human resources implications arising from this Cabinet report and decision.

Equalities implications and risks:

The Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010 requires the Council, when exercising its functions, to have due regard to:

- (i) the need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (ii) the need to advance equality of opportunity between persons who share protected characteristics and those who do not, and;
- (iii) foster good relations between those who have protected characteristics and those who do not.

Note: 'Protected characteristics' are: age, sex, race, disability, sexual orientation, marriage and civil partnerships, religion or belief, pregnancy and maternity and gender reassignment.

The Council is committed to all of the above in the provision, procurement and commissioning of its services, and the employment of its workforce. In addition, the Council is also committed to improving the quality of life and wellbeing for all Havering residents in respect of socio-economics and health determinants.

A full Equalities Impact Assessment was undertaken of the Local Plan as set out in The Cabinet and Council reports for the Proposed Submission Havering Local Plan in July 2017.

The Local Plan will provide the Council with a strategic framework to help deliver a range of outcomes including new homes, jobs, local economic growth and improved social infrastructure for all residents across Havering including those who share the characteristics protected by the Equality Act 2010.

As such ensuring that the Local Plan has addressed these has been a priority in its preparation throughout the process since 2015. As the Local Plan has a key role in influencing the built environment and how people use it, a key aspect of the EIA is to ensure that access issues for people with disabilities is considered.

The Equality Impact Assessment that supports the Submission Local Plan was formally submitted with the Local Plan and the suite of supporting documents to the Secretary of State.

The preparation of the recommended amendments to the Statement of Community Involvement has been accompanied by a specific Equalities Impact Assessment.

As work progresses on forthcoming documents that will support and complement the Local Plan, further assessments of the Local Plan and its documents from an equalities impact assessment will be undertaken.

Health and Wellbeing implications and Risks

The Submission Local Plan has been subject to a comprehensive Health Impact Assessment in collaboration with the Council's public Health Team.

The Health Impact Assessment of the Submission Local Plan resulted in a raft of policies being revised, new guidance being drafted and a proposed new policy that requires developers of all major developments to undertake their own HIA pre-application.

The health and wellbeing implications of the proposed Main Modifications have been assessed through an updated Health Impact Assessment which forms one of the evidence base documents that will be subject to further consultation.

The recommended changes to the SCI take account of the latest planning and social distancing guidance from the Government and reflect the continuing importance of maintaining public health and safety during the Covid 19 pandemic.

BACKGROUND PAPERS

None.

Havering Cabinet Meeting on August 5 2020

**Summary table of text and /or policies with Proposed Main
Modifications**

August 2020

Annex 1

Havering Local Plan – Summary table of text and / or policies with Proposed Main Modifications following Local Plan Examination

Havering Local Plan Text / Policy	Subject of text and / or policy	Is a Main Modification proposed?	Main Modification Number (if applicable)
Overview text	What is the Local Plan	Yes	MM1
Strategic objectives	Strategic objectives	Yes	MM2
Policy 1	Romford Strategic Development Area	Yes	MM3
Policy 2	Rainham and Beam Park Strategic Development Area	Yes	MM5
Policy 3	Housing Supply	Yes	MM6
Policy 4	Affordable Housing	Yes	MM7
Policy 5	Housing mix	Yes	MM8
Policy 6	Specialist accommodation	Yes	MM9
Policy 7	Residential design and amenity	Yes	MM10
Policy 8	Homes in Multiple Occupation	No	Not applicable
Policy 9	Conversions and subdivisions	No	Not applicable
Policy 10	Gardens and backland development	Yes	MM11
Policy 11	Gypsy and Traveller accommodation	Yes	MM12
Policy 12	Healthy communities	Yes	MM13
Policy 13	Town centre development	Yes	MM14
Policy 14	Eating and drinking	No	Not applicable
Policy 15	Culture and community	Yes	MM15
Policy 16	Social infrastructure	No	
Policy 17	Education	Yes	MM16
Policy 18	Open space, sports and recreation	No	Not applicable
Policy 19	Business growth	Yes	MM17
Policy 20	Loss of Industrial land	Yes	MM18
Policy 21	Affordable workspace	Yes	MM19
Policy 22	Skills and training	Yes	MM20
Policy 23	Transport connections	Yes	MM21
Policy 24	Parking standards and design	Yes	MM22
Policy 25	Digital connections	No	Not applicable
Policy 26	Urban design	No	Not applicable
Policy 27	Landscaping	No	Not applicable
Policy 28	Heritage assets	Yes	MM23
Policy 29	Green infrastructure	No	Not applicable

Policy 30	Nature conservation	Yes	MM24
Policy 31	Rivers and river corridors	Yes	MM25
Policy 32	Flood management	No	Not applicable
Policy 33	Air quality	No	Not applicable
Policy 34	Managing pollution	No	Not applicable
Policy 35	On-site waste management	No	Not applicable
Policy 36	Low carbon design, decentralised energy and renewable energy	Yes	MM26
Policy 37	Mineral reserves	No	Not applicable
Policy 38	Mineral extraction	Yes	MM27
Policy 39	Secondary aggregates	No	Not applicable
Section 14	Delivery and implementation	Yes	MM28
Table	Monitoring	Yes	MM29

Note : at the instruction of the Local Plan Inspector no Main Modification was assigned to number 4.

This page is intentionally left blank

Havering Cabinet Meeting on August 5 2020

Item to be approved for Havering Local Plan Main Modifications Public Consultation

Schedule of Proposed Main Modifications

August 2020



Examination into the Havering Local Plan 2016 - 2031

Document for Public Consultation alongside the Proposed Main Modifications

Schedule of Proposed Main Modifications

August 2020

The purpose of this Proposed Main Modifications schedule

The schedule has been published to set out the Proposed Main Modifications to the **submission Havering Local Plan (March 2018)** following:

- the Regulation 19 consultation in Autumn 2017
- the submission of the Local Plan to the Secretary of State in March 2018; and
- the Examination in Public hearing sessions in October 2018 and May 2019

How to use this Proposed Main Modifications schedule

The proposed Main Modifications are arranged in plan 'order' and each has a unique number.

Each of the proposed Main Modifications (Column 1) is identified with a prefix: 'MM' followed by a number (1-29).

In all cases, all the proposed modifications for an individual policy and / or the supporting explanatory text (sometimes referred to as 'reasoned justification') have been dealt with under **a single** modification number.

The page number (Column 2) refers to the submission version of the Havering Local Plan (March 2018). Column 3 refers to the policy number or paragraph of explanatory text in the submission Local Plan.

Column 4 sets out the detail of the proposed Main Modification to the policy and / or the explanatory text. For convenience, at the start of the text, it also identifies the relevant section of the Local Plan.

For both text in the policy and the supporting explanatory text, the proposed Main Modifications are expressed in the conventional form of ~~striking through~~ for deletions and underlining for proposed additions of text or numbering changes.

For each proposed modification, any changes proposed to the 'headline' policy text are set out first. These are then followed by proposed changes to the explanatory text (where appropriate). In some cases there are no proposed modifications to the policy text and the proposed modification only encompasses modifications to the explanatory text.

In most cases, aside from minor additional changes which fall outside the scope of this proposed main modifications schedule, text in the submission Local Plan which it is proposed to retain as **unchanged** in the adopted Local Plan (subject to the outcome of the Examination and Member approval) is **not** included in this document. The exceptions to this are those instances where its inclusion in this document is helpful for clarity and assisting in placing the proposed modification into its context.

It should be noted that the proposed Main Modifications for policies 3, 11 and 24 (dealing with housing supply, gypsy and traveller accommodation and parking provision and design, respectively), and which formed an important part of the Examination hearings, are more extensive compared to other proposed Main Modifications and, for this reason, the proposed Main Modifications are set out in this document within the preceding and following text in the submission Local Plan which remains unchanged.

The commentary describing the proposed modifications to policy text will refer to specific paragraphs (for example, first or second). This will always reflect the submission version of the Local Plan unless a Proposed Modification earlier in the policy has required deletion or addition of text. In such cases, the reference to third or fourth paragraph, for example, will take account of the necessary adjustments if the modification is adopted. For convenience, the position of the paragraph in the submission Local Plan is shown in brackets (for example, 'was second'. Paragraph numbers in the submission Local Plan which are adjusted as a result of additional or deleted text are shown in the strikethrough and underline format to show the original number and the proposed new number (for example, 7.8.69).

The source or the reasons for the modifications are provided in Column 5 (the right-hand column). The 'reasons' refer to hearing sessions of the Local Plan Examination.

London Borough of Havering April 2020

Schedule of Proposed Main Modifications

Column 1 Ref. Number	Column 2 Page	Column 3 Policy/ Para.	Column 4 Proposed Main Modification	Column 5 Source / Reason for proposed modification
MM1	4	New para. 1.1.8	<p>Section 1 Overview: 1.1 What is the Local Plan?</p> <p>Insert additional final paragraph after 1.1.7 :</p> <p>1.1.8 On adoption of this Local Plan the following documents that form part of the current Local Development Framework (2008) will be superseded:</p> <ul style="list-style-type: none"> • <u>Core Strategy (2008)</u> • <u>Development Control Policies (2008)</u> • <u>Proposals Map (2008)</u> - will be superseded by a new Proposals Map for the Local Plan and this will include the changes identified in the Proposals Map Changes booklet(s) and those elements of the existing Proposals Map which will be unchanged. • <u>Sustainable Design and Construction (2009)</u> • <u>Planning Obligations (2013)</u> will be superseded by the introduction of Havering CLL (2019) <p><u>Retain the remaining existing allocations in the Romford Area Action Plan (2008) and the Site Specific Allocations (2008) until masterplans are adopted for the Romford and Rainham and Beam Park areas, respectively.</u></p>	<p>In response to discussions on Day 1 of the hearing sessions (Matter 1).</p> <p>The proposed modification :</p> <ul style="list-style-type: none"> • ensures that the Local Plan is in accordance with Reg 8(5) of the Town and Country Planning (Local Plans) (England) Regulations 2012. This requires that a statement must set out which documents will be superseded by a new Local Plan.
MM2	10	Strategic Objectives Para 3.2.1	<p>Section 3 : Strategic Objectives</p> <p>Add new criterion to paragraph 3.2.1 as follows :</p> <p><u>xxii. Support greater use of the River Thames for freight and passenger transport</u></p> <p>and renumber the final criterion as xxiii.</p>	<p>In response to discussions on Day 5 of the Hearing session (Matter 8).</p> <p>The proposed modification recognises the potential of the river for freight transport in line with the Mayor of London's strategies and the Council's transport policies.</p>
MM3	16	Policy 1	<p>Section 6 : Strategic Development Areas : 6.1 Romford Strategic Development Area</p> <p>Update and amend the first paragraph of the policy as follows:</p> <p>Residential Development</p> <p>Over the plan period the Council will support the delivery of over <u>6,000 5,300⁽²⁾</u> new high quality homes within the Romford Strategic Development Area in well managed residential and mixed use schemes that provide attractive places to live and which are well integrated with the existing community.</p> <p>Insert text and renumber the policy criteria from ix. onwards (including ix.) as follows :</p> <p>Connectivity</p> <p>Romford is the most accessible and well connected area within the borough and has an important role as a</p>	<p>In response to discussions on Day 1 of the hearing sessions (Matter 2).</p> <p>The proposed modifications:</p> <ul style="list-style-type: none"> • update the housing figures included in the policy in line with Policy 3 and the Housing Position Statement : Technical Update (October 2019) • clarify that only major developments will be required to secure improvements in connectivity • to reflect updated evidence that school provision has been taken into account and will be included in the Bridge Close development • emphasise the importance of mixed uses being secured in the Romford Strategic Development

			<p>transport hub. The Council will support proposals that further enhance connectivity and will:</p> <ul style="list-style-type: none"> * <u>ix</u> Continue to work with partners to secure significant improvements to Romford station; * <u>x</u> Support the delivery of Crossrail services to Romford and improvements to the public realm in the vicinity of the station; * <u>xi</u> Support the delivery of a new east-west shared use link from the railway station across the River Rom to the existing and new residential areas to the west; * <u>xii</u> Actively pursue opportunities with TfL and other partners to tunnel the western section of the ring road; * <u>xiii</u> Work with TfL to improve accessibility into Romford Town Centre for active travel users; * <u>xiv</u> Work with the Barking Havering Redbridge University Hospital NHS Trust and TfL to improve links to Queens Hospital including increasing bus capacity at Queens Interchange; * <u>xv</u> Require developers seeking to develop land adjacent to the ring road to address its perception as a barrier for active travel including opportunities for its greening; * <u>xvi</u> Support development which improves the quality of the pedestrian environment, including the greening of the town centre with new street trees and planting and enhanced provision for pedestrians and cyclists; * <u>xvii</u> Require developers of <u>major sites</u> to improve active travel links between Romford Station, Waterloo Road and Bridge Close; * <u>xviii</u> Support development proposals that better integrates The Brewery with South Street; * <u>xix</u> Require proposals for development along the River Rom to improve the quality and setting of the river and to provide continuous, safe and accessible links alongside the river to promote active travel and improve north-south connectivity; and * <u>xx</u> Support development proposals that deliver an enhanced link between the Market Place, St Edward the Confessor Church, North Street and the Trinity Methodist Church, improving the quality of the pedestrian environment along Angel Way. <p>Renumber the policy criteria and insert text as follows :</p> <p>Social infrastructure</p> <p>To support growth in the Romford Strategic Development Area and to assist in ensuring it is a successful place to live, the Council will work with developers and service providers to ensure the delivery of:</p> <p>* <u>xxi</u> Romford Leisure Centre</p> <p>* <u>xxii</u> New and enhanced public open spaces</p> <p>* <u>xxiii</u> A new health hub, including the sexual health services relocated from Queens Hospital;</p> <p>* <u>xxiv</u> Additional school places in line with the Council's Commissioning Plan and Schools Expansion Programme over the Plan period;</p> <p>* <u>xxv</u> Additional primary school provision equivalent to 3 forms of entry (FE) in the first 5 years of the Plan and a further 6FE need for primary school places beyond the first five years. <u>A 3 form of entry primary school (630 places) has been approved on the Bridge Close development site and the new school should be sufficient to meet demand for the additional primary places needed over the next five years. A further 6FE need for primary school places beyond the first five years</u></p> <p>* <u>xxvi</u> A 6/8FE secondary school in the second phase of the Plan period (5-10 years);</p> <p>Development proposals that generate a primary school child yield equivalent to one additional form of entry will be expected to provide adequate space on site for the provision of a school. The Council will only support proposals without this provision where it can be robustly demonstrated that existing or planned education provision can cater for the additional demand for school places.</p>	<p>Area and clarify the role of the Romford Masterplan</p> <ul style="list-style-type: none"> • clarify floor to ceiling height requirements • clarify requirements about tall buildings • explain the Council's approach to the Romford Masterplan • corrects a numbering error in the policy criteria
--	--	--	--	---

	<p>Renumber the policy criteria and insert text as follows :</p> <p>Design and Heritage</p> <p>The Council will require development in Romford town centre to be of high architectural and urban design quality. Development and uses must be appropriate to and will be expected to improve the function, appearance, and character of the town centre.</p> <p>The Council will support proposals that:</p> <p>xxii. Create active streets with strong and well-articulated frontages to all existing and proposed pedestrian routes, particularly at ground floor level, avoiding blank facades and exposed service areas;</p> <p>xxiii. Incorporate generous floor to ceiling heights at ground floor level to provide for flexibility and adaptability over time and respond to the needs of different retailers. To achieve a vibrant and thriving Town Centre there will need to be a mix of uses throughout the Romford Strategic Development Area (RSDA). It is envisaged that this will include residential, retail, commercial, leisure and arts uses. It is intended that the preferred locations for these different uses within the Town Centre will be identified through the ongoing master planning process for Romford. To facilitate delivery of these uses, the design of the ground floor of a mixed use development within RSDA should have a minimum floor-to-floor height of 3.5m to allow flexibility for future changes and adaptability over time. This is a recommended dimension for floor-to-floor height, as the floor-to-ceiling height in retail or commercial development will depend on individual occupier fit out requirements. Commercial buildings, given their likely increased service requirements will generally require a minimum floor-to-ceiling height of 3.5m to 4m.</p> <p>xxix. Positively respond to the sensitive nature and urban fabric within the Conservation Area, views of St. Edward the Confessor Church and the historic crossroads where South Street, the High Street and the Market Place meet;</p> <p>xxx. Make a positive contribution towards public realm improvements in the Market Place;</p> <p>xxxi. Demonstrate how the proposed scheme responds to wider development opportunities, movement and environmental enhancements in the town centre;</p> <p>xxxii. On major development sites open up access to the River Rom and positively incorporate the river into the development scheme(s);</p> <p>xxxiii. Optimise the design and location of development including the incorporation of resilience measures to address potential flood risk, where appropriate; and</p> <p>xxxiv. Respond to the local character and context and make a positive contribution to the skyline. Tall buildings may be acceptable in the vicinity of the station subject to high quality design and strong public realm propositions at ground level. Proposals for tall buildings within the Conservation Area and north of the railway line along south street are inappropriate. The heights of proposed new buildings in this area will need to respond positively to the historic context. Elsewhere in the town centre the height of proposed buildings should respond to local character and context, and make a positive contribution to the skyline in Romford town centre.</p> <p>² at least 4,750 <u>5,000</u> homes will be built over the first 10 years of the plan period</p> <p>Proposed modifications to explanatory text :</p> <p>Text added to, and deleted from, paragraph 6.1.22 of the explanatory text as follows :</p> <p>6.1.22 Education provision is particularly challenging in Romford. Existing schools within the area are already at full capacity and whilst the Council's school expansion programme will assist in meeting future demand, this will not offer sufficient capacity over the Plan period. In order to meet the need for primary school places in the</p>	

			<p>Romford area a 3 form of entry primary school (630 places) has been approved on the Bridge Close development site and the new school should be sufficient to meet demand for the additional primary places needed over the next five years. over the next five years an additional 3FE will be needed. 1FE is likely to be delivered through expansion of an existing school and a new 2FE school will be needed. There is a further 6FE needed for primary school places beyond the first five years. This will need to be delivered through new schools. This will be addressed via the Site Specific Allocation Plan that will identify specific sites for future schools. If further sites come forward for housing development the Council will need to assess whether further education provision will be needed. A 6/8FE secondary school is required in the second phase of the Plan period (5-10 years). The Council will seek to identify sites suitable for additional education provision through the Romford Masterplan and Site Specific Allocations Local Plan.</p> <p>Add new paragraph 6.1.30</p> <p>6.1.30 Tall buildings may be acceptable in the vicinity of the station subject to high quality design and strong public realm propositions at ground level. Proposals for tall buildings within the Conservation Area are inappropriate. The heights of proposed new buildings in this area will need to respond positively to the historic context. Elsewhere in the town centre the height of proposed buildings should respond to local character and context, and make a positive contribution to the skyline in Romford town centre.</p> <p>A tall building is generally understood to be anything which is of significantly greater height than its context. As Historic England note in the Tall Building Advice Note 4: "In a successful plan-led system, the location and design of tall buildings will reflect the local vision for an area, and a positive, managed approach to development, rather than a reaction to speculative development applications". To determine the appropriate scale, height and form of development with the Romford Strategic Development Area the Council have commissioned consultants to work with the Council to develop a masterplan for Romford Town Centre. This piece of work will involve analysis, characterisation and building height studies to provide evidence to support a local height definition for tall buildings and the identification of appropriate locations with the Romford Strategic Development Area for such buildings beyond the definition within the Local Plan. The Romford Masterplan is envisaged to be adopted as a Supplementary Planning Document and will therefore provide clarity in due course in this area.</p>	
MM4			<p>MM number not used</p>	
MM5	22	Policy 2	<p>Section 6 : Strategic Development Areas : 6.2 Rainham and Beam Park Strategic Development Area</p> <p>Amend and add new text to the fourth paragraph of the policy as follows :</p> <p>Commercial Development</p> <p>A new local centre adjoining Beam Park Station will be delivered providing between 3,500 and 4,000 sq m of floor space through the provision of new modern retail and commercial units.</p> <p>The Council will support development that creates a vibrant mix of active ground floor uses with apartment blocks above within the Beam Park Local Centre.</p> <p>New <u>commercial</u> development will be required to incorporate generous floor to ceiling heights of <u>3.75-3.5m to 4m</u> at ground floors of buildings in Beam Park Centre, and <u>3m at ground floors of buildings</u> along New Road to provide for flexibility for use as either retail or commercial spaces in the future.</p>	<p>In response to discussions on Day 1 of the hearing sessions (Matter 1).</p> <p>The proposed modifications :</p> <ul style="list-style-type: none"> • emphasise that mixed uses will be required in the Rainham Strategic Development Area • clarify requirements about floor to ceiling heights • recognise the importance of heritage considerations • highlight the Council's commitment to further planning work being undertaken to guide development on key sites

			<p>Insert a new fifth paragraph in the policy as follows :</p> <p><u>To achieve a vibrant and thriving area there will need to be a mix of uses throughout the Rainham and Beam Park Strategic Development Area It is envisaged that this will include retail, commercial, leisure and arts uses.</u></p> <p>Add a new policy criteria xx. and renumber the remaining criteria as follows :</p> <p>Design and Heritage</p> <p>To ensure the successful transformation of the area, the Council will support development proposals which:</p> <p>xv. Adopt an integrated and comprehensive approach without prejudice to the achievement of the wider vision for the area as set out in paragraph 2.2.5;</p> <p>xvi. Provide a layout that facilitates a coherent urban structure across the area as a whole and demonstrate that the layout achieves a coherent structure both in its own right, and in terms of its facilitation of future phases;</p> <p>xvii. Better link the existing settlements of South Hornchurch and Orchard Village with Rainham Village, and transform New Road (the A1306) from a traffic dominated corridor into an attractive high quality green urban street commensurate with the adjoining new residential neighbourhoods;</p> <p>xviii. Overcome the barrier presented by the river and the industrial sites and bring significant enhancement of the wider area as an attractive place;</p> <p>xix. Respond positively to the context within Rainham Village strengthening and enhancing the character of this historic village;</p> <p>xx. <u>Take account of and positively respond to the various listed buildings and their settings.</u></p> <p>xxi. Orientate buildings with their front and main entrance towards streets and open spaces to provide overlooking and natural surveillance and to help to create a place with a strong sense of place that is safe and welcoming;</p> <p>xxii. Have buildings designed at street corners that 'turn the corner' and address both street spaces;</p> <p>xxiii. Provide a good sense of enclosure to streets and public spaces with buildings positioned along consistent building lines;</p> <p>xxiv. Avoid adverse effects on the nearby Ingrebourne Marshes SSSI and Inner Thames Marshes SSSI and seeks to achieve enhancements to these sites, where possible; and</p> <p>xxv. Optimise the design and location of development including the incorporation of resilience measures to address potential flood risk and explores opening up culverts, where appropriate.</p>
--	--	--	---

MM6	27	Policy 3	<p>Section 7 : Successful Places to live : 7.1 Housing Supply</p> <p>Delete the first sentence from the second paragraph of the policy :</p> <p>Over the full 15 year Plan period, at least 17,550 new homes will be built in Havering.</p> <p>Replace the deleted sentence of the second paragraph of the policy (as above) with new text and update the figures and amend the text in the itemised points with the following :</p> <p><u>In line with the London Plan 10 year housing target for Havering, at least 11,701 new homes will be built in Havering over the first 10 years of the Plan period. This will include the delivery of at least:</u></p> <ul style="list-style-type: none"> i. 5,300 <u>5,000</u> homes on major sites in the Romford Strategic Development Area; ii. 3,000 homes on major sites in the Rainham and Beam Park Strategic Development Area; iii. 700 300 homes through the intensification and renewal of existing Council housing estates outside the Strategic Development Areas; iv. 400 homes on two large previously developed sites within the Green Belt; and 1,500 homes on other major sites outside of the Strategic Development Areas and Council housing estates; and v. 2,700 homes on small sites across the borough; 1500 homes on small sites across the borough <u>and through vacant units returning to use.</u> <p>Add new criteria viii. and ix. and renumber following criteria as follows :</p> <p>The delivery of new homes will also be achieved by:</p> <ul style="list-style-type: none"> vi. Promoting mixed use development in town centres and designated out of town centre locations; vii. Prioritising all non-designated land for housing when it becomes available; viii. <u>Supporting the re-use of brownfield sites when they become available;</u> ix. <u>Supporting residential development proposals around stations where it is compatible with the character of the local area. Major development proposals around stations will be subject to design review.</u> <p>xi. <u>x.</u> Supporting appropriate development of infill, under-utilised and vacant sites in the borough's sub-urban areas;</p> <p>xii. <u>xi.</u> Resisting the net loss of residential development;</p> <p>xiii. <u>xii.</u> Supporting initiatives to bring back empty residential properties into use;</p> <p>xiv. <u>xiii.</u> Supporting self-build initiatives; and</p>	<p>In response to :</p> <ul style="list-style-type: none"> • third party representations submitted at Regulation 19 stage consultation • discussions on Days 2 and 7 of the hearing sessions (Matter 3) • post hearing advice from the Inspector (as set out in document IPHD001) <p>The proposed modifications :</p> <ul style="list-style-type: none"> • reflect the evidence in the Housing position Statement Technical Update (October 2019) • explain the Council's approach to addressing housing targets (the application of a 'stepped' approach) and identifies the relevant targets and 'milestones' • ensure that the Local Plan is consistent with national planning policy as set out in the National Planning Policy Framework (2012) which formed the national planning policy context for the Examination hearings of the Local Plan • ensure that the Local Plan is consistent with the London Plan (2016) which formed the regional planning policy context for the Examination hearings of the Local Plan • set out the Council's commitment to an update of the Local Plan immediately after it has been adopted it has been adopted
-----	----	----------	--	---

~~§§~~-xiv Seeking to optimise residential output and densities consistent with the density matrix set out in the London Plan

Insert additional final paragraph to the policy and add a new table (Table 1) as follows :

Over the course of the whole Plan period, Havering will aim to deliver at least 17,551 new homes. Delivery will be phased over the 15 year plan period as follows :

Table 1: Phased Targets

	Phase 1:	Phase 2:	Phase 3:
<u>Targets for net additional homes</u>	<u>2016/17-2020/21</u>	<u>2021/22-2024/25</u>	<u>2025/26-2026/27-2030/31</u>
<u>Minimum dwellings per annum</u>	<u>700</u>	<u>1,640</u>	<u>1,641</u>
<u>Total</u>	<u>3,500</u>	<u>8,201</u>	<u>5,850</u>
<u>10 Year Total</u>	<u>11,701</u>		
<u>15 Year Total</u>	<u>17,551</u>		

Proposed modifications to explanatory text :

7.1.1. London and the South East are experiencing significant development pressures and there is a need to increase the supply of housing to meet the demands of the growing population. The NPPF requires local planning authorities to identify and meet their full objectively assessed needs for housing.

7.1.2. Havering forms part of the London-wide housing market area with all of the other London boroughs. The Mayor of London, through the preparation of the 2015 London Plan sought to identify both the need for new housing and the potential supply across London. The GLA's Strategic Housing Market Assessment (SHMA) 2013 identifies a need for a minimum of 490,000 new homes in London between 2015-2026 (or 49,000 new homes per annum). In comparison, the GLA Strategic Housing Land Availability Assessment 2013 found that London has capacity for at least 420,000 additional homes or 42,000 per annum.

7.1.3. Based on this evidence, the London Plan sets out average annual minimum housing supply targets for each borough until 2025. For Havering, the target is a minimum of 11,701 new homes over the period 2015-2025. The London Plan states that the annual average (1,170) should be rolled forward for the remainder of the Plan period.

Amend paragraph 7.1.4 of the explanatory text as follows:

7.1.4 As a result of the cumulative deficit of identified housing supply across the capital, the London Plan states that boroughs should seek to achieve and exceed the relevant minimum borough annual average housing target. Boroughs are expected to draw on the housing benchmarks in developing their housing targets, augmented where possible with extra housing capacity to close the gap between identified housing need and supply in line with the requirement of the NPPF. In line with the requirements of the London Plan, the Council will seek to deliver and exceed the minimum target set in the Plan, being 11,701 over a 10 year

period. Over the 15 year lifetime of this Local Plan ~~Haverling's minimum housing target is therefore 17,550 as reflected in Policy 3. Haverling will seek to deliver at least 17,551 new homes.~~

7.1.5 At a sub-regional level, Haverling forms part of the Outer North East London Housing Market Area with the London Boroughs of Barking and Dagenham and Redbridge. The Council has worked with these authorities to prepare a sub-regional SHMA. A subsequent update has been prepared for Haverling taking into account updated GLA household projections⁽⁹⁾. The 2016 SHMA Update for Haverling indicates that Haverling's full Objectively Assessed Need is for 30,052 new homes over the period 2011-2033 or 1,366 homes per annum.

7.1.6 Through the Local Plan process, the Council has sought to identify all sources of potential housing supply and identify sustainable development sites in order to close the gap between the housing target set in the London Plan and its objectively assessed need requirement. With two Strategic Development Areas in Romford and in Rainham and Beam Park (both with Housing Zone status), an ambitious estates regeneration programme for its own homes, the establishment of the Council's own housing company, opportunities across a range of well-located brownfield sites and working pro-actively and collaboratively with developers to bring forward sites in private ownership, Haverling is making every effort to increase housing supply and deliver the homes that are needed in regard to both quantity and quality.

Amend and update paragraph 7.1.7 of the explanatory text as follows:

7.1.7 Over the first 10 years of the Plan period (2016-2026), the Council has identified capacity to deliver at least ~~13,095~~ ~~44,947~~ new homes ~~in addition to bringing 260 existing vacant units back into use~~ (see Table 2). This exceeds the minimum 10 year target set out in the London Plan but falls slightly short of meeting the objectively assessed need identified through the Outer North East London SHMA. The Council recognises that Haverling's objectively assessed housing need is higher than its identified sources of housing capacity. Policy 3, therefore, sets out a positive and proactive approach to housing development to increase the supply over the plan period. As part of managing the overall approach to housing growth in Haverling, the Council adopts a general presumption in favour of housing to meet the identified housing need in the borough, and prioritises housing use on all non-allocated land when it becomes available.

Add two new paragraphs to the explanatory text as 7.1.8 and 7.1.9 and renumber the following paragraphs as follows :

7.1.8 Due to the nature of the housing supply in the Local Plan, the Council has applied a 'stepped' approach to housing delivery over the first 10 years of the plan period. The 'stepped' approach targets are set out in Table 1.

7.1.9 The 'stepped' approach is explained and justified in detail within the Housing Position Paper 2019: Technical Update. It involves having phased housing targets that are lower in the first 5 years of the plan period (Phase 1). These targets then increase in the second five years of the plan period (Phase 2). The 'stepped' approach reflects the longer lead in times for the development of sites in the Strategic Development Areas and the Council's estates regeneration programme. It represents a level of house-building that is achievable over the first 10 years of the plan period, while ensuring that Haverling is able to meet its 10 year target. The targets are a minimum and should not preclude the development of more housing to meet the borough's objectively assessed need, particularly within the first 5 years of the Plan period.

7.1.810 Through the Duty to Co-operate, the GLA have confirmed that London forms one housing market area and unmet housing need is being addressed at the London wide level, with all boroughs seeking to identify additional capacity over and above the level identified in the current London Plan.

7.1.9¹¹ The NPPF requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the Plan Period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the Plan Period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.

Add two new paragraphs to the explanatory text incorporating information about the calculation of 5 year land supply, including the buffer and shortfall from paragraphs 7.3-7.5 and Table 7.3 of the HPS. Explain reason for inclusion of 525 (now 197) net unit surplus from 2015/16. Renumber the following paragraphs as follows :

7.1.12 Over the period 2004/05 to 2016/17 Havering has met or exceeding its target in 5 years, and under delivered in 8 years. Havering's delivery record is characterised by a mixture of over and under delivery connected to the peaks and troughs of the housing market cycle. It is recognised that previous delivery has not been at the level required and there has been persistent under-delivery. In light of this the 5 year housing land supply calculations have included a 20% buffer.

7.1.13 Table 2 (below) demonstrates how Havering's 5 year supply has been calculated on the basis of its proposed stepped targets with the application of a 20% buffer and using the Sedgfield Approach of accommodating the shortfall within the first 5 years. The 20% buffer has been applied to the shortfall in addition to the housing target. Where there is no shortfall but is instead a surplus a 20% buffer has not been applied to the surplus. Net completions are grouped by financial year (April 1 – March 31 the following year).

7.1.14 The shortfall (414) is calculated by subtracting the combined annual targets from 2015/16 -2018/19 and subtracting the actual or anticipated net new completed homes in that same time period.

7.1.15 A surplus of 221 net new homes from the 2015/16 financial year is included in the shortfall calculation despite not being within the Plan Period. This is because the GLA SHMA 2013, from which the London Plan targets are derived, and in turn which the Local Plan 10 and 15 year targets are taken from, only account for previous delivery (backlog) up until (but not including) the 2015/16 financial year.

Table 2

Five Year Supply Based on a Stepped Trajectory as at Adoption (2019) using the Sedgfield Approach*	
Target	6320
Shortfall	414
Five year target plus shortfall	6734
Application of 20% Buffer	8081 (6734 x 1.2)
Annualised target with 20% buffer	1616 (8081/5)
Supply	8624(2019 – 2023)
Supply divided by annualised target with 20% buffer	5.34 years supply (8624/1616)

7.1.14¹⁵ A significant proportion of new housing development will be delivered in the two Strategic Development Areas and predominantly on large sites within these areas. Work is already underway in Havering to bring these sites forward and whilst construction will start within the first five years of the Plan, completion is more likely to be towards the end of this period and into the second phase. The Council is making every effort to bring forward these

			<p>sites as quickly as possible in order to boost housing supply and meet the short term need for housing.</p> <p>Renumber and amend paragraph 7.1.11 of the explanatory text as follows :</p> <p>7.1.14¹⁶ Full details of the Council's land supply and the approach to delivery housing over a 10 year period is set out within the Housing Position Statement <u>October 2019: Technical Update supporting this Local Plan</u>. This also includes a set of <u>a Housing Implementation Strategy</u> addressing the initiatives underway to increase housing supply.</p> <p>Add a new paragraph 7.1.17 to the explanatory text and renumber following paragraphs as follows:</p> <p>7.1.17 The Housing Position Statement identifies specific deliverable and developable sites for the first 10 years of the Plan. <u>The Council is committed to ensuring that there is a sufficient supply of housing over the 15 year plan period and beyond and will therefore undertake an early update of the Plan. This update will begin immediately after adoption of the Local Plan.</u></p> <p>7.1.42¹⁸ As part of its strategy, the Council has looked at the scope for the Green Belt to provide land for new homes. It has undertaken a review against the functions of the Green Belt as set out in the NPPF. The Council is satisfied that all of the Green Belt in Havering fulfils its purpose and that having regard to the significant opportunities for new homes to come forward in Havering's built up area, there is no planning justification for releasing land from the Green Belt. Opportunities do exist on previously developed sites within the Green Belt at St George's Hospital in Hornchurch and Quares Campus in Harold Hill.</p> <p>7.1.43¹⁹ In seeking to meet its objectively assessed housing need the Council explored and tested a number of alternative development strategies in its Sustainability Appraisal (SA) Report. The SA report demonstrates that the development strategy chosen by the Council is the most sustainable approach.</p> <p>7.1.44²⁰ The Council supports self-build initiatives to give local residents the opportunity to design, build and own their homes. Since May 2016, the Council has published a register for individuals and groups to express an interest in acquiring self-build and custom build plots in Havering. The Council will continue to monitor this register to gather up to date evidence of the level of interest for these types of homes and accordingly seek to make provision for meeting this need within the Site Specific Allocations Local Plan.</p> <p>7.1.45²¹ Development densities should reflect the density matrix in the London Plan. However, the Council recognises that when determining an application, density is only one of a number of considerations and the density matrix should not be applied mechanistically. The Council will place a high priority on the quality and design of the scheme, the local context and the relationship with surrounding areas when determining whether a scheme is acceptable. It will always aim to optimise residential output and densities consistent with the London Plan for different types of location within the borough through encouraging higher densities of housing development in places with good levels of public transport accessibility.</p> <p>Update and renumber Table 1 as follows:</p>	
--	--	--	--	--

Table 4.3: Housing Supply 2016-2026

Source of Supply	Net additional Homes 0-5 years	Net additional Homes 5-10 years	Total 10 year supply	Total 15 year supply
Large Major sites within the Romford Strategic Development Area* ¹	4,725 124	3,499 5,117	4,770 5,241	6,642
Large Major sites within the Rainham and Beam Park Strategic Development Area*	954 590	2,074 2,515	3,022 3,105	3,105
L&H Estate Regeneration Schemes (outside the Strategic Development Areas)	55 34	370 410	345 376	1,288
Large Other major sites outside the Strategic Development Areas*	4,758 1,117	492 503	4,950 1,620	1,620
Small sites	930 540	930 900	4,860 1,440	2,340
Vacant units returning to use	440 78	130	260 208	338
Completions 2016/17 and 2017/18	884	NA	884	884
Surplus from 2015/16	221	NA	221	221
Total	5,025 3,520	7,402 9,575	12,427 13,095	16,438

Source:

Table 6.1 Key sources of housing supply- Housing Position Statement Technical Update October 2019

MM7	29	Policy 4	<p>Section 7 : Successful Places to live : 7.2 Affordable housing</p> <p>Amend / insert additional text in the first paragraph of the policy as follows :</p> <p>Having residents should have access to high quality, affordable new homes and the Council will seek to maximise affordable housing provision from development proposals. All developments of more than 10</p>	<p>In response to discussions on Day 6 of the hearing sessions (Matter 3).</p> <p>The proposed modifications :</p> <ul style="list-style-type: none"> clarify the threshold at which the policy will apply
-----	----	----------	--	---

¹ * Includes sites with planning permission

		<p>dwelling 10 or more dwellings or residential developments with a site area of more than 1,000 square metres are required to provide at least 35% affordable housing based on habitable rooms</p> <p>Proposed modifications to explanatory text :</p> <p>Amend/ insert additional text to paragraph 7.2.2 of the explanatory text as follows :</p> <p>7.2.2 The Outer North East London SHMA estimates that of the 30,052 new homes needed in Havering over the period 2011-2033, 35% (10,520) of these are required to be affordable. The Council, therefore, considers it appropriate to seek at least 35% affordable housing from new developments. This is also consistent with the London Plan and the Mayor's Draft Affordable Housing and Viability Supplementary Planning Guidance (20176)</p> <p>Update paragraph 7.2.5 of explanatory text as follows :</p> <p>7.2.5 The Council supports a transparent approach to viability in line with the Mayor's Draft Affordable Housing and Viability Supplementary Planning Guidance (20176). Applicants will be required to pay for an independent viability assessment by a third party where requested by the Council. The Council will use review mechanisms to ensure that new development delivers the appropriate amount of affordable housing as viability improves.</p> <p>Amend paragraph 7.2.7 of the explanatory text as follows :</p> <p>7.2.7 Where a development proposal is considered to under-develop a site, the Council will consider negotiating an increase in the number of dwellings, and thus affordable housing provision, or consider refusing the application. The Council has established that development sites of more than 1000 square metres are potentially able to be configured to deliver more than 10 residential 10 or more residential dwellings and, therefore, contribute to affordable housing provision.</p>	<ul style="list-style-type: none"> clarify the overall policy target and confirm that it accords with the London Plan (2016) and its associated Affordable Housing and Viability guidance documents
MM8	31	<p>Policy 5</p> <p>Section 7 : Successful places to live : 7.3 Housing Mix</p> <p>Add to, and delete, text from the first, second and third paragraphs of the policy as follows :</p> <p>The Council will support development proposals that provide a mix of dwelling types, sizes and tenures.</p> <p>All housing schemes should include a proportion of family sized homes and reflect the recommended housing mix identified in Table 2.3 unless. When considering the mix of dwelling sizes appropriate for a particular development proposal, the Council will have regard to it can be robustly demonstrated that a variation to the mix in Table 3 is justified having regard to individual site circumstances including location, site constraints, viability and the achievement of mixed and balanced communities.</p> <p>Where proposals are seeking to provide retirement, sheltered or extra care housing, the Council recognises that there may be a need for greater flexibility with regard the mix of units to be provided within developments and the housing mix as set out in table 3 does not apply to such proposals. Particularly in achieving the provision of 3 bedroom units.</p>	<p>In response to discussions on Day 6 of the hearing sessions (Matter 3).</p> <p>The proposed modifications :</p> <ul style="list-style-type: none"> increase the flexibility of the policy clarify the circumstances that will apply to the provision of specialist housing
MM9	32	<p>Policy 6</p> <p>Section 7 : Successful Places to live : 7.4 Specialist accommodation</p> <p>Amend / insert additional text in policy criteria vii. and viii. as follows :</p>	<p>In response to discussions on Days 6 and 7 of the hearing sessions (Matter 3).</p> <p>The proposed modifications :</p>

			<p>The provision of appropriate housing to meet the specialist needs of local people will be supported where it can be demonstrated robustly that:</p> <ol style="list-style-type: none"> There is an identified need within the borough; The site has access to essential services and shops by walking and cycling; The site is well served by public transport; The proposal contributes to a mixed, balanced and inclusive community; The site is suitable for the intended occupiers in terms of the standard of facilities, the level of independence, and the provision of and/or care; An appropriate level of amenity space is provided to meet the needs of the intended occupants taking account of the need for an attractive outlook; Consideration has been given to all possible future needs and the development can be easily adapted to meet the needs of future occupants; The proposal does not have any unacceptable adverse impacts on the surrounding area and will not be likely to give rise to significantly unacceptable greater levels of noise and disturbance to occupiers of nearby residential properties; The proposal meets the parking requirements set out in Policy 24 and will not have an unacceptable impact on parking conditions and traffic congestion in the area; and Adequate provision for visitor and carer parking facilities is provided, and where appropriate, provision is made for the safe and convenient storage of wheelchairs and mobility scooters. meet other identified prioritised local need; or The existing accommodation will be adequately re-provided to an equivalent or better standard on-site or elsewhere within the borough. <p>Proposed modifications to explanatory text :</p> <p>Add a new paragraph 7.4.5 to the explanatory text as follows :</p> <p><u>7.4.5 The London Plan 2016 states that boroughs should identify and address the local expression of older persons strategic housing needs, informed by indicative requirements set out in Annex A5 of the London Plan 2016. Havering's indicative requirement is identified as being 185 additional units per year.</u></p> <p>Renumber and amend paragraph 7.4.5 of the explanatory text as 7.4.6 as follows:</p> <p><u>7.4.5-6 In 2015, the Council undertook a review of the commissioned a report to identify the locally expressed need for specialist older people's housing within the borough. This review report looked at both the current and projected need for housing for older people and the specific types of specialist accommodation required. This report employed a model which draws heavily on both the GLA's model and the Housing LIN model, but then applies local information to ensure its relevance to Havering. The review report found that:</u></p> <ul style="list-style-type: none"> There is a current and projected surplus of affordable Sheltered Housing Schemes in Havering and this is projected to continue even with projected population growth in the number of older people living in Havering. There is a current and projected deficit in sheltered/ retirement housing for lease and sale within Havering. There is a current and projected deficit in enhanced and extra care housing and specialist housing 	<ul style="list-style-type: none"> respond to third party representations submitted at Regulation 19 stage consultation make reference to the updated Havering Specialist Older Persons Accommodation report (2018) update strategic older persons housing target from 185 units per year to 255 units per year
--	--	--	--	--

		<p>available for older people when their current home is no longer suitable due to physical and/or mental frailty or affordability</p> <p>Delete paragraph 7.4.6 as follows :</p> <p>These findings are in line with the indicative annual benchmark for the provision of additional specialist older person accommodation which is set out in the London Plan. In Havering, a need for 185 additional units per year has been identified of which 135 should be for private sale and 50 for intermediate sale. No need was identified for affordable rent products due to the current surplus.</p> <p>Add a new paragraph 7.4.7 to the explanatory text and renumber the following paragraphs as follows :</p> <p><u>7.4.7 In 2018, the report was reviewed and reached the same conclusions listed above. Overall, an annual need for 255 owner occupier/intermediate housing was identified. The report will continue to be reviewed every 3 years so that the Council is able to maintain an up-to-date understanding of identified need within the borough, taking into account changes in demographic projection, technological and building innovations and older person's assessment of how their own housing needs are best met.</u></p> <p><u>7.4.78 To meet the needs of Havering's population and as part of the Council's estate regeneration programme, the Council is proposing to close four sheltered housing schemes and redevelop three others. Three of the four sites that are closing will be regenerated to provide high quality general needs housing and one will provide high quality general needs flats for residents over the age of 55. Of the three sheltered schemes for redevelopment, two will become Older People's Villages offering a range of housing options designed to support a variety of needs within a community setting. One sheltered scheme will become an Extra Care scheme offering residents the benefit of additional support to meet increasing needs.</u></p> <p><u>7.4.89 In addition, there will be considerable financial investment focused on the remaining twelve sheltered schemes over the next two years. This will enable the Council to improve facilities and services within sheltered schemes, which will support the needs of older people and encourage our residents to remain independent for as long as possible to improve their quality of life and reduce the financial burdens on local health and social care services.</u></p> <p><u>7.4.910 There is a need for both specialist and long term housing solutions to be found for people with a learning disability, mental health conditions, substance misuse and older looked-after children within Havering. Work is underway to identify the demand for supported housing as part of the Council's housing development programme work.</u></p> <p><u>7.4.1011 For residents with a special educational need and disability who have reached 16 years of age, the Council is developing an integrated post-16 strategy that will include identifying housing needs and setting out suitable housing options. This will include the development of further supported living schemes and work to ensure that existing housing options are identified, such as the ground floor flats or bungalows that enable individuals to live independently (with appropriate support) in the community.</u></p> <p><u>7.4.112 All development proposals for specialist accommodation should meet an identified and up to date local need. It is important that any new provision reflects the requirements of the local community in terms of the type, location and design of accommodation.</u></p> <p><u>7.4.1213 Specialist housing should be located in areas that have good public transport connections and access to essential services by walking and cycling. This will enable residents to integrate into the local community and avoid social isolation.</u></p>	
--	--	--	--

			<p>7.4.4314 Careful consideration should be given to the design of specialist accommodation to ensure that it is tailored to the needs of the intended occupants and that it is easily adaptable for future occupants who may have different needs. Residents should have access to high quality and usable outdoor amenity space. In circumstances where the intended occupants are unlikely to use outdoor space, it will still be important for an attractive outlook to be provided which should incorporate soft landscaping.</p>	
MM10	34	Policy 7	<p>Section 7 : Successful Places to live : 7.5 Residential design and amenity</p> <p>Amend / insert additional text in policy criteria v., vi. and viii. as follows :</p> <p>To ensure a high quality living environment for residents of new developments, the Council will support residential developments that:</p> <p>iv. Meet the National Space Standards and the London Plan requirement for floor to ceiling heights;</p> <p>v. Adhere to the London Plan policies in regards to Lifetime Homes Standards and Lifetime Neighbourhoods;</p> <p>v. Are sited and designed to maximise daylight and sunlight;</p> <p>vi. Incorporate an appropriate level of high quality, usable green infrastructure and amenity space that is designed to be multi-functional and offer a range of environmental benefits and leisure and recreation opportunities;</p> <p>vii. Provide both balconies and communal amenity space in flatted schemes; and</p> <p>viii. <u>Maximises the provision of</u> Provide dual aspect accommodation unless exceptional circumstances are demonstrated;</p> <p>Proposed modifications to explanatory text :</p> <p>Delete paragraph 7.5.3 from the explanatory text and renumber following paragraph as follows :</p> <p>7.5.3 Developments will be expected to deliver lifetime homes and lifetime neighbourhoods reflecting the six principles relating to access, services and amenities, built and natural environments, social network and well-being, and housing. By developing homes which are adaptable to change based on the needs of residents, it will facilitate greater pride and sense of community.</p> <p>7.5.43 The Council will expect the impact of development proposals to be assessed following the methodology set out in the most recent version of Building Research Establishment's (BRE) "Site layout planning for daylight and sunlight: A guide to good practice". Depending on the scale of the development a Daylight and Sunlight Report may be required to fully assess the impacts.</p> <p>Add a new paragraph 7.5.4 to the explanatory text as follows:</p> <p><u>7.5.4 New development in Havering should be of a high quality and offer a good quality living environment for residents. Dual aspect accommodation offers a range of benefits such as better daylight, a greater chance of direct sunlight for longer periods, natural cross ventilation, mitigating pollution, offering a choice of views, greater flexibility and adaptability. In line with the Mayor's Housing SPG 2016 developments should minimise the number of single aspect dwellings. Single aspect dwellings that are north facing, or exposed to noise levels above which significant adverse effects on health and quality of life occur, or which contain three or more bedrooms should be avoided.</u></p>	<p>In response to the discussions on Day 6 of the hearing sessions (Matter 3).</p> <p>The proposed modifications:</p> <ul style="list-style-type: none"> • ensure that the policy is consistent with the London Plan (2016) • recognise the importance of the provision of green infrastructure in development • recognise the importance of dual aspect accommodation being provided in accordance with the London Plan SPG

			Amend the start of paragraph 7.5.5 of the explanatory text as follows :	
MM11	38	Policy 10	<p><u>7.5.5 High quality green infrastructure and</u> <u>Amenity</u> space provides many benefits in terms of opportunities for recreation and leisure, and enhancing quality of life through improved health, reduced stress levels, child development through play spaces and interaction with the natural environment.</p> <p>Section 7 : Successful Places to live : 7.8 Garden and Backland Development</p> <p>Insert additional criterion v. in the policy and renumber final criterion as vi as follows :</p> <p>Proposals for residential development on garden and backland sites in Havering will be supported when they:</p> <ol style="list-style-type: none"> Ensure good access and, where possible, retain existing through routes; Retain and provide adequate amenity space for existing and new dwellings; Do not have a significant adverse impact on the amenity of existing and new occupants; Do not prejudice the future development of neighbouring sites; and <u>Do not result in significant adverse impacts on green infrastructure and biodiversity that cannot be effectively mitigated and;</u> vi. --vi. Within the Hall Lane and Emerson Park Character Areas as designated on the Proposals Map, the subdivision of plots and garden development will not be supported, unless it can be robustly demonstrated that the proposal would not have an adverse impact on the character of the area and that the proposed plot sizes are consistent with the size, setting and arrangement of properties in the surrounding area. 	<p>In response to the discussions on Day 6 of the hearing sessions (Matter 3).</p> <p>The proposed modification :</p> <ul style="list-style-type: none"> ensures that the impacts of development on green infrastructure are taken into account and mitigated.
MM12	39	Policy 11	<p>Section 7 : Successful Places to live : 7.9 Gypsy and Traveller accommodation</p> <p>Delete the existing Policy as follows:</p> <p>Gypsy and Traveller accommodation</p> <p>The Council will meet the identified current and future accommodation needs of Gypsies and Travellers and Travelling Showpeople in Havering by:</p> <ol style="list-style-type: none"> Formalising seven existing private sites providing a maximum of 33 pitches for Gypsies and Travellers. These sites are identified on the Proposals Map and the maximum number of pitches that will be permitted on each site is identified in paragraph 7.9.5; and Retaining and protecting the existing Travelling Showpeople plot at Fair Oaks, St Marys Lane. <p>Proposals brought forward for permanent Gypsy and Traveller pitches on the sites identified on the Proposals Map will be required to demonstrate:</p> <ol style="list-style-type: none"> A suitable layout of the site; That the site has essential services such as water, power, sewerage, drainage and waste disposal; High quality boundary treatment and landscaping of the site; and The removal of ancillary equipment and structures not part of the residential accommodation. <p>Development of any additional permanent or temporary Gypsy and Traveller pitches must meet an up-to-date</p>	<p>In response to :</p> <ul style="list-style-type: none"> third party representations submitted at Regulation 19 stage consultation discussions on Days 3 and 8 of the hearing sessions (Matter 4) post hearing advice from the Inspector (as set out in IPHD002) <p>The proposed modifications:</p> <ul style="list-style-type: none"> ensure that the policy is consistent with national planning policy including Planning Policy for Traveller Sites(2015) reflect the Gypsy and Traveller Accommodation Assessment Update report (July 2019) reflect other evidence base work supporting the Local Plan on this topic focussed on site capacity and deliverability

		<p>and evidenced need and will be determined in accordance with the National Planning Policy for Traveller Sites. Proposals must also satisfy the criteria below in addition to criteria iii-vi above:</p> <p>vii. The site has safe and convenient access to the highway and public transport services;</p> <p>viii. There is provision within the site for parking, turning and servicing;</p> <p>ix. The site has reasonable access to local services and community facilities such as healthcare, schools and shops;</p> <p>x. The proposal would not result in significant adverse impacts on the amenity of occupiers of neighbouring sites;</p> <p>xi. The proposal would not result in significant adverse impacts on the visual amenity of the local area; and</p> <p>xii. Sites at risk of flooding should be subject to the sequential and exception tests.</p> <p>7.9.1 The Havering Gypsy and Traveller Accommodation Assessment (GTA) 2017 provides a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpersons accommodation in the borough up to 2031. The Assessment identifies a need for 33 additional pitches for the Gypsy and Traveller households who meet the planning definition as set out in the National Planning Policy for Traveller Sites. Of the 33 pitches needed, 26 pitches are required within the first 5 year period of the Plan (2016-2021), and the remaining 7 pitches in the latter part of the plan period. No additional need has been identified for plots for Travelling Showpeople over the 15 year plan period (2016-2031).</p> <p>7.9.2 The GTA demonstrates that all Gypsy and Traveller families living in the borough currently occupy private sites within the Green Belt. There are no public sites within the borough. The biggest constraint when trying to identify suitable land to meet the need for Gypsy and Traveller pitches in Havering is the Green Belt.</p> <p>7.9.3 In accordance with National Planning Policy, 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 and deliverable land within the built up area that could be used for the Gypsy and Traveller accommodation.</p> <p>7.9.4 Policy 11 therefore seeks to meet the need identified in the GTA through the allocation and intensification of sites within the Green Belt.</p> <p>7.9.5 The sites are identified on the Proposals Map and are listed below. In order to provide firm controls and prevent further intensification, a maximum number of pitches will be permitted on each site as set out below:</p> <ul style="list-style-type: none"> • Tyas Stud Farm rear of Letchford Farm – maximum of 5 pitches • Vinegar Hill – maximum of 4 pitches • Hogbar Farm West – maximum of 3 pitches • Ashlea View, Tomkyns Lane – maximum of 2 pitches • Benskins Lane – maximum of 10 pitches • Fairhill Rise – maximum of 2 pitches • Hogbar Farm East – maximum of 7 pitches 	

		<p>• Lower Bedforde Road – maximum 1 pitch</p> <p>• The Caravan Park, Putwell Bridge – maximum of 2 pitches</p> <p>7.9.6 The sites are all currently in Gypsy and Traveller use and they have all been identified within the GTAA as contributing to the overall need for pitches in line with the definition of Gypsies and Travellers in the Planning Policy for Traveller sites 2012. The maximum number of pitches on each site takes into account the need arising from each site as identified in the GTAA and an understanding of what facilities and space a pitch typically requires. Further details are set out in the Gypsy and Traveller Position Statement that supports this Local Plan</p> <p>7.9.7 The GTAA also identified need for up to 20 additional pitches for “unknown households”, that is, households whose travelling status was not able to be determined through the assessment. These households either refused to be interviewed, or were not on site at the time of fieldwork. It is not possible to identify sites to meet an unknown need.</p> <p>7.9.8 Where further sites are proposed the Council will ensure that they are required to meet legitimate additional borough need. When considering applications for Gypsy and Traveller sites and Travelling Showpersons plots, the Council will take into account the policy criteria outlined in Policy 11 in addition to the requirements of National Policy.</p> <p>7.9.9 In general, proposals for Gypsy and Traveller sites and Travelling Showpersons plots are inappropriate development in the Green Belt and any additional sites will only be approved when very special circumstances have been demonstrated in line with National Policy.</p> <p>Insert new policy as follows:</p> <p>Policy 11 Gypsy and Traveller accommodation</p> <p>The Council will seek to ensure that the accommodation needs of Gypsies, Travellers and Travelling Showpeople who meet the planning definition of a traveller and those who do not meet the planning definition (as set out in Planning Policy for Traveller Sites (2015)) are met for the Local Plan period 2016-2031.</p> <p><u>(1) Identifying and addressing accommodation needs</u></p> <p><u>a) Overall accommodation needs for Gypsy and Traveller and Travelling Showpeople households</u></p> <p>The Council has undertaken a Gypsy and Traveller Accommodation Assessment (GTAA). The Update report (July 2019) of the GTAA identifies this need as 220 pitches for Gypsies and Travellers and 5 plots for Travelling Showpeople for the Plan period 2016-2031 comprised of:</p> <ul style="list-style-type: none"> • 174 pitches for Gypsy and Traveller households who meet the planning definition • 43 pitches for Gypsy and Traveller households who do not meet the definition • 3 pitches for undetermined households • 5 plots for Travelling Showpeople who meet the planning definition
--	--	--

	<p><u>b) Accommodation needs for Gypsy and Traveller and Travelling Showpeople households for 2016-2021</u></p> <p>The GTAA Update report (July 2019) identifies the need for pitches and plots for Gypsies and Travellers and Travelling Showpeople for the period 2016-2021 as:</p> <ul style="list-style-type: none"> • <u>136 pitches for Gypsy and Traveller households who meet the planning definition</u> • <u>33 pitches for Gypsy and Traveller households who do not meet the definition</u> • <u>2 pitches from undetermined Gypsy and Traveller households</u> • <u>5 plots for Travelling Showpeople</u> <p>The sites allocated for Gypsies, Travellers and Travelling Showpeople households are identified on the Proposals Map and listed in the tables in Appendix X. The tables in the appendix identify the number of pitches and plots that will be accommodated on each site.</p> <p>In total, 162 pitches are identified on these sites for Gypsy and Traveller households and 5 plots for Travelling Showpeople households. The remaining accommodation needs for 2016-2021 for Gypsy and Traveller households of 7 pitches required will be addressed through the consideration of planning applications for pitches within the seven areas indicated below which have been identified for accommodating growth for 2021-2026.</p> <p>The sites allocated in Appendix X and for accommodating growth (below) are only to be used for accommodation for Gypsies, Travellers and Travelling Showpeople. These sites will be removed from the Green Belt and inset within it.</p> <p><u>c) Accommodation needs for Gypsy and Traveller and Travelling Showpeople households for after 2021</u></p> <p>It is unlikely that there will be scope for sites in the urban area to address the accommodation needs of Gypsies, Travellers and Travelling Showpeople in the period after 2021. Following detailed assessment of the sites allocated in this Local Plan, the Council expects that the majority of the accommodation needs arising for the period 2021-2026 could be met within existing sites or within land adjoining them where this is in the control of households on the existing site(s).</p> <p>The Council expects the accommodation needs of Gypsy and Traveller households arising in the period 2021-2026 to be met at the following locations :</p> <ul style="list-style-type: none"> • <u>Ashlea View, Tomkyns Lane</u> • <u>Church Road</u> • <u>Haunted House Wood</u> • <u>Laburnham Stables</u> • <u>The Old Forge, Hubbards Chase</u> • <u>Tyas Stud Farm</u> • <u>Willow Tree Lodge</u> <p>No further need in Havering after 2021 has been identified as necessary for accommodation for Travelling Showpeople households.</p>	

	<p><u>d) Accommodation needs for Gypsy and Traveller and Travelling Showpeople households after 2026</u></p> <p>Planning applications for sites to meet future accommodation needs for Gypsies and Travellers and Travelling Showpeople in the latter periods of the Local Plan period (2026-31) as a result of new household formation will be addressed against relevant national policy and the criteria set out below.</p> <p>Where appropriate, the Council will seek to retain approved sites for Gypsies, Travellers and Travelling Showpeople in the light of the challenges of identifying suitable sites for these communities.</p> <p><u>(2) Development criteria for sites for Gypsy and Traveller and Travelling Showpeople</u></p> <p><u>When considering planning applications for sites for Gypsies, Travellers and Travelling Showpeople, the Council will take into account the matters identified in criteria (a) – (e) of paragraph 24 of Planning Policy for Traveller Sites (PPTS) (2015).</u></p> <p><u>Provision for pitches and plots to meet the needs of Gypsies, Travellers and Travelling Showpeople on the identified sites and on new sites will be supported in a planning application where the Council considers that:</u></p> <ol style="list-style-type: none"> <u>The site has a suitable site layout which demonstrates that the site is able to accommodate the number of pitches and plots sought;</u> <u>The site has essential services such as water, power, sewerage, drainage and waste disposal or is capable of being provided with these;</u> <u>The site is provided with high quality boundary treatment and landscaping in accordance with Policy 27 of this Plan;</u> <u>The site has safe access to the highway and public transport services and will not result in unacceptable impact on the capacity and environment of the highway network;</u> <u>The site does not place an undue pressure on local infrastructure (such as healthcare, schools and shops);</u> <u>The proposal would not result in unacceptable adverse impacts on the amenity of other site occupants and the occupiers of neighbouring sites;</u> <u>The proposal would not result in unacceptable adverse impacts on the visual amenity of the local area;</u> <u>Sites at risk of flooding should be subject to the sequential and exception tests.</u> <p><u>In addition, the Council will also give weight to the criteria set out in paragraph 26 of Planning Policy for Traveller Sites (PPTS)(2015) (or any revisions to national planning policy) when assessing proposals for sites for Gypsies, Travellers and Travelling Showpeople.</u></p> <p><u>7.9.1 The Havering Gypsy and Traveller Accommodation Assessment (GTAA) Update Report (July 2019) provides a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in Havering for the plan period 2016-2031. The report identifies additional need for Gypsy and Traveller households by 5 year periods for households who meet the planning definition and those who do not meet the planning definition (as defined in Planning Policy for Traveller Sites (2015)) as well as those households for which need was undetermined. The table below summarises this:</u></p>	

Table 4

Additional need in the number of pitches to be provided in Havering for the Plan period (2016-2031) for Gypsy and Traveller households by 5 year periods

Years	0-5	6-10	11-15	Total
	2016-21	2021-26	2026-31	
Households who meet the planning definition	136	18	20	174
Households whose Gypsy and Traveller status was undetermined	2	0	1	3
Households who do not meet the planning definition	33	5	5	43
TOTAL	171	23	26	220

Note: numbers in the table refer to the number of pitches to be provided

7.9.2 Additionally, the GTAA Update Report (July 2019) identified that there are 5 Travelling Showpeople households in Havering and all meet the planning definition in national planning policy.

7.9.3 The Council will commence an immediate update of this Local Plan after its adoption. It will provide the opportunity to review the GTAA as a key part of the evidence base to ensure that the need for Gypsy and Traveller accommodation is understood and recognised through appropriate provision. The immediate update of the Local Plan will also provide the opportunity for the Council to assess how the need for further sites for gypsies and travellers can be met and how it may identify these in its next Local Plan. In doing this, the Council will have regard to the Planning Policy for Traveller Sites (PPTS (2015). The Council recognises that because of factors such as the pressure for other land uses it is unlikely that there will be scope for sites in Havering's urban area to address the accommodation needs of Gypsies and Travellers and Travelling Showpeople.

7.9.4 The GTAA Update Report (July 2019) is supported by an up to date and detailed Pitch Deliverability Assessment to determine whether the current identified need for pitches could be accommodated within the existing boundaries of established sites. Further work based on this evidence has also encompassed looking at the scope for existing sites to be expanded to accommodate existing and future needs where the households on a site have ownership or control of adjoining land. This work encompassed assessing the capacity of individual sites to accommodate further accommodation units of the types typically used by Gypsy and Traveller families including park homes, touring caravans and 'day-rooms'. It provided for reasonable separation between units and access arrangements. It did not encompass detailed feasibility studies as to the capability of sites to accommodate further units. In assessing the scope for sites to accommodate current and future accommodation needs of Gypsy and Traveller and Travelling Showpeople households, the Council has been assisted by the close co-operation of many of the households particularly those with larger, extended family groups. Many households indicated their willingness to take a flexible and pragmatic approach to meeting their accommodation needs through a combination of shared static caravans, tourers and dayrooms

		<p>rather than more formally set out sites with separate pitches. This was because this would provide the opportunity for households to remain together rather than be accommodated on different sites. It is recognised this approach has practical merit in enabling households to remain together in the short term. Regular review and update of the GTAA will be required, and undertaken, to ensure that future accommodation needs are properly identified and that overcrowding of sites is avoided.</p> <p>7.9.5 The GTAA Update Report (July 2019) identifies that all Gypsy and Traveller families living in Havering currently occupy private sites within the Havering Green Belt. There are no public sites within the borough and there are no sites in the built up area. The biggest constraint when trying to identify suitable land to meet the need for Gypsy and Traveller pitches in Havering is the Green Belt.</p> <p>7.9.6 National planning policy says that Gypsy and Traveller pitches are inappropriate development in the Green Belt and can only be permitted in very special circumstances. However, despite repeated and extensive efforts, the Council has not been able to identify any suitable and deliverable non-Green Belt land within the built-up area that could be used for Gypsy and Traveller accommodation.</p> <p>7.9.7 The policy seeks to meet the needs identified in the GTAA Update report (July 2019) through the allocation, regularisation, intensification or appropriate expansion of existing Gypsy and Traveller sites within the Havering Green Belt. This follows the Council's conclusion that exceptional circumstances can be demonstrated from a significant level of need for pitches for Gypsies and Travellers; a lack of any alternative suitable and deliverable non-Green Belt land; and that the allocation, regularisation, intensification or expansion of established sites would cause no further harm to the Green Belt subject to proposals satisfying the criteria in the policy.</p> <p>7.9.8 Through the preparation of this Local Plan, the Council is removing these sites from the Green Belt and 'insetting' them within it. This is so that planning applications for Gypsy, Traveller and Travelling Showpeople accommodation on these sites do not need to demonstrate very special circumstances to be approved. The Council wishes to make it clear that these alterations to the Green Belt boundary are limited and exceptional in order to meet the specific identified needs for Gypsy, Traveller and Travelling Showpeople sites.</p> <p>7.9.9 Although the sites allocated in this policy for Gypsy and Traveller and Travelling Showpeople households are removed from the Green Belt, the Council emphasises that the only acceptable use of these sites will be for accommodation for Gypsies, Travellers and Travelling Showpeople.</p> <p>7.9.10 The Council will expect planning applications to be submitted from the adoption of this Local Plan to 'regularise' these sites. All planning applications for these sites will be assessed against the relevant policies of this Local Plan and Planning Policy for Traveller Sites (2015). Proposals will be expected to provide a satisfactory residential environment for the occupiers on the site.</p> <p><u>(a) Need for pitches for Gypsy and Traveller households who met the planning definition in Planning Policy for Traveller Sites (2015)</u></p> <p>7.9.11 The GTAA Update report (July 2019) identifies a 15-year need for 174 pitches for Gypsy and Traveller households who met the planning definition of a Traveller as set out in the Planning Policy for Traveller Sites (PPTS) (2015).</p>	

Table 5

Additional need in the number of pitches to be provided in Havering for households who meet the planning definition

Years	0-5	6-10	11-15	Total
	2016-21	2021-26	2026-31	
Households who met the planning definition	136	18	20	174

Note: numbers in the table refer to the number of pitches to be provided

7.9.12 Of the 174 pitches, 136 pitches are needed within the first 5-year period of the Plan (2016-2021) to meet current need and the remaining 38 pitches in the latter part of the Local Plan period (2021-2031) to meet future need through new household formation.

7.9.13 The Pitch Deliverability Assessment concluded that 129 pitches of the necessary 136 pitches needed in the first 5 years of the plan period could be accommodated within existing site boundaries or through the expansion of these sites on adjoining land owned by the households.

7.9.14 It is not currently possible to meet the current need for 7 pitches for households on 2 unauthorised sites within the current site boundaries due to land ownership issues. In the event that the households involved wish to remain in Havering, the Council will expect them to submit planning applications for pitches at one of the seven sites indicated in the policy as the broad locations for growth for the period 2021 - 2026 (see para. 7.9.22).

7.9.15 The sites where an allocation has been made are identified on the Proposals Map and listed in Appendix X. These allocations include any existing temporary or unauthorised pitches. The table in Appendix X identifies the numbers of pitches that can be accommodated on each of the allocated sites.

(b) Need for pitches for Gypsy and Traveller households in Havering who did not meet the planning definition in Planning Policy for Traveller Sites (2015)

7.9.16 The GTAA Update report (July 2019) identified a 15-year need for 43 pitches for households that did not meet the planning definition of a Traveller. Of these, a total of 33 pitches are needed in the first 5 years of the Local Plan period (2016-2021) and a further 10 pitches are needed in the latter part of the Local Plan period (2021-2031). All of this need arises from existing sites located in the Green Belt.

Table 6

Additional need in the number of pitches to be provided in Havering for households who do not meet the planning definition

Years	0-5	6-10	11-15	Total
	2016-21	2021-26	2026-31	
Households who did not meet the planning definition	33	5	5	43

Note: the numbers in table refer to the number of pitches to be provided

7.9.17 The Pitch Deliverability Assessment that was completed concluded that the identified need for 33 pitches in the first 5 years of the Local Plan period (2016-21) can be met within the boundaries of the existing sites.

7.9.18 The sites where an allocation to meet the need identified above are identified on the Proposals Map and are listed in Appendix X. These allocations include any existing temporary or unauthorised pitches.

(c) Need for pitches from 'undetermined' households

7.9.19 The GTAA also identified need for up to 3 pitches for 'undetermined' households. There is a need for 2 pitches in the first 5 years of the Local Plan period (2016-2021) and a need for a further pitch in the latter part of the Local Plan period (2021-2031). Any need arising from undetermined households will be determined against the criteria set out in Policy 11.

Table 7

Additional need in the number of pitches to be provided in Havering for undetermined households

Years	0-5	6-10	11-15	Total
	2016-21	2021-26	2026-31	
Households whose Gypsy and Traveller status was undetermined	2	0	1	3

Note: the number in table refer to the number of pitches to be provided

(d) Future accommodation needs in Havering for Gypsy and Traveller households

7.9.20. National planning policy requires that the Council indicate broad locations for growth for meeting the accommodation needs of Gypsies, Travellers and Travelling Showpeople for years 6-10 of the plan period of this Local Plan. In practice, the Council will have initiated a full review of the Local Plan immediately after its adoption. This will provide the opportunity for a comprehensive review of how accommodation needs may be

	<p><u>addressed.</u></p> <p>7.9.21 In the light of the other land-use priorities in Havering, particularly, the need to provide enough new homes, the Council considers that it may be unlikely that adequate sites will be identified in the built up areas. Notwithstanding that, at this stage, the Council considers that the work it has undertaken to support the preparation of this Local Plan (paragraph 7.9.4) provides it with up to date and robust information about the potential, if necessary, for existing sites to accommodate further growth in either their current form or with modest expansion into adjoining land that is within the control of the households occupying the current sites. The Council considers that in the event that sites in the urban area cannot be identified or would not provide enough capacity then growth in years 6-10 could be located on some of the existing sites in the Green Belt or extensions to them. In coming to this conclusion, the Council has also taken into account that it is likely that there may be changes to the levels of needs arising from the existing households and these will be identified in a future update of the GTAA.</p> <p>7.9.22 Following detailed work (see paragraph 7.9.4 above), the existing Gypsy and Traveller sites at:</p> <ul style="list-style-type: none"> • <u>Ashlea View, Tomkyns Lane</u> • <u>Church Road</u> • <u>Haunted House Wood</u> • <u>Laburnham Stables</u> • <u>The Old Forge, Hubbards Chase</u> • <u>Iyas Stud Farm</u> • <u>Willow Tree Lodge</u> <p>have been identified to accommodate Gypsy and Traveller household growth in years 6-10 of the Plan period (2021-2026) and those Gypsy and Traveller households whose accommodation needs (identified in the GTAA Update report (July 2019) as 7 pitches) in the first 5 years of the Local Plan period cannot be met on their current unauthorised sites.</p> <p>7.9.23 When considering planning applications for Gypsy and Traveller pitches, the Council will take into account the policy criteria outlined in Policy 11 in addition to the requirements of national policy.</p> <p><u>(e) Travelling Showpeople in Havering</u></p> <p>7.9.24 As identified above in paragraph 7.9.2, the GTAA Update Report (July 2019) identified that there are 5 Travelling Showpeople households in Havering and all meet the planning definition in national planning policy. The households living on the existing yard stated that they are looking to expand the yard on to adjacent land that they own, and that this will meet all of their current and future needs. The Council envisages that planning applications for the expansion of the Travelling Showpeople site (identified in Appendix X) will be considered favourably subject to the criteria in national policy and this policy being satisfied.</p> <p><u>(f) Transit sites in Havering</u></p> <p>7.9.25 There have been low levels of unauthorised encampments in Havering in recent years. The GTAA Update Report (July 2019) indicates that the majority were short-term visiting family or friends, transient and passing through the borough. Since 2016, there has been an increase in the number of encampments on industrial land that have involved the criminal dumping of waste. It is considered that transit provision would not address any issues related to this activity. Under these circumstances, the Council does not intend to provide any new transit pitches or emergency stopping places. It will monitor the movements of gypsy and travellers into Havering and it will continue to use management arrangements (including enforcement action).</p>	

for dealing with unauthorised encampments.

Appendix X

Sites in Havering identified in Policy 11 and allocated in this Local Plan for Gypsy and Traveller accommodation

Site	5-Year Need (Meet planning definition) (number of pitches)	5-Year Need (Do not meet planning definition) (number of pitches)	Total 5-Year Need (number of pitches)
66-72 Lower Bedfords Road	0	3	3
Ashleigh View, Tomkyns Lane	5	0	5
Church Road, Blossom Hill View	1	0	1
Church Road, Cherry Blossom View	2	0	2
Church Road, Cherry Tree View	3	0	3
Church Road, Dunromin	1	0	1
Church Road, Meadow Rise	4	0	4
Church Road, Meadow View	3	0	3
Church Road, Paddock View	2	0	2
Church Road, Plot 3	1	0	1
Church Road, Plot 13	1	0	1
Church Road, Plot 14	1	0	1
Church Road, Springfield	2	0	2
Church Road, The Oak View	1	0	1
Church Road, The Oak	1	0	1
Church Road, The Schoolhouse	1	0	1
Church Road, Willow View	1	0	1
Crow Lane (r/o 21)	2	0	2
Fairhill Rise	3	4	7
Gravel Pit Coppice, Benskins Lane	14	0	14

<u>Haunted House Wood</u>	<u>1</u>		<u>4</u>		<u>5</u>
<u>Hogbar Farm</u>	<u>8</u>		<u>8</u>		<u>16</u>
<u>Hogbar Farm East</u>	<u>10</u>		<u>0</u>		<u>10</u>
<u>Hogbar Farm West</u>	<u>1</u>		<u>6</u>		<u>7</u>
<u>Laburnham Stables</u>	<u>4</u>		<u>0</u>		<u>4</u>
<u>Laburnham Stables</u>	<u>5</u>		<u>0</u>		<u>5</u>
<u>Laburnham Stables</u>	<u>1</u>		<u>0</u>		<u>1</u>
<u>Railway Sidings, North</u>	<u>1</u>		<u>0</u>		<u>1</u>
<u>Ockendon</u>					
<u>Railway Sidings, North</u>	<u>10</u>		<u>2</u>		<u>12</u>
<u>Ockendon</u>					
<u>The Caravan Park,</u>	<u>3</u>		<u>2</u>		<u>5</u>
<u>Putwell Bridge (The</u>					
<u>former Brook Street</u>					
<u>Garage site)</u>					
<u>The Grove, Prospect</u>	<u>5</u>		<u>0</u>		<u>5</u>
<u>Road</u>					
<u>The Old Forge,</u>	<u>2</u>		<u>0</u>		<u>2</u>
<u>Hubbards Chase</u>					
<u>Iyas Stud Farm</u>	<u>5</u>		<u>0</u>		<u>5</u>
<u>Vinegar Hill</u>	<u>18</u>		<u>4</u>		<u>22</u>
<u>Willow Tree Lodge</u>	<u>6</u>		<u>0</u>		<u>6</u>
<u>TOTAL</u>	<u>129</u>		<u>33</u>		<u>162</u>

Note: the numbers in the table refer to numbers of pitches to be provided

Sites in Havering identified in Policy 11 and allocated in this Local Plan for Travelling Showpeople plots

<u>Years</u>	<u>0-5</u>	<u>6-10</u>	<u>11-15</u>	<u>Total</u>
<u>2016-2021</u>	<u>(number of</u>	<u>2021-2026</u>	<u>2026-2031</u>	<u>(number of</u>
<u>plots)</u>	<u>plots)</u>	<u>plots)</u>	<u>plots)</u>	<u>plots)</u>
<u>Fairoaks, St</u>	<u>5</u>	<u>0</u>	<u>0</u>	<u>5</u>
<u>Mary's Lane,</u>				
<u>Upminster</u>				
<u>TOTAL</u>	<u>5</u>	<u>0</u>	<u>0</u>	<u>5</u>

Note: the numbers in the table refer to numbers of plots to be provided

MM13	41	Policy 12	<p>Section 8 : Thriving communities : 8.1 Healthy Communities</p> <p>Amend policy criteria iii. as follows :</p> <p>The Local Plan will promote health and wellbeing by:</p> <ol style="list-style-type: none"> Directing new development to well-connected locations to enable active travel (refer to Policy 3); Promoting well designed and safe places (refer to Policy 26); Promoting the diversification of uses within town centres and managing the overconcentration of uses that can have a negative health impacts such as betting shops and fast food takeaways (refer to Policy 13); Supporting the delivery of essential community services (refer to Policies 16 and 17); Providing and protecting open space, leisure and recreation facilities (refer to Policy 18); Supporting measures to promote walking and cycling (refer to Policy 23); Supporting the provision of multifunctional green infrastructure (refer to Policy 29); Seeking environmental improvements, minimising exposure to pollutants and improving air quality (refer to Policies 33 and 34); and Avoiding contributing to factors that affect climate change, and contribute to prevention measures that militate against the effects of climate change (refer to Policies 32 and 36). <p>Amend the final paragraph of the policy as follows :</p> <p>Developers of major development proposals are required to consider wider local/regional primary care and other health strategies, as appropriate, to take into account how any developments can contribute to the aims and objectives of those strategies.</p>	<p>In response to discussions on Day 5 of the hearing sessions (Matter 7).</p> <p>The proposed modifications :</p> <ul style="list-style-type: none"> recognises the harmful effect of overconcentration of uses with negative health impacts clarifies that developers of major development proposals are required to consider wider local / regional primary care and other health strategies, as appropriate , and to take into account how any developments can contribute to the aims and objectives of those strategies
MM14	42	Policy 13 Para. 8.2.2	<p>Section 8 : Thriving communities : 8.2 Town Centre development</p> <p>Proposed modifications to explanatory text :</p> <p>Amend / insert additional text within and at the end of paragraph 8.2.2 of the explanatory text as follows :</p> <p>8.2.2 The Havering Retail and Commercial Leisure Needs Assessment <u>Quantitative Update Addendum (20158)</u> identified a quantitative need for the borough for comparison goods of up to 49,500-20,720 square metres, for convenience goods of up to 43,200-10,851 square metres and for commercial leisure floorspace (A3, A4 and A5 uses) of up to 24,000-10,620 square metres gross by 2031 <u>(see Table 8)</u>. The largest proportion of the retail and commercial leisure development will be accommodated within Romford Metropolitan Town Centre, and the reminder spread across the district centres where further scope for development and enhancement has been identified. <u>This extra comparison retail space will not be required until after the Local Plan has been reviewed.</u></p> <p>Insert new table as follows :</p>	<p>In response to discussions on Day 4 of the hearing sessions (Matter 7).</p> <p>The proposed modifications:</p> <ul style="list-style-type: none"> provide up to date evidence from the Havering Retail and Commercial Leisure Needs Assessment Quantitative Update Addendum (2018) clarify when the additional retail space will be needed (after the Local Plan has been updated)

Table 8 Floor space Needs (Gross) from 2017 -2031 (Comparison, Convenience and Commercial Leisure)					
Year	2017	2021	2026	2029	2031
Comparison	-3,724	-3,345	8,179	15,303	20,722
Convenience	8,235	5,822	8,299	9,829	10,851
Commercial Leisure	14	2,426	6,403	8,921	10,619

Source : Havering Retail and Commercial Leisure Needs Assessment (2018) Quantitative Update Addendum (Peter Brett Associates)

Section 8 : Thriving communities : 8.4 Culture and creativity

Delete criteria iv. and vi. from the policy and renumber the remaining criteria as follows :

The Council is committed to sustaining and enhancing Havering's cultural offer and creating inclusive and diverse communities by:

- i. Safeguarding the borough's existing diverse range of creative arts, cultural and performance spaces, professional sporting and entertainment facilities and their related facilities, and refusing to grant planning permission to development proposals that will result in their loss unless replacement facilities of equivalent or greater quality and quantity are provided on site or within the vicinity which meets the needs of the local community or particular groups, or it has been demonstrated that there is no demand for another similar use on site;
- ii. Supporting development which enhances and diversifies the cultural offer within the borough's metropolitan centre of Romford, and the six district centres of Hornchurch, Collier Row, Harold Hill, Uppminster, Elm Park and Rainham to contribute more effectively to their regeneration and town centre renewal;
- iii. Permitting temporary use of vacant commercial buildings, and cleared sites for performance and creative work where they contribute positively to the regeneration, vitality and character of the area;
- iv. ~~Requiring provision of arts and cultural facilities in major mixed-use developments;~~
- ~~iv- iv~~ Encouraging a diverse range of evening and night time activities including expanding opening hours of existing daytime facilities such as shops, cafés, medical facilities, libraries and theatres to integrate leisure and other uses to promote and sustain customer cross over.
- ~~iv- Seeking contributions from developments that result in additional need for cultural and leisure facilities to enhance existing facilities or provide new facilities;~~
- ~~vi- v~~ Ensuring that development proposals are designed to be inclusive;
- ~~vi- vi~~ Working proactively with operators, landowners, stakeholders to maximise the positive impacts and mitigate the negative impacts of art, cultural and leisure activities; and

In response to discussions on Day 4 of the hearing sessions (Matter 7).

The proposed modifications :

- recognise that it is inappropriate and unrealistic to require all major mixed use schemes to include arts and cultural facilities
- recognise that it is inappropriate to seek to secure financial contributions from development (particularly where there is a Community Infrastructure Levy in place)

			<p>x. vii. Supporting planned improvement to existing arts, cultural and performance spaces, including creative work and related facilities.</p>	
MM16	49	Policy 17	<p>Section 8 : Thriving communities : 8.6 Education</p> <p>Amend criteria vi. of the policy as follows :</p> <p>Development proposals for nurseries will also be expected to demonstrate that:</p> <p>v. They meet the floorspace requirements as set out in the statutory framework for the early years foundation stage;</p> <p>vi. Drop offs and pickups can be catered for safely on-site; and</p> <p>vii. There is no significant adverse impact on the amenity of existing residents.</p> <p>Proposed modifications to explanatory text :</p> <p>Amend paragraph 8.6.9 of the explanatory text as follows :</p> <p>Childcare facilities should be safe, accessible for all, and provide both indoor and outdoor learning opportunities. There has been an increase in Havering in planning applications for nurseries in residential areas. Although these proposals can contribute towards meeting a local need, it is important that residential amenity and highway safety are preserved. As nurseries generate significant traffic during peak hours, proposals will be expected to provide sufficient car-parking including pick-up and drop-off points. on-site</p>	<p>In response to discussions on Day 4 of the hearing sessions (Matter 7).</p> <ul style="list-style-type: none"> to ensure flexibility in the policy wording to allow for site specific circumstances to be taken into account
MM17	53	Policy 19	<p>Section 9 : Opportunities to prosper : 9.1 Business Growth</p> <p>Amend criteria iv. of the policy as follows :</p> <p>The Council is committed to building a strong and prosperous economy in Havering and will encourage and promote business growth by:</p> <p>i. Protecting designated Strategic Industrial Locations for industrial uses as set out in the London Plan;</p> <p>ii. Protecting designated Locally Significant Industrial Sites for B1 (b) (c), B2 and B8 uses;</p> <p>iii. Directing office development to Romford Metropolitan Centre and the borough's district centres as part of mixed-use developments;</p> <p>iv. Requiring large scale residential proposals within Romford Town Centre to incorporate high quality flexible business space, subject to viability, and progress towards meeting the identified office employment floor space requirement as detailed in Table 10 Local Plan Monitoring Framework, and in <u>consideration of individual site characteristics not comprised in viability assessments such as configuration, servicing requirements and neighbouring uses.</u></p> <p>v. Supporting the development of high quality affordable and flexible business spaces of varied unit sizes to meet the needs of small and medium sized enterprises (SMEs) and start-up businesses (see Policy 21);</p> <p>vi. Supporting development proposals that improve the physical appearance, attractiveness and competitiveness of employment areas;</p> <p>vii. Supporting the sustainable growth and expansion of business and enterprise in rural areas;</p> <p>viii. Supporting the development of a hotel within, or in close proximity, to the Rainham Employment Area to support business growth and opportunities in this area; and</p> <p>ix. Supporting the London Riverside and the emerging Romford Town Centre Business Improvement</p>	<p>In response to discussions on Day 5 of the hearing sessions (Matter 6).</p> <p>The proposed modifications :</p> <ul style="list-style-type: none"> clarify the targets for office employment floorspace recognise the importance of site characteristic set out the Council's intention to work with the Port of London Authority to realise infrastructure improvement and greater use of the River Thames for freight recognise the potential of Havering in regard to logistics in accordance with the London Plan reflect the Employment Land Review (2015) and provides an overall figure for release of Locally Significant Industrial Land and non-designated industrial land (see MM 17 below)

			<p>Districts;</p> <p>Additional criteria x. and xi. be added to the policy :</p> <p>x. <u>Working with the Port of London Authority (PLA) to explore opportunities to improve and develop wharf infrastructure and to explore increasing use of the River Thames for freight transport; and</u></p> <p>xi. <u>Supporting the strategic significant growth potential of the Borough in logistics activities of greater than sub-regional importance, as set out in the London Plan.</u></p> <p>The borough's Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs) are shown on the Proposals Map.</p> <p>Proposed modifications to explanatory text :</p> <p>Additional text added to the end of paragraph 9.1.4 of the explanatory text as follows :</p> <p>9.1.4 Strategic Industrial Locations (SILs) are locations identified by the Mayor of London, following assessment of future demand, as London's main reservoir of industrial land. They are identified as vital for providing capacity for activities such as logistics, waste management, utilities, land for transport, and industrial services to support the service sector, and they are accorded strategic protection by the Mayor of London and London boroughs. The Locally Strategic Industrial Sites (LSISs) are sites identified by the Council as vital for local industrial functions, including availability of low rent accommodation, which support a range of local employment. <u>The Council nevertheless realise the importance of addressing other strategic and local land-use requirements, in particular the pressing need for new homes. The Council will, therefore, keep under review the need for employment land as part of a managed approach in line with the requirements in the National Planning Policy Framework and the London Plan and with regard to meeting the other objectives of this Local Plan.</u></p> <p>9.1.5 The Havering Employment Land Review (ELR) (2015) found that there is a gross demand for 350 hectares of industrial land (B2 and B8 Use Classes) in Havering over the Local Plan period up to 2031/2. It notes that the vast majority of the existing Strategic Industrial Locations (SILs) are located away from residential areas with direct access to the strategic road network. The Locally Significant Industrial Sites (LSISs) are well functioning industrial employment areas with an on-going demand for space to service industrial and logistical occupiers. They are areas that remain the most suitable locations for accommodating Havering's industrial and warehousing demand. The Review also recommends the designation of Freightmaster Estate in Rainham as a Strategic Industrial Location.</p> <p>Amend paragraph 9.1.6 of the explanatory text as follows :</p> <p>9.1.6 The ELR advises that 49.5 <u>24ha</u> of employment land can be released over the Plan period. Industrial land previously designated for its local significance can be released from industrial employment uses. The previously designated land recommend for release comprises 2.7 ha at Crow Lane (Romford gas works), 15.4 ha at Rainham West and 1.4 ha at Bridge Close, Romford. The de-designation of these sites will facilitate the delivery of new residential developments and make a significant contribution towards meeting the borough's housing need. Safeguarding SILs and the remaining LSISs will ensure that there is sufficient capacity to meet projected demand for industrial land in the borough going forward over the plan period.</p>	
MM18	55	Policy 20	<p>Section 9 : Opportunities to prosper : 9.2 Loss of Industrial land</p> <p>Amend the policy title as follows :</p>	In response to discussions on Day 5 of the hearing sessions (Matter 6).

	<p><u>Loss of industrial land</u> <u>Loss of locally significant industrial sites and non-designated land</u></p> <p>Add a new opening paragraph to the policy as follows :</p> <p><u>The Council will keep under review the provision of Locally Significant Industrial Sites (LSISs) and non-designated industrial land as part of its commitment to ensuring that Havering has a strong and prosperous economy.</u></p> <p>Delete criteria ii. from the second paragraph (was first paragraph) as follows :</p> <p>The Council will only support the loss of non-designated industrial land and floorspace in Havering where it can be demonstrated that:</p> <ul style="list-style-type: none"> i. The change of use from industrial employment uses will not lower the industrial capacity of the borough below that necessary to meet projected demand over the planning period as estimated by the most up to date Havering Employment Land Review; ii. The existing employment land use causes unacceptable detrimental effects, that cannot be mitigated, on the amenity of nearby residential areas; and iii. There is no market interest in the site following one year of continuous active marketing. <p>Add new third and fourth paragraphs to the policy as follows :</p> <p>In considering proposals for the loss of LSISs and non-designated industrial land, the Council will take into account the wider land-use objectives of the Local Plan because the release of land which is no longer needed for employment use may assist in securing these.</p> <p><u>The Council will require the re-provision of non-designated industrial land where it is located within a wider area of commercial uses (such as retail) in the event of proposals being submitted for redevelopment of the wider area except in cases where this policy accepts their loss.</u></p> <p>Proposed modifications to explanatory text :</p> <p>Amend paragraph 9.2. 1 of the explanatory text as follows :</p> <p>9.2. 1 <u>Locally Significant Industrial Sites (LSISs) are of local significance for industry and warehousing. Non-designated industrial land and floorspace comprises land and floor space last used for employment use or land and floorspace which is currently in employment use but does not lie within the area identified and safeguarded as a Strategic Industrial Location (SIL) or a Locally Significant Industrial Site (LSIS).</u></p> <p>Delete paragraph 9.2.2 of the explanatory text as follows :</p> <p>9.2.2 The underlying purpose of Policy 20 is to protect and where possible enhance the employment potential of the existing non-safeguarded employment land and floorspace. The policy provides some flexibility which aims to recognise individual site characteristics and allow some very limited loss of employment land and floor space where significant unacceptable detrimental effects on amenity of nearby residential uses and no market interest are clearly demonstrated. The policy thrust is therefore to ensure that not too much industrial land and floorspace is released as this could hinder the long term economic prospects of the borough.</p>	<p>The proposed modifications :</p> <ul style="list-style-type: none"> • set out that the Council will keep the provision of Locally Significant Industrial Land and non designated industrial sites under review • clarify the criterion against which the loss of non designated land will be assessed and deletes a criterion linked to the environmental impacts of such uses • recognise that the spatial strategy of the Local Plan will require that wider land use objectives are considered when proposals come forward to release land which is no longer needed for employment uses • clarify that the Council will require the re-provision of non-designated industrial land where it is located within a wider area of commercial uses unless the policy accepts that the loss is acceptable • clarify the purpose of the policy • highlight the importance of Locally Significant Industrial Sites for industry and warehousing in Havering • recognise the importance of some flexibility being included as to which industrial land is safeguarded • acknowledge that there is pressure in Havering to accommodate a range of important land uses including housing and infrastructure as well as industry and employment

			<p>Add new text as replacement paragraph 9.2.2 of the explanatory text as follows :</p> <p><u>9.2.2 In line with the focus on a strong economy in Havering, the purpose of Policy 20 is to protect and where possible enhance the employment potential of the existing Locally Significant Industrial Sites and non-designated employment land and floorspace.</u></p> <p>Add a new paragraph 9.2.3 to the explanatory text as follows :</p> <p><u>9.2.3 Although the focus of Policy 20 is to seek to protect Locally Significant Industrial Sites and non-designated industrial land, the Council recognise that the policy should provide for some flexibility in the extent to which industrial land is safeguarded. Some scope for flexibility is important because the Council recognises that in Havering there is considerable pressure to accommodate a range of important land uses including housing and infrastructure as well as industrial / employment. In taking this approach, the Council will always carefully consider up to date evidence as to how the proposed change of use from industrial / employment uses will impact on the overall industrial capacity of Havering over the Plan Period. It will also examine information arising from the marketing of the site to ensure that the site / land is genuinely surplus to employment requirements.</u></p> <p>Amend paragraph 9.2.3 and renumber as 9.2.4 of the explanatory text as follows :</p> <p><u>9.2.34 As already noted in Policy 19 on Business Growth, the Havering Employment Land Review (ELR) (2015) identified 19.5 hectares of land previously designated for its local significance and an additional 4.5ha from non-designated employment uses to be released over the Plan period making the overall amount of employment land to be released not greater than 24 ha to be released from designated industrial employment use to enable wider regeneration benefits. The ELR further advised that an additional 4 to 5 hectares of employment land could be released from other non-designated sites over the Plan Period, making the overall amount of employment land to be released not greater than 24 hectares. To allow for a loss bigger than the recommended 24 hectares benchmark would undermine Havering's economic development objectives. Companies seeking to expand or start a business in Havering in the future may not have sufficient land or business premises to do so. There are approximately 50 hectares of non-designated industrial sites remaining in the borough. These generally perform well as employment areas, meeting the needs of local businesses. By resisting further erosion of this type of employment land and floorspace this policy is seeking to maintain business land and spaces for local business.</u></p> <p>Renumber paragraphs 9.2.4 and 9.2.5 of the explanatory text as 9.2.5 and 9.2.6 as follows :</p> <p><u>9.2.45 As part of managing the overall approach of housing delivery in Havering, the Council recognises that there may be locations where the quality of residential environment is being compromised by the operation nearby industrial use, for example due to noise or access issues. In these cases the relocation of that offending industrial activity would be reasonable way forward in mitigating the adverse amenity issues may be acceptable. Every case will be treated on its own merits.</u></p> <p><u>9.2.56 To demonstrate a lack of market demand an applicant should submit transparent and robust marketing evidence that the site has been vacant and that a thorough continuous marketing exercise has been undertaken and sustained in the local area for a 12 month period. Marketing must be through a commercial agent that sets out the competitive price that genuinely reflects the market value of the property in relation to its use, condition, quality and location. It must be demonstrated that consideration has been given to alternative layouts and business uses, including smaller premises with short term flexible leases appropriate for SMEs.</u></p>
--	--	--	---

			<p>Add a new final paragraph 9.2.7 to the explanatory text as follows :</p> <p><u>9.2.7. Some non-designated industrial land and floorspace is located within larger sites that include other uses such as retail. The Council recognises that in such cases redevelopment of the overall site may provide an important opportunity to secure a more advantageous distribution and allocation of land uses having regard to factors such as the characteristics of the site and its surroundings. In such cases, the Council will expect the wider redevelopment proposal to make suitable re-provision for the non-designated industrial land where the policy requires that it is retained. Any subsequent proposals for the loss of the non-designated land will be assessed against the policy requirements in order to ensure that there is no incremental loss of industrial land over the Plan Period.</u></p>	
MM19	56	Policy 21	<p>Section 9 : Opportunities to prosper : 9.3 Affordable workspace</p> <p>Amend the first paragraph of the policy as follows :</p> <p><u>The Council will promote opportunities for start-up and small and medium enterprises by expecting major commercial and mixed use schemes to provide a minimum of 20% of its floorspace as affordable workspace support local micro and small businesses through securing affordable workspace within the boroughs network of town centres, Strategic Industrial Locations and Local Significant Industrial Sites. Major commercial and mixed-use developments should provide a minimum of 10% total gross commercial floorspace as affordable workspace for a minimum of 5 years, subject to viability.</u></p> <p><u>For the purposes of this Policy affordable workspace is defined as –</u></p> <p><u>A workspace provided where rent and service charges, excluding business support services, are on average at least 10% less than comparable local market rates for the duration of a lease (although it is noted that, for some sectors and locations, much reduced rents may be needed to render them affordable to target occupiers).</u></p> <p>Move the final paragraph of the policy to become the second paragraph as follows:</p> <p><u>Redevelopment of existing low value employment floorspace, that is reliant on less than market-level rent, will be required to re-provide such floorspace in terms of design, rents and service charges, for existing uses, subject to scheme viability, current lease arrangements and the desire of existing businesses to remain on-site.</u></p> <p>Affordable workspace should incorporate flexible design features to provide adaptability for a range of uses and occupants with basic fit-out provided to a level beyond shell and core.</p> <p>The applicant will be required to demonstrate flexible lease terms for target sectors, and where appropriate make provision for short-term, flexible 'all-in' or 'meanwhile' leases, and/or letting space on a per-desk rather than per sq ft basis with the Workspace Provider. The commercial lease terms to be agreed with the Workspace Provider for target sectors will be secured via legal agreement.</p> <p>Add a new fifth paragraph to the policy as follows :</p> <p><u>The proportion of affordable workspace to be provided within specific schemes will be addressed on a site</u></p>	<p>In response to discussions on Day 5 of the hearing sessions (Matter 6).</p> <p>The proposed modifications :</p> <ul style="list-style-type: none"> • enable the Council to set out its commitment to supporting smaller business enterprises and to highlight the role of these in the wider Havering economy • set a realistic and reasonable level of floorspace to be provided as 'affordable' • set out the exceptional circumstances in which financial contributions will be accepted • recognise that development viability may impact on the provision of affordable workspace • set out the challenges linked to affordable workspace provision in the context of wider land use issues in Havering • recognise the importance of the Council maintaining a register of affordable workspace • provide detailed information on matters such as cost, size and type linked to affordable workspace • set out the circumstance where off-site provision of affordable workspace may be acceptable and how this can be secured • sets out the importance of dialogue with a Workspace Provider

			<p><u>specific, case-by-case basis, taking into account the viability of the development.</u></p> <p>Amend the sixth paragraph (was fourth) of the policy as follows :</p> <p>Where on-site provision is not possible, financial contributions for equivalent off-site provision will be sought. and the amount must be to the satisfaction of the Council.</p> <p>Add a new seventh paragraph to the policy as follows :</p> <p><u>Financial contributions will normally only be agreed in exceptional circumstances when it has not been possible to secure appropriate on-site physical space. The amount secured will be dependent on the outcome of a viability assessment and negotiations with the Council.</u></p> <p>Delete the final paragraph of the policy as follows :</p> <p>Redevelopment of existing low value employment floorspace reliant on less than market level rent will be required to re-provide such floorspace suitable, in terms of design, rents and service charges, for existing uses, subject to scheme viability, current lease arrangements and the desire of existing businesses to remain on-site.</p> <p>Proposed modifications to explanatory text :</p> <p>Add a new opening paragraph 9.3.1 in the explanatory text as follows :</p> <p>9.3.1 <u>The intention of securing and operating affordable workspace in Havering is to use it as a mechanism to strengthen local growth sectors and enable local people to thrive. Havering's entrepreneurial businesses play an essential role in the local economy. The Council is committed to supporting these organisations and recognises that affordable workspace is a means to do so.</u></p> <p>Add a new second paragraph 9.3.2 in the explanatory text as follows:</p> <p>9.3.2 <u>Flexible workspaces are managed, commercial premises, particularly suitable for small/ start-up businesses and which are divided into a collection of small units help by occupiers on a short-term, easy-in, easy-out basis and with communally-shared services, facilities and support for the entrepreneurial activities of the occupiers. Affordable Workspace means flexible workspace which is let to a Workplace Provider and which will allow for occupation by the end users in one or more sectors on terms:</u></p> <ul style="list-style-type: none"> • <u>substantially below market levels of rents and charges when compared with an equivalent letting of the space and facilities on the open market; and</u> • <u>at a rate comparable with similar facilities available in Havering or (if sufficient comparator premises do not exist in the borough) across London as a whole; and</u> • <u>at rates which mean that occupation is feasible to a large number of small/ start-up businesses in the relevant sector(s)</u> <p>Add new text to the end of paragraph 9.3.3 of the explanatory text :</p> <p>9.3.4.3 <u>Havering has a high number of micro and small businesses. Havering's Employment Land Review</u></p>	
--	--	--	--	--

		<p>(2015) reported that over 90% of businesses in the borough are micro companies with up to nine employees and a further 7% are small enterprises with between 10 and 49 employees. The ELR found that in the office sector the key gap in provision is in affordable and flexible serviced office accommodation to meet the needs of small start-up companies. <u>Increasing provision of affordable industrial unit space for start-up/young and growing businesses. Increasing provision of affordable workspace through contributions from the applicant, or in new premises can help ensure more small businesses have space to stay in the borough and expand.</u></p> <p>9.3.2 Many SMEs and start-ups with the potential for financial self-sufficiency seek affordable small offices, studies or workspace with favourable flexible lease or licence conditions but often discover that their particular needs cannot be met by market rent levels. The Council's business survey indicates that the cost of rents and poor availability of suitable premises are main factors in driving businesses out of the borough. The provision and preservation of affordable and suitable workspaces that can easily be sub-divided for different uses will increase the opportunities for small business which are essential to Havering's economic vitality and a catalyst for regeneration.</p> <p>Delete paragraph 9.3.3 of the explanatory text as follows :</p> <p>9.3.3 An affordable workspace is a workspace provided where rent and service charges, excluding business support services, are on average at least 20% less than comparable local market rates for the duration of a lease (although it is noted that for some sectors and locations, much reduced rents may be needed to render them affordable to target occupiers). While a level of 80% of market rents may be acceptable in some cases, the Council's preference is for a sliding scale of 60% of market rents from years 1 to 2, 80% from years 3 to 5, and 90% thereafter, subject to negotiation. A sliding scale is preferred as it will allow a larger rent yield during the initial stages of a company's development which will reduce as a company matures and is likely to be able to pay higher rents. This will also enable a seamless transition to market level rent at the end of the period.</p> <p>Add a new text as paragraph 9.3.4 in the explanatory text as follows :</p> <p><u>Many small/start-up businesses, with the potential for financial self-sufficiency, have particular needs that often cannot be met by the market, either because affordable rents are unviable for the applicant, or it is below a standard expectation of return. This has been compounded by a significant loss of office floorspace in the borough over the last decade due to particular pressure on the conversion of offices to residential use. The introduction of permitted development rights, which allows office to residential conversion without explicit planning permission means that these losses have been further exacerbated – a trend which is expected to continue. In addition, pressure on providing housing targets in the borough requires the Council to de-designate industrial land, which puts additional pressure on the borough's industrial employment land to provide smaller light industrial units that encourage small/start-ups businesses to provide 'services to support the service sector'.</u></p> <p>Delete paragraph 9.3.4 of the explanatory text as follows :</p> <p>9.3.4 Major developments should provide 20% of total gross commercial floor space as affordable workspace for a minimum of 5 years, subject to viability. In a redevelopment scheme, the council will require the re-provision of low value employment floor space reliant on less than market level rent to ensure existing businesses are not displaced.</p> <p>Insert new text in the explanatory text as paragraph 9.3.5 of as follows :</p>	

		<p><u>9.3.5</u> The Council intends to use affordable workspace as a key driver to support a flourishing local economy, and provision and preservation of affordable and suitable workspaces that can easily be sub-divided for different uses will increase the opportunities for small business which are essential to Havering's economic vitality and a catalyst for regeneration. The Council will maintain a record of affordable workspace available to small businesses as part of its commitment to growing the Havering economy.</p> <p>Add new text as paragraph 9.3.6 in the explanatory text as follows :</p> <p><u>9.3.6</u> Cost and size are the two primary variables to consider in defining affordable workspace, and these are both influenced by the type of workspace to be provided – which in turn is related to the occupant that the space will be marketed towards, usually determined by the economic clusters in the locality.</p> <p>Insert additional text in the explanatory text and delete existing text as follows :</p> <p><u>Cost</u></p> <p><u>9.3.7</u> In this context, 'affordable' would be defined as rent and service charges (excluding business support services) that are either:</p> <ul style="list-style-type: none"> • less than 80% than comparable local market rates for a period of 5-years per occupant; or • a sliding scale of 60% of local market rates from years 1 to 2, and 80% from years 3 to 5. <p>The Council will also consider alternative suggestions made by developers.</p> <p><u>9.3.8</u> A sliding scale is preferred as it will allow a larger rent relief during the initial stages, which will reduce as a business matures and is likely to be able to pay higher rents. This will also enable a more seamless transition to a market level rent at the end of the lease.</p> <p><u>9.3.9</u> What is defined as 'local market rate' will vary depending on the location and the type of workspace provided. Market rates can rise considerably in a short space of time. For the purpose of this Policy, 'local market rates' will be defined by:</p> <ul style="list-style-type: none"> • Use Class comparison • Havering borough comparison or (if sufficient comparator premises do not exist in the borough) across the Thames Gateway corridor <p><u>Size</u></p> <p><u>9.3.10</u> An affordable workspace unit may be stand-alone premises or a component of a larger workspace area. To maximise flexibility the Council encourages developments that comprise a large area of floorspace to be managed as a series of smaller 'units'. However, this creates complexity in determining whether a proposal meets policy requirements. Where the micro/small floorspace component is provided as a single floorplate, the applicant must demonstrate that the design of the development is orientated towards the operational needs of small businesses. It is acknowledged that a 'unit' may be a physical entity, or a component of a larger floor area.</p>	

		<p><u>Type</u></p> <p><u>9.3.11</u> <u>Local market analysis has identified key growth sectors² which the Council seek to strengthen. These include:</u></p> <ul style="list-style-type: none"> • <u>Construction</u> • <u>Creative & Digital</u> • <u>Logistics</u> • <u>Manufacturing, Engineering & Technology</u> • <u>Medical science & Health/Social Care</u> <p><u>9.3.12</u> <u>These priority sectors will change over time to reflect the needs of the local economy.</u></p> <p><u>9.3.13</u> <u>The type of workspace to be provided will be dependent on a number of factors. Where affordable workspace is being provided, early discussions between the applicant and the Council are essential to:</u></p> <ol style="list-style-type: none"> <u>determine the size of the affordable element of the workspace;</u> <u>decide which industries are suitable to market the workspace too; and</u> <u>help partner the applicant with the most appropriate Workspace Provider – to facilitate the design and planned management of the space.</u> <p><u>Off-Site Provision</u></p> <p><u>9.3.14</u> <u>Where genuinely exceptional circumstances can be demonstrated to the Council that the provision of affordable workspace on-site is either inappropriate, or would have an unacceptable impact on the viability of a scheme, financial contributions will be sought to secure equivalent provision off-site.</u></p> <p><u>9.3.15</u> <u>Off-site provision will be achieved by the Council through:</u></p> <ul style="list-style-type: none"> • <u>bringing redundant properties into use;</u> • <u>working in partnership with a stakeholder to secure improvements to existing workspaces, or providing additional workspace; offering alternative interventions/activities that support micro and small businesses such as business support.</u> <p><u>9.3.16</u> <u>The off-site contribution will be negotiated on a case by case, cost per sq ft basis. This will also be dependent on the outcomes of a viability assessment and discussions with the Council.</u></p> <p><u>Workspace Provider</u></p> <p><u>9.3.17</u> <u>Where affordable workspace is to be provided it is important that the applicant initiates dialogue with a Workspace Provider, as nominated by or agreed with the Council, early on in the pre-application stage. At the planning application stage an agreed Workspace Provider must be identified, along with a submitted proposal for assessment by the Council which details the agreement with the Workspace Provider for managing the workspace to an agreed specification, detailing the potential</u></p>	

² These priority sectors will change over time to reflect the needs of the local economy.

	<p><u>management arrangements and rents to be charged for a minimum of 5 years.</u></p> <p><u>9.3.18 Applicants will be required to demonstrate likely lease terms for target sectors, and where appropriate make provision for short-term, flexible ‘all-in’ and ‘meanwhile’ leases, and where relevant letting space on a per-desk rather than per-square-foot basis.</u></p> <p><u>9.3.6 The design of workspace for small and micro enterprises will vary, depending on the end occupier or sector. New business space should be flexible, with good natural light, suitable for subdivision and configuration for new uses and activities. The proposal should incorporate flexible design features to provide adaptability for a range of uses and activities. Basic fit-out should be provided to a level beyond shell and core to include: toilets, super-fast broadband connections, shared space for events, good standard of insulation to mitigate any overspill from future alternative uses in the building, grouping of services, plumbing, electrics, cabling, and communications infrastructure. Light industrial or maker spaces have physical needs for greater floor-to-ceiling heights and service access to grouping of services, plumbing, electrics, cabling, and communications infrastructure; light industrial or maker spaces have physical needs for greater floor-to-ceiling heights and service access to accommodate larger equipment and deliveries.</u></p> <p><u>The design of workspace for small and micro enterprises will vary, depending on the end occupier or sector. In general however, applicants should demonstrate that the workspace incorporates flexible internal arrangements, with good natural light, suitable subdivision and configuration for new uses and activities. The proposal should incorporate flexible design features to provide adaptability for a range of uses and occupants.</u></p> <ul style="list-style-type: none"> • <u>Basic fit-out should be provided to a level beyond shell and core to include: ., super-fast broadband connections, shared space and facilities such as communal breakout space, kitchen areas, toilets, bike storage, etc; good standard of insulation to mitigate any overspill from future alternative uses in the building, grouping of services, plumbing, electrics, cabling, and communications infrastructure; light industrial or maker spaces have physical needs for greater floor-to-ceiling heights and service access to accommodate larger equipment and deliveries.</u> • <u>On specific projects other issues may need to be considered, such as the co-ordination of fire alarm provision, access control arrangements, landscaping design, and mobile phone signal strength.</u> <p><u>A consequential modification is required to Table 10 of the Glossary as follows:</u></p> <p><u>For the purpose of Policy 21, Affordable Workspace means:</u></p> <p><u>Flexible workspace which is let to a Workspace Provider and which will allow for occupation by the end users in one or more sectors on terms:</u></p> <ul style="list-style-type: none"> • <u>substantially below market levels of rents and charges when compared with an equivalent letting of the space and facilities on the open market; and</u> • <u>at a rate comparable with similar facilities available in Havering or (if sufficient comparator premises do not exist in the borough) across London as a whole; and</u> • <u>at rates which mean that occupation is feasible to a large number of small/start-up businesses in the relevant sector(s).</u> <p><u>For the purpose of Policy 21, Flexible Workspace means:</u></p>	

			<p>Managed, commercial premises, particularly suitable for small/start-up businesses and which are divided into a collection of small units held by occupiers on a short-term, easy-in, easy-out basis and with communally-shared services, facilities and support for the entrepreneurial activities of the occupiers.</p> <p>A workspace provided where rent and service charges, excluding business support services, are on average at least 20% less than comparable local market rates for the duration of a lease (although it is noted that, for some sectors and locations, much reduced rents may be needed to render them affordable to target occupiers)</p>	
MM20	57	Policy 22	<p>Section 9 : Opportunities to prosper : 9.4 Skills and training</p> <p>Proposed modifications to explanatory text :</p> <p>Insert a new final paragraph of explanatory text as follows :</p> <p><u>9.4.7 For the purpose of Policy 22 'local' refers to the location of permanent operation of business or location of resident's home being within the London Borough of Havering.</u></p>	<p>In response to discussions on Day 5 of the hearing sessions (Matter 6).</p> <p>The proposed modification :</p> <ul style="list-style-type: none"> Clarifies what is meant by 'local' in this policy.
MM21	59	Policy 23	<p>Section 10 : 10.1 Transport Connections</p> <p>A new criterion to be added to the end of the policy as follows :</p> <p><u>xvii. Working with partners including the port of London Authority to explore opportunities for utilising the River Thames for freight and passenger transport to reduce traffic congestion and support local businesses.</u></p>	<p>In response to discussions on Day 5 of the hearing sessions (Matter 8).</p> <p>The proposed modification:</p> <ul style="list-style-type: none"> sets out the Council's intention to work with partners to explore the opportunities for greater use of the River Thames for freight and transport to reduce traffic congestion and to support local businesses better reflects the strategic objectives of the Local Plan
MM22		Policy 24	<p>Section 10 : Connections : 10.2 Parking provision and design</p> <p>Delete the first three paragraphs of the policy as follows :</p> <p>The Council will require all development to provide sufficient parking provision in accordance with the maximum parking standards in the London Plan.</p> <p>In areas of the borough that have low public transport accessibility levels (PTAL 0-2), the minimum residential parking standards set out in Table 4 will apply.</p> <p>In the most accessible parts of the borough (where a standard in the London Plan of up to 1 space per unit applies) the Council will expect a minimum of 0.5 parking spaces per unit.</p>	<ul style="list-style-type: none"> In order to ensure that the Local Plan is in general compliance with the London Plan

Insert new text and new tables 10 and 10a in the policy as follows :

London Plan maximums standards apply across the borough (see Table 10 below):.

Table 10 – Residential Parking Standards

<u>PTAL</u>	<u>Parking Provision</u>
<u>0-2</u>	<u>See Table 10a (below)</u>
<u>3-6</u>	<u>London Plan standards</u>

In areas of the borough that have low public transport access (PTAL 0-1 and areas of 2 defined below) where no improvements are planned, the minimum residential parking standards set out in Table 10a (below) will also apply :

Table 10a Minimum Parking – PTAL 0-2*

<u>1 Bedroom</u>	<u>2 bedrooms</u>	<u>3 bedrooms</u>	<u>4+ bedrooms</u>
<u>Less than 1 parking space per unit</u>	<u>Less than 1 parking space per unit</u>	<u>Up to 1.5 spaces per unit</u>	<u>Up to 2 spaces per unit</u>

*Areas of PTAL 2 where minimum standards set out in table 10a will be applied are specifically parts of the borough that are PTAL 2 and are 800 metres or more away from existing or planned rail and underground stations. Minimum standards will not apply in other areas of PTAL2. The London Plan parking standards will apply to all other parts of the borough that are PTAL 2.

Amend the third paragraph (was fourth) of the policy and criteria iv. as follows :

In all areas, subject to the standards set out in Tables 10 and 10a being met, the Council will support proposals that:

- i. Consider the location and layout of parking provision at the earliest stage and as an integral part of the design process;
- ii. Locate parking close to people's homes and in areas with natural surveillance;
- iii. Provide intensive and durable planting in regular intervals that visually screens the continuity of car parking to the front of dwellings and provides a green street scene; and
- iv. Include car club membership open to all and provide on-site car club parking spaces.

Where a development proposal would result in a net loss of car parking spaces the applicant will be required to demonstrate robustly that there is no need for these spaces.

Planning conditions and legal agreements may be used to restrict eligibility for on-street residential and commercial parking permits, irrespective of the amount of parking spaces provided off street as part of the development.

Amend the sixth and seventh paragraphs (were seventh) as follows :

			<p>Parking provision in new shopping and leisure developments should serve the area or centre as a whole. It <u>and should</u> not be reserved solely for use in connection with the development proposed and <u>be</u> provided as short stay parking.</p> <p>Disabled parking and cycle parking should be located closest to town centres and the entrance to <u>of</u> the facilities and should include provision for long and short stay use.</p> <p>The Council will support development proposals that provide adequate off street servicing arrangements for commercial vehicles and general servicing.</p> <p>Proposed modifications to explanatory text :</p> <p>10.2.1 Car parking for development should aim to strike an appropriate balance between meeting the essential parking needs of the site whilst neither acting as a discouragement to using public transport nor adding to demand for on-street parking. Discussion of the appropriate balance should form a key part of Transport Assessments. Travel Plans should be developed to minimise the need for car-based access. Developments should seek to provide the minimum realistic amount of car parking for the scheme without undue risk of overspill parking onto surrounding streets. The allocation of car parking should consider the needs of disabled people, both in terms of quantity and location.</p> <p>10.2.2 Developments will be supported that comply with the London Plan parking standards for all other forms of parking including for cycles, motor-cycles, cars for disabled people, electric vehicle charging points and coaches;</p> <p>Insert a new final sentence in paragraph 10.2.3 of the explanatory text as follows :</p> <p>10.2.3 The Council's approach to off-street car parking standards is to ensure that parking is not over-provided at destinations served by good public transport (maximum levels of provision), but to recognise and respect the decision many residents make to continue to own a car and ensure that adequate levels of off-street parking are provided in new residential development in areas with lower levels of accessibility to public transport. The Council considers this is justified and appropriate in Havering because the borough is not well provided with public transport services for some journeys and there are no practical alternatives to making journeys by car.</p> <p>10.2.4 The London Plan Parking Standards clearly outline the need for more sustainable travel. The parking standards for outer London boroughs allow for additional parking in comparison to central London boroughs. This is determined by the access to public transport, as identified by the TfL's Public Transport Accessibility Levels (PTAL).</p> <p>Delete paragraph 10.2.5 of the explanatory text and Table 4 as follows :</p> <p>10.2.5 The Council's Residential Car Parking Standards Report (2017) draws together a range of evidence to help inform the car parking standards for Havering. The report demonstrates that a significant proportion of the borough has a PTAL of 0-2 reflecting the lack access to rail or underground stations. Havering also has one of the highest levels of car ownership which is above the average for outer London boroughs. Unsurprisingly, the highest levels of car ownership per household are in the areas with the poorest public transport accessibility. In accordance with the London Plan the Council considers it appropriate to set minimum car parking standards for these areas with the lowest levels of public transport accessibility (see</p>
--	--	--	--

Table 4 below). A lower standard may be appropriate for sites with a PTAL of 2 within the Romford Strategic Development Area where this can be justified on a case by case basis.

Minimum Parking Standards PTAL 0-2

1 bedroom	2 bedrooms	3 bedrooms+
1 parking space per unit	1.5 parking spaces per unit	2 parking spaces per unit

Insert a replacement paragraph 10.2.5 in the explanatory text as follows :

10.2.5 Table 10a sets out minimum parking standards for PTAL's 0-1 together with areas which are PTAL 2 and are 800m+ away from existing or planned rail and underground stations. Applying minimum standards to some specific parts of the borough that are PTAL 2 recognises that the London Plan provides outer London boroughs with the opportunity to apply a more flexible approach to parking standards in these areas.

Delete the final sentence of paragraph 10.2.6 of the explanatory text as follows :

10.2.6 Some areas of the borough (such as central Romford and Upminster) have good or very good access to public transport. In areas well served by public transport and therefore with high PTAL levels, the Council has an obligation under the London Plan to reduce private car use and provide fewer parking spaces in comparison to other parts of the borough. ~~The Residential Car Parking Standards Report (2017) found that in Havering, even areas with high PTALs can have higher car ownership levels than the outer London average.~~

Delete paragraph 10.2.7 of the explanatory text as follows :

~~10.2.7 The report also concluded that areas in Havering with higher PTAL scores, which generally lie on the main rail routes, have achieved these scores largely due to the ease of access to and from London rather than because of good local public transport provision in the borough. Driver tips are predominantly locally focused and without the availability of alternative options there is a demand to own and use cars. A key priority is therefore to increase public transport connections and sustainable travel options as detailed in Policy 23. A balance also needs to be struck between the provision of residential parking spaces and wider objectives such as reducing congestion and improving air quality and the use of parking controls to protect the amenity of existing residents. The Council consider it appropriate to set a minimum requirement of 0.5 spaces per unit in areas that would be captured by the London Plan policy as having a standard of less than 1 space per unit.~~

Renumber the remaining paragraphs as follows :

~~10.2.8~~ 7 Car clubs and pool car schemes are becoming increasingly popular as a means of reducing the need for people to own a car, particularly in areas of good public transport accessibility where there may only be occasional need to use a car. The Council will expect the inclusion of a publicly accessible car club scheme where the scale of development would support the provision of such a scheme.

~~10.2.9~~ 8 The London Plan has also set out a requirement for electric vehicle charging point parking spaces to be included within a development. Therefore, developments will need to include the minimum required electric vehicle parking spaces as required at the time of the application.

~~10.2.10~~ 9 The Council will expect parking provision to be provided on site, but it is recognised that this may not always be sufficient. In situations where in-curtage parking is required, it should be located close to the

			<p>home to avoid inconvenience and increase natural surveillance. Large, isolated car parks should be avoided. Whilst parking will be provided within private areas, it should be recognised that people will wish to park where they consider convenient and this is often on the existing or proposed street. This should be taken into consideration, and parking designed to be convenient for residents so that streets are not dominated by cars.</p> <p>10.2.4<u>10.2.41</u> The design and layout of new residential development should take account of the needs of people wishing to cycle through the provision of safe, accessible and secure cycle parking. Developers should aim to make cycle storage as convenient as access to car parking to encourage cycling as a sustainable mode of transport. New flatted development should provide some space either inside the building in a cycle store-room or provide a separate, secure and accessible bike shed within the overall development.</p> <p>10.2.42<u>10.2.41</u> To reinforce the need for sufficient off-street parking provision and to encourage occupiers to use the available on-site parking, restrictions to eligibility for on-street parking permits can apply to existing and any future parking restrictions.</p> <p>10.2.43<u>10.2.41</u> The Council will use informatives and legal agreements to ensure that future occupants are aware they are not entitled to apply for on-street parking permits.</p>	
MM23	71	Policy 28	<p>Section 11 : High Quality Places : 11.3 Heritage assets</p> <p>Amend criteria i., vii. and viii. of the policy as follows :</p> <p>The Council recognises the significance and value of Havering's heritage assets and will support:</p> <ol style="list-style-type: none"> Proposals that seek to sustain <u>conserve and enhance</u> the significance of heritage assets at risk in the borough; The maintenance of up to date Conservation Area Appraisals and Management Plans; The identification, and maintenance, of a local list of non-designated heritage assets that meet agreed selection criteria; Well designed and high quality development in a Conservation Area, or its setting, which preserves, enhances or better reveals the character and appearance of the area and its significance, and which contributes to local character and distinctiveness, taking into account the Conservation Area Appraisal or Management Plan. Where a building (or other element) detracts from the significance of a Conservation Area, its removal will be supported when acceptable plans for redevelopment have been agreed; Viable uses, alterations or extensions to a listed building, or development within its setting, which would not be harmful to the significance of the heritage asset, including its historic and architectural interest; Well designed and high quality development within a Registered Park or Garden of Historic Interest, Historic Park or Garden of Local Interest, Area of Special Townscape or Landscape Character, or within their setting, which sustains or enhances the significance of the heritage asset, including its special character and important views; and Proposals affecting the significance of a heritage asset with archaeological interest, including the contribution to significance made by its setting, where: <ol style="list-style-type: none"> The proposals are supported by an appropriate assessment of the asset's significance; b. Any harm is minimised, clearly justified and necessary to achieve public benefits that are substantial enough to outweigh loss of harm to the asset's significance; and The significance of any asset or part of an asset to be lost is recorded and made publicly Well designed and high quality proposals which would not affect the significance of a heritage asset with 	<p>In response to discussions on Day 6 of the hearing sessions (Matter 9).</p> <p>The proposed modifications:</p> <ul style="list-style-type: none"> ensure that the policy is in line with national planning policy

			<p>archaeological interest, including the contribution made to significance by its setting. viii. <u>The maintenance of up to date Archaeological Priority Areas.</u></p> <p>Delete the second paragraph of the policy as follows :</p> <p><u>Substantial harm to, or loss of, a Scheduled Monument or non-designated heritage asset with archaeological interest that is demonstrably of national importance, will only be considered in exceptional circumstances.</u></p> <p>Add a new final paragraph to the policy as follows :</p> <p><u>Where a development proposal is judged to cause harm then it will be assessed against the relevant test in the National Planning Policy Framework (NPPF) depending on whether the harm caused is substantial or less than substantial.</u></p>	
MM24	75	Policy 30	<p>Section 12 : Green Places : 12.2 Nature conservation</p> <p>Amend the first sentence of the policy as follows :</p> <p>The Council will protect and enhance the rich biodiversity and geodiversity borough's natural environment and seek to increase the quantity and quality of biodiversity in Havering by :</p> <p>Delete criteria i. – v. of the policy as follows :</p> <p>i. Protecting Sites of Specific Scientific Interest, Local Nature Reserves and Sites of Importance for ii. Conserving and, where possible, extending wildlife corridors; iii. Preserving 'veteran' trees and ancient woodland outside protected areas; iv. Protecting recognised priority species and habitats; and v. Supporting development that provides appropriate new biodiversity features on site.</p> <p>Replace deleted criteria (above) with new criteria i. – vi. as follows :</p> <p>i. Ensuring developers demonstrate that the impact of proposals on protected sites and species have been fully assessed when development has the potential to impact on such sites or species. Appropriate mitigation and compensation measures will also need to be identified where necessary. If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), <u>adequately mitigated, or, as a last resort, compensated for, then planning permission will normally be refused;</u></p> <p>ii. Not permitting development which would adversely affect the integrity of Specific Scientific Interest, Local Nature Reserves and Sites of Importance for Nature Conservation except for reasons of overriding public interest, or where adequate compensatory measures are provided. If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), <u>adequately mitigated, or, as a last resort, compensated for, then planning permission will normally be refused;</u></p> <p>iii. Supporting proposals where the primary objective is to conserve or enhance biodiversity;</p> <p>iv. Encouraging developments where there are opportunities to incorporate biodiversity in and around the development;</p> <p>v. Supporting developments that promote the qualitative enhancement of sites of biodiversity value, (by supporting proposals that improve access, connectivity and the creation of new habitats. Measures include maintaining trees, native vegetation, and improving and restoring open spaces and green infrastructure for the benefit of wildlife;</p> <p>vi. Working with partners and local conservation groups to improve conditions for biodiversity in the borough.</p>	<p>In response to discussions on Day 6 of the hearing sessions (Matter 9).</p> <p>The proposed modifications :</p> <ul style="list-style-type: none"> ensure that the policy accords with national planning policy.

MM25	78	Policy 31	<p>Section 12 : Green Places : 12.3 Rivers and river corridors</p> <p>Insert additional text in the second paragraph of the policy as follows :</p> <p>Haveing's rivers and river corridors fulfil important biodiversity, recreation, place-making, amenity, freight transport and flood management functions which the Council will seek to optimise.</p> <p>The Council will seek to enhance the river environment by requiring <u>major</u> developments in close proximity to a river to investigate and, where feasible, secure opportunities to restore and enhance rivers and their corridors in line with the Thames River Basin Management Plan (RBMP).</p>	<p>In response to discussions on Day 6 of the hearing sessions (Matter 10).</p> <p>The proposed modification:</p> <ul style="list-style-type: none"> clarifies that the Council will only require major developments in close proximity to a river to investigate and where feasible secure opportunities for the restoration and enhancement of these waterways.
MM26	85	Policy 36	<p>Section 12 : Green Places : 12.8 Low carbon design, decentralised energy and renewable energy</p> <p>Insert a new fifth paragraph in the policy as follows :</p> <p>All stand-alone renewable energy developments should be located and designed to minimise any adverse impacts. Applicants are required to address the following issues in their proposals: impacts on landscape, biodiversity, historic environment, residential amenity, aviation activities, air quality, highway safety, fuel and energy security, including their cumulative and visual impacts.</p> <p><u>In assessing the likely impacts of potential wind energy development when identifying suitable areas, and in determining planning applications for such development, the Council will follow the approach set out in the National Policy Statement for Renewable Energy Infrastructure (along with the relevant sections of the Overarching National Policy Statement for Energy Infrastructure, including that on aviation impacts).</u></p> <p>Amend criteria iii. and v. and insert additional criteria vi. in the policy as follows :</p> <p>iii. There is no unacceptable <u>adverse</u> impact on residential amenity in terms of noise, shadow flicker, vibration and visual dominance;</p> <p>iv. A noise impact assessment, which considers all relevant National and Local guidance, must be conducted, and identify appropriate noise mitigation measures were required to reduce the impacts on the surrounding occupants; and</p> <p>v. It is in compliance with the <u>NPPE</u> and the Ministerial Written Statement (HCWS42) or subsequent national policy and</p> <p><u>vi. There is no unacceptable adverse impact on highway safety on the existing infrastructure or the proposed M25 Junction 28 Improvement Scheme.</u></p>	<p>In response to discussions on Day 6 of the hearing sessions (Matter 10).</p> <p>The proposed modifications :</p> <ul style="list-style-type: none"> ensure that the policy is consistent with national planning policy, the National Planning Policy Statement for Renewable Energy Infrastructure and relevant sections of the Overarching National Policy Statement for Energy Infrastructure
MM27	87	Policy 38	<p>Section 13 : Minerals : 13.1 Mineral extraction</p> <p>Amend the first sentence of the text in the policy as follows :</p> <p>The Council will seek to maintain at least a seven year aggregate land bank, as per the <u>Haveing</u> <u>apportionment</u> of at least 1.75 million tons apportionment within the London Plan. In this regard, mineral extraction within Mineral Safeguarding Areas will be supported when proposals in isolation and cumulatively would not unacceptably impact on :</p> <p>i. Public health and safety;</p> <p>ii. The amenity and quality of life of nearby communities;</p>	<p>In response discussions on Day 6 of the hearing sessions (Matter 11).</p> <p>The proposed modifications:</p> <ul style="list-style-type: none"> ensure that the policy is consistent with the London Plan (2016) highlight the opportunities to use the River Thames for the transport of minerals material.

			<p>iii. The natural, built and historic environments:</p> <p>iv. The efficient and effective operation of the road network, including safety and capacity.</p> <p>Insert additional text at the start of the second paragraph of the policy as follows :</p> <p><u>When necessary, A appropriate mitigation measures, to ensure that criteria i - iv is complied with will be secured as part of any proposed development by planning condition and/or legal agreement.</u></p> <p>Add new text to the end of the third paragraph of the policy as follows :</p> <p>A Transport Statement or Transport Assessment (as appropriate) will be required with all applications to determine the potential impacts the proposal may have on the road network and ensure reasonable contributions from the developers are received to maintain the roads. <u>Full consideration should be given to the use of the River Thames for the transportation of any materials as part of any submitted transport statement.</u></p>	
MM28	90	Section 14	<p>Section 14 : Delivery and Implementation</p> <p>Amend paragraph 14.0.17 of the explanatory text as follows :</p> <p>Delivering new homes and communities through Havering's Housing Zones</p> <p>14.0.17 <u>Major sites in the</u> The Romford Strategic Development Area and the Rainham and Beam Park Strategic Development Area are anticipated to deliver over 5,300 <u>6,000</u> and 3,000 homes, respectively, over the Plan period.</p> <p>Amend paragraphs 14.0.28 onwards of the explanatory text as follows :</p> <p>Monitoring the Local Plan</p> <p>Insert additional text at the end of paragraph 14.0.28 of the explanatory text as follows :</p> <p>14.0.28 The Local Plan took account of the best possible evidence and research information available when it was prepared. Whilst this gives a sound basis for the Plan's overall direction and policies, it is acknowledged that over the Plan Period circumstances may change. In this circumstance, the Council may wish to adjust the Plan's direction or policies. In particular, it is recognised that the latter stages of the Local Plan have been prepared concurrently with revisions to the National Planning Policy Framework (2019) by the Government and the Mayor of London preparing a draft new London Plan. Changes in national and Mayoral planning policy will need to be assessed to ensure that Havering's planning policies remain up to date and appropriate for Havering. <u>In the light of these factors, the Council will bring forward an update of the Local Plan immediately after its adoption.</u></p> <p>Amend paragraph 14.0.29 of the explanatory text as follows :</p> <p>14.0.29 <u>Notwithstanding the commitment to an update of the Local Plan, and pending the adoption of a new strategy, the Council will, therefore, monitor the effectiveness of the Local Plan in delivering its objectives. It will do this by regularly assessing its performance against a series of identified key monitoring indicators. The Council will publish the results of these assessments via its Authority Monitoring Report on an annual basis. The monitoring indicators listed in Table 9-10 of Annex 8 will be used to monitor the delivery of each local plan policy. The indicators have specifically been selected to address every policy as far as possible.</u></p>	<p>In response to discussions on Day 6 of the hearing sessions (Matter 12).</p> <p>The proposed modifications :</p> <ul style="list-style-type: none"> • provide updated information on the potential for housing in the Strategic Development Areas in line with the revisions to Policy 3 and the updated Housing Position Statement Technical update October 2019. • recognise that the Local Plan has been prepared concurrently with the preparation of new planning policy guidance from Government and the preparation of a new London Plan • confirm that the Council will update the Local Plan immediately after its adoption (in line with the commitments elsewhere in the Local Plan) • 'signpost' the proposed modifications to the Local Plan in regard to its monitoring • updates the Local Plan in regard to the Housing Delivery Test set out in national planning policy guidance • updates the Local Plan in regard to the preparation of Masterplans for Romford and Rainham and Beam Park

			<p>The indicators are supported by relevant targets, where appropriate, and the extent to which the Local Plan secures these targets will be an important consideration in determining the Council's approach in its update.</p> <p>Insert two new paragraphs in the explanatory text as follows :</p> <p><u>14.0.30 The Council will review policies where it is clear that targets are not met on a consistent basis over time and / or where they fail to be met by a significant amount when considered individually. The Council recognises that given the focus on providing new homes, the indicators and targets for Places to live are especially important. Policy 3 and the Housing Position Statement: Technical Update (October 2019) outline the Council's approach to maintaining a five year supply of housing land and meeting its housing targets. The Council will also keep under review the accommodation needs of Gypsies and Travellers and Travelling Showpeople by undertaking regular reviews of its Gypsy and Traveller Accommodation Assessment.</u></p> <p><u>14.0.31 In addition, the Government's Housing Delivery Test in the National Planning Policy Framework (2019) sets a minimum threshold for housing delivery over a three year period. If delivery falls below this threshold, the Council will need to produce a Housing Action Plan in line with national guidance. The Housing Action Plan will identify reasons for under-delivery, examine ways to reduce the risk of further under-delivery and set out measures the authority will take to improve delivery.</u></p> <p>Renumber and insert additional text at the end of the final paragraph of the explanatory text as follows :</p> <p><u>14.0.34³² The Council, at this stage, does not wish to be prescriptive about this. In all cases it will consider carefully the need for the item and such factors as the most appropriate means of securing its preparation and delivery and its available resources. In the course of preparing the Local Plan, the Council has initiated the preparation of a Masterplan for Romford (due to be published in 2020) and it expects to bring forward a similar strategy for Rainham and Beam Park. These items reflect the importance of these areas to the overall spatial strategy for development in Havering and the commitment of the Council to working with its partners to ensure that the borough is provided with up to date and appropriate planning and regeneration strategies to guide development and to enable the Council to deliver its place-making role.</u></p>													
MM29	107	A.8 Monitoring	<p>Annexes : A8 Monitoring</p> <p>A.8.1 Monitoring is a vital tool in ensuring the Local Plan is being implemented as intended. Havering Council produces an Authority Monitoring Report on an annual basis which will report on the progress of the indicators below. The Authority Monitoring Report will be published by the end of December each year and will cover the previous financial year. All indicators in the table will be monitored on this basis unless otherwise stated.</p> <p>Delete Table 9 as follows :</p> <p>Table 9 Local Plan monitoring framework</p> <table><tr><th>Policy</th><th>Strategic Objective</th><th>Indicators</th><th>Source of Data</th></tr><tr><td colspan="4">Successful Places to Live</td></tr><tr><td>Housing Supply</td><td>SO1, SO11, SO14, SOX1</td><td>Net additional dwellings over the previous five year period or since the start of the relevant Local Plan period, whichever is longer</td><td>London Development Database</td></tr></table>	Policy	Strategic Objective	Indicators	Source of Data	Successful Places to Live				Housing Supply	SO1, SO11, SO14, SOX1	Net additional dwellings over the previous five year period or since the start of the relevant Local Plan period, whichever is longer	London Development Database	<p>In response discussions on day 6 of the hearing sessions (Matter 12).</p> <p>The proposed modification replaces the table in the submission Local Plan with a wholly new table that clarifies the targets and indicators that will be used to monitor the adopted Local Plan.</p>
Policy	Strategic Objective	Indicators	Source of Data													
Successful Places to Live																
Housing Supply	SO1, SO11, SO14, SOX1	Net additional dwellings over the previous five year period or since the start of the relevant Local Plan period, whichever is longer	London Development Database													

Page 162

		Net additional dwellings in:	
		i. Ramford Strategic Development Area ii. Rainham Strategic Development Area iii. Each District centre iv. Council Housing Estates	
		Percentage of dwellings built on previously developed land	
		Number of dwellings lost to other uses (without re-provision)	
		Projected net additional dwellings up to the end of the Local Plan period	
Affordable Housing	SOi, SOii	Net affordable housing completions (number and as a percentage of net housing completions) Net affordable housing completions by tenure type (number and as a percentage of net affordable housing completions)	London Development Database
Housing Mix	SOi, SOii	Net completions by housing size and type	London Development Database
Specialist Housing	SOi	Net additional specialist housing completions	London Development Database
Residential Design and Amenity	SOi	Number and proportion of housing completions achieving the Lifetime Homes Standards Number and proportion of housing completions that meet Building Regulation Requirement M4(2) and M4(3) Number and proportion of housing completions that meet the National Space Standards	London Development Database
Houses in Multiple Occupancy	SOi, SOii	Net additional HMO completions	London Development Database
Conversions and Sub-divisions	SOii, SOiii	Net additional completions arising from: i. Conversions of existing non-residential buildings ii. Sub-division of residential developments	London Development Database
Garden and Backland Development	SOii	Net additional housing completions on garden and backland	London Development Database
Gypsy and Traveller Accommodation	SOiii	Net additional gypsy and traveller pitches and travelling showpersons plots	London Development Database
Thriving Communities			
Healthy Communities	SOv	Percentage of major applications submitted with a Health Impact Assessment	LBH
Town Centre Development	SOvi	Position of Havering's town centres in the London strategic town centre network Amount of completed retail floorspace in Havering's metropolitan and district centres In Havering's primary and secondary frontages, the number and percentage of: i. Vacancies ii. A1 and A2 units	GLA London Development Database LBH

		iii. A5 units iv. betting shops v. payday loan shops	
Eating and Drinking	SOx <i>i</i>	Net additional A3 and A4 units and floorspace in Havering's metropolitan and district centres	LBH
Culture and creativity	SOx <i>ii</i>	Net additional arts, cultural and leisure floorspace in town centres and out of town centres.	LBH London Development Database
Social infrastructure	SOx <i>y</i> , SOx <i>iii</i>	Net additional floorspace for social infrastructure facilities Average size of GP patient lists	London Development Database LBH
Education and Early Years Provision	SOx <i>iii</i>	School places vs demand for school places Net additional floorspace for educational purposes	LBH London Development Database
Open Space, Leisure and Recreation	SOx <i>y</i>	Net loss/gain of public open space, playing fields and leisure floorspace Number of open spaces with Green Flag Awards	London Development Database LBH
Opportunities to Prosper			
Business Growth	SOx <i>i</i> , SOx	Amount of designated and non-designated industrial floorspace lost to non-industrial uses Net additional office floorspace Net additional employment floorspace by type	London Development Database London Development Database London Development Database
Loss of Industrial Land	SOx <i>i</i>	Births, deaths, and survival of enterprises Amount of employment land lost to residential and/or commercial developments	National Statistics London Development Database
Affordable workspace	SOx <i>i</i> , SOx	Number of affordable workspace units delivered Net additional affordable workspace floorspace	LBH LBH
Skills and Training	SOx	Percentage of local labour used in the construction of new developments and end user phase where applicable	LBH
Connections			
Transport Connections	SOx <i>i</i> , SOx <i>ii</i>	Proportion of journeys made by Havering school pupils to school by walking and cycling Car use and car ownership across the borough Number of road accidents (collisions) by age and by Ward	LBH LBH LBH LBH
Parking provision and design	SOx <i>i</i>	Progress on the delivery of key transport infrastructure projects as set out in Policy 23 Percentage of completed development schemes meeting the required parking standards	LBH LBH
Digital Connections	SOx <i>i</i>	Percentage of new developments with access to high speed broadband	LBH
High Quality Places			

Urban Design	SOxiv	Number of schemes nominated for and/or awarded a design award	LBH
		Number and proportion of major applications reviewed by a Design Review Panel	LBH
Landscaping	SOxiii, SOxiv	Number of proportion of major applications approved without a detailed landscape scheme	LBH
Heritage Assets	SOxiv	Number of heritage assets on the Heritage at Risk Register	Historic England
		Number of Conservation Areas with up-to date Appraisals and Management Plans	LBH
Green Places			
Green Infrastructure	SOxiv	Progress on the key green infrastructure projects as set out in Policy 29	LBH and external partners
Nature Conservation	SOxv	Changes in areas and populations of biodiversity importance, including: <div> i. Changes in priority habitats and species (by type); and ii. Changes in areas designated for their intrinsic environmental value; including sites of international, national, regional, sub-regional or local significance </div>	Natural England
Rivers and River Corridors	SOxiv, SOxx	Percentage of main rivers of good or fair chemical and biological quality	Environmental Agency
Flood Management	SOxvi	Number of planning permissions granted contrary to the advice of the Environmental Agency	Environmental Agency
		Number and proportion of developments which incorporate Sustainable Drainage Systems (SuDS)	LBH
Air Quality	SOxviii	Concentrations of two main air pollutants (NO2 & PM10) at monitoring stations	LBH
Pollution	SOxvii, SOxx	Percentage of main rivers of good or fair chemical and biological quality	Environmental Agency
On-site waste management	SOxvii	Percentage of household waste recycled/re-used/composted	LBH
Low Carbon design and renewable energy	SOxix	Number of developments where on-site renewable energy generation is integrated	LBH
		Percentage of energy generation by type from renewable sources	LBH
Minerals			
Mineral Reserves	SOxii	Loss of mineral safeguarded land to development	LBH
Mineral Extraction	SOxii	Production (tonnes) of primary land won aggregates	LBH
Secondary Aggregates	SOxii	Production (tonnes) of secondary/recycled aggregates	LBH
		Use of primary won materials	LBH

Insert replacement table as follows :

Table 10 Local Plan monitoring framework in the Local Plan

Policy	Strategic	Indicators	Target	Data source
--------	-----------	------------	--------	-------------

objective(s)			
Places to live			
Housing (Policies 1.2 and 3)	SOI SOI SOIV SOxvi	Annual net additional dwellings completed	Delivering a minimum of : <ul style="list-style-type: none"> 700 new dwellings per year during Phase 1 of the Plan Period (2016/2017-2020/2021) 1640 new dwellings per year during Phase 2 (2021/2022-2024/2025) of the Plan Period and 1641 (2025/2026) 1170 new dwellings per year during Phase 4 of the Plan Period (2026/2027-2030/2031) In accordance with Policy 3
		<p>Net additional dwellings completed from the 2015 financial year onwards</p> <p>Net additional dwellings In:</p> <ol style="list-style-type: none"> Romford Strategic Development Area Rainham Strategic Development Area Council housing estates outside the Strategic Development Areas Other major sites outside the Strategic Development Areas and Council housing estates Small sites and through vacant units returning to use 	<p>Meeting the cumulative housing requirement target since (and including) the 2015 financial year</p> <p>Sites within Havering being delivered in accordance with the numbers set out within Policies 1.2 and 3 to achieve the following over the first 10 years of the Plan Period :</p> <ul style="list-style-type: none"> At least 5,000 new homes on Major sites in the Romford Strategic Development Area (including Twelve Estate Regeneration Programme sites) At least new 3,000 homes on Major sites in the Rainham and Beam Park Strategic Development Area (including Twelve Estate Regeneration Programme sites) At least new 300 homes through the Twelve Estates Programme (these sites are outside the Strategic Development Areas) At least 1,500 homes on other major sites outside the Strategic Development Areas and
			London Development Database

[illegible]

<u>Conversions and Sub-divisions (Policy 9)</u>	<u>SOii</u> <u>SOiii</u>	<u>Net additional completions arising from:</u> <u>i. Conversions of existing non-residential buildings</u> <u>ii. Sub-division of residential developments</u>	<u>Proposals to increase housing stock in Havering comply with Policy 9 (and Policies 7, 24 and 35)</u>	<u>London Development Database</u>		
<u>Garden and backland development (Policy 10)</u>	<u>SOii</u>	<u>Net additional housing completions on garden and backland</u>	<u>Net increase in housing stock secured through development that meets the requirements of Policy 10</u>	<u>London Development Database</u>		
<u>Gypsy and Traveller accommodation (Policy 11)</u>	<u>SOiii</u>	<u>Net additional gypsy and traveller pitches and travelling showpersons plots</u>	<u>The provision of gypsy and traveller pitch provision and pitches for travelling show people to reflect the Gypsy and Traveller Accommodation Assessment Update report (July 2019) in accordance with Policy 11</u> <u>No net loss of pitches or plots</u>	<u>London Development Database</u>		
<u>Thriving communities</u>						
<u>Healthy communities (Policy 12)</u>	<u>SOv</u>	<u>Percentage of major applications submitted with a Health Impact Assessment</u>	<u>All major proposals to be submitted with a Health Impact Assessment in accordance with Policy 12</u>	<u>GLA</u>		
<u>Town Centre development (Policy 13)</u>	<u>SOvi</u>	<u>Position of Havering's town centres in the London strategic town centre network</u>	<u>Havering town centres retain their position in the London Strategic town centre network (as defined in the London Plan) in accordance with Policy 13 and Map 1</u>			
		<u>Amount of completed retail floorspace in Havering's metropolitan and district centres</u>	<u>In accordance with Policy 13:</u> <ul style="list-style-type: none"> <u>make provision for a minimum of 20,722 square metres of comparison floorspace in Havering by 2031</u> <u>make provision for a minimum of 10,881 square metres of convenience floorspace in Havering by 2031</u> <u>make provision for a minimum of 10,619 square metres of commercial leisure floorspace in Havering</u> 	<u>London Development Database</u>		

[illegible]

[illegible]

Havering Cabinet Meeting on August 5 2020

Item to be approved for Havering Local Plan Main Modifications Public Consultation

Schedule of Changes to the Proposals Map

August 2020



Examination into the Havering Local Plan 2016 - 2031

Document for Public Consultation alongside the Proposed Main Modifications

Proposals Map Changes Booklet Addendum December 2019

August 2020

Havering Local Plan 2016-2031

Proposals Map Changes Booklet

Addendum December 2019

This document replaces the following submission documents:

- 1. Proposals Map Changes Booklet – Addendum March 2019**
- 2. Proposals Map Changes Booklet – Addendum September 2019**

Cleaner, Safer, Prouder Together

1. Introduction

This document will serve as an Addendum to the Proposals Map Changes Booklet – July 2017 and Addendum - March 2018, which accompanied the Havering Local Plan (2016-2031) submission and would not alter the fundamental direction and approach of the Havering Local Plan.

The reason for the subsequent document is a direct response to representations made on the Proposed Submission Version Local Plan and supporting evidence base in respect of Gypsy and Traveller Accommodation within the Borough, as a result of the Examination in Public (EiP) in October 2018 and 2019 and the second phase of consultation (legally referred to as Regulation 19 consultation).

As a result of the consultation, certain additional information emerged given rise to the need to modify the draft Local Plan (2016-2031), in respect of Policy 11 - Gypsy and Traveller Accommodation. This involved necessary amendments to the Proposals Map to ensure that it is accurately reflected in the Local Plan.

These modifications of the Local Plan supersede proposals outlined in previous Addendums since submission and will serve as an Addendum to the Proposals Map Changes Booklet, dated July 2017 and Addendum , dated March 2018.

The document supersedes addendum versions dated March 2019 and September 2019

The sites presented in this document have been marked as either additions or amendment to signify the updates that have been made since the Local Plan was submitted in March 2018.

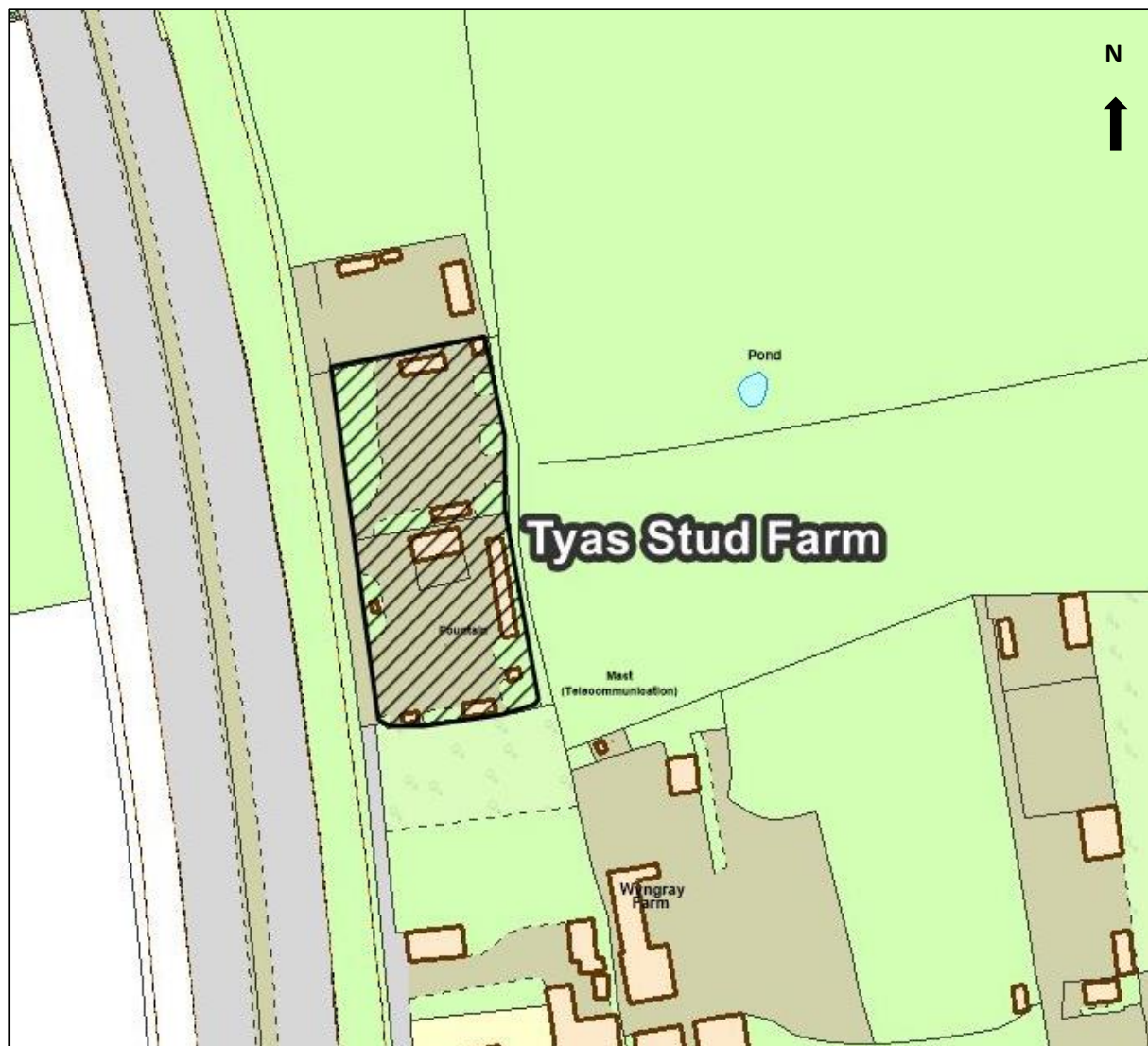
2. Summary of Amendments

In accordance with the statutory requirements of the NPPF, amendments listed in the table below include additions and revision of boundaries:

	Site allocation	Amendment Type	Map Reference	Addition/Amendment
1	Ashlea View, Tomkyns Lane	Revised boundary	Map 10	Amendment
2	Crow Lane (r/o 21)	Additional site	Map 81	Addition
3	Haunted House Woods, 102 St Johns Road	Additional site	Map 83	Addition
4	Hogbar Farm East, Lower Bedfords Road	Revised boundary	Map 7	Amendment
5	Hogbar Farm	Additional site	Map 85	Addition
6	Laburnham Stables, Laburnham Gardens	Additional site	Map 78	Addition
7	The Railway Sidings, Ockendon Road	Additional site	Map 79	Addition
8	Putwell Bridge (The Former Brook Street Garage Site)	Revised boundary	Map 12	Amendment
9	The Grove, The Track, Prospect Road	Additional site	Map 82	Addition
10	The Old Forge, Hubbards Close	Additional site	Map 80	Addition
11	Tyas Stud Farm	Revised boundary	Map 4	Amendment
12	Willow Tree Lodge, Brookmans Park Drive	Revised boundary	Map 76	Amendment
13	Fairoaks, St Mary's Lane	Additional site	Map 84	Addition

3. Mapping Changes and Additions

3.1 Gypsy and Traveller Site at TyasStud Farm (amended)



Havering
LONDON BOROUGH

London Borough of Havering,
Town Hall, Main Road, Romford, RM1 3DB,
Tel: 01708 434343

©Crown copyright and database rights 2017.
Ordnance Survey 100024327.


Key- Map 4


Tyas Stud Farm - Gypsy and Traveller Site



3.2 Gypsy and Traveller Site at Hogbar Farm East (amended)



 Havering <small>LONDON BOROUGH</small>	London Borough of Havering, Town Hall, Main Road, Romford, RM1 3DB, Tel: 01708 434343	©Crown copyright and database rights 2017. Ordnance Survey 100024327.
--	---	--

Key- Map 7	
Hogbar Farm East - Gypsy and Traveller Site	

3.3 Gypsy and Traveller Site at Ashlea View, Tomkyns Lane (amended)



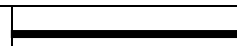
Havering
LONDON BOROUGH

London Borough of Havering,
Town Hall, Main Road, Romford, RM1 3DB,
Tel: 01708 434343

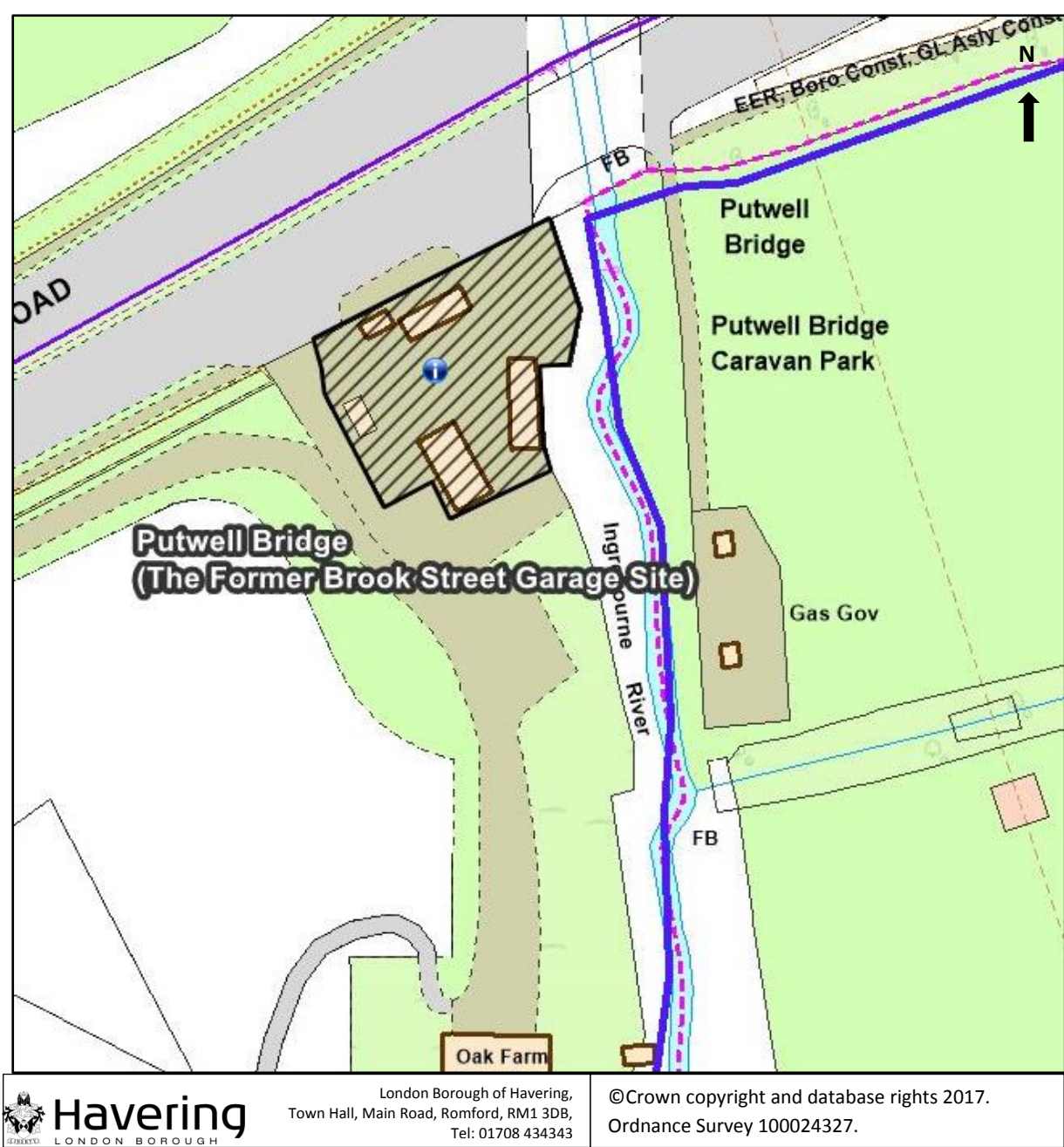
©Crown copyright and database rights 2017.
Ordnance Survey 100024327.



Key- Map 10

Ashlea View, Tomkyns Lane - Gypsy and Traveller Site





3.4 Gypsy and Traveller Site at Putwell Bridge (amended)



Key- Map 12	
Putwell Bridge (The Former Brook Street Garage Site) - Gypsy and Traveller Site	
Borough Boundary	

3.5 Gypsy and Traveller Site at Willow Tree Lodge (amended)



 Havering <small>LONDON BOROUGH</small>	London Borough of Havering, Town Hall, Main Road, Romford, RM1 3DB Tel: 01708 434343	© Crown Copyright and database rights 2017. Ordnance Survey 100024327
Key – Map 76		
Willow Tree Lodge, Brookmans Park Drive - Gypsy and Traveller Site		

3.6 Gypsy and Traveller Site at Laburnham Stables, Upminster (additional)



Havering
LONDON BOROUGH

London Borough of Havering,
Town Hall, Main Road, Romford, RM1 3DB
Tel: 01708 434343

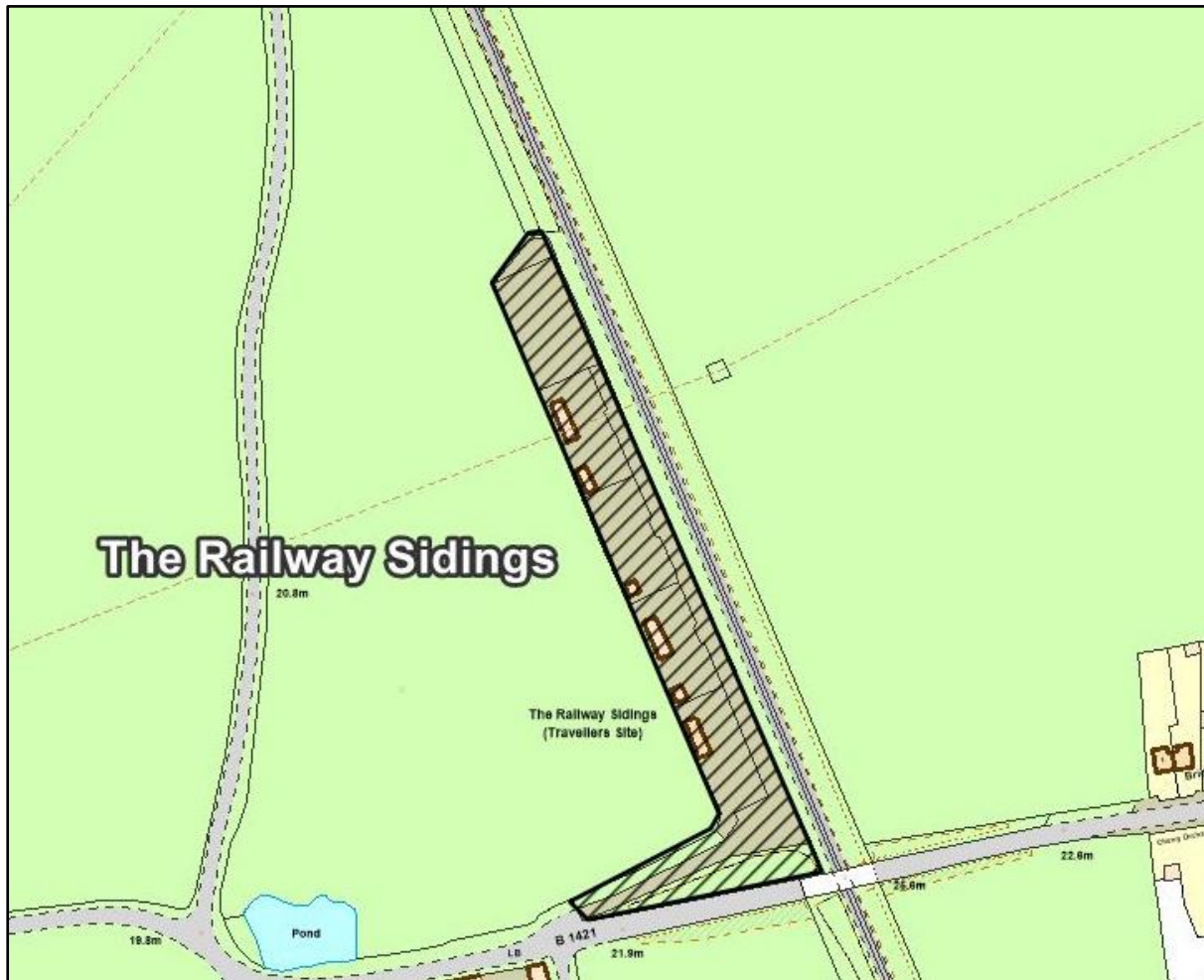
© Crown Copyright and database rights 2017.
Ordnance Survey 100024327

Key – Map 78

Laburnham Stables - Gypsy and Traveller Site



3.7 Gypsy and Traveller Site at The Railway Sidings, Upminster (additional)



London Borough of Havering,
Town Hall, Main Road, Romford, RM1 3DB
Tel: 01708 434343

© Crown Copyright and database rights 2017.
Ordnance Survey 100024327

Key – Map 79

The Railway Sidings Stables - Gypsy and Traveller Site



3.8 Gypsy and Traveller Site at The Old Forge (additional)



Havering
LONDON BOROUGH

London Borough of Havering,
Town Hall, Main Road, Romford, RM1 3DB
Tel: 01708 434343

© Crown Copyright and database rights 2017.
Ordnance Survey 100024327

Key – Map 80


The Old Forge, Hubbard's Close - Gypsy and Traveller Site



3.9 Gypsy and Traveller Site at Crow Lane (r/o no.21) (additional)



 Havering <small>LONDON BOROUGH</small>	London Borough of Havering, Town Hall, Main Road, Romford, RM1 3DB Tel: 01708 434343	Copyright and database rights 2017. Ordnance Survey 100024327
--	--	--

Key – Map 81	
Crow Lane (r/o no.21) - Gypsy and Traveller Site	

3.10 Gypsy and Traveller site at The Grove, Prospect Road (additional)



Havering
LONDON BOROUGH

London Borough of Havering,
Town Hall, Main Road, Romford,
RM1 3DB

© Crown Copyright and database rights 2017.
Ordnance Survey 100024327


Key – Map 82

The Grove - Gypsy and Traveller Site




3.11 Gypsy and Traveller Site Haunted House Woods, 102 St John's Road (additional)

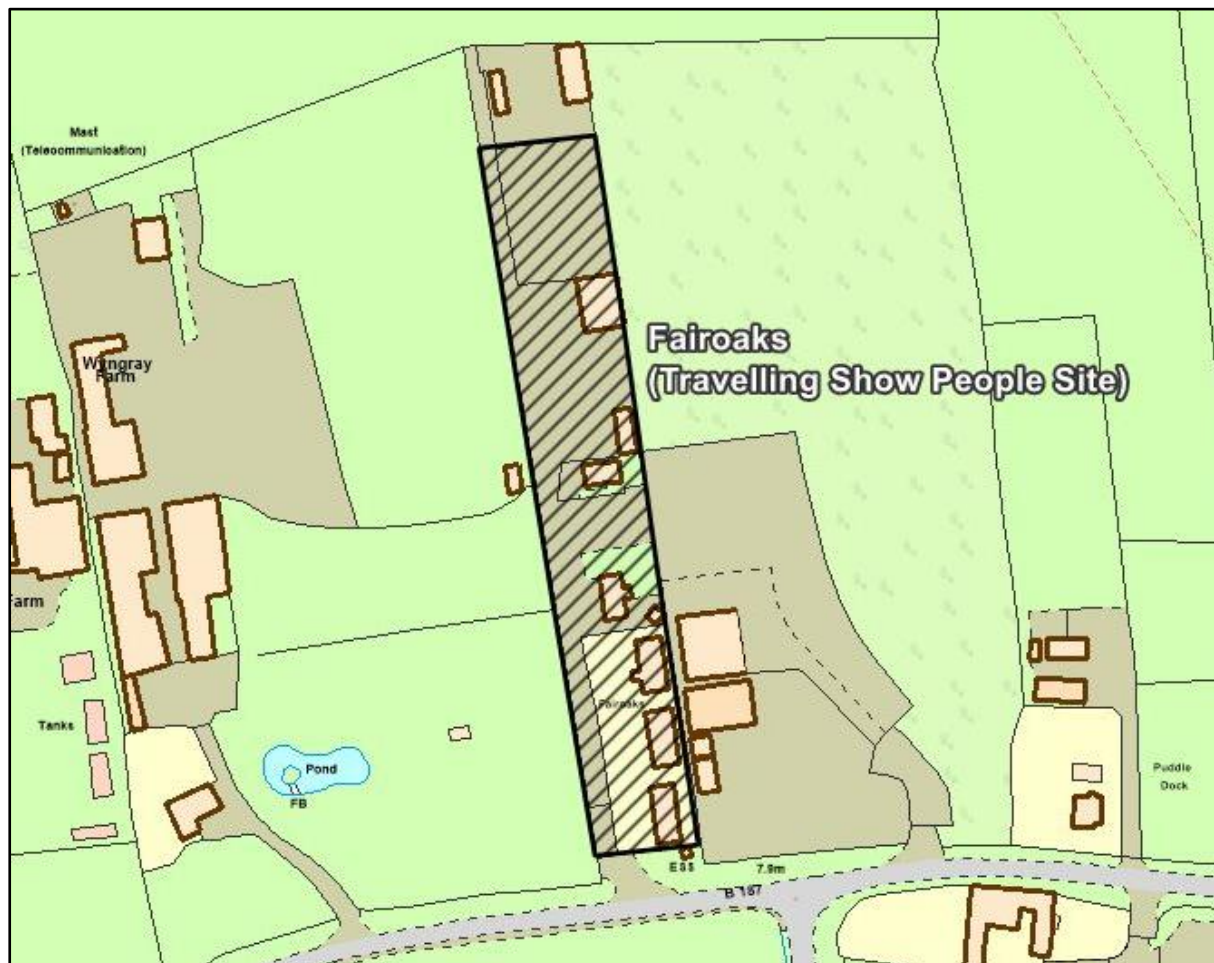




Havering LONDON BOROUGH
 London Borough of Havering,
 Town Hall, Main Road, Romford,
 RM1 3DB


n Copyright and database rights 2017.
 Ordnance Survey 100024327

Key – Map 83	
Haunted House Woods, St John's Road - Gypsy and Traveller Site	

3.12 Gypsy and Traveller Site at Fair Oaks, St Mary's Lane, Upminster (additional)




 Havering LONDON BOROUGH	London Borough of Havering, Town Hall, Main Road, Romford, RM1 3DB	Copyright and database rights 2017. Ordnance Survey 100024327
---	--	--

Key – Map 84	
Fairoaks, St Mary's Lane – Travelling Show People Site	

3.13 Gypsy and Traveller site at Hogbar Farm (additional)



 Havering LONDON BOROUGH	London Borough of Havering, Town Hall, Main Road, Romford, RM1 3DB	Copyright and database rights 2017. Ordnance Survey 100024327
---	--	--

Key – Map 85	
Hogbar Farm – Gypsy and Traveller Site	

Havering Cabinet Meeting on August 5 2020

Item to be approved for Havering Local Plan Main Modifications Public Consultation

Habitat Regulations Assessment: Havering Local Plan Main Modifications

August 2020



Examination into the Havering Local Plan 2016 - 2031

Document for Public Consultation alongside the Proposed Main Modifications

Habitat Regulations Assessment: Havering Local Plan Proposed Main Modifications

August 2020

Habitat Regulations Assessment

Havering Local Plan: Main Modifications

London Borough of Havering

April 2020

Quality information

Prepared by	Checked by	Verified by	Approved by
Hannah Corrigan Graduate Ecologist	Dr James Riley Technical Director	Dr James Riley Technical Director	Max Wade Technical Director

Revision History

Revision	Revision date	Details	Authorized	Name	Position
01	26/09/2019	Draft	JR	James Riley	Technical Director
02	07/10/2019	Final	JR	James Riley	Technical Director
03	01/12/2019	Inspector's updates	JR	James Riley	Technical Director
04	21/01/2020	Final, reissued without alteration April 2020	JR	James Riley	Technical Director

Distribution List

# Hard Copies	PDF Required	Association / Company Name

Prepared for:

London Borough of Havering

Prepared by:

AECOM Infrastructure & Environment UK Limited
Midpoint, Alencon Link
Basingstoke
Hampshire RG21 7PP
United Kingdom

T: +44(0)1256 310200
aecom.com

© 2020 AECOM Infrastructure & Environment UK Limited. All Rights Reserved.

This document has been prepared by AECOM Infrastructure & Environment UK Limited ("AECOM") for sole use of our client (the "Client") in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. No third party may rely upon this document without the prior and express written agreement of AECOM.

Table of Contents

1.	Introduction.....	5
2.	Likely Significant Effects of Main Modifications	6
3.	Conclusion.....	63

Tables

Table 1. Likely Significant Effects of Main Modifications.....	7
--	---

1. Introduction

- 1.1 In 2017 AECOM undertook a Habitat Regulation Assessment (HRA) of the London Borough of Havering Local Plan (hereafter referred to as the 'Plan' or 'Local Plan'). That HRA concluded that there would be no likely significant effects on any European sites from increased development within the London Borough of Havering. This conclusion was reached on the basis that no impact pathways existed for growth in Havering to affect any European sites.
- 1.2 Following the Examination into the Local Plan, the Inspector has recommended a series of Main Modifications to be made. It is therefore necessary for those modifications to be examined in order to confirm that they will not themselves introduce new likely significant effects that were not thoroughly investigated for the HRA of the submitted Local Plan. That is the purpose of this report.
- 1.3 Note therefore that this report should be considered an Addendum to the HRA of Havering Council's Local Plan. As such, it does not recap the methodology of the HRA or the results of either the likely significant effects test or appropriate assessment, including the 'in combination' assessment. Instead it focusses specifically on whether the Main Modifications will result in likely significant effects on any European sites.
- 1.4 Only the Main Modifications are assessed in this document, on the basis that Minor Modifications are, by definition, minor changes to presentation and detailed wording of supporting text that do not materially change any of the Local Plan policies.

2. Likely Significant Effects of Main Modifications

- 2.1 This section sets out the assessment of each Main Modification. The Main Modification is presented in the first two columns of the table below. The assessment of likely significant effects is then presented in the second column.

Table 1. Likely Significant Effects of Main Modifications

Ref. Number	Policy/ Para.	Proposed Main Modification	Likely Significant Effects
MM1	New para. 1.1.8	<p>Section 1 Overview: 1.1 What is the Local Plan?</p> <p>Insert additional final paragraph after 1.1.7 :</p> <p><u>1.1.8 On adoption of this Local Plan the following documents that form part of the current Local Development Framework (2008) will be superseded:</u></p> <ul style="list-style-type: none"> • <u>Core Strategy (2008)</u> • <u>Development Control Policies (2008)</u> • <u>Proposals Map (2008) - will be superseded by a new Proposals Map for the Local Plan and this will include the changes identified in the Proposals Map Changes booklet(s) and those elements of the existing Proposals Map which will be unchanged.</u> • <u>Sustainable Design and Construction (2009)</u> • <u>Planning Obligations (2013) will be superseded by the introduction of Havering CIL (2019)</u> <p><u>Retain the remaining existing allocations in the Romford Area Action Plan (2008) and the Site Specific Allocations (2008) until masterplans are adopted for the Romford and Rainham and Beam Park areas, respectively.</u></p>	No Likely Significant Effect – this change applies to aspects of the plan that are irrelevant to European sites
MM2	Strategic Objectives Para 3.2.1	<p>Section 3 : Strategic Objectives</p> <p>Add new criterion to paragraph 3.2.1 as follows :</p> <p><u>xxii. Support greater use of the River Thames for freight and passenger transport</u></p> <p>and renumber the final criterion as xxiii.</p>	No Likely Significant Effect – increased industrial activity is assessed within the existing HRA. Therefore, the conclusions of no likely significant effect to European Sites remains the same.
MM3	Policy 1	<p>Section 6 : Strategic Development Areas : 6.1 Romford Strategic Development Area</p> <p>Update and amend the first paragraph of the policy as follows:</p> <p>Residential Development</p>	No Likely Significant Effect – there are no impact pathways connecting growth in Havering with European sites

Over the plan period the Council will support the delivery of over ~~6,000~~ ~~5,300~~⁽²⁾ new high quality homes within the Romford Strategic Development Area in well managed residential and mixed use schemes that provide attractive places to live and which are well integrated with the existing community.

Insert text and renumber the policy criteria from ix. onwards (including ix.) as follows :

Connectivity

Romford is the most accessible and well connected area within the borough and has an important role as a transport hub. The Council will support proposals that further enhance connectivity and will:

- ~~x.~~ ix Continue to work with partners to secure significant improvements to Romford station;
- ~~xi.~~ x Support the delivery of Crossrail services to Romford and improvements to the public realm in the vicinity of the station;
- ~~xii.~~ xi Support the delivery of a new east-west shared use link from the railway station across the River Rom to the existing and new residential areas to the west;
- ~~xiii.~~ xii Actively pursue opportunities with TfL and other partners to tunnel the western section of the ring road;
- ~~xiv.~~ xiii Work with TfL to improve accessibility into Romford Town Centre for active travel users;
- ~~xv.~~ xiv Work with the Barking Havering Redbridge University Hospital NHS Trust and TfL to improve links to Queens Hospital including increasing bus capacity at Queens interchange;
- ~~xvi.~~ xv Require developers seeking to develop land adjacent to the ring road to address its perception as a barrier for active travel including opportunities for its greening;
- ~~xvii.~~ xvi Support development which improves the quality of the pedestrian environment, including the greening of the town centre with new street trees and planting and enhanced provision for pedestrians and cyclists.
- ~~xviii.~~ xvii Require developers of major sites to improve active travel links between Romford Station, Waterloo Road and Bridge Close;
- ~~xix.~~ xviii Support development proposals that better integrates The Brewery with South Street;
- ~~xx.~~ xix Require proposals for development along the River Rom to improve the quality and setting of the river and to provide continuous, safe and accessible links alongside the river to promote active travel and improve north-south connectivity; and
- ~~xxi.~~ xx Support development proposals that deliver an enhanced link between the Market Place, St Edward the Confessor Church, North Street and the Trinity Methodist Church, improving the quality of the pedestrian environment along Angel Way.

Renumber the policy criteria and insert text as follows :

Social infrastructure

To support growth in the Romford Strategic Development Area and to assist in ensuring it is a successful place to live, the Council will work with developers and service providers to ensure the delivery of:

- ~~xviii.~~ xxi Romford Leisure Centre
- ~~xix.~~ xxii New and enhanced public open spaces
- ~~xx.~~ xxiii A new health hub, including the sexual health services relocated from Queens Hospital;
- ~~xxi-xxiv.~~ Additional school places in line with the Council's Commissioning Plan and Schools Expansion Programme over the Plan period;
- ~~xxii-xxv.~~ Additional primary school provision equivalent to 3 forms of entry (FE) in the first 5 years of the Plan and a further 6FE need for primary school places beyond the first five years. A 3 form of entry primary school (630 places) has been approved on the Bridge Close development site and the new school should be sufficient to meet demand for the additional primary places needed over the next five years. A further 6FE need for primary school places beyond the first five years
- ~~xxiii-xxvi.~~ xxvi. A 6/8FE secondary school in the second phase of the Plan period (5-10 years);

Development proposals that generate a primary school child yield equivalent to one additional form of entry will be expected to provide adequate space on site for the provision of a school. The Council will only support proposals without this provision where it can be robustly demonstrated that existing or planned education provision can cater for the additional demand for school places.

Renumber the policy criteria and insert text as follows :

Design and Heritage

The Council will require development in Romford town centre to be of high architectural and urban design quality. Development and uses must be appropriate to and will be expected to improve the function, appearance, and character of the town centre.

The Council will support proposals that:

- ~~xxii.~~ xxvii. Create active streets with strong and well-articulated frontages to all existing and proposed pedestrian routes, particularly at ground floor level, avoiding blank facades and exposed service areas;
- ~~xxiii.~~ xxviii. Incorporate generous floor to ceiling heights at ground floor level to provide for flexibility and adaptability over time and respond to the needs of different retailers. To achieve a vibrant and thriving Town Centre there will need to be a mix of uses throughout the Romford Strategic Development Area (RSDA). It is envisaged that this will include residential, retail, commercial, leisure and arts uses. It is intended that the preferred locations for these different uses within the Town Centre will be identified through the ongoing master planning process for Romford. To facilitate delivery of these uses, the design of the ground floor of a mixed use development within RSDA should have a minimum floor-to-floor height of 3.5m to allow flexibility for future changes and adaptability over time. This is a recommended dimension for floor-to-floor height, as the floor-to-ceiling height in retail or commercial development will depend on individual occupier fit out requirements. Commercial buildings, given their likely increased service requirements will generally require a minimum floor-to-ceiling height of 3.5m to 4m.
- ~~xxiv.~~ xxix. Positively respond to the sensitive nature and urban fabric within the Conservation Area, views of St. Edward the Confessor Church and the historic crossroads where South Street, the High Street and the Market Place meet;
- ~~xxv.~~ xxx. Make a positive contribution towards public realm improvements in the Market Place;

~~xxvi.~~ xxxi. Demonstrate how the proposed scheme responds to wider development opportunities, movement and environmental enhancements in the town centre;

~~xxvii.~~ xxxi. On major development sites open up access to the River Rom and positively incorporate the river into the development scheme(s);

~~xxviii.~~ xxxiii. Optimise the design and location of development including the incorporation of resilience measures to address potential flood risk, where appropriate; and

~~xxx.~~ xxxiv. Respond to the local character and context and make a positive contribution to the skyline. Tall buildings may be acceptable in the vicinity of the station subject to high quality design and strong public realm propositions at ground level. Proposals for tall buildings within the Conservation Area and north of the railway line along south street are inappropriate. ~~The heights of proposed new buildings in this area will need to respond positively to the historic context. Elsewhere in the town centre the height of proposed buildings should respond to local character and context, and make a positive contribution to the skyline in Romford town centre.~~

² at least ~~4,750~~ 5,000 homes will be built over the first 10 years of the plan period

Proposed modifications to explanatory text :

Text added to, and deleted from, paragraph 6.1.22 of the explanatory text as follows :

6.1.22 Education provision is particularly challenging in Romford. Existing schools within the area are already at full capacity and whilst the Council's school expansion programme will assist in meeting future demand, this will not offer sufficient capacity over the Plan period. In order to meet the need for primary school places in the Romford area a 3 form of entry primary school (630 places) has been approved on the Bridge Close development site and the new school should be sufficient to meet demand for the additional primary places needed over the next five years. ~~over the next five years an additional 3FE will be needed. 1FE is likely to be delivered through expansion of an existing school and a new 2FE school will be needed.~~ There is a further 6FE need for primary school places beyond the first five years. This will need to be delivered through new schools. This will be addressed via the Site Specific Allocation Plan that will identify specific sites for future schools. If further sites come forward for housing development the Council will need to assess whether further education provision will be needed. A 6/8FE secondary school is required in the second phase of the Plan period (5-10 years). The Council will seek to identify sites suitable for additional education provision through the Romford Masterplan and Site Specific Allocations Local Plan.

Add new paragraph 6.1.30

6.1.30 Tall buildings may be acceptable in the vicinity of the station subject to high quality design and strong public realm propositions at ground level. Proposals for tall buildings within the Conservation Area are inappropriate. The heights of proposed new buildings in this area will need to respond positively to the historic context. Elsewhere in the town centre the height of proposed buildings should respond to local character and context, and make a positive contribution to the skyline in Romford town centre.

A tall building is generally understood to be anything which is of significantly greater height than its context. As Historic England note in the Tall Building Advice Note 4: "In a successful plan-led system, the location and design of tall buildings will reflect the local vision for an area, and a positive, managed approach to development, rather than a reaction to speculative development applications". To determine the appropriate scale, height and form of development with the Romford Strategic Development Area the Council have commissioned consultants to work with the Council to develop a masterplan for Romford Town Centre. This piece of work will involve analysis, characterisation and building height studies to provide evidence to support a local height definition for tall buildings and the identification of appropriate locations with the Romford Strategic Development Area for such buildings beyond the definition within the Local Plan. The Romford Masterplan is envisaged to be adopted as a Supplementary Planning Document and will therefore provide clarity in due course in this area.

MM4		MM number not used	N/A
MM5	Policy 2	<p>Section 6 : Strategic Development Areas : 6.2 Rainham and Beam Park Strategic Development Area</p> <p>Amend and add new text to the fourth paragraph of the policy as follows :</p> <p>Commercial Development</p> <p>A new local centre adjoining Beam Park Station will be delivered providing between 3,500 and 4,000 sq m of floor space through the provision of new modern retail and commercial units.</p> <p>The Council will support development that creates a vibrant mix of active ground floor uses with apartment blocks above within the Beam Park Local Centre.</p> <p>New <u>commercial</u> development will be required to incorporate generous floor to ceiling heights of 3-7.5 <u>3.5m to 4m</u> at ground floors of buildings in Beam Park Centre, and 3m at ground floors of buildings along New Road to provide for flexibility for use as either retail or commercial spaces in the future.</p> <p>Insert a new fifth paragraph in the policy as follows :</p> <p><u>To achieve a vibrant and thriving area there will need to be a mix of uses throughout the Rainham and Beam Park Strategic Development Area It is envisaged that this will include retail, commercial, leisure and arts uses.</u></p> <p>Add a new policy criteria xx. and renumber the remaining criteria as follows :</p> <p>Design and Heritage</p> <p>To ensure the successful transformation of the area, the Council will support development proposals which:</p>	<p>N/A</p> <p>No likely significant effect – this change does not materially alter the total amount of residential development within the Plan period. Moreover, there are no linking impact pathways from growth in Havering to European sites. Therefore, the conclusions of the 2017 HRA are still appropriate.</p>

Section 7 : Successful Places to live : 7.1 Housing Supply

Delete the first sentence from the second paragraph of the policy :

~~Over the full 15 year Plan period, at least 17,550 new homes will be built in Havering.~~

Replace the deleted sentence of the second paragraph of the policy (as above) with new text and update the figures and amend the text in the itemised points with the following :

In line with the London Plan 10 year housing target for Havering, at least 11,701 new homes will be built in Havering over the first 10 years of the Plan period. This will include the delivery of at least:

- i. ~~5,300~~ 5,000 homes on major sites in the Romford Strategic Development Area;
- ii. 3,000 homes on major sites in the Rainham and Beam Park Strategic Development Area;

- xv. Adopt an integrated and comprehensive approach without prejudice to the achievement of the wider vision for the area as set out in paragraph 2.2.5;
- xvi. Provide a layout that facilitates a coherent urban structure across the area as a whole and demonstrate that the layout achieves a coherent structure both in its own right, and in terms of its facilitation of future phases;
- xvii. Better link the existing settlements of South Hornchurch and Orchard Village with Rainham Village, and transform New Road (the A1306) from a traffic dominated corridor into an attractive high quality green urban street commensurate with the adjoining new residential neighbourhoods;
- xviii. Overcome the barrier presented by the river and the industrial sites and bring significant enhancement of the wider area as an attractive place;
- xix. Respond positively to the context within Rainham Village strengthening and enhancing the character of this historic village;
- xx. Take account of and positively respond to the various listed buildings and their settings;
- xxi. Orientate buildings with their front and main entrance towards streets and open spaces to provide overlooking and natural surveillance and to help to create a place with a strong sense of place that is safe and welcoming;
- xxii. Have buildings designed at street corners that 'turn the corner' and address both street spaces;
- xxiii. Provide a good sense of enclosure to streets and public spaces with buildings positioned along consistent building lines;
- xxiv. Avoid adverse effects on the nearby Ingrebourne Marshes SSSI and Inner Thames Marshes SSSI and seeks to achieve enhancements to these sites, where possible; and
- xxv. Optimise the design and location of development including the incorporation of resilience measures to address potential flood risk and explores opening up culverts, where appropriate.

No Likely Significant Effect – this change applies to aspects of the plan that are irrelevant to European sites, since the HRA of the submitted Local Plan confirmed there were no significant impact pathways linking growth in Havering to European sites.

- iii. ~~700~~ 300 homes through the intensification and renewal of existing Council housing estates outside the Strategic Development Areas;
- iv. ~~400 homes on two large previously developed sites within the Green Belt; and~~ 1,500 homes on other major sites outside of the Strategic Development Areas and Council housing estates; and
- v. ~~2,700 homes on small sites across borough.~~ 1500 homes on small sites across the borough and through vacant units returning to use.

Add new criteria viii. and ix. and renumber following criteria as follows :

The delivery of new homes will also be achieved by:

- vi. Promoting mixed use development in town centres and designated out of town centre locations;
- vii. Prioritising all non-designated land for housing when it becomes available;
- viii. Supporting the re-use of brownfield sites when they become available;
- ix. Supporting residential development proposals around stations where it is compatible with the character of the local area. Major development proposals around stations will be subject to design review;

~~Viii~~ x. Supporting appropriate development of infill, under-utilised and vacant sites in the borough's sub-urban areas;

~~ix~~-xi. Resisting the net loss of residential development;

~~x~~-xii. Supporting initiatives to bring back empty residential properties into use;

~~xi~~-xiii. Supporting self-build initiatives; and

~~xii~~-xiv Seeking to optimise residential output and densities consistent with the density matrix set out in the London Plan

Insert additional final paragraph to the policy and add a new table (Table 1) as follows :

Over the course of the whole Plan period, Havering will aim to deliver at least 17,551 new homes. Delivery will be phased over the 15 year plan period as follows :

Table 1: Phased Targets

	<u>Phase 1:</u>	<u>Phase 2:</u>		<u>Phase 3:</u>
<u>Targets for net additional homes</u>	<u>2016/17-2020/21</u>	<u>2021/22-2024/25</u>	<u>2025/26</u>	<u>2026/27-2030/31</u>
<u>Minimum dwellings per annum</u>	<u>700</u>	<u>1,640</u>	<u>1,641</u>	<u>1,170</u>
<u>Total</u>	<u>3,500</u>	<u>8,201</u>		<u>5,850</u>
<u>10 Year Total</u>	<u>11,701</u>			
<u>15 Year Total</u>	<u>17,551</u>			

Proposed modifications to explanatory text :

7.1.1. London and the South East are experiencing significant development pressures and there is a need to increase the supply of housing to meet the demands of the growing population. The NPPF requires local planning authorities to identify and meet their full objectively assessed needs for housing.

7.1.2 Havering forms part of the London-wide housing market area with all of the other London boroughs. The Mayor of London, through the preparation of the 2015 London Plan sought to identify both the need for new housing and the potential supply across London. The GLA's Strategic Housing Market Assessment (SHMA) 2013 identifies a need for a minimum of 490,000 new homes in London between 2015-2026 (or 49,000 new homes per annum). In comparison, the GLA Strategic Housing Land Availability Assessment 2013 found that London has capacity for at least 420,000 additional homes or 42,000 per annum.

7.1.3 Based on this evidence, the London Plan sets out average annual minimum housing supply targets for each borough until 2025. For Havering, the target is a minimum of 11,701 new homes over the period 2015-2025. The London Plan states that the annual average (1,170) should be rolled forward for the remainder of the Plan period.

Amend paragraph 7.1.4 of the explanatory text as follows:

7.1.4 As a result of the cumulative deficit of identified housing supply across the capital, the London Plan states that boroughs should seek to achieve and exceed the relevant minimum borough annual average housing target. Boroughs are expected to draw on the housing benchmarks

in developing their housing targets, augmented where possible with extra housing capacity to close the gap between identified housing need and supply in line with the requirement of the NPPF. In line with the requirements of the London Plan, the Council will seek to deliver and exceed the minimum target set in the Plan, being 11,701 over a 10 year period. Over the 15 year lifetime of this Local Plan ~~Havering's minimum housing target is therefore 17,550 as reflected in Policy 3. Havering will seek to deliver at least 17,551 new homes.~~

7.1.5 At a sub-regional level, Havering forms part of the Outer North East London Housing Market Area with the London Boroughs of Barking and Dagenham and Redbridge. The Council has worked with these authorities to prepare a sub-regional SHMA. A subsequent update has been prepared for Havering taking into account updated GLA household projections⁽⁹⁾. The 2016 SHMA Update for Havering indicates that Havering's full Objectively Assessed Need is for 30,052 new homes over the period 2011-2033 or 1,366 homes per annum.

7.1.6 Through the Local Plan process, the Council has sought to identify all sources of potential housing supply and identify sustainable development sites in order to close the gap between the housing target set in the London Plan and its objectively assessed need requirement. With two Strategic Development Areas in Romford and in Rainham and Beam Park (both with Housing Zone status), an ambitious estates regeneration programme for its own homes, the establishment of the Council's own housing company, opportunities across a range of well-located brownfield sites and working pro-actively and collaboratively with developers to bring forward sites in private ownership, Havering is making every effort to increase housing supply and deliver the homes that are needed in regard to both quantity and quality.

Amend and update paragraph 7.1.7 of the explanatory text as follows:

7.1.7 Over the first 10 years of the Plan period (2016-2026), the Council has identified capacity to deliver at least ~~13,095~~ 14,947 new homes ~~in addition to bringing 260 existing vacant units back into use (see Table 2)~~. This exceeds the minimum 10 year target set out in the London Plan but falls slightly short of meeting the objectively assessed need identified through the Outer North East London SHMA. The Council recognises that Havering's objectively assessed housing need is higher than its identified sources of housing capacity. Policy 3, therefore, sets out a positive and proactive approach to housing development to increase the supply over the plan period. As part of managing the overall approach to housing growth in Havering, the Council adopts a general presumption in favour of housing to meet the identified housing need in the borough, and prioritises housing use on all non-allocated land when it becomes available.

Add two new paragraphs to the explanatory text as 7.1.8 and 7.1.9 and renumber the following paragraphs as follows :

7.1.8 Due to the nature of the housing supply in the Local Plan, the Council has applied a 'stepped' approach to housing delivery over the first 10 years of the plan period. The 'stepped' approach targets are set out in Table 1.

7.1.9 The 'stepped' approach is explained and justified in detail within the Housing Position Paper 2019: Technical Update. It involves having phased housing targets that are lower in the first 5 years of the plan period (Phase 1). These targets then increase in the second five years of the plan period (Phase 2). The 'stepped' approach reflects the longer lead in times for the development of sites in the Strategic Development Areas and the Council's estates regeneration programme. It represents a level of house-building that is achievable over the first 10 years of the

plan period, while ensuring that Havering is able to meet its 10 year target. The targets are a minimum and should not preclude the development of more housing to meet the borough's objectively assessed need, particularly within the first 5 years of the Plan period.

7.1.810 Through the Duty to Co-operate, the GLA have confirmed that London forms one housing market area and unmet housing need is being addressed at the London wide level, with all boroughs seeking to identify additional capacity over and above the level identified in the current London Plan.

7.1.911 The NPPF requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the Plan Period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the Plan Period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.

Add two new paragraphs to the explanatory text incorporating information about the calculation of 5 year land supply, including the buffer and shortfall from paragraphs 7.3-7.5 and Table 7.3 of the HPS. Explain reason for inclusion of 525 (now 197) net unit surplus from 2015/16. Renumber the following paragraphs as follows :

7.1.12 Over the period 2004/05 to 2016/17 Havering has met or exceeding its target in 5 years, and under delivered in 8 years. Havering's delivery record is characterised by a mixture of over and under delivery connected to the peaks and troughs of the housing market cycle. It is recognised that previous delivery has not been at the level required and there has been persistent under-delivery. In light of this the 5 year housing land supply calculations have included a 20% buffer.

7.1.13 Table 2 (below) demonstrates how Havering's 5 year supply has been calculated on the basis of its proposed stepped targets with the application of a 20% buffer and using the Sedgefield Approach of accommodating the shortfall within the first 5 years. The 20% buffer has been applied to the shortfall in addition to the housing target. Where there is no shortfall but is instead a surplus a 20% buffer has not been applied to the surplus. Net completions are grouped by financial year (April 1 – March 31 the following year).

7.1.14 The shortfall (414) is calculated by subtracting the combined annual targets from 2015/16 -2018/19 and subtracting the actual or anticipated net new completed homes in that same time period.

7.1.15 A surplus of 221 net new homes from the 2015/16 financial year is included in the shortfall calculation despite not being within the Plan Period. This is because the GLA SHMA 2013, from which the London Plan targets are derived, and in turn which the Local Plan 10 and 15 year targets are taken from, only account for previous delivery (backlog) up until (but not including) the 2015/16 financial year.

Table 2

Five Year Supply Based on a Stepped Trajectory as at Adoption (2019) using the Sedgefield Approach*	
Target	6320
Shortfall	414

Five year target plus shortfall	6734
Application of 20% Buffer	8081 (6734 x 1.2)
Annualised target with 20% buffer	1616 (8081/5)
Supply	8624(2019 – 2023)
Supply divided by annualised target with 20% buffer	5.34 years supply (8624/1616)

7.1.40~~15~~ A significant proportion of new housing development will be delivered in the two Strategic Development Areas and predominantly on large sites within these areas. Work is already underway in Havering to bring these sites forward and whilst construction will start within the first five years of the Plan, completion is more likely to be towards the end of this period and into the second phase. The Council is making every effort to bring forward these sites as quickly as possible in order to boost housing supply and meet the short term need for housing.

Renumber and amend paragraph 7.1.11 of the explanatory text as follows :

7.1.44~~16~~ Full details of the Council's land supply and the approach to delivery housing over a 10 year period is set out within the Housing Position Statement October 2019: Technical Update supporting this Local Plan. This also includes ~~an action plan~~ Housing Implementation Strategy addressing the initiatives underway to increase housing supply.

Add a new paragraph 7.1.17 to the explanatory text and renumber following paragraphs as follows:

7.1.17 The Housing Position Statement identifies specific deliverable and developable sites for the first 10 years of the Plan. The Council is committed to ensuring that there is a sufficient supply of housing over the 15 year plan period and beyond and will therefore undertake an early update of the Plan. This update will begin immediately after adoption of the Local Plan.

7.1.42~~18~~ As part of its strategy, the Council has looked at the scope for the Green Belt to provide land for new homes. It has undertaken a review against the functions of the Green Belt as set out in the NPPF. The Council is satisfied that all of the Green Belt in Havering fulfils its purpose and that having regard to the significant opportunities for new homes to come forward in Havering's built up area, there is no planning justification for releasing land from the Green Belt. Opportunities do exist on previously developed sites within the Green Belt at St George's Hospital in Hornchurch and Quarles Campus in Harold Hill.

7.1.43~~19~~ In seeking to meet its objectively assessed housing need the Council explored and tested a number of alternative development strategies in its Sustainability Appraisal (SA) Report. The SA report demonstrates that the development strategy chosen by the Council is the most sustainable approach.

7.1.44~~20~~ The Council supports self-build initiatives to give local residents the opportunity to design, build and own their homes. Since May 2016, the Council has published a register for individuals and groups to express an interest in acquiring self-build and custom build plots in Havering.

The Council will continue to monitor this register to gather up to date evidence of the level of interest for these types of homes and accordingly seek to make provision for meeting this need within the Site Specific Allocations Local Plan.

7.1.45²¹ Development densities should reflect the density matrix in the London Plan. However, the Council recognises that when determining an application, density is only one of a number of considerations and the density matrix should not be applied mechanistically. The Council will place a high priority on the quality and design of the scheme, the local context and the relationship with surrounding areas when determining whether a scheme is acceptable. It will always aim to optimise residential output and densities consistent with the London Plan for different types of location within the borough through encouraging higher densities of housing development in places with good levels of public transport accessibility.

Update and renumber Table 1 as follows:

Table 4-3: Housing Supply 2016-2026

Source of Supply	Net additional Homes 0-5 years	Net additional Homes 5-6- 10 years	Total 10 year supply	Total 15 year supply
Large Major sites within the Romford Strategic Development Area* ¹	4,725 124	3,409 5,117	4,770 5,241	6,642
Large Major sites within the Rainham and Beam Park Strategic Development Area*	954 590	2,074 2,515	3,022 3,105	3,105
LBH Estate Regeneration Schemes (outside the Strategic Development Areas)	55 34	370 410	345 376	1,288
Large Other major sites outside the Strategic Development Areas*	4,758 1,117	492 503	4,950 1,620	1,620
Small sites	930 540	930 900	4,860 1,440	2,340

¹ *Includes sites with planning permission

<u>Vacant units returning to use</u>	430 78	130	260 208	<u>338</u>
<u>Completions 2016/17 and 2017/18</u>	<u>884</u>	<u>NA</u>	<u>884</u>	<u>884</u>
<u>Surplus from 2015/16</u>	<u>221</u>	<u>NA</u>	<u>221</u>	<u>221</u>
Total	5,075 <u>3,520</u>	7,402 <u>9,575</u>	12,177 13,095	<u>16,438</u>

Source:

Table 6.1 Key sources of housing supply- Housing Position Statement Technical Update October 2019

MM7

Policy 4

Section 7 : Successful Places to live : 7.2 Affordable housing

Amend / insert additional text in the first paragraph of the policy as follows :

Havering residents should have access to high quality, affordable new homes and the Council will seek to maximise affordable housing provision from development proposals. All developments of ~~more than 10 dwellings~~ 10 or more dwellings or residential developments with a site area of more than 1,000 square metres are required to provide at least 35% affordable housing based on habitable rooms

Proposed modifications to explanatory text :

Amend/ insert additional text to paragraph 7.2.2 of the explanatory text as follows :

7.2.2 The Outer North East London SHMA estimates that of the 30,052 new homes needed in Havering over the period 2011-2033, 35% (10,520) of these are required to be affordable. The Council, therefore, considers it appropriate to seek at least 35% affordable housing from new developments. This is also consistent with the London Plan and the Mayor's ~~Draft~~ Affordable Housing and Viability Supplementary Planning Guidance (2017~~6~~)

Update paragraph 7.2.5 of explanatory text as follows :

7.2.5 The Council supports a transparent approach to viability in line with the Mayor's ~~Draft~~ Affordable Housing and Viability Supplementary Planning Guidance (2017~~6~~). Applicants will be required to pay for an independent viability assessment by a third party where requested by the Council. The Council will use review mechanisms to ensure that new development delivers the appropriate amount of affordable housing as viability improves.

Page 213

No Likely Significant Effect – this change applies to aspects of the plan that are irrelevant to European sites

Amend paragraph 7.2.7 of the explanatory text as follows :

7.2.7 Where a development proposal is considered to under-develop a site, the Council will consider negotiating an increase in the number of dwellings, and thus affordable housing provision, or consider refusing the application. The Council has established that development sites of more than 1000 square metres are potentially able to be configured to deliver ~~more than 10 residential~~ 10 or more residential dwellings and, therefore, contribute to affordable housing provision.

MM8	Policy 5	<p>Section 7 : Successful places to live : 7.3 Housing Mix</p> <p>Add to, and delete, text from the first, second and third paragraphs of the policy as follows :</p> <p>The Council will support development proposals that provide a mix of dwelling types, sizes and tenures.</p> <p>All housing schemes should include a proportion of family sized homes and reflect the recommended housing mix identified in Table 2 3 unless <u>When considering the mix of dwelling sizes appropriate for a particular development proposal, the Council will have regard to it can be robustly demonstrated that a variation to the mix in Table 3 is justified having regard</u> to individual site circumstances including location, site constraints, viability and the achievement of mixed and balanced communities.</p> <p>Where proposals are seeking to provide retirement, sheltered or extra care housing, the Council recognises that there may be a need for greater flexibility with regard the mix of units to be provided within developments <u>and the housing mix as set out in table 3 does not apply to such proposals</u> particularly in achieving the provision of 3 bedroom units.</p>	No Likely Significant Effect – this change does not change the conclusions of the 2017 HRA to European sites.
MM9	Policy 6	<p>Section 7 : Successful Places to live : 7.4 Specialist accommodation</p> <p>Amend / insert additional text in policy criteria vii. and viii. as follows :</p> <p>The provision of appropriate housing to meet the specialist needs of local people will be supported where it can be demonstrated robustly that:</p> <ul style="list-style-type: none"> i. There is an identified need within the borough; ii. The site has access to essential services and shops by walking and cycling; iii. The site is well served by public transport; iv. The proposal contributes to a mixed, balanced and inclusive community; v. The site is suitable for the intended occupiers in terms of the standard of facilities, the level of independence, and the provision of and/or care; vi. An appropriate level of amenity space is provided to meet the needs of the intended occupants taking account of the need for an attractive outlook; vii. Consideration has been given to all possible future needs and the development can be easily adapted to meet the needs of future occupants; 	

- viii. The proposal does not have any unacceptable adverse impacts on the surrounding area and will not be likely to give rise to significantly unacceptable greater levels of noise and disturbance to occupiers of nearby residential properties;
- ix. The proposal meets the parking requirements set out in Policy 24 and will not have an unacceptable impact on parking conditions and traffic congestion in the area; and
- x. Adequate provision for visitor and carer parking facilities is provided, and where appropriate, provision is made for the safe and convenient storage of wheelchairs and mobility scooters.
- xi. meet other identified prioritised local need; or
- xii. The existing accommodation will be adequately re-provided to an equivalent or better standard on-site or elsewhere within the borough.

Proposed modifications to explanatory text :

Add a new paragraph 7.4.5 to the explanatory text as follows :

7.4.5 The London Plan 2016 states that boroughs should identify and address the local expression of older persons strategic housing needs, informed by indicative requirements set out in Annex A5 of the London Plan 2016. Havering's indicative requirement is identified as being 185 additional units per year.

Renumber and amend paragraph 7.4.5 of the explanatory text as 7.4.6 as follows:

7.4.5-6 In 2015, the Council undertook a review of the commissioned a report to identify the locally expressed need for specialist older people's housing within the borough. This ~~review~~ report looked at both the current and projected need for housing for older people and the specific types of specialist accommodation required. This report employed a model which draws heavily on both the GLA's model and the Housing LIN model, but then applies local information to ensure its relevance to Havering. The ~~review~~ report found that:

- There is a current and projected surplus of affordable Sheltered Housing Schemes in Havering and this is projected to continue even with projected population growth in the number of older people living in Havering.
- There is a current and projected deficit in sheltered/ retirement housing for lease and sale within Havering.
- There is a current and projected deficit in enhanced and extra care housing and specialist housing available for older people when their current home is no longer suitable due to physical and/or mental frailty or affordability

Delete paragraph 7.4.6 as follows :

~~These finding are in line with the indicative annual benchmark for the provision of additional specialist older person accommodation which is set out in the London Plan. In Havering, a need for 185 additional units per year has been identified of which 135 should be for private sale and 50 for intermediate sale. No need was identified for affordable rent products due to the current surplus.~~

Add a new paragraph 7.4.7 to the explanatory text and renumber the following paragraphs as follows :

7.4.7 In 2018, the report was reviewed and reached the same conclusions listed above. Overall, an annual need for 255 owner occupier/intermediate housing was identified. The report will continue to be reviewed every 3 years so that the Council is able to maintain an up-to-date understanding of identified need within the borough, taking into account changes in demographic projection, technological and building innovations and older person's assessment of how their own housing needs are best met.

7.4.78 To meet the needs of Havering's population and as part of the Council's estate regeneration programme, the Council is proposing to close four sheltered housing schemes and redevelop three others. Three of the four sites that are closing will be regenerated to provide high quality general needs housing and one will provide high quality general needs flats for residents over the age of 55. Of the three sheltered schemes for redevelopment, two will become Older People's Villages offering a range of housing options designed to support a variety of needs within a community setting. One sheltered scheme will become an Extra Care scheme offering residents the benefit of additional support to meet increasing needs.

7.4.89 In addition, there will be considerable financial investment focused on the remaining twelve sheltered schemes over the next two years. This will enable the Council to improve facilities and services within sheltered schemes, which will support the needs of older people and encourage our residents to remain independent for as long as possible to improve their quality of life and reduce the financial burdens on local health and social care services.

7.4.910 There is a need for both specialist and long term housing solutions to be found for people with a learning disability, mental health conditions, substance misuse and older looked-after children within Havering. Work is underway to identify the demand for supported housing as part of the Council's housing development programme work.

7.4.4011 For residents with a special educational need and disability who have reached 16 years of age, the Council is developing an integrated post-16 strategy that will include identifying housing needs and setting out suitable housing options. This will include the development of further supported living schemes and work to ensure that existing housing options are identified, such as the ground floor flats or bungalows that enable individuals to live independently (with appropriate support) in the community.

7.4.4412 All development proposals for specialist accommodation should meet an identified and up to date local need. It is important that any new provision reflects the requirements of the local community in terms of the type, location and design of accommodation.

7.4.4213 Specialist housing should be located in areas that have good public transport connections and access to essential services by walking and cycling. This will enable residents to integrate into the local community and avoid social isolation.

7.4.4314 Careful consideration should be given to the design of specialist accommodation to ensure that it is tailored to the needs of the intended occupants and that it is easily adaptable for future occupants who may have different needs. Residents should have access to high quality and usable outdoor amenity space. In circumstances where the intended occupants are unlikely to use outdoor space, it will still be important for an attractive outlook to be provided which should incorporate soft landscaping.

MM10	Policy 7	<p>Section 7 : Successful Places to live : 7.5 Residential design and amenity</p> <p>Amend / insert additional text in policy criteria v., vi. and viii. as follows :</p> <p>To ensure a high quality living environment for residents of new developments, the Council will support residential developments that:</p> <ul style="list-style-type: none"> iv. Meet the National Space Standards and the London Plan requirement for floor to ceiling heights; v. Adhere to the London Plan policies in regards to 'Lifetime Homes Standards' and 'Lifetime Neighbourhoods'; v. Are sited and designed to maximise daylight and sunlight; vi. Incorporate an appropriate level of high quality, usable <u>green infrastructure</u> and amenity space that is designed to be multi-functional and offer a range of <u>environmental benefits</u> and leisure and recreation opportunities; vii. Provide both balconies and communal amenity space in flatted schemes; and viii. <u>Maximises the provision of</u> Provide dual aspect accommodation unless exceptional circumstances are demonstrated; <p>Proposed modifications to explanatory text :</p> <p>Delete paragraph 7.5.3 from the explanatory text and renumber following paragraph as follows :</p> <p>7.5.3 Developments will be expected to deliver 'lifetime' homes and 'lifetime' neighbourhoods reflecting the six principles relating to access, services and amenities, built and natural environments, social network and well being, and housing. By developing homes which are adaptable to change based on the needs of residents, it will facilitate greater pride and sense of community.</p> <p>7.5.43 The Council will expect the impact of development proposals to be assessed following the methodology set out in the most recent version of Building Research Establishment's (BRE) "Site layout planning for daylight and sunlight: A guide to good practice". Depending on the scale of the development a Daylight and Sunlight Report may be required to fully assess the impacts.</p> <p>Add a new paragraph 7.5.4 to the explanatory text as follows:</p> <p><u>7.5.4 New development in Havering should be of a high quality and offer a good quality living environment for residents. Dual aspect accommodation offers a range of benefits such as better daylight, a greater chance of direct sunlight for longer periods, natural cross ventilation, mitigating pollution, offering a choice of views, greater flexibility and adaptability. In line with the Mayor's Housing SPG 2016 developments should minimise the number of single aspect dwellings. Single aspect dwellings that are north facing, or exposed to noise levels above which significant adverse effects on health and quality of life occur, or which contain three or more bedrooms should be avoided.</u></p> <p>Amend the start of paragraph 7.5.5 of the explanatory text as follows :</p>	<p>No Likely Significant Effect – this change would be positive for European sites and strengthen their protection</p>
------	----------	---	--

		<p>7.5.5 <u>High quality green infrastructure and Amenity</u> space provides many benefits in terms of opportunities for recreation and leisure, and enhancing quality of life through improved health, reduced stress levels, child development through play spaces and interaction with the natural environment.</p>	
MM11	Policy 10	<p>Section 7 : Successful Places to live : 7.8 Garden and Backland Development</p> <p>Insert additional criterion v. in the policy and renumber final criterion as vi as follows :</p> <p>Proposals for residential development on garden and backland sites in Havering will be supported when they:</p> <ul style="list-style-type: none"> i. Ensure good access and, where possible, retain existing through routes; ii. Retain and provide adequate amenity space for existing and new dwellings; iii. Do not have a significant adverse impact on the amenity of existing and new occupants; iv. Do not prejudice the future development of neighbouring sites; and v. <u>Do not result in significant adverse impacts on green infrastructure and biodiversity that cannot be effectively mitigated and;</u> <p>→ vi. Within the Hall Lane and Emerson Park Character Areas as designated on the Proposals Map, the subdivision of plots and garden development will not be supported , unless it can be robustly demonstrated that the proposal would not have an adverse impact on the character of the area and that the proposed plot sizes are consistent with the size, setting and arrangement of properties in the surrounding area.</p>	No Likely Significant Effect – there are no linking impact pathways between growth in Havering and European sites.
MM12	Policy 11	<p>Delete the existing Policy as follows:</p> <p>Gypsy and Traveller accommodation</p> <p>The Council will meet the identified current and future accommodation needs of Gypsies and Travellers and Travelling Showpeople in Havering by:</p> <ul style="list-style-type: none"> i. Formalising seven existing private sites providing a maximum of 33 pitches for Gypsies and Travellers. These sites are identified on the Proposals Map and the maximum number of pitches that will be permitted on each site is identified in paragraph 7.9.5; and ii. Retaining and protecting the existing Travelling Showpeople plot at Fair Oaks, St Marys Lane. <p>Proposals brought forward for permanent Gypsy and Traveller pitches on the sites identified on the Proposals Map will be required to demonstrate:</p>	No Likely Significant Effect – this change applies to aspects of the plan that are irrelevant to European sites since the HRA of the submitted Local Plan confirmed there were no significant impact pathways linking growth in Havering to European sites.

- iii. ~~A suitable layout of the site;~~
- iv. ~~That the site has essential services such as water, power, sewerage, drainage and waste disposal;~~
- v. ~~High quality boundary treatment and landscaping of the site; and~~
- vi. ~~The removal of ancillary equipment and structures not part of the residential accommodation.~~

~~Development of any additional permanent or temporary Gypsy and Traveller pitches must meet an up to date and evidenced need and will be determined in accordance with the National Planning Policy for Traveller Sites. Proposals must also satisfy the criteria below in addition to criteria iii-vi above:~~

- vii. ~~The site has safe and convenient access to the highway and public transport services;~~
- viii. ~~There is provision within the site for parking, turning and servicing;~~
- ix. ~~The site has reasonable access to local services and community facilities such as healthcare, schools and shops;~~
- x. ~~The proposal would not result in significant adverse impacts on the amenity of occupiers of neighbouring sites;~~
- xi. ~~The proposal would not result in significant adverse impacts on the visual amenity of the local area; and~~
- xii. ~~Sites at risk of flooding should be subject to the sequential and exception tests.~~

~~7.9.1 The Havering Gypsy and Traveller Accommodation Assessment (GTAA) 2017 provides a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpersons accommodation in the borough up to 2031. The Assessment identifies a need for 33 additional pitches for the Gypsy and Traveller households who meet the planning definition as set out in the National Planning Policy for Traveller Sites. Of the 33 pitches needed, 26 pitches are required within the first 5 year period of the Plan (2016—2021), and the remaining 7 pitches in the latter part of the plan period. No additional need has been identified for plots for Travelling Showpeople over the 15 year plan period (2016-2031).~~

~~7.9.2 The GTAA demonstrates that all Gypsy and Traveller families living in the borough currently occupy private sites within the Green Belt. There are no public sites within the borough. The biggest constraint when trying to identify suitable land to meet the need for Gypsy and Traveller pitches in Havering is the Green Belt.~~

~~7.9.3 In accordance with National Planning Policy, 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 and deliverable land within the built up area that could be used for the Gypsy and Traveller accommodation.~~

~~7.9.4 Policy 11 therefore seeks to meet the need identified in the GTAA through the allocation and intensification of sites within the Green Belt.~~

~~7.9.5 The sites are identified on the Proposals Map and are listed below. In order to provide firm controls and prevent further intensification, a maximum number of pitches will be permitted on each site as set out below:~~

- ~~● Tyas Stud Farm rear of Latchford Farm – maximum of 5 pitches~~
- ~~● Vinegar Hill – maximum of 4 pitches~~
- ~~● Hogbar Farm West – maximum of 3 pitches~~
- ~~● Ashlea View, Tomkyns Lane – maximum of 2 pitches~~
- ~~● Benskins Lane – maximum of 10 pitches~~
- ~~● Fairhill Rise – maximum of 2 pitches~~
- ~~● Hogbar Farm East – maximum of 7 pitches~~
- ~~● Lower Bedfords Road – maximum 1 pitche~~
- ~~● The Caravan Park, Putwell Bridge – maximum of 2 pitches~~

~~7.9.6 The sites are all currently in Gypsy and Traveller use and they have all been identified within the GTAA as contributing to the overall need for pitches in line with the definition of Gypsies and Travellers in the Planning Policy for Traveller sites 2012. The maximum number of pitches on each site takes into account the need arising from each site as identified in the GTAA and an understanding of what facilities and space a pitch typically requires. Further details are set out in the Gypsy and Traveller Position Statement that supports this Local Plan~~

~~7.9.7 The GTAA also identified need for up to 29 additional pitches for “unknown households”, that is, households whose travelling status was not able to be determined through the assessment. These households either refused to be interviewed, or were not on site at the time of fieldwork. It is not possible to identify sites to meet an unknown need.~~

~~7.9.8 Where further sites are proposed the Council will ensure that they are required to meet legitimate additional borough need. When considering applications for Gypsy and Traveller sites and Travelling Showpersons plots, the Council will take into account the policy criteria outlined in Policy 11 in addition to the requirements of National Policy.~~

~~7.9.9 In general, proposals for Gypsy and Traveller sites and Travelling Showpersons plots are inappropriate development in the Green Belt and any additional sites will only be approved when very special circumstances have been demonstrated in line with National Policy.~~

Insert new policy as follows:

Policy 11 Gypsy and Traveller accommodation

The Council will seek to ensure that the accommodation needs of Gypsies, Travellers and Travelling Showpeople who meet the planning definition of a traveller and those who do not meet the planning definition (as set out in Planning Policy for Traveller Sites (2015)) are met for the Local Plan period 2016-2031.

(1) Identifying and addressing accommodation needs

a) Overall accommodation needs for Gypsy and Traveller and Travelling Showpeople households

The Council has undertaken a Gypsy and Traveller Accommodation Assessment (GTAA). The Update report (July 2019) of the GTAA identifies this need as 220 pitches for Gypsies and Travellers and 5 plots for Travelling Showpeople for the Plan period 2016-2031 comprised of:

- 174 pitches for Gypsy and Traveller households who meet the planning definition
- 43 pitches for Gypsy and Traveller households who do not meet the definition
- 3 pitches for undetermined households
- 5 plots for Travelling Showpeople who meet the planning definition

b) Accommodation needs for Gypsy and Traveller and Travelling Showpeople households for 2016-2021

The GTAA Update report (July 2019) identifies the need for pitches and plots for Gypsies and Travellers and Travelling Showpeople for the period 2016-2021 as:

- 136 pitches for Gypsy and Traveller households who meet the planning definition
- 33 pitches for Gypsy and Traveller households who do not meet the definition
- 2 pitches from undetermined Gypsy and Traveller households
- 5 plots for Travelling Showpeople

The sites allocated for Gypsies, Travellers and Travelling Showpeople households are identified on the Proposals Map and listed in the tables in Appendix X. The tables in the appendix identify the number of pitches and plots that will be accommodated on each site.

In total, 162 pitches are identified on these sites for Gypsy and Traveller households and 5 plots for Travelling Showpeople households. The remaining accommodation needs for 2016-2021 for Gypsy and Traveller households of 7 pitches required will be addressed through the consideration of planning applications for pitches within the seven areas indicated below which have been identified for accommodating growth for 2021-2026.

The sites allocated in Appendix X and for accommodating growth (below) are only to be used for accommodation for Gypsies, Travellers and Travelling Showpeople. These sites will be removed from the Green Belt and inset within it.

c) Accommodation needs for Gypsy and Traveller and Travelling Showpeople households for after 2021

It is unlikely that there will be scope for sites in the urban area to address the accommodation needs of Gypsies, Travellers and Travelling Showpeople in the period after 2021. Following detailed assessment of the sites allocated in this Local Plan, the Council expects that the majority of the accommodation needs arising for the period 2021-2026 could be met within existing sites or within land adjoining them where this is in the control of households on the existing site(s).

The Council expects the accommodation needs of Gypsy and Traveller households arising in the period 2021 - 2026 to be met at the following locations :

- Ashlea View, Tomkyns Lane
- Church Road
- Haunted House Wood
- Laburnham Stables
- The Old Forge, Hubbards Chase
- Tyas Stud Farm
- Willow Tree Lodge

No further need in Havering after 2021 has been identified as necessary for accommodation for Travelling Showpeople households.

d) Accommodation needs for Gypsy and Traveller and Travelling Showpeople households after 2026

Planning applications for sites to meet future accommodation needs for Gypsies and Travellers and Travelling Showpeople in the latter periods of the Local Plan period (2026-31) as a result of new household formation will be addressed against relevant national policy and the criteria set out below.

Where appropriate, the Council will seek to retain approved sites for Gypsies, Travellers and Travelling Showpeople in the light of the challenges of identifying suitable sites for these communities.

(2) Development criteria for sites for Gypsy and Traveller and Travelling Showpeople

When considering planning applications for sites for Gypsies, Travellers and Travelling Showpeople, the Council will take into account the matters identified in criteria (a) – (e) of paragraph 24 of Planning Policy for Traveller Sites (PPTS) (2015).

Provision for pitches and plots to meet the needs of Gypsies, Travellers and Travelling Showpeople on the identified sites and on new sites will be supported in a planning application where the Council considers that:

- i. The site has a suitable site layout which demonstrates that the site is able to accommodate the number of pitches and plots sought;
- ii. The site has essential services such as water, power, sewerage, drainage and waste disposal or is capable of being provided with these;
- iii. The site is provided with high quality boundary treatment and landscaping in accordance with Policy 27 of this Plan;
- iv. The site has safe access to the highway and public transport services and will not result in unacceptable impact on the capacity and environment of the highway network;
- v. The site does not place an undue pressure on local infrastructure (such as healthcare, schools and shops);
- vi. The proposal would not result in unacceptable adverse impacts on the amenity of other site occupants and the occupiers of neighbouring sites;
- vii. The proposal would not result in unacceptable adverse impacts on the visual amenity of the local area;
- viii. Sites at risk of flooding should be subject to the sequential and exception tests.

In addition, the Council will also give weight to the criteria set out in paragraph 26 of Planning Policy for Traveller Sites (PPTS)(2015) (or any revisions to national planning policy) when assessing proposals for sites for Gypsies, Travellers and Travelling Showpeople.

7.9.1 The Havering Gypsy and Traveller Accommodation Assessment (GTAA) Update Report (July 2019) provides a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in Havering for the plan period 2016-2031. The report identifies additional need for Gypsy and Traveller households by 5 year periods for households who meet the planning definition and those who do not meet the planning definition (as defined in Planning Policy for Traveller Sites (2015)) as well as those households for which need was undetermined. The table below summarises this:

Table 4

Additional need in the number of pitches to be provided in Havering for the Plan period (2016-2031) for Gypsy and Traveller households by 5 year periods

<u>Years</u>	<u>0-5</u>	<u>6-10</u>	<u>11-15</u>	
	<u>2016-21</u>	<u>2021-26</u>	<u>2026-31</u>	<u>Total</u>
Households who meet the planning definition	<u>136</u>	<u>18</u>	<u>20</u>	<u>174</u>
Households whose Gypsy and Traveller status was undetermined	<u>2</u>	<u>0</u>	<u>1</u>	<u>3</u>
Households who do not meet the planning definition	<u>33</u>	<u>5</u>	<u>5</u>	<u>43</u>
<u>TOTAL</u>	<u>171</u>	<u>23</u>	<u>26</u>	<u>220</u>

Note: numbers in the table refer to the number of pitches to be provided

7.9.2 Additionally, the GTAA Update Report (July 2019) identified that there are 5 Travelling Showpeople households in Havering and all meet the planning definition in national planning policy.

7.9.3 The Council will commence an immediate update of this Local Plan after its adoption. It will provide the opportunity to review the GTAA as a key part of the evidence base to ensure that the need for Gypsy and Traveller accommodation is understood and recognised through appropriate provision. The immediate update of the Local Plan will also provide the opportunity for the Council to assess how the need for further sites for gypsies and travellers can be met and how it may identify these in its next Local Plan. In doing this, the Council will have regard to the Planning Policy for Traveller Sites (PPTS (2015)). The Council recognises that because of factors such as the pressure for other land uses it is unlikely that there will be scope for sites in Havering's urban area to address the accommodation needs of Gypsies and Travellers and Travelling Showpeople.

7.9.4 The GTAA Update Report (July 2019) is supported by an up to date and detailed Pitch Deliverability Assessment to determine whether the current identified need for pitches could be accommodated within the existing boundaries of established sites. Further work based on this evidence has also encompassed looking at the scope for existing sites to be expanded to accommodate existing and future needs where the households on a site have ownership or control of adjoining land. This work encompassed assessing the capacity of individual sites to accommodate further accommodation units of the types typically used by Gypsy and Traveller families including park homes, touring caravans and 'day-rooms'. It provided for reasonable separation between units and access arrangements. It did not encompass detailed feasibility studies as to the capability of sites to accommodate further units. In assessing the scope for sites to accommodate current and future accommodation needs of Gypsy and Traveller and Travelling Showpeople households, the Council has been assisted by the close co-operation of many of the households particularly those with larger, extended family groups. Many households indicated their willingness to take a flexible and pragmatic approach to meeting their accommodation needs through a combination of shared static caravans, tourers and dayrooms rather than more formally set out sites with separate pitches. This was because this would provide the opportunity for households to remain together rather than be accommodated on different sites.

It is recognised this approach has practical merit in enabling households to remain together in the short term. Regular review and update of the GTAA will be required, and undertaken, to ensure that future accommodation needs are properly identified and that overcrowding of sites is avoided.

7.9.5 The GTAA Update Report (July 2019) identifies that all Gypsy and Traveller families living in Havering currently occupy private sites within the Havering Green Belt. There are no public sites within the borough and there are no sites in the built up area. The biggest constraint when trying to identify suitable land to meet the need for Gypsy and Traveller pitches in Havering is the Green Belt.

7.9.6 National planning policy says that Gypsy and Traveller pitches are inappropriate development in the Green Belt and can only be permitted in very special circumstances. However, despite repeated and extensive efforts, the Council has not been able to identify any suitable and deliverable non-Green Belt land within the built-up area that could be used for Gypsy and Traveller accommodation.

7.9.7 The policy seeks to meet the needs identified in the GTAA Update report (July 2019) through the allocation, regularisation, intensification or appropriate expansion of existing Gypsy and Traveller sites within the Havering Green Belt. This follows the Council's conclusion that exceptional circumstances can be demonstrated from a significant level of need for pitches for Gypsies and Travellers; a lack of any alternative suitable and deliverable non-Green Belt land; and that the allocation, regularisation, intensification or expansion of established sites would cause no further harm to the Green Belt subject to proposals satisfying the criteria in the policy.

7.9.8 Through the preparation of this Local Plan, the Council is removing these sites from the Green Belt and 'insetting' them within it. This is so that planning applications for Gypsy, Traveller and Travelling Showpeople accommodation on these sites do not need to demonstrate very special circumstances to be approved. The Council wishes to make it clear that these alterations to the Green Belt boundary are limited and exceptional in order to meet the specific identified needs for Gypsy, Traveller and Travelling Showpeople sites.

7.9.9 Although the sites allocated in this policy for Gypsy and Traveller and Travelling Showpeople households are removed from the Green Belt, the Council emphasises that the only acceptable use of these sites will be for accommodation for Gypsies, Travellers and Travelling Showpeople.

7.9.10 The Council will expect planning applications to be submitted from the adoption of this Local Plan to 'regularise' these sites. All planning applications for these sites will be assessed against the relevant policies of this Local Plan and Planning Policy for Traveller Sites (2015). Proposals will be expected to provide a satisfactory residential environment for the occupiers on the site.

(a) Need for pitches for Gypsy and Traveller households who met the planning definition in Planning Policy for Traveller Sites (2015)

7.9.11 The GTAA Update report (July 2019) identifies a 15-year need for 174 pitches for Gypsy and Traveller households who met the planning definition of a Traveller as set out in the Planning Policy for Traveller Sites (PPTS) (2015).

Table 5

Additional need in the number of pitches to be provided in Havering for households who meet the planning definition

<u>Years</u>	<u>0-5</u>	<u>6-10</u>	<u>11-15</u>	<u>Total</u>
	<u>2016-21</u>	<u>2021-26</u>	<u>2026-31</u>	
<u>Households who met the planning definition</u>	<u>136</u>	<u>18</u>	<u>20</u>	<u>174</u>

Note: numbers in the table refer to the number of pitches to be provided

7.9.12 Of the 174 pitches, 136 pitches are needed within the first 5-year period of the Plan (2016-2021) to meet current need and the remaining 38 pitches in the latter part of the Local Plan period (2021-2031) to meet future need through new household formation.

7.9.13 The Pitch Deliverability Assessment concluded that 129 pitches of the necessary 136 pitches needed in the first 5 years of the plan period could be accommodated within existing site boundaries or through the expansion of these sites on adjoining land owned by the households.

7.9.14 It is not currently possible to meet the current need for 7 pitches for households on 2 unauthorised sites within the current site boundaries due to land ownership issues. In the event that the households involved wish to remain in Havering, the Council will expect them to submit planning applications for pitches at one of the seven sites indicated in the policy as the broad locations for growth for the period 2021- 2026 (see para. 7.9.22).

7.9.15 The sites where an allocation has been made are identified on the Proposals Map and listed in Appendix X. These allocations include any existing temporary or unauthorised pitches. The table in Appendix X identifies the numbers of pitches that can be accommodated on each of the allocated sites.

(b) Need for pitches for Gypsy and Traveller households in Havering who did not meet the planning definition in Planning Policy for Traveller Sites (2015)

7.9.16 The GTAA Update report (July 2019) identified a 15-year need for 43 pitches for households that did not meet the planning definition of a Traveller. Of these, a total of 33 pitches are needed in the first 5 years of the Local Plan period (2016-2021) and a further 10 pitches are needed in the latter part of the Local Plan period (2021-2031). All of this need arises from existing sites located in the Green Belt.

Table 6

Additional need in the number of pitches to be provided in Havering for households who do not meet the planning definition

<u>Years</u>	<u>0-5</u>	<u>6-10</u>	<u>11-15</u>	<u>Total</u>
	<u>2016-21</u>	<u>2021-26</u>	<u>2026-31</u>	
<u>Households who did not meet the planning definition</u>	<u>33</u>	<u>5</u>	<u>5</u>	<u>43</u>

Note: the numbers in table refer to the number of pitches to be provided

7.9.17 The Pitch Deliverability Assessment that was completed concluded that the identified need for 33 pitches in the first 5 years of the Local Plan period (2016-21) can be met within the boundaries of the existing sites.

7.9.18 The sites where an allocation to meet the need identified above are identified on the Proposals Map and are listed in Appendix X. These allocations include any existing temporary or unauthorised pitches.

(c) Need for pitches from 'undetermined' households

7.9.19 The GTAA also identified need for up to 3 pitches for 'undetermined' households. There is a need for 2 pitches in the first 5 years of the Local Plan period (2016-2021) and a need for a further pitch in the latter part of the Local Plan period (2021-2031). Any need arising from undetermined households will be determined against the criteria set out in Policy 11.

Table 7

Additional need in the number of pitches to be provided in Havering for undetermined households

<u>Years</u>	<u>0-5</u>	<u>6-10</u>	<u>11-15</u>	<u>Total</u>
--------------	------------	-------------	--------------	--------------

	2016-21	2021-26	2026-31	
Households whose Gypsy and Traveller status was undetermined	2	0	1	3

Note: the number in table refer to the number of pitches to be provided

(d) Future accommodation needs in Havering for Gypsy and Traveller households

7.9.20. National planning policy requires that the Council indicate broad locations for growth for meeting the accommodation needs of Gypsies, Travellers and Travelling Showpeople for years 6-10 of the plan period of this Local Plan. In practice, the Council will have initiated a full review of the Local Plan immediately after its adoption. This will provide the opportunity for a comprehensive review of how accommodation needs may be addressed.

7.9.21 In the light of the other land-use priorities in Havering, particularly, the need to provide enough new homes, the Council considers that it may be unlikely that adequate sites will be identified in the built up areas. Notwithstanding that, at this stage, the Council considers that the work it has undertaken to support the preparation of this Local Plan (paragraph 7.9.4) provides it with up to date and robust information about the potential, if necessary, for existing sites to accommodate further growth in either their current form or with modest expansion into adjoining land that is within the control of the households occupying the current sites. The Council considers that in the event that sites in the urban area cannot be identified or would not provide enough capacity then growth in years 6-10 could be located on some of the existing sites in the Green Belt or extensions to them. In coming to this conclusion, the Council has also taken into account that it is likely that there may be changes to the levels of needs arising from the existing households and these will be identified in a future update of the GTAA.

7.9.22 Following detailed work (see paragraph 7.9.4 above), the existing Gypsy and Traveller sites at:

- Ashlea View, Tomkyns Lane
- Church Road
- Haunted House Wood
- Laburnham Stables
- The Old Forge, Hubbards Chase
- Tyas Stud Farm
- Willow Tree Lodge

have been identified to accommodate Gypsy and Traveller household growth in years 6-10 of the Plan period (2021-2026) and those Gypsy and Traveller households whose accommodation needs (identified in the GTAA Update report (July 2019) as 7 pitches) in the first 5 years of the Local Plan period cannot be met on their current unauthorised sites.

7.9.23 When considering planning applications for Gypsy and Traveller pitches, the Council will take into account the policy criteria outlined in Policy 11 in addition to the requirements of national policy.

(e) Travelling Showpeople in Havering

7.9.24 As identified above in paragraph 7.9.2, the GTAA Update Report (July 2019) identified that there are 5 Travelling Showpeople households in Havering and all meet the planning definition in national planning policy. The households living on the existing yard stated that they are looking to expand the yard on to adjacent land that they own, and that this will meet all of their current and future needs. The Council envisages that planning applications for the expansion of the Travelling Showpeople site (identified in Appendix X) will be considered favourably subject to the criteria in national policy and this policy being satisfied.

(f) Transit sites in Havering

7.9.25 There have been low levels of unauthorised encampments in Havering in recent years. The GTAA Update Report (July 2019) indicates that the majority were short-term visiting family or friends, transient and passing through the borough. Since 2016, there has been an increase in the number of encampments on industrial land that have involved the criminal dumping of waste. It is considered that transit provision would not address any issues related to this activity. Under these circumstances, the Council does not intend to provide any new transit pitches or emergency stopping places. It will monitor the movements of gypsy and travellers into Havering and it will continue to use management arrangements (including enforcement action) for dealing with unauthorised encampments.

Appendix X

Sites in Havering identified in Policy 11 and allocated in this Local Plan for Gypsy and Traveller accommodation

<u>Site</u>	<u>5-Year Need (Meet planning definition) (number of pitches)</u>	<u>5-Year Need (Do not meet planning definition) (number of pitches)</u>	<u>Total 5-Year Need (number of pitches)</u>
<u>66-72 Lower Bedfords Road</u>	<u>0</u>	<u>3</u>	<u>3</u>
<u>Ashleigh View, Tomkyns Lane</u>	<u>5</u>	<u>0</u>	<u>5</u>
<u>Church Road, Blossom Hill View</u>	<u>1</u>	<u>0</u>	<u>1</u>
<u>Church Road, Cherry Blossom View</u>	<u>2</u>	<u>0</u>	<u>2</u>
<u>Church Road, Cherry Tree View</u>	<u>3</u>	<u>0</u>	<u>3</u>
<u>Church Road, Dunromin</u>	<u>1</u>	<u>0</u>	<u>1</u>

<u>Church Road, Meadow Rise</u>	<u>4</u>	<u>0</u>	<u>4</u>
<u>Church Road, Meadow View</u>	<u>3</u>	<u>0</u>	<u>3</u>
<u>Church Road, Paddock View</u>	<u>2</u>	<u>0</u>	<u>2</u>
<u>Church Road, Plot 3</u>	<u>1</u>	<u>0</u>	<u>1</u>
<u>Church Road, Plot 13</u>	<u>1</u>	<u>0</u>	<u>1</u>
<u>Church Road, Plot 14</u>	<u>1</u>	<u>0</u>	<u>1</u>
<u>Church Road, Springfield</u>	<u>2</u>	<u>0</u>	<u>2</u>
<u>Church Road, The Oak View</u>	<u>1</u>	<u>0</u>	<u>1</u>
<u>Church Road, The Oak</u>	<u>1</u>	<u>0</u>	<u>1</u>
<u>Church Road, The Schoolhouse</u>	<u>1</u>	<u>0</u>	<u>1</u>
<u>Church Road, Willow View</u>	<u>1</u>	<u>0</u>	<u>1</u>
<u>Crow Lane (r/o 21)</u>	<u>2</u>	<u>0</u>	<u>2</u>
<u>Fairhill Rise</u>	<u>3</u>	<u>4</u>	<u>7</u>
<u>Gravel Pit Coppice, Benskins Lane</u>	<u>14</u>	<u>0</u>	<u>14</u>
<u>Haunted House Wood</u>	<u>1</u>	<u>4</u>	<u>5</u>
<u>Hogbar Farm</u>	<u>8</u>	<u>8</u>	<u>16</u>
<u>Hogbar Farm East</u>	<u>10</u>	<u>0</u>	<u>10</u>
<u>Hogbar Farm West</u>	<u>1</u>	<u>6</u>	<u>7</u>
<u>Laburnham Stables</u>	<u>4</u>	<u>0</u>	<u>4</u>
<u>Laburnham Stables</u>	<u>5</u>	<u>0</u>	<u>5</u>
<u>Laburnham Stables</u>	<u>1</u>	<u>0</u>	<u>1</u>
<u>Railway Sidings, North Ockendon</u>	<u>1</u>	<u>0</u>	<u>1</u>
<u>Railway Sidings, North Ockendon</u>	<u>10</u>	<u>2</u>	<u>12</u>
<u>The Caravan Park, Putwell Bridge (The former Brook Street Garage site)</u>	<u>3</u>	<u>2</u>	<u>5</u>
<u>The Grove, Prospect Road</u>	<u>5</u>	<u>0</u>	<u>5</u>
<u>The Old Forge, Hubbards Chase</u>	<u>2</u>	<u>0</u>	<u>2</u>
<u>Tyas Stud Farm</u>	<u>5</u>	<u>0</u>	<u>5</u>
<u>Vinegar Hill</u>	<u>18</u>	<u>4</u>	<u>22</u>

Willow Tree Lodge	6	0	6
TOTAL	129	33	162

Note: the numbers in the table refer to numbers of pitches to be provided

Sites in Havering identified in Policy 11 and allocated in this Local Plan for Travelling Showpeople plots

Years	0-5	6-10	11-15	Total
	2016-2021 (number of plots)	2021-2026 (number of plots)	2026-2031 (number of plots)	(number of plots)
Fairoaks, St Mary's Lane, Upminster	5	0	0	5
TOTAL	5	0	0	5

Note: the numbers in the table refer to numbers of plots to be provided

MM13

Policy 12

Section 8 : Thriving communities : 8.1 Healthy Communities

Amend policy criteria iii. as follows :

The Local Plan will promote health and wellbeing by:

- Directing new development to well-connected locations to enable active travel (refer to Policy 3);
- Promoting well designed and safe places (refer to Policy 26);
- Promoting the diversification of uses within town centres and managing the overconcentration of uses that can have a negative health impacts such as betting shops and fast food takeaways (refer to Policy 13);
- Supporting the delivery of essential community services (refer to Policies 16 and 17);
- Providing and protecting open space, leisure and recreation facilities (refer to Policy 18);
- Supporting measures to promote walking and cycling (refer to Policy 23);
- Supporting the provision of multifunctional green infrastructure (refer to Policy 29);
- Seeking environmental improvements, minimising exposure to pollutants and improving air quality (refer to Policies 33 and 34); and
- Avoiding contributing to factors that affect climate change, and contribute to prevention measures that militate against the effects of climate change (refer to Policies 32 and 36).

Amend the final paragraph of the policy as follows :

No Likely Significant Effect – this change reduces the allocation of retail and commercial space within the Local Plan and is therefore not expected to impact European sites.

Developers of major development proposals are required to consider wider local/regional primary care and other health strategies, as appropriate, to take into account how any developments can contribute to the aims and objectives of those strategies.

MM14 Policy 13 **Section 8 : Thriving communities : 8.2 Town Centre development**

Para.
8.2.2 Proposed modifications to explanatory text :

Amend / insert additional text within and at the end of paragraph 8.2.2 of the explanatory text as follows :

8.2.2 The Havering Retail and Commercial Leisure Needs Assessment Quantitative Update Addendum (20158) identified a quantitative need for the borough for comparison goods of up to ~~49,500~~20,720 square metres, for convenience goods of up to ~~13,200~~10,851 square metres and for commercial leisure floorspace (A3, A4 and A5 uses) of up to ~~24,000~~10,620 square metres gross by 2031 (see Table 8). The largest proportion of the retail and commercial leisure development will be accommodated within Romford Metropolitan Town Centre, and the reminder spread across the district centres where further scope for development and enhancement has been identified. This extra comparison retail space will not be required until after the Local Plan has been reviewed.

Insert new table as follows :

Table 8

Floor space Needs (Gross) from 2017 -2031 (Comparison, Convenience and Commercial Leisure)

<u>Year</u>	<u>2017</u>	<u>2021</u>	<u>2026</u>	<u>2029</u>	<u>2031</u>
<u>Comparison</u>	<u>-3,724</u>	<u>-3,345</u>	<u>8,179</u>	<u>15,303</u>	<u>20,722</u>
<u>Convenience</u>	<u>8,235</u>	<u>5,822</u>	<u>8,299</u>	<u>9,829</u>	<u>10,851</u>
<u>Commercial Leisure</u>	<u>14</u>	<u>2,426</u>	<u>6,403</u>	<u>8,921</u>	<u>10,619</u>

No Likely Significant Effect – this change applies to aspects of the plan that are irrelevant to European sites

--	--	--	--	--	--

Source : Havering Retail and Commercial Leisure Needs Assessment (2018) Quantitative Update Addendum (Peter Brett Associates)

MM15 Policy 15 **Section 8 : Thriving communities : 8.4 Culture and creativity**

Delete criteria iv. and vi. from the policy and renumber the remaining criteria as follows :

The Council is committed to sustaining and enhancing Havering's cultural offer and creating inclusive and diverse communities by:

- i. Safeguarding the borough's existing diverse range of creative arts, cultural and performance spaces, professional sporting and entertainment facilities and their related facilities, and refusing to grant planning permission to development proposals that will result in their loss unless replacement facilities of equivalent or greater quality and quantity are provided on site or within the vicinity which meets the needs of the local community or particular groups, or it has been demonstrated that there is no demand for another similar use on site;
- ii. Supporting development which enhances and diversifies the cultural offer within the borough's metropolitan centre of Romford, and the six district centres of Hornchurch, Collier Row, Harold Hill, Upminster, Elm Park and Rainham to contribute more effectively to their regeneration and town centre renewal;
- iii. Permitting temporary use of vacant commercial buildings, and cleared sites for performance and creative work where they contribute positively to the regeneration, vitality and character of the area;
- iv. ~~Requiring provision of arts and cultural facilities in major mixed use developments;~~
- ~~iv.~~ iv Encouraging a diverse range of evening and night time activities including expanding opening hours of existing daytime facilities such as shops, cafés, medical facilities, libraries and theatres to integrate leisure and other uses to promote and sustain customer cross over;
- ~~vi. Seeking contributions from developments that result in additional need for cultural and leisure facilities to enhance existing facilities or provide new facilities;~~
- ~~vii.~~ v Ensuring that development proposals are designed to be inclusive;
- ~~viii.~~ vi Working proactively with operators, landowners, stakeholders to maximise the positive impacts and mitigate the negative impacts of art, cultural and leisure activities; and
- ~~ix.~~ vii Supporting planned improvement to existing arts, cultural and performance spaces, including creative work and related facilities.

No Likely Significant Effect – this change applies to aspects of the plan that are irrelevant to European sites

MM16 Policy 17 **Section 8 : Thriving communities : 8.6 Education**

Amend criteria vi. of the policy as follows :

Development proposals for nurseries will also be expected to demonstrate that:

- v. They meet the floorspace requirements as set out in the statutory framework for the early years foundation stage;
- vi. Drop offs and pickups can be catered for safely ~~on site~~; and
- vii. There is no significant adverse impact on the amenity of existing residents.

No Likely Significant Effect – this change applies to grammatical aspects of the plan that are irrelevant to European sites

Proposed modifications to explanatory text :

Amend paragraph 8.6.9 of the explanatory text as follows :

Childcare facilities should be safe, accessible for all, and provide both indoor and outdoor learning opportunities. There has been an increase in Havering in planning applications for nurseries in residential areas. Although these proposals can contribute towards meeting a local need, it is important that residential amenity and highway safety are preserved. As nurseries generate significant traffic during peak hours, proposals will be expected to provide sufficient car-parking including pick-up and drop-off points. ~~on-site~~.

MM17 Policy 19 **Section 9 : Opportunities to prosper : 9.1 Business Growth**

Amend criteria iv. of the policy as follows :

The Council is committed to building a strong and prosperous economy in Havering and will encourage and promote business growth by:

- i. Protecting designated Strategic Industrial Locations for industrial uses as set out in the London Plan;
- ii. Protecting designated Locally Significant Industrial Sites for B1 (b) (c), B2 and B8 uses;
- iii. Directing office development to Romford Metropolitan Centre and the borough's district centres as part of mixed-use developments;
- iv. Requiring large scale residential proposals within Romford Town Centre to incorporate high quality flexible business space, subject to viability, and progress towards meeting the identified office employment floor space requirement as detailed in Table 10 Local Plan Monitoring Framework, and in consideration of individual site characteristics not comprised in viability assessments such as configuration, servicing requirements and neighbouring uses.
- v. Supporting the development of high quality affordable and flexible business spaces of varied unit sizes to meet the needs of small and medium sized enterprises (SMEs) and start-up businesses (see Policy 21);
- vi. Supporting development proposals that improve the physical appearance, attractiveness and competitiveness of employment areas;
- vii. Supporting the sustainable growth and expansion of business and enterprise in rural areas;
- viii. Supporting the development of a hotel within, or in close proximity, to the Rainham Employment Area to support business growth and opportunities in this area; ~~and~~
- ix. Supporting the London Riverside and the emerging Romford Town Centre Business Improvement Districts;

Additional criteria x. and xi. be added to the policy :

- x. Working with the Port of London Authority (PLA) to explore opportunities to improve and develop wharf infrastructure and to explore increasing use of the River Thames for freight transport; and
- xi. Supporting the strategic significant growth potential of the Borough in logistics activities of greater than sub-regional importance, as set out in the London Plan.

No likely significant effect – policy does not allocate additional land for industrial or employment uses than has already been assessed in the HRA.

The borough's Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs) are shown on the Proposals Map.

Proposed modifications to explanatory text :

Additional text added to the end of paragraph 9.1.4 of the explanatory text as follows :

9.1.4 Strategic Industrial Locations (SILs) are locations identified by the Mayor of London, following assessment of future demand, as London's main reservoir of industrial land. They are identified as vital for providing capacity for activities such as logistics, waste management, utilities, land for transport, and industrial 'services to support the service sector', and they are accorded strategic protection by the Mayor of London and London boroughs. The Locally Strategic Industrial Sites (LSISs) are sites identified by the Council as vital for local industrial functions, including availability of low rent accommodation, which support a range of local employment. The Council nevertheless realise the importance of addressing other strategic and local land-use requirements, in particular the pressing need for new homes. The Council will, therefore, keep under review the need for employment land as part of a managed approach in line with the requirements in the National Planning Policy Framework and the London Plan and with regard to meeting the other objectives of this Local Plan.

9.1.5 The Havering Employment Land Review (ELR) (2015) found that there is a gross demand for 350 hectares of industrial land (B2 and B8 Use Classes) in Havering over the Local Plan period up to 2031/2. It notes that the vast majority of the existing Strategic Industrial Locations (SILs) are located away from residential areas with direct access to the strategic road network. The Locally Significant Industrial Sites (LSISs) are well functioning industrial employment areas with an on-going demand for space to service industrial and logistical occupiers. They are areas that remain the most suitable locations for accommodating Havering's industrial and warehousing demand. The Review also recommends the designation of Freightmaster Estate in Rainham as a Strategic Industrial Location.

Amend paragraph 9.1.6 of the explanatory text as follows :

9.1.6 The ELR advises that ~~49.5 24ha of employment land can be released over the Plan period. Industrial land previously designated for its local significance can be released from industrial employment uses.~~ The previously designated land recommend for release comprises 2.7 ha at Crow Lane (Romford gas works), 15.4 ha at Rainham West and 1.4 ha at Bridge Close, Romford. The de-designation of these sites will facilitate the delivery of new residential developments and make a significant contribution towards meeting the borough's housing need. Safeguarding SILs and the remaining LSISs will ensure that there is sufficient capacity to meet projected demand for industrial land in the borough going forward over the plan period.

MM18 Policy 20 **Section 9 : Opportunities to prosper : 9.2 Loss of Industrial land**

Amend the policy title as follows :

No Likely Significant Effect – this change applies to aspects of the plan that are irrelevant to European sites.

Loss of industrial land Loss of locally significant industrial sites and non-designated land

Add a new opening paragraph to the policy as follows :

The Council will keep under review the provision of Locally Significant Industrial Sites (LSISs) and non-designated industrial land as part of its commitment to ensuring that Havering has a strong and prosperous economy.

Delete criteria ii. from the second paragraph (was first paragraph) as follows :

The Council will only support the loss of non-designated industrial land and floorspace in Havering where it can be demonstrated that:

- i. The change of use from industrial employment uses will not lower the industrial capacity of the borough below that necessary to meet projected demand over the planning period as estimated by the most up to date Havering Employment Land Review;
- ii. ~~The existing employment land use causes unacceptable detrimental effects, that cannot be mitigated, on the amenity of nearby residential areas; and~~
- iii. There is no market interest in the site following one year of continuous active marketing.

Add new third and fourth paragraphs to the policy as follows :

In considering proposals for the loss of LSISs and non-designated industrial land, the Council will take into account the wider land-use objectives of the Local Plan because the release of land which is no longer needed for employment use may assist in securing these.

The Council will require the re-provision of non-designated industrial land where it is located within a wider area of commercial uses (such as retail) in the event of proposals being submitted for redevelopment of the wider area except in cases where this policy accepts their loss.

Proposed modifications to explanatory text :

Amend paragraph 9.2.1 of the explanatory text as follows :

9.2.1 ~~Locally Significant Industrial Sites (LSISs) are of local significance for industry and warehousing.~~ Non-designated industrial land and floorspace comprises land and floor space last used for employment use or land and floorspace which is currently in employment use but does not lie within the area identified and safeguarded as a Strategic Industrial Location (SIL) or a Locally Significant Industrial Site (LSIS).

Delete paragraph 9.2.2 of the explanatory text as follows :

~~9.2.2 The underlying purpose of Policy 20 is to protect and where possible enhance the employment potential of the existing non-safeguarded employment land and floorspace. The policy provides some flexibility which aims to recognise individual site characteristics and allow some very~~

limited loss of employment land and floor space where significant unacceptable detrimental effects on amenity of nearby residential uses and no market interest are clearly demonstrated. The policy thrust is therefore to ensure that not too much industrial land and floorspace is released as this could hinder the long term economic prospects of the borough.

Add new text as replacement paragraph 9.2.2 of the explanatory text as follows :

9.2.2 In line with the focus on a strong economy in Havering, the purpose of Policy 20 is to protect and where possible enhance the employment potential of the existing Locally Significant Industrial Sites and non-designated employment land and floorspace.

Add a new paragraph 9.2.3 to the explanatory text as follows :

9.2.3 Although the focus of Policy 20 is to seek to protect Locally Significant Industrial Sites and non-designated industrial land, the Council recognise that the policy should provide for some flexibility in the extent to which industrial land is safeguarded. Some scope for flexibility is important because the Council recognises that in Havering there is considerable pressure to accommodate a range of important land uses including housing and infrastructure as well as industrial / employment. In taking this approach, the Council will always carefully consider up to date evidence as to how the proposed change of use from industrial / employment uses will impact on the overall industrial capacity of Havering over the Plan Period. It will also examine information arising from the marketing of the site to ensure that the site / land is genuinely surplus to employment requirements.

Amend paragraph 9.2.3 and renumber as 9.2.4 of the explanatory text as follows :

9.2.34 As already noted in Policy 19 on Business Growth, the Havering Employment Land Review (ELR) (2015) identified 19.5 hectares of land previously designated for its local significance and an additional 4-5ha from non-designated employment uses to be released over the Plan period making the overall amount of employment land to be released not greater than 24 ha to be released from designated industrial employment use to enable wider regeneration benefits. The ELR further advised that an additional 4 to 5 hectares of employment land could be released from other non-designated sites over the Plan Period, making the overall amount of employment land to be released not greater than 24 hectares. To allow for a loss bigger than the recommended 24 hectares benchmark would undermine Havering's economic development objectives. Companies seeking to expand or start a business in Havering in the future may not have sufficient land or business premises to do so. There are approximately 50 hectares of non-designated industrial sites remaining in the borough. These generally perform well as employment areas, meeting the needs of local businesses. By resisting further erosion of this type of employment land and floorspace this policy is seeking to maintain business land and spaces for local business.

Renumber paragraphs 9.2.4 and 9.2.5 of the explanatory text as 9.2.5 and 9.2.6 as follows :

9.2.45 As part of managing the overall approach of housing delivery in Havering, the Council recognises that there may be locations where the quality of residential environment is being compromised by the operation nearby industrial use, for example due to noise or access issues. In

these cases the relocation of that offending industrial activity would be reasonable way forward in mitigating the adverse amenity issues may be acceptable. Every case will be treated on its own merits.

9.2.56 To demonstrate a lack of market demand an applicant should submit transparent and robust marketing evidence that the site has been vacant and that a thorough continuous marketing exercise has been undertaken and sustained in the local area for a 12 month period. Marketing must be through a commercial agent that sets out the competitive price that genuinely reflects the market value of the property in relation to its use, condition, quality and location. It must be demonstrated that consideration has been given to alternative layouts and business uses, including smaller premises with short term flexible leases appropriate for SMEs.

Add a new final paragraph 9.2.7 to the explanatory text as follows :

9.2.7 Some non-designated industrial land and floorspace is located within larger sites that include other uses such as retail. The Council recognises that in such cases redevelopment of the overall site may provide an important opportunity to secure a more advantageous distribution and allocation of land uses having regard to factors such as the characteristics of the site and its surroundings. In such cases, the Council will expect the wider redevelopment proposal to make suitable re-provision for the non-designated industrial land where the policy requires that it is retained. Any subsequent proposals for the loss of the non-designated land will be assessed against the policy requirements in order to ensure that there is no incremental loss of industrial land over the Plan Period.

MM19 Policy 21

Section 9 : Opportunities to prosper : 9.3 Affordable workspace

Amend the first paragraph of the policy as follows :

The Council will ~~promote opportunities for start up and small and medium enterprises by expecting major commercial and mixed use schemes to provide a minimum of 20% of its floorspace as affordable workspace support local micro and small businesses through securing affordable workspace within the boroughs network of town centres, Strategic Industrial Locations and Local Significant Industrial Sites. Major commercial and mixed-use developments should provide a minimum of 10% total gross commercial floorspace as affordable workspace for a minimum of 5 years, subject to viability.~~

For the purposes of this Policy affordable workspace is defined as –

No Likely Significant Effect – this change applies to aspects of the plan that are irrelevant to European sites.

A workspace provided where rent and service charges, excluding business support services, are on average at least 10% less than comparable local market rates for the duration of a lease (although it is noted that, for some sectors and locations, much reduced rents may be needed to render them affordable to target occupiers).

Move the final paragraph of the policy to become the second paragraph as follows:

Redevelopment of existing low value employment floorspace, that is reliant on less than market-level rent, will be required to re-provide such floorspace in terms of design, rents and service charges, for existing uses; subject to scheme viability, current lease arrangements and the desire of existing businesses to remain on-site.

Affordable workspace should incorporate flexible design features to provide adaptability for a range of uses and occupants with basic fit-out provided to a level beyond shell and core.

The applicant will be required to demonstrate flexible lease terms for target sectors, and where appropriate make provision for short-term, flexible 'all-in' or 'meanwhile' leases, and/or letting space on a per-desk rather than per sq ft basis with the Workspace Provider. The commercial lease terms to be agreed with the Workspace Provider for target sectors will be secured via legal agreement.

Add a new fifth paragraph to the policy as follows :

The proportion of affordable workspace to be provided within specific schemes will be addressed on a site specific, case-by-case basis, taking into account the viability of the development.

Amend the sixth paragraph (was fourth) of the policy as follows :

Where on-site provision is not possible, financial contributions for equivalent off-site provision will be sought. ~~and the amount must be to the satisfaction of the Council.~~

Add a new seventh paragraph to the policy as follows :

Financial contributions will normally only be agreed in exceptional circumstances when it has not been possible to secure appropriate on-site physical space. The amount secured will be dependent on the outcome of a viability assessment and negotiations with the Council.

Delete the final paragraph of the policy as follows :

~~Redevelopment of existing low value employment floorspace reliant on less than market level rent will be required to re-provide such floorspace suitable, in terms of design, rents and service charges, for existing uses, subject to scheme viability, current lease arrangements and the desire of existing businesses to remain on site.~~

Proposed modifications to explanatory text :

Add a new opening paragraph 9.3.1 in the explanatory text as follows :

9.3.1 The intention of securing and operating affordable workspace in Havering is to use it as a mechanism to strengthen local growth sectors and enable local people to thrive. Havering's entrepreneurial businesses play an essential role in the local economy. The Council is committed to supporting these organisations and recognises that affordable workspace is a means to do so.

Add a new second paragraph 9.3.2 in the explanatory text as follows:

9.3.2 Flexible workspaces are managed, commercial premises, particularly suitable for small/ start-up businesses and which are divided into a collection of small units help by occupiers on a short-term, easy-in, easy-out basis and with communally-shared services, facilities and support for the entrepreneurial activities of the occupiers. Affordable Workspace means flexible workspace which is let to a Workplace Provider and which will allow for occupation by the end users in one or more sectors on terms:

- substantially below market levels of rents and charges when compared with an equivalent letting of the space and facilities on the open market; and
- at a rate comparable with similar facilities available in Havering or (if sufficient comparator premises do not exist in the borough) across London as a whole; and
- at rates which mean that occupation is feasible to a large number of small/ start-up businesses in the relevant sector(s)

Add new text to the end of paragraph 9.3.3 of the explanatory text :

9.3.4.3 Havering has a high number of micro and small businesses. Havering's Employment Land Review (2015) reported that over 90% of businesses in the borough are micro companies with up to nine employees and a further 7% are small enterprises with between 10 and 49 employees. The ELR found that in the office sector the key gap in provision is in affordable and flexible serviced office accommodation to meet the needs of small start-up companies, there is also demand for smaller industrial unit space for start-

up/young and growing businesses. Increasing provision of affordable workspace through contributions from the applicant, or in new premises can help ensure more small businesses have space to stay in the borough and expand.

~~9.3.2 Many SMEs and start-ups with the potential for financial self-sufficiency seek affordable small offices, studios or workspace with favourable flexible lease or licence conditions but often discover that their particular needs cannot be met by market rent levels. The Council's business survey indicates that the cost of rents and poor availability of suitable premises are main factors in driving businesses out of the borough. The provision and preservation of affordable and suitable workspaces that can easily be sub-divided for different uses will increase the opportunities for small business which are essential to Havering's economic vitality and a catalyst for regeneration.~~

Delete paragraph 9.3.3 of the explanatory text as follows :

~~9.3.3 An affordable workspace is a workspace provided where rent and service charges, excluding business support services, are on average at least 20% less than comparable local market rates for the duration of a lease (although it is noted that, for some sectors and locations, much reduced rents may be needed to render them affordable to target occupiers). While a level of 80% of market rents may be acceptable in some cases, the Council's preference is for a sliding scale of 60% of markets rents from years 1 to 2; 80% from years 3 to 5; and 90% thereafter, subject to negotiation. A sliding scale is preferred as it will allow a larger rent yield during the initial stages of a company's' development which will reduce as a comp may matures and is likely to be able to pay higher rents. This will also enable a seamless transition to market level rent at the end of the period.~~

Add a new text as paragraph 9.3.4 in the explanatory text as follows :

Many small/start-up businesses, with the potential for financial self-sufficiency, have particular needs that often cannot be met by the market, either because affordable rents are unviable for the applicant, or it is below a standard expectation of return. This has been compounded by a significant loss of office floorspace in the borough over the last decade due to particular pressure on the conversion of offices to residential use. The introduction of permitted development rights, which allows office to residential conversion without explicit planning permission means that these losses have been further exacerbated – a trend which is expected to continue. In addition, pressure on providing housing targets in the borough requires the Council to de-designate industrial land, which puts additional pressure on the borough's industrial employment land to provide smaller light industrial units that encourage small/start-ups businesses to provide 'services to support the service sector'.

Delete paragraph 9.3.4 of the explanatory text as follows :

~~9.3.4 Major developments should provide 20% of total gross commercial floor space as affordable workspace for a minimum of 5 years, subject to viability. In a redevelopment scheme, the council will require the re-provision of low value employment floor space reliant on less than market level rent to ensure existing businesses are not displaced.~~

Insert new text in the explanatory text as paragraph 9.3.5 of as follows :

9.3.5 The Council intends to use affordable workspace as a key driver to support a flourishing local economy, and provision and preservation of affordable and suitable workspaces that can easily be sub-divided for different uses will increase the opportunities for small business which are essential to Havering's economic vitality and a catalyst for regeneration. The Council will maintain a record of affordable workspace available to small businesses as part of its commitment to growing the Havering economy.

Add new text as paragraph 9.3.6 in the explanatory text as follows :

9.3.6 Cost and size are the two primary variables to consider in defining affordable workspace, and these are both influenced by the type of workspace to be provided – which in turn is related to the occupant that the space will be marketed towards, usually determined by the economic clusters in the locality.

Insert additional text in the explanatory text and delete existing text as follows :

Cost

9.3.7 In this context, 'affordable' would be defined as rent and service charges (excluding business support services) that are either:

- less than 80% than comparable local market rates for a period of 5-years per occupant; or
- a sliding scale of 60% of local market rates from years 1 to 2; and 80% from years 3 to 5.

The Council will also consider alternative suggestions made by developers.

9.3.8 A sliding scale is preferred as it will allow a larger rent relief during the initial stages, which will reduce as a business matures and is likely to be able to pay higher rents. This will also enable a more seamless transition to a market level rent at the end of the lease.

9.3.9 What is defined as 'local market rate' will vary depending on the location and the type of workspace provided. Market rates can rise considerably in a short space of time. For the purpose of this Policy, 'local market rates' will be defined by:

- Use Class comparison
- Havering borough comparison or (if sufficient comparator premises do not exist in the borough) across the Thames Gateway corridor

Size

9.3.10 An affordable workspace unit may be stand-alone premises or a component of a larger workspace area. To maximise flexibility the Council encourages developments that comprise a large area of floorspace to be managed as a series of smaller 'units'. However, this creates complexity in determining whether a proposal meets policy requirements. Where the micro/small floorspace component is provided as a single floorplate, the applicant must demonstrate that the design of the development is orientated towards the operational needs of small businesses. It is acknowledged that a 'unit' may be a physical entity, or a component of a larger floor area.

Type

9.3.11 Local market analysis has identified key growth sectors² which the Council seek to strengthen. These include:

- Construction
- Creative & Digital
- Logistics
- Manufacturing, Engineering & Technology
- Medical science & Health/Social Care

9.3.12 These priority sectors will change over time to reflect the needs of the local economy.

9.3.13 The type of workspace to be provided will be dependent on a number of factors. Where affordable workspace is being provided, early discussions between the applicant and the Council are essential to:

- a) determine the size of the affordable element of the workspace;
- b) decide which industries are suitable to market the workspace too; and
- c) help partner the applicant with the most appropriate Workspace Provider – to facilitate the design and planned management of the space.

Off-Site Provision

9.3.14 Where genuinely exceptional circumstances can be demonstrated to the Council that the provision of affordable workspace on-site is either inappropriate, or would have an unacceptable impact on the viability of a scheme, financial contributions will be sought to secure equivalent provision off-site.

9.3.15 Off-site provision will be achieved by the Council through:

- bringing redundant properties into use;

² These priority sectors will change over time to reflect the needs of the local economy.

- working in partnership with a stakeholder to secure improvements to existing workspaces, or providing additional workspace; offering alternative interventions/activities that support micro and small businesses such as business support.

9.3.16 The off-site contribution will be negotiated on a case by case, cost per sq ft basis. This will also be dependent on the outcomes of a viability assessment and discussions with the Council.

Workspace Provider

~~9.3.5~~ 9.3.17 Where affordable workspace is to be provided it is important that the applicant initiates dialogue with a Workspace Provider, as nominated by or agreed with the Council, early on in the pre-application stage. At the planning application stage an agreed Workspace Provider must be identified, along with a submitted proposal for assessment by the Council which details the agreement with the Workspace Provider for managing the workspace to an agreed specification; detailing the potential management arrangements and rents to be charged for a minimum of 5 years.

9.3.18 Applicants will be required to demonstrate likely lease terms for target sectors, and where appropriate make provision for short-term, flexible 'all-in' and 'meanwhile' leases, and where relevant letting space on a per-desk rather than per-square-foot basis.

~~9.3.6~~ The design of workspace for small and micro enterprises will vary, depending on the end occupier or sector. New business space should be flexible, with good natural light, suitable for subdivision and configuration for new uses and activities. The proposal should incorporate flexible design features to provide adaptability for a range of uses and activities. Basic fit-out should be provided to a level beyond shell and core to include: toilets, super-fast broadband connections; shared space for events, good standard of insulation to mitigate any overspill from future alternative uses in the building, grouping of services; plumbing, electrics, cabling, and communications infrastructure; light industrial or maker spaces have physical needs for greater floor-to-ceiling heights and service access to accommodate larger equipment and deliveries.

The design of workspace for small and micro enterprises will vary, depending on the end occupier or sector. In general however, applicants should demonstrate that the workspace incorporates flexible internal arrangements, with good natural light, suitable subdivision and configuration for new uses and activities. The proposal should incorporate flexible design features to provide adaptability for a range of uses and occupants.

- Basic fit-out should be provided to a level beyond shell and core to include: . super-fast broadband connections; shared space and facilities such as communal breakout space, kitchen areas, toilets, bike storage, etc; good standard of insulation to mitigate any overspill from future alternative uses in the building, grouping of services; plumbing, electrics, cabling, and communications infrastructure; light industrial or maker spaces have physical needs for greater floor-to-ceiling heights and service access to accommodate larger equipment and deliveries.

- On specific projects other issues may need to be considered, such as the co-ordination of fire alarm provision, access control arrangements, landscaping design, and mobile phone signal strength.

A consequential modification is required to Table 10 of the Glossary as follows:

For the purpose of Policy 21, Affordable Workspace means:

Flexible workspace which is let to a Workspace Provider and which will allow for occupation by the end users in one or more sectors on terms:

- substantially below market levels of rents and charges when compared with an equivalent letting of the space and facilities on the open market; and
- at a rate comparable with similar facilities available in Havering or (if sufficient comparator premises do not exist in the borough) across London as a whole; and
- at rates which mean that occupation is feasible to a large number of small/start-up businesses in the relevant sector(s).

For the purpose of Policy 21, Flexible Workspace means:

Managed, commercial premises, particularly suitable for small/start-up businesses and which are divided into a collection of small units held by occupiers on a short-term, easy-in, easy-out basis and with communally-shared services, facilities and support for the entrepreneurial activities of the occupiers.

A workspace provided where rent and service charges, excluding business support services, are on average at least 20% less than comparable local market rates for the duration of a lease (although it is noted that, for some sectors and locations, much reduced rents may be needed to render them affordable to target occupiers)

MM20 Policy 22 **Section 9 : Opportunities to prosper : 9.4 Skills and training**

Proposed modifications to explanatory text :

Insert a new final paragraph of explanatory text as follows :

9.4.7 For the purpose of Policy 22 'Local' refers to the location of permanent operation of business or location of resident's home being within the London Borough of Havering

No Likely Significant Effect – this change applies to aspects of the plan that are irrelevant to European sites.

MM21 Policy 23 **Section 10 : 10.1 Transport Connections**

No likely significant effect – policy does not allocate additional parking

A new criterion to be added to the end of the policy as follows :

xvii. Working with partners including the port of London Authority to explore opportunities for utilising the River Thames for freight and passenger transport to reduce traffic congestion and support local businesses.

facilities than has already been assessed in the HRA.

MM22 Policy 24 **Section 10 : Connections : 10.2 Parking provision and design**

Delete the first three paragraphs of the policy as follows :

~~The Council will require all development to provide sufficient parking provision in accordance with the maximum parking standards in the London Plan.~~

~~In areas of the borough that have low public transport accessibility levels (PTAL 0-2), the minimum residential parking standards set out in Table 4 will apply.~~

~~In the most accessible parts of the borough (where a standard in the London Plan of up to 1 space per unit applies) the Council will expect a minimum of 0.5 parking spaces per unit.~~

Insert new text and new tables 10 and 10a in the policy as follows :

London Plan maximums standards apply across the borough (see Table 10 below):.

Table 10 – Residential Parking Standards

PTAL	Parking Provision
<u>0-2</u>	<u>See Table 10a (below)</u>
<u>3-6</u>	<u>London Plan standards</u>

No Likely Significant Effect – this change applies to aspects of the plan that are irrelevant to European sites

In areas of the borough that have low public transport access (PTAL 0-1 and areas of 2 defined below) where no improvements are planned, the minimum residential parking standards set out in Table 10a (below) will also apply :

Table 10a Minimum Parking – PTAL 0-2*

<u>1 Bedroom</u>	<u>2 bedrooms</u>	<u>3 bedrooms</u>	<u>4+ bedrooms</u>
<u>Less than 1 parking space per unit</u>	<u>Less than 1 parking space per unit</u>	<u>Up to 1.5 spaces per unit</u>	<u>Up to 2 spaces per unit</u>

*Areas of PTAL 2 where minimum standards set out in table 10a will be applied are specifically parts of the borough that are PTAL 2 and are 800 metres or more away from existing or planned rail and underground stations. Minimum standards will not apply in other areas of PTAL2. The London Plan parking standards will apply to all other parts of the borough that are PTAL 2.

Amend the third paragraph (was fourth) of the policy and criteria iv. as follows :

In all areas, subject to the standards set out in Tables 10 and 10a being met, the Council will support proposals that:

- i. Consider the location and layout of parking provision at the earliest stage and as an integral part of the design process;
- ii. Locate parking close to people's homes and in areas with natural surveillance;
- iii. Provide intensive and durable planting in regular intervals that visually screens the continuity of car parking to the front of dwellings and provides a green street scene; and
- iv. Include car club membership open to all and provide on-site car club parking spaces.

Where a development proposal would result in a net loss of car parking spaces the applicant will be required to demonstrate robustly that there is no need for these spaces.

Planning conditions and legal agreements may be used to restrict eligibility for on-street residential and commercial parking permits, irrespective of the amount of parking spaces provided off street as part of the development.

Amend the sixth and seventh paragraphs (were seventh) as follows :

Parking provision in new shopping and leisure developments should serve the area or centre as a whole. It and should not be reserved solely for use in connection with the development proposed and be provided as short stay parking.

Disabled parking and cycle parking should be located closest to town centres and the entrance to ~~of~~ the facilities and should include provision for long and short stay use.

The Council will support development proposals that provide adequate off street servicing arrangements for commercial vehicles and general servicing.

Proposed modifications to explanatory text :

10.2.1 Car parking for development should aim to strike an appropriate balance between meeting the essential parking needs of the site whilst neither acting as a discouragement to using public transport nor adding to demand for on-street parking. Discussion of the appropriate balance should form a key part of Transport Assessments. Travel Plans should be developed to minimise the need for car-based access. Developments should seek to provide the minimum realistic amount of car parking for the scheme without undue risk of overspill parking onto surrounding streets. The allocation of car parking should consider the needs of disabled people, both in terms of quantity and location.

10.2.2 Developments will be supported that comply with the London Plan parking standards for all other forms of parking including for cycles, motor-cycles, cars for disabled people, electric vehicle charging points and coaches;

Insert a new final sentence in paragraph 10.2.3 of the explanatory text as follows :

10.2.3 The Council's approach to off-street car parking standards is to ensure that parking is not over-provided at destinations served by good public transport (maximum levels of provision), but to recognise and respect the decision many residents make to continue to own a car and ensure that adequate levels of off-street parking are provided in new residential development in areas with lower levels of accessibility to public transport. The Council considers this is justified and appropriate in Havering because the borough is not well provided with public transport services for some journeys and there are no practical alternatives to making journeys by car.

10.2.4 The London Plan Parking Standards clearly outline the need for more sustainable travel. The parking standards for outer London boroughs allow for additional parking in comparison to central London boroughs. This is determined by the access to public transport, as identified by the TfL's Public Transport Accessibility Levels (PTAL).

Delete paragraph 10.2.5 of the explanatory text and Table 4 as follows :

~~10.2.5 The Council's Residential Car Parking Standards Report (2017) draws together a range of evidence to help inform the car parking standards for Havering. The report demonstrates that a significant proportion of the borough has a PTAL of 0-2 reflecting the lack access to rail or underground stations. Havering also has one of the highest levels of car ownership which is above the average for outer London boroughs. Unsurprisingly, the highest levels of car ownership per household are in the areas with the poorest public transport accessibility. In accordance with the London Plan the Council considers it appropriate to set minimum car parking standards for those areas with the lowest levels of public transport accessibility (see Table 4 below). A lower standard may be appropriate for sites with a PTAL of 2 within the Romford Strategic Development Area where this can be justified on a case by case basis.~~

~~Minimum Parking Standards PTAL 0-2~~

1 bedroom	2 bedrooms	3 bedrooms+
1 parking space per unit	1.5 parking spaces per unit	2 parking spaces per unit

Insert a replacement paragraph 10.2.5 in the explanatory text as follows :

10.2.5 Table 10a sets out minimum parking standards for PTAL's 0-1 together with areas which are PTAL 2 and are 800m+ away from existing or planned rail and underground stations. Applying minimum standards to some specific parts of the borough that are PTAL 2 recognises that the London Plan provides outer London boroughs with the opportunity to apply a more flexible approach to parking standards in these areas.

Delete the final sentence of paragraph 10.2.6 of the explanatory text as follows :

10.2.6 Some areas of the borough (such as central Romford and Upminster) have good or very good access to public transport. In areas well served by public transport and therefore with high PTAL levels, the Council has an obligation under the London Plan to reduce private car use and provide fewer parking spaces in comparison to other parts of the borough. ~~The Residential Car Parking Standards Report (2017) found that in Havering, even areas with high PTALs can have higher car ownership levels than the outer London average.~~

Delete paragraph 10.2.7 of the explanatory text as follows :

~~10.2.7 The report also concluded that areas in Havering with higher PTAL scores, which generally lie on the main rail routes, have achieved those scores largely due to the ease of access to and from London rather than because of good local public transport provision in the borough. Driver trips are predominantly locally focused and without the availability of alternative options there is a demand to own and use cars. A key priority is therefore to increase public transport connections and sustainable travel options as detailed in Policy 23. A balance also needs to be struck between the provision of residential parking spaces and wider objectives such as reducing congestion and improving air quality and the use of parking controls to protect the amenity of existing residents. The Council consider it appropriate to set a minimum requirement of 0.5 spaces per unit in areas that would be captured by the London Plan policy as having a standard of less than 1 space per unit.~~

Renumber the remaining paragraphs as follows :

~~10.2.8~~7 Car clubs and pool car schemes are becoming increasingly popular as a means of reducing the need for people to own a car, particularly in areas of good public transport accessibility where there may only be occasional need to use a car. The Council will expect the inclusion of a publicly accessible car club scheme where the scale of development would support the provision of such a scheme.

~~10.2.9~~8 The London Plan has also set out a requirement for electric vehicle charging point parking spaces to be included within a development. Therefore, developments will need to include the minimum required electric vehicle parking spaces as required at the time of the application.

~~10.2.40~~9 The Council will expect parking provision to be provided on site, but it is recognised that this may not always be sufficient. In situations where in-curtilage parking is required, it should be located close to the home to avoid inconvenience and increase natural surveillance. Large, isolated car parks should be avoided. Whilst parking will be provided within private areas, it should be recognised that people will wish to park where they consider convenient and this is often on the existing or proposed street. This should be taken into consideration, and parking designed to be convenient for residents so that streets are not dominated by cars.

~~10.2.44~~10 The design and layout of new residential development should take account of the needs of people wishing to cycle through the provision of safe, accessible and secure cycle parking. Developers should aim to make cycle storage as convenient as access to car parking to encourage cycling as a sustainable mode of transport. New flatted development should provide some space either inside the building in a cycle store-room or provide a separate, secure and accessible bike shed within the overall development.

~~10.2.42~~11 To reinforce the need for sufficient off-street parking provision and to encourage occupiers to use the available on-site parking, restrictions to eligibility for on-street parking permits can apply to existing and any future parking restrictions.

10.2.43~~12~~ The Council will use informatives and legal agreements to ensure that future occupants are aware they are not entitled to apply for on-street parking permits.

MM23 Policy 28 **Section 11 : High Quality Places : 11.3 Heritage assets**

Amend criteria i., vii. and viii. of the policy as follows :

The Council recognises the significance and value of Havering's heritage assets and will support:

- i. Proposals that seek to ~~sustain or conserve~~ and enhance the significance of heritage assets at risk in the borough;
- ii. The maintenance of up to date Conservation Area Appraisals and Management Plans;
- iii. The identification, and maintenance, of a local list of non-designated heritage assets that meet agreed selection criteria;
- iv. Well designed and high quality development in a Conservation Area, or its setting, which preserves, enhances or better reveals the character and appearance of the area and its significance, and which contributes to local character and distinctiveness, taking into account the Conservation Area Appraisal or Management Plan. Where a building (or other element) detracts from the significance of a Conservation Area, its removal will be supported when acceptable plans for redevelopment have been agreed;
- v. Viable uses, alterations or extensions to a listed building, or development within its setting, which would not be harmful to the significance of the heritage asset, including its historic and architectural interest;
- vi. Well designed and high quality development within a Registered Park or Garden of Historic Interest, Historic Park or Garden of Local Interest, Area of Special Townscape or Landscape Character, or within their setting, which sustains or enhances the significance of the heritage asset, including its special character and important views; and
- vii. ~~Proposals affecting the significance of a heritage asset with archaeological interest, including the contribution to significance made by its setting, where:~~
 - a. ~~The proposals are supported by an appropriate assessment of the asset's significance;~~
 - b. ~~Any harm is minimised, clearly justified and necessary to achieve public benefits that are substantial enough to outweigh loss or harm to the asset's significance; and~~
 - c. ~~The significance of any asset or part of an asset to be lost is recorded and made publicly available.~~Well designed and high quality proposals which would not affect the significance of a heritage asset with archaeological interest, including the contribution made to significance by its setting;
- viii. The maintenance of up to date Archaeological Priority Areas;

Delete the second paragraph of the policy as follows :

~~Substantial harm to, or loss of, a Scheduled Monument or non-designated heritage asset with archaeological interest that is demonstrably of national importance, will only be considered in exceptional circumstances.~~

Add a new final paragraph to the policy as follows :

Where a development proposal is judged to cause harm then it will be assessed against the relevant test in the National Planning Policy Framework (NPPF) depending on whether the harm caused is substantial or less than substantial.

No Likely Significant Effect – these modifications are positive and does not change previous policy requirements therefore the conclusions of the HRA are considered appropriate.

MM24 Policy 30 **Section 12 : Green Places : 12.2 Nature conservation**

Amend the first sentence of the policy as follows :

The Council will protect and enhance the ~~rich biodiversity and good diversity~~ borough's natural environment and seek to increase the quantity and quality of biodiversity in Havering by :

Delete criteria i. – v. of the policy as follows :

- ~~i. Protecting Sites of Specific Scientific Interest, Local Nature Reserves and Sites of Importance for~~
- ~~ii. Conserving and, where possible, extending wildlife corridors;~~
- ~~iii. Preserving 'veteran' trees and ancient woodland outside protected areas;~~
- ~~iv. Protecting recognised priority species and habitats; and~~
- ~~v. Supporting development that provides appropriate new biodiversity features on site.~~

Replace deleted criteria (above) with new criteria i. – vi. as follows :

- i. Ensuring developers demonstrate that the impact of proposals on protected sites and species have been fully assessed when development has the potential to impact on such sites or species. Appropriate mitigation and compensation measures will also need to be identified where necessary. If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission will normally be refused;
- ii. Not permitting development which would adversely affect the integrity of Specific Scientific Interest, Local Nature Reserves and Sites of Importance for Nature Conservation except for reasons of overriding public interest, or where adequate compensatory measures are provided: If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission will normally be refused;
- iii. Supporting proposals where the primary objective is to conserve or enhance biodiversity;
- iv. Encouraging developments where there are opportunities to incorporate biodiversity in and around the development;
- v. Supporting developments that promote the qualitative enhancement of sites of biodiversity value, (by supporting proposals that improve access, connectivity and the creation of new habitats. Measures include maintaining trees, native vegetation, and improving and restoring open spaces and green infrastructure for the benefit of wildlife;
- vi. Working with partners and local conservation groups to improve conditions for biodiversity in the borough.

No Likely Significant Effect – again, these modifications are positive and does not change previous policy requirements therefore the conclusions of the HRA are considered appropriate.

MM25 Policy 31 **Section 12 : Green Places : 12.3 Rivers and river corridors**

Insert additional text in the second paragraph of the policy as follows :

No Likely Significant Effect – again, these modifications are positive and do not change previous policy requirements therefore the

		<p>Havering's rivers and river corridors fulfil important biodiversity, recreation, place-making, amenity, freight transport and flood management functions which the Council will seek to optimise.</p> <p>The Council will seek to enhance the river environment by requiring <u>major</u> developments in close proximity to a river to investigate and, where feasible, secure opportunities to restore and enhance rivers and their corridors in line with the Thames River Basin Management Plan (RBMP).</p>	<p>conclusions of the HRA are considered appropriate.</p>
MM26	Policy 36	<p>Section 12 : Green Places : 12.8 Low carbon design, decentralised energy and renewable energy</p> <p>Insert a new fifth paragraph in the policy as follows :</p> <p>All stand-alone renewable energy developments should be located and designed to minimise any adverse impacts. Applicants are required to address the following issues in their proposals: impacts on landscape, biodiversity, historic environment, residential amenity, aviation activities, air quality, highway safety, fuel and energy security, including their cumulative and visual impacts.</p> <p><u>In assessing the likely impacts of potential wind energy development when identifying suitable areas, and in determining planning applications for such development, the Council will follow the approach set out in the National Policy Statement for Renewable Energy Infrastructure (along with the relevant sections of the Overarching National Policy Statement for Energy Infrastructure, including that on aviation impacts).</u></p> <p>Amend criteria iii. and v. and insert additional criteria vi. in the policy as follows :</p> <p>iii. There is no unacceptable <u>adverse</u> impact on residential amenity in terms of noise, shadow flicker, vibration and visual dominance;</p> <p>iv. A noise impact assessment, which considers all relevant National and Local guidance, must be conducted, and identify appropriate noise mitigation measures were required to reduce the impacts on the surrounding occupants; and</p> <p>v. It is in compliance with the <u>NPPE</u> and the Ministerial Written Statement (HCWS42) or subsequent national policy <u>and</u></p> <p><u>vi. There is no unacceptable adverse impact on highway safety on the existing infrastructure or the proposed M25 Junction 28 Improvement Scheme.</u></p>	<p>No Likely Significant Effect – this change applies to aspects of the plan that are irrelevant to European sites.</p>
MM27	Policy 38	<p>Section 13 : Minerals : 13.1 Mineral extraction</p> <p>Amend the first sentence of the text in the policy as follows :</p> <p>The Council will seek to maintain <u>at least a</u> seven year aggregate land bank, as per the Havering apportionment of at least 1.75 million tons apportionment within the London Plan. In this regard, mineral extraction within Mineral Safeguarding Areas will be supported when proposals in isolation and cumulatively would not unacceptably impact on :</p>	<p>No Likely Significant Effect – this change applies to aspects of the plan that are irrelevant to European sites.</p>

- i..Public health and safety;
- ii. The amenity and quality of life of nearby communities;
- iii. The natural, built and historic environments;
- iv. The efficient and effective operation of the road network, including safety and capacity.

Insert additional text at the start of the second paragraph of the policy as follows :

When necessary, ~~A~~ appropriate mitigation measures, to ensure that criteria i.- iv is complied with will be secured as part of any proposed development by planning condition and/or legal agreement.

Add new text to the end of the third paragraph of the policy as follows :

A Transport Statement or Transport Assessment (as appropriate) will be required with all applications to determine the potential impacts the proposal may have on the road network and ensure reasonable contributions from the developers are received to maintain the roads. Full consideration should be given to the use of the River Thames for the transportation of any materials as part of any submitted transport statement.

MM28

Section 14

Section 14 : Delivery and Implementation

Amend paragraph 14.0.17 of the explanatory text as follows :

Delivering new homes and communities through Havering's Housing Zones

14.0.17 ~~Major sites in the~~ The Romford Strategic Development Area and the Rainham and Beam Park Strategic Development Area are anticipated to deliver over ~~5,300~~ 6,000 and 3,000 homes, respectively, over the Plan period.

Amend paragraphs 14.0.28 onwards of the explanatory text as follows :

Monitoring the Local Plan

Insert additional text at the end of paragraph 14.0.28 of the explanatory text as follows :

No Likely Significant Effect – this change applies to aspects of the plan that are irrelevant to European sites

14.0.28 The Local Plan took account of the best possible evidence and research information available when it was prepared. Whilst this gives a sound basis for the Plan's overall direction and policies, it is acknowledged that over the Plan Period circumstances may change. In this circumstance, the Council may wish to adjust the Plan's direction or policies. In particular, it is recognised that the latter stages of the Local Plan have been prepared concurrently with revisions to the National Planning Policy Framework (2019) by the Government and the Mayor of London preparing a draft new London Plan. Changes in national and Mayoral planning policy will need to be assessed to ensure that Havering's planning policies remain up to date and appropriate for Havering. In the light of these factors, the Council will bring forward an update of the Local Plan immediately after its adoption.

Amend paragraph 14.0.29 of the explanatory text as follows :

14.0.29 Notwithstanding the commitment to an update of the Local Plan, and pending the adoption of a new strategy, the Council will, therefore, monitor the effectiveness of its the Local Plan in delivering its objectives. It will do this by regularly assessing its performance against a series of identified key monitoring indicators. The Council will publish the results of these assessments via its Authority Monitoring Report on an annual basis. The monitoring indicators listed in Table 9-10 of Annex 8 will be used to monitor the delivery of each local plan policy. The indicators have specifically been selected to address every policy as far as possible. The indicators are supported by relevant targets, where appropriate, and the extent to which the Local Plan secures these targets will be an important consideration in determining the Council's approach in its update.

Insert two new paragraphs in the explanatory text as follows :

14.0.30 The Council will review policies where it is clear that targets are not met on a consistent basis over time and / or where they fail to be met by a significant amount when considered individually. The Council recognises that given the focus on providing new homes, the indicators and targets for Places to live are especially important. Policy 3 and the Housing Position Statement: Technical Update (October 2019) outline the Council's approach to maintaining a five year supply of housing land and meeting its housing targets. The Council will also keep under review the accommodation needs of Gypsies and Travellers and Travelling Showpeople by undertaking regular reviews of its Gypsy and Traveller Accommodation Assessment.

14.0.31 In addition, the Government's Housing Delivery Test in the National Planning Policy Framework (2019) sets a minimum threshold for housing delivery over a three year period. If delivery falls below this threshold, the Council will need to produce a Housing Action Plan in line with national guidance. The Housing Action Plan will identify reasons for under-delivery, examine ways to reduce the risk of further under-delivery and set out measures the authority will take to improve delivery.

Renumber and insert additional text at the end of the final paragraph of the explanatory text as follows :

14.0.34³² The Council, at this stage, does not wish to be prescriptive about this. In all cases it will consider carefully the need for the item and such factors as the most appropriate means of securing its preparation and delivery and its available resources. In the course of preparing the Local Plan, the Council has initiated the preparation of a Masterplan for Romford (due to be published in 2020) and it expects to bring forward a similar strategy for Rainham and Beam Park. These items reflect the importance of these areas to the overall spatial strategy for development in

Havering and the commitment of the Council to working with its partners to ensure that the borough is provided with up to date and appropriate planning and regeneration strategies to guide development and to enable the Council to deliver its place-making role.



MM29	MM number not used		N/A
MM30	A.8 Monitoring	Various changes to monitoring appendix.	No Likely Significant Effect – this change applies solely to monitoring and therefore presents no mechanism for an effect on European sites

3. Conclusion

- 3.1 Following the examination of the Main Modifications it can be concluded that they will not lead to likely significant effects on European sites and do not undermine the conclusions of the HRA of the submitted in 2017. This is principally because the HRA of the submitted Local Plan was able to confirm that Havering was sufficiently remote from European sites that no realistic impact pathway existed linking development in Havering to effects on European sites.

Havering Cabinet Meeting on August 5 2020

Item to be approved for Havering Local Plan Main Modifications Public Consultation

**Health Impact Assessment Review 2019: Report
responding to Proposed Main Modifications to Local Plan**

August 2020



Examination into the Havering Local Plan 2016 - 2031

Document for Public Consultation alongside the Proposed Main Modifications

Health Impact Assessment Review 2019: Report Responding to Proposed Modifications to Local Plan

August 2020

Health Impact Assessment Review 2019: Report Responding to Proposed Main Modifications to Local Plan (April 2020)



Document details	
Name	Health Impact Assessment Review 2019
Creation date	April 2020
Status	Final
Authors	LBH Public Health Service LBH Development Planning Team
Lead Directors	Mark Ansell, Acting Director of Public Health Sue Harper, Interim Director of Neighbourhoods

Contents

1.0 Introduction.....	3
1.1 Context	3
1.2 Purpose of this Report	3
2.0 Health Impact Assessment Review Process	3
2.1 Schedule of Proposed Modifications	3
2.2 Appraisal of the Main Modifications.....	4
2.3 Key Findings.....	4
3.0 Conclusion and Recommendations.....	5
4.0 Future Monitoring and evaluation	7
Appendix 1: Wider determinants of health, and the impact of the built environment on health	8
Appendix 2: Appraisal of Main Modifications.....	9

1.0 Introduction

1.1 Context

In 2018, the submission version of Havering's Local Plan began its examination process by HM Planning Inspectorate. The Local Plan for Havering guides future growth and development within the borough over the next 15 years, until 2031, setting out the Council's vision and strategy, and the policies that are needed to deliver them. The Plan indicates the broad locations in Havering for future housing, employment, retail, leisure, transport, community services and other types of development.

An accompanying Health Impact Assessment (HIA) of the Local Plan was undertaken in order to promote health and wellbeing through development. The HIA approach recognises that where we live, how we travel, and how we gain access to green space or leisure activities can all have a significant impact on health and wellbeing (Appendix 1 provides a brief description of these wider determinants of health). HIA provides an opportunity to ensure that the potential impacts on health and wellbeing, particularly where there may be inequalities in outcomes for marginalised or disadvantaged groups, are addressed from the outset and mitigated where possible. The purpose of the HIA was to ensure that the Local Plan was sufficiently robust to maximise health gains and, where there is a risk of negative impact, to mitigate against this where possible.

The HIA of the Local Plan resulted in a raft of policies being revised, new guidance being drafted and a proposed new policy that requires developers of all major developments to undertake their own HIA pre-application. The Examination hearings looked upon this new policy favourably and is being supported in its implementation through training and the development of a series of templates to assist developers in conducting a HIA commensurate with the scale of their development application.

1.2 Purpose of this Report

As the purpose of a HIA is to inform decision-making, it is good practice to assess and re-assess the impacts of a policy throughout its lifetime, continuing to monitor and evaluate how the HIA has informed and/or influenced decision-making¹. The Planning Inspectorate Examination process has resulted in a number of modifications to Havering's Local Plan. Therefore, the purpose of this report is to review these modifications to ascertain the health impacts of the modifications and/or whether they significantly alter the findings of the previous Health Impact Assessment.

The table given in Appendix 2 outlines the health impact assessment of the modifications, lists the recommendations from this assessment and identifies the mitigation measures that are already in place within the Local Plan. A summary of these health impacts, according to the 11 themes (from the HUDU Rapid HIA tool previously used for the original HIA) is given in section 2.3 of this report.

2.0 Health Impact Assessment Review Process

2.1 Schedule of Proposed Modifications

This HIA Review has been conducted on the "Draft Schedule of Proposed Modifications to the Havering Local Plan following the Examination in Public Hearing sessions in October 2018 and May 2019". The schedule sets out the

¹ Wales Health Impact Assessment Support Unit: Health Impact Assessment: A Practical Guide
https://whiasu.publichealthnetwork.cymru/files/1415/0710/5107/HIA_Tool_Kit_V2_WEB.pdf

proposed main modifications to the text of a policy included in the 2018 Submission Version of the Local Plan and/or the supporting text providing reasoned justification for that policy. The modifications have arisen as a result of:

- the Regulation 19 consultation in Autumn 2017
- the submission of the Local Plan to the Secretary of State in March 2018; and
- the Examination in Public hearing sessions in October 2018 and May 2019

2.2 Appraisal of the Main Modifications

Each main modification identified in the schedule was reviewed with the following questions in mind:

- Using the HUDU Rapid HIA Tool as a framework, do any of those questions apply to the modification?
- Does the proposed modification significantly alter the policy's impact on health and wellbeing?
- What are the likely positive or negative impacts of the modification?
- Are further mitigation measures required in response to identified negative impacts?

2.3 Key Findings

For the most part, the proposed main modifications clarified or added further detail to the policies proposed in the original submission. Therefore, many of the health impacts had already been considered as part of the original Health Impact Assessment. Appendix 2 lists the main modifications which were considered to require additional assessment. The key findings were in relation to the following areas:

i) *Housing quality and design*

Whilst increasing the density of new homes within a small area can increase the capacity for meeting housing need, it may impact negatively on provision of green and open space, which in turn can impact negatively on mental health and wellbeing. In addition, consideration of tall buildings near the station adds potential for increase access to employment opportunities and travel. However this may impact negatively on light within homes, and increase exposure to poor air quality. Despite these potential negative impacts as a result of the proposed modifications, the context and structure of the Local Plan itself aims to mitigate for these impacts through the use of policies on good design and making the most of the available development space.

The modification proposed for Policy 11 in relation to provision of sites for gypsy and traveller communities is consistent with national planning policy and reflects the Gypsy and Traveller Accommodation Assessment Update Report (July 2019).

ii) *Access to healthcare services and other social infrastructure*

Provision of suitable social infrastructure particularly to meet educational needs can impact positively on overall wellbeing by providing children with the best start in life. The modifications proposed include additional provision of a 3-form entry primary school to meet the needs of the residents of the substantial new housing development in the area. However, it is recommended that as part of the development process for this school that it is designed with consideration for restricting access to the school by cars/other vehicles to improve air quality around the school.

iii) *Access to open space and nature*

The HIA supports the proposed modification for Policy 10 that developments on garden and backland sites will be supported when they do not result in significant adverse impacts on green infrastructure and biodiversity that cannot be effectively mitigated. It is important to maintain access to green and open space for both physical and mental health and wellbeing and so preservation of these spaces is welcomed. However, there remains to be a clear definition of 'significant adverse impact'.

iv) *Air quality, noise and neighbourhood amenity*

The addition of the word 'unacceptable' in Policy 6 relating to adverse impacts of development, gives greater opportunities to build developments to meet housing needs. Such development may have a negative impact, but those impacts may be deemed acceptable by key stakeholders. It is recommended that full and frank consultation is conducted where negative impacts are identified to test the acceptability by key stakeholders.

v) *Accessibility and active travel*

The Havering Local Plan's Strategic Objectives now includes reference to supporting greater use of the River Thames for passenger and freight transport. Whilst opening up the river for passenger use may positively impact on health and wellbeing in terms of an alternative route to work and access to leisure, it is recommended that developers consider how the passenger embarkation points will be made as accessible to all as possible. In addition, increased passenger and freight transport on the river may have negative impacts on the biodiversity of the area, which already includes a Site of Special Scientific Interest (SSSI) in the Rainham Marshes area.

vi) *Crime reduction and community safety*

None of the modifications appeared to have any additional impact (positively or negatively) on crime reduction and community safety aspects.

vii) *Access to healthy food*

The HIA supports the modification in Policy 12 limiting the overconcentration of uses within a town centre – there are no additional positive or negative impacts of this modification.

viii) *Access to Work and Training*

The proposed main modifications which focus on developers ensuring a mix of uses, particularly in the strategic development areas, have the potential for positive impacts on health and wellbeing in terms of employment opportunities, and business opportunities for a range of sizes of enterprises. It is recommended that developers consider provision of affordable workspaces of a range of sizes, and lengths of lease to encourage innovation through start-up businesses as well as smaller enterprises. The limits set on percentage of affordable workspace have reduced through the modifications from 20% to 10% but it is recognised this has been agreed as a reasonable figure through negotiation.

ix) *Social cohesion and lifetime neighbourhoods*

Provision in the modifications to the Local Plan for industrial sites offers an opportunity for employment, hopefully in the longer term with a successful business endeavour.

x) *Minimising the use of resources*

The HIA supports the modification in Policy 3 regarding returning vacant units to active use, which will assist in meeting housing need. Providing a home is a fundamental determinant of a person's health and wellbeing and so re-purposing vacant units to new homes will assist in providing homes for those in need.

xi) *Climate Change*

Efficient use vacant properties, and encouraging use of the River Thames for freight and passenger transport could potentially impact positively and negatively on climate change. Whilst the removal of freight from key transport routes through the borough may reduce levels of pollution, it will be necessary to carefully consider the impact of the increased river traffic on air quality and biodiversity in the region and its ultimate impact on climate change.

3.0 Recommendations and Existing Mitigation Measures

The findings from this Health Impact Assessment review of the main modifications do not significantly alter the original findings.

However, for the purposes of rigour, the health impact assessment of the modifications included a process to identify whether any further recommendations could be made. Where these were made, the Local Plan was examined to ascertain whether mitigation measures were already in place respond to these recommendations.

Key Recommendations Arising from Assessment of Modifications	Mitigation Measures Already in Place
To ensure the Local Plan continues to be consistent with national planning policy and any updates to the London Plan	The Local Plan will be reviewed regularly in line with national and local policy updates.
That should increased river freight and passenger transport use be realised, housing development and social infrastructure ensures good accessibility to the river amenities and for leisure opportunities	The Local Plan already contains policies on Air Quality (Policy 33), Managing Pollution (Policy 34) and Nature Conservation (Policy 30) which will mitigate any potential negative impacts
Priority for new or re-provisioned homes under Council control are allocated according to highest need.	<p>Havering Council's housing allocations policy has been designed to give real help to people in housing need.</p> <p>Policy 7- Residential design and amenity- sets out clear guidelines for quality of development and development standards including access to amenity spaces.</p>
Tall, or high density structures endeavour to maintain accessibility to green and open space through good design and effective use of urban planting	<p>Policy 34- Managing Pollution- The Council will support development proposals that:</p> <ul style="list-style-type: none"> i. Do not unduly impact upon amenity, human health and safety and the natural environment by noise, dust, odour and light pollution, vibration and land contamination <p>The Councils Environmental Health Team are consulted on planning applications and conditions are placed on applicants regarding mitigating noise pollution. There are also building regulations in place.</p> <p>The forthcoming Romford masterplan this will provide further guidance on tall buildings. A design review panel has been set up and it is expected that major applications will be referred to this panel.</p>
Mitigation for the adverse impact of noise, poor air quality and high density accommodation is recommended as central to any development application to minimise the impact on health and wellbeing	The Local Plan already contains policies on Air Quality (Policy 33), Managing Pollution (Policy 34) and Nature Conservation (Policy 30) which will mitigate any potential negative impacts
That HIA of this Local Plan is updated regularly in line with demographic, political or climate changes	The Local Plan will be reviewed regularly.

4.0 Future Monitoring and evaluation

This HIA reviewed the main modifications proposed for the Submission version of Local Plan. It is anticipated that, once the final plan has been adopted, it will be subject to future review within the context of other external pressures, such as changes in local demography, politics (leadership, EU Exit etc.) or climate change. As per best practice, the HIA will be monitored and evaluated to assess how it has continued to inform and influence decision-making within the Council. It will be reviewed either on a regular basis over the lifetime of the plan (every 3-5 years) and/or when there are definitive changes made on an ad hoc basis.

Appendix 1: Wider determinants of health, and the impact of the built environment on health

Figure 1 below reproduces Dahlgren and Whitehead's representation of the wider determinants of health. It illustrates the many factors that interact to influence health status.

Whilst we are powerless to alter such central factors as our age, sex and genetically inherited propensity to disease, the interaction between our individual characteristics and the environment in which we live, not just our immediate surroundings but also the socio-political and cultural environment, is key to determining health.

Figure 1. The Wider Determinants of Health Model



People living in areas of deprivation, with potentially poor housing conditions, overcrowding, high levels of unemployment, on low incomes, and poor education, live significantly shorter lives than their more affluent counterparts. For example, in England, a person in the quintile of lowest deprivation can expect to live around 7 years longer than a person in the quintile of highest deprivation. The environmental aspects of the local place also interplay with the social conditions; large networks of streets or estates can impact on our ability to access green and open spaces, important not just for physical activity, but for our mental health and wellbeing too. The design and density of housing, access to shops, supermarkets, leisure facilities and other retailers can affect the quality of our diet and lifestyle, including how we build and maintain our social relationships. Also, how we travel through our environments, whether there are traffic calming measures, safe places for children to play and the impact of traffic pollution on our air quality are important factors.

Appendix 2: Appraisal of Main Modifications

Page 270

Ref. No.	Page	Policy / Para	Proposed Main Modification	Relevance to HUDU HIA Framework Theme	Appraisal of Likely Positive Impacts of Modification	Appraisal of Likely Negative Impacts of Modification	Recommendations	Mitigation measures in Place in the Local Plan
MM2	10	Strategic Objectives Para 3.2.1	Section 3 : Strategic Objectives Add new criterion to paragraph 3.2.1 as follows : <u>xxii. Support greater use of the River Thames for freight and passenger transport</u> and renumber the final criterion as xxiii	<ul style="list-style-type: none"> Accessibility and active travel Climate Change Air quality, noise and neighbourhood amenity 	Supporting greater use of Thames for freight and passenger transport could have a positive impact on accessibility to public transport.	However, the negative impact might be in terms of increase in air and water pollution by boats and impact on local biodiversity.	Planners/developers to consider: <ul style="list-style-type: none"> Importance of and way to mitigate for impact of increased river traffic. 	The Local Plan already contains policies on Air Quality (Policy 33), Managing Pollution (Policy 34) and Nature Conservation (Policy 30) which will mitigate any potential negative impacts
MM3	16	Policy 1	Over the plan period the Council will support the delivery of over 6,000 ^{5,300} ⁽²⁾ new high quality homes <u>within the Romford Strategic Development Area</u> in well managed residential and mixed use schemes that provide attractive places to live and which are well integrated with the existing community.	<ul style="list-style-type: none"> Housing quality and design Access to work and training Accessibility and active travel Air quality, noise and neighbourhood amenity 	Increasing the number of new homes to be available within the RSDA from 5,300 to 6,000 will have potential positive impacts on meeting housing needs. Developing within the Romford area will likely increase access to transport connections for employment purposes and access to leisure	Increasing the density of new homes within a small area may impact negatively on provision of green and open space, which in turn can impact negatively on mental health and wellbeing.	It is recommended that priority for new homes on Council housing registers be given to those with the greatest need. Good design of high density housing will contribute to mitigating against potential overcrowding. It is recommended that the design incorporates features of urban	Havering Council's housing allocations policy has been designed to give real help to people in housing need. Policy 7- Residential design and amenity- sets out clear

Ref. No.	Page	Policy / Para	Proposed Main Modification	Relevance to HUDU HIA Framework Theme	Appraisal of Likely Positive Impacts of Modification	Appraisal of Likely Negative Impacts of Modification	Recommendations	Mitigation measures in Place in the Local Plan
					and entertainment opportunities.		planting to maintain a sense of access to green and open space.	guidelines for quality of development and development standards including access to amenity spaces.
MM3	16	Policy 1	Social Infrastructure: <u>A 3 form of entry primary school (630 places) has been approved on the Bridge Close development site and the new school should be sufficient to meet demand for the additional primary places needed over the next five years. A further 6FE need for primary school places beyond the first five years</u> xxiii. xxvi. <u>A 6/8FE secondary school in the second phase of the Plan period (5-10 years);</u>	<ul style="list-style-type: none"> • Access to healthcare services and other social infrastructure • Access to work and training • Accessibility and active travel • Air quality, noise and neighbourhood amenity 	Provision of suitable education establishments can have an overall positive impact on health and wellbeing through creating opportunities to improve education and gain better employment. Cross-referencing to other design and development policies in the plan will contribute to ensuring the school is as health promoting as possible.	Air pollution, noise, dust impacts need to be mitigated for during the construction phase of the school.	Planners/developers to consider: <ul style="list-style-type: none"> • Ensuring the school is accessible by means of active transport • Design the school with restricted access by vehicles, with exception for those whose needs demand car access to school 	Policy 23 Transport Connections contains the requirement for a travel plans for certain developments. There are officers in the Council Transport Planning team who work with schools to promote the benefits of active travel to and supporting the development, delivery and monitoring of school, travel plans as

Ref. No.	Page	Policy / Para	Proposed Main Modification	Relevance to HUDU HIA Framework Theme	Appraisal of Likely Positive Impacts of Modification	Appraisal of Likely Negative Impacts of Modification	Recommendations	Mitigation measures in Place in the Local Plan
								referenced in section 10 of the Plan.
MM3	16	Policy 1	<u>To achieve a vibrant and thriving Town Centre there will need to be a mix of uses throughout the Romford Strategic Development Area (RSDA). It is envisaged that this will include residential, retail, commercial, leisure and arts uses. It is intended that the preferred locations for these different uses within the Town Centre will be identified through the ongoing master planning process for Romford. To facilitate delivery of these uses, the design of the ground floor of a mixed use development within RSDA should have a minimum floor-to-floor height of 4.5 3.5m to allow flexibility for future changes and adaptability over time. This is a recommended dimension for floor-to-floor height, as the floor-to-ceiling height in retail or commercial development will depend on individual occupier fit out</u>	<ul style="list-style-type: none"> • Social cohesion and lifetime neighbourhoods • Access to healthy food • Access to healthcare services and other social infrastructure • Access to work and training • Accessibility and active travel • Air quality, noise and neighbourhood amenity 	Potential for increased opportunities for employment and access to leisure opportunities can have positive impacts particularly on mental health and wellbeing.	Depending on the uses, there may be increased noise affecting the local residents.	None	<p>Policy 34- Managing Pollution- The Council will support development proposals that:</p> <p>i. Do not unduly impact upon amenity, human health and safety and the natural environment by noise, dust, odour and light pollution, vibration and land contamination</p> <p>The Councils Environmental Health Team are consulted on planning applications and conditions are placed on applicants regarding mitigating noise pollution.</p>

Ref. No.	Page	Policy / Para	Proposed Main Modification	Relevance to HUDU HIA Framework Theme	Appraisal of Likely Positive Impacts of Modification	Appraisal of Likely Negative Impacts of Modification	Recommendations	Mitigation measures in Place in the Local Plan
			<u>requirements. Commercial buildings, given their likely increased service requirements will generally require a minimum floor-to-ceiling height of 3.5m to 4m to achieve appropriate ceiling heights.</u>					There are also building regulations in place.
MM3	16	Policy 1	<u>New Paragraph 6.1.31 Tall buildings may be acceptable in the vicinity of the station subject to high quality design and strong public realm propositions at ground level. Proposals for tall buildings within the Conservation Area and north of the railway line along south street are inappropriate. The heights of proposed new buildings in this area will need to respond positively to the historic context. Elsewhere in the town centre the height of proposed buildings should respond to local character and context, and make a positive contribution to the skyline in Romford town centre.</u>	<ul style="list-style-type: none"> • Social cohesion and lifetime neighbourhoods • Housing quality and design 	Increased accessibility to public transport for those living in the vicinity of the station may enable greater access to employment opportunities	Residential space in the middle of a town near a station may increase exposure to noise and air pollution; tall buildings may restrict the light for other nearby residences or access to natural light for employees of local commercial and retail spaces	Developers to consider: <ul style="list-style-type: none"> • what materials need to be used to minimise noise for residents of these buildings • good design of tall buildings in the context of their impact on existing amenities 	Policy 34- Managing Pollution- The Council will support development proposals that: <ol style="list-style-type: none"> Do not unduly impact upon amenity, human health and safety and the natural environment by noise, dust, odour and light pollution, vibration and land contamination The Councils Environmental Health Team are consulted on planning

Ref. No.	Page	Policy / Para	Proposed Main Modification	Relevance to HUDU HIA Framework Theme	Appraisal of Likely Positive Impacts of Modification	Appraisal of Likely Negative Impacts of Modification	Recommendations	Mitigation measures in Place in the Local Plan
								<p>applications and conditions are placed on applicants regarding mitigating noise pollution. There are also building regulations in place.</p> <p>The forthcoming Romford masterplan this will provide further guidance on tall buildings. A design review panel has been set up and it is expected that major applications will be referred to this panel.</p>
MM5	22	Policy 2	Insert a new fifth paragraph in the policy as follows : <u>To achieve a vibrant and thriving area there will need to</u>	<ul style="list-style-type: none"> Social cohesion and lifetime neighbourhoods 	Potential for increased opportunities for employment and access to leisure	None identified	Planners/developers to consider: <ul style="list-style-type: none"> Provision of affordable 	Policy 21 Affordable Workspace- sets out the position

Ref. No.	Page	Policy / Para	Proposed Main Modification	Relevance to HUDU HIA Framework Theme	Appraisal of Likely Positive Impacts of Modification	Appraisal of Likely Negative Impacts of Modification	Recommendations	Mitigation measures in Place in the Local Plan
			<u>be a mix of uses throughout the Rainham and Beam Park Strategic Development Area It is envisaged that this will include retail, commercial, leisure and arts uses.</u>	<ul style="list-style-type: none"> • Access to healthy food • Access to healthcare services and other social infrastructure • Access to work and training 	opportunities can have positive impacts particularly on mental health and wellbeing		workspaces for local business <ul style="list-style-type: none"> • Whether local procurement arrangements could provide employment opportunities for local residents 	on affordable workspaces in mixed use developments. Council's economic development team work with procurement services to ensure there are opportunities for local companies to be involved in the procurement of goods and services.
MM5	22	Policy 2	<u>Take account of and positively respond to the various listed buildings and their settings;</u>	<ul style="list-style-type: none"> • Social cohesion and lifetime neighbourhoods 	Maintaining the cultural character and identity of a place may have a positive impact on wellbeing through sense of belonging, history and heritage. It has the opportunity to enhance social cohesion through celebration of cultural heritage.	None identified	None	N/A
MM6	27	Policy 3	Section 7: Successful Places to Live	<ul style="list-style-type: none"> • Access to healthcare services 	The addition of the qualification to return	Potential for overcrowding if small	Developers to consider whether	Policy 7-

Ref. No.	Page	Policy / Para	Proposed Main Modification	Relevance to HUDU HIA Framework Theme	Appraisal of Likely Positive Impacts of Modification	Appraisal of Likely Negative Impacts of Modification	Recommendations	Mitigation measures in Place in the Local Plan
			v. 2,790 homes on small sites across borough. 1,500 homes on small sites across the borough <u>and through vacant units returning to use.</u>	and other social infrastructure <ul style="list-style-type: none"> Social cohesion and lifetime neighbourhoods 	vacant units to use has a positive impact on efficient use of resources. Provision of homes for people in need will meet their basic health and wellbeing needs.	sites are overdeveloped.	development on small sites meets all standards for provision of space requirements and maintaining adequate access to green and open space	Residential design and amenity- sets out clear guidelines for quality of development and development standards including access to amenity spaces.
MM6	27	Policy 3	<u>ix) Supporting residential development proposals around stations where it is compatible with the character of the local area. Major development proposals around stations will be subject to design review</u>	<ul style="list-style-type: none"> Access to work and training Accessibility and active travel Air quality, noise and neighbourhood amenity 	Potential for easy access to employment opportunities and leisure opportunities.	Homes near stations may be subject to increased levels of noise and air pollution, both of which can impact negatively on health and wellbeing.	Developers to consider how best to integrate noise-reducing building materials. Consideration should be given in the design of the homes to the pollution sources and ways to mitigate this through good design.	Policy 34- Managing Contamination The Councils Environmental Health Team are consulted on planning applications and conditions are placed on applicants regarding mitigating pollution. There are also building regulations in place.

Health Impact Assessment Review 2019

Ref. No.	Page	Policy / Para	Proposed Main Modification	Relevance to HUDU HIA Framework Theme	Appraisal of Likely Positive Impacts of Modification	Appraisal of Likely Negative Impacts of Modification	Recommendations	Mitigation measures in Place in the Local Plan
								Pre-application discussions are also encouraged where these issues can be discussed at an early stage.
MM6	27	Policy 3	<u>7.1.8 Due to the nature of the housing supply in the Local Plan, the Council has applied a 'stepped' approach to housing delivery over the first 10 years of the plan period. The 'stepped' approach targets are set out in Table 1. (and all subsequent modifications in this section)</u>	<ul style="list-style-type: none"> Housing quality and design 	No additional impact identified through this modification	No additional impact identified through this modification	None	N/A
MM9	32	Policy 6	The proposal does not have any <u>unacceptable</u> adverse impacts on the surrounding area and will not be likely to give rise to significantly <u>unacceptable</u> greater levels of noise and disturbance to occupiers of nearby residential properties;	<ul style="list-style-type: none"> Housing quality and design 	The addition of the word 'unacceptable' here gives greater opportunities to build developments to meet housing needs. Such development may have a negative impact, but those impacts are deemed acceptable by key stakeholders	None identified	Developers to ensure they have consulted with key stakeholders in an open and honest approach to record where potential negative impacts are deemed acceptable	Pre-application discussions are also encouraged where these issues can be discussed at an early stage

Ref. No.	Page	Policy / Para	Proposed Main Modification	Relevance to HUDU HIA Framework Theme	Appraisal of Likely Positive Impacts of Modification	Appraisal of Likely Negative Impacts of Modification	Recommendations	Mitigation measures in Place in the Local Plan
MM9	32	Policy 6	<u>7.4.7 In 2018, the report was reviewed and reached the same conclusions listed above. Overall, an annual need for 255 owner occupier/ intermediate housing was identified. The report will continue to be reviewed every 3 years so that the Council is able to maintain an up-to-date understanding of identified need within the borough taking into account changes in demographic projection, technological and building innovations and older person's assessment of how their own housing needs are best met.</u>	<ul style="list-style-type: none"> Housing quality and design Access to healthcare services and other social infrastructure 	Assessment of their own housing needs by older people may positively affect health and wellbeing through maintaining a sense of independence and an ability to influence and control their housing provision.	No additional impacts identified	None identified	N/A
MM10	34	Policy 7	v. Adhere to the London Plan policies in regards to 'Lifetime Homes Standards' and 'Lifetime Neighbourhoods'; Addition of new paragraph in <u>7.5.4 New development in Havering should be of a high quality and offer a good quality living environment for residents. Dual aspect accommodation offers a range of benefits such as better daylight, a greater chance of direct sunlight for longer periods, natural cross</u>	<ul style="list-style-type: none"> Housing quality and design 	The new paragraph added in 7.5.4 has potential for positive impacts on health and wellbeing through standards for better daylight, ventilation, minimising pollution and offering a choice of views.	Removal of these standards might discourage developers from building homes adaptable for the future. However, this is mitigated for by the addition of the new paragraph in 7.5.4	When the Local Plan is updated in-corporate any appropriate new standard. up to	<p>Addition of the new paragraph in 7.5.4</p> <p>Local Plan update will include any appropriate new standards.</p>

Ref. No.	Page	Policy / Para	Proposed Main Modification	Relevance to HUDU HIA Framework Theme	Appraisal of Likely Positive Impacts of Modification	Appraisal of Likely Negative Impacts of Modification	Recommendations	Mitigation measures in Place in the Local Plan
			<u>ventilation, mitigating pollution, offering a choice of views, greater flexibility and adaptability. In line with the Mayor's Housing SPG 2016 developments should minimise the number of single aspect dwellings. Single aspect dwellings that are north facing, or exposed to noise levels above which significant adverse effects on health and quality of life occur, or which contain three or more bedrooms should be avoided.</u>					
MM1 1	38	Policy 10	Proposals for residential development on garden and backland sites in Havering will be supported when they: v. <u>Do not result in significant adverse impacts on green infrastructure and biodiversity that cannot be effectively mitigated</u>	<ul style="list-style-type: none"> Access to open space and nature 	The modification has a positive impact by endeavouring to preserve access to open space and nature. This may help both physical and mental health.	None identified	None	N/A
MM1 2		Policy 11	Replacement of text for policy on gypsy and traveller sites	<ul style="list-style-type: none"> Housing quality and design Access to open space and nature 	The modification proposed ensures that the policy is consistent with national planning policy including Planning Policy for Traveller Sites(2015); and reflect the Gypsy and Traveller Accommodation	None identified	None	N/A

Ref. No.	Page	Policy / Para	Proposed Main Modification	Relevance to HUDU HIA Framework Theme	Appraisal of Likely Positive Impacts of Modification	Appraisal of Likely Negative Impacts of Modification	Recommendations	Mitigation measures in Place in the Local Plan
					Assessment Update report (July 2019)			
MM1 3	31	Policy 12	<p>Promoting the diversification of uses within town centres and managing the <u>overconcentration of</u> uses that can have a negative health impacts such as betting shops and fast food takeaways (refer to Policy 13);</p> <p>Addition of 'major development proposals'</p>	<ul style="list-style-type: none"> Access to healthy food 	<p>The modification clarifies that developers of major development proposals are required to consider wider local / regional primary care and other health strategies, as appropriate , and to take into account how any developments can contribute to the aims and objectives of those strategies</p> <p>'Major' development adds clarity and does not have any additional impact on health and wellbeing</p>	<p>The proposed modifications :</p> <ul style="list-style-type: none"> recognise the harmful effect of overconcentration of uses with negative health impacts 	Keep the proposed modifications	N/A
MM1 7	53	Policy 19	Requiring large scale residential proposals within Romford Town Centre to incorporate high quality flexible business space, subject to viability, and <u>progress towards meeting the identified office employment floor space requirement as</u>	<ul style="list-style-type: none"> Access to work and training 	Potential positive impact on wellbeing by enhancing the wider determinants of health ie. Employment opportunities	None identified	None	N/A

Ref. No.	Page	Policy / Para	Proposed Main Modification	Relevance to HUDU HIA Framework Theme	Appraisal of Likely Positive Impacts of Modification	Appraisal of Likely Negative Impacts of Modification	Recommendations	Mitigation measures in Place in the Local Plan
			<u>detailed in Table 10 Local Plan monitoring framework, and in consideration of individual site characteristics not comprised in viability assessments such as configuration, servicing requirements and neighbouring uses.</u>					
MM1 7	53	Policy 19	Addition of: <u>The Council nevertheless realise the importance of addressing other strategic and local land-use requirements, in particular the pressing need for new homes. The Council will, therefore, keep under review the need for employment land as part of a managed approach in line with the requirements in the National Planning Policy Framework and the London Plan and with regard to meeting the other objectives of this Local Plan.</u>	<ul style="list-style-type: none"> Access to work and training 	Potential positive impact on wellbeing by enhancing the wider determinants of health ie. Employment opportunities	None identified	None	N/A
MM1 8	55	Policy 20	Add a new opening paragraph to the policy as follows: <u>The Council will keep under review the provision of Locally Significant Industrial Sites (LSISs) and non-designated industrial land as part of its commitment to ensuring that</u>	<ul style="list-style-type: none"> Access to work and training 	The additional paragraph adds weight to the need for employment opportunities as a significant determinant of health and wellbeing.	Increased numbers of industrial sites may reduce air quality around the site	Developers to ensure that new industrial sites mitigate for any harmful pollution as a result of their activities	The Local Plan already contains a policy on Managing Pollution (Policy 34) which will mitigate any potential

Ref. No.	Page	Policy / Para	Proposed Main Modification	Relevance to HUDU HIA Framework Theme	Appraisal of Likely Positive Impacts of Modification	Appraisal of Likely Negative Impacts of Modification	Recommendations	Mitigation measures in Place in the Local Plan
			<u>Havering has a strong and prosperous economy.</u>		Maintaining opportunities for employment and business growth will have a likely positive impact.			negative impacts
MM19	Page 282	Policy 21	The Council will promote opportunities for start-up and small and medium enterprises by expecting major commercial and mixed-use schemes to provide a minimum of 20% of its floorspace as affordable workspace support local micro and small businesses through <u>securing affordable workspace within the boroughs network of town centres, Strategic Industrial Locations and Local Significant Industrial Sites. Major commercial and mixed-use developments should provide a minimum of 20% of 10% total gross commercial floorspace as affordable workspace for a minimum of 5 years, subject to viability.</u>	<ul style="list-style-type: none"> Access to work and training 	None identified	Reduction in the percentage of affordable workspace limits opportunities for start up and small business however it is recognised that it is necessary to set a 'reasonable' level of affordable workspace and that this amendment has been negotiated and agreed. This is further explained in the additional explanatory text included in the modifications in this policy.	None	N/A
(not identified)		Policy 23	A new criterion to be added to the end of the policy as follows : <u>xvii. Working with partners including the port of London Authority to explore opportunities for utilising the River Thames for freight and</u>	<ul style="list-style-type: none"> Air quality, noise and neighbourhood amenity Accessibility and active travel 	Potential for positives in terms of access to alternative forms of transport and reducing congestion on roads, hence also potential for	Need to consider the impact of increased river freight and passenger transport on pollution and impact on biodiversity	Providers of new river services to conduct a health and environmental impact assessment on the boats to be	There is legislation that deals with policies for freight and passenger transport.

Ref. No.	Page	Policy / Para	Proposed Main Modification	Relevance to HUDU HIA Framework Theme	Appraisal of Likely Positive Impacts of Modification	Appraisal of Likely Negative Impacts of Modification	Recommendations	Mitigation measures in Place in the Local Plan
			<u>passenger transport to reduce traffic congestion and support local businesses.</u>		improvements in air quality for local residents and workers	along the river corridor	used for such purposes.	The Local Plan already contains policies on Air Quality (Policy 33), Managing Pollution (Policy 34) and Nature Conservation (Policy 30) which will mitigate any potential negative impacts

This page is intentionally left blank

Havering Cabinet Meeting on August 5 2020

Item to be approved for Havering Local Plan Main Modifications Public Consultation

**Sustainability Appraisal (SA) for the Havering Local Plan:
SA Report Addendum to accompany the Main
Modifications**

August 2020



Examination into the Havering Local Plan 2016 - 2031

Document for Public Consultation alongside the Proposed Main Modifications

Sustainability Appraisal (SA) for the Havering Local Plan: SA Report Addendum to Accompany the Proposed Main Modifications

August 2020

Sustainability Appraisal (SA) for the Havering Local Plan

SA Report Addendum to accompany
the Main Modifications

The London Borough of Havering

Project number: 60494252

April 2020

Quality information

Prepared by

Alastair Peattie
Associate Director

Checked by

Nick Chisholm-Batten
Associate Director

Approved by

Steve Smith
Technical Director

Revision History

Revision	Revision date	Details	Authorised	Name	Position
V5.0	11/03/20	Consultation version	11/03/20	Nick Chisholm- Batten	Associate Director

Prepared for:

London Borough of Havering

Prepared by:

AECOM Infrastructure & Environment UK Limited
Aldgate Tower
2 Leman Street
London E1 8FA
United Kingdom
aecom.com

© 2020 AECOM Infrastructure & Environment UK Limited. All Rights Reserved.

This document has been prepared by AECOM Infrastructure & Environment UK Limited ("AECOM") for sole use of our client (the "Client") in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. No third party may rely upon this document without the prior and express written agreement of AECOM.

THIS PAGE IS INTENTIONALLY LEFT BLANK

Table of Contents

Non-Technical Summary	
1. Introduction.....	1
Background	1
Sustainability Appraisal	1
Purpose and structure of this SA Report Addendum	1
2. What's the scope of the SA?	2
3. Screening of the Main Modifications	3
Introduction.....	3
Method	3
Screening findings.....	3
4. Appraisal of the Main Modifications	7
Introduction.....	7
Methodology.....	7
Appraisal of the Main Modifications	7
Main Modification MM3	7
Main Modification MM9	10
Main Modification MM12	11
5. Next steps	13
Plan finalisation	13
Monitoring.....	13
Appendix I: Appraisal of Gypsy and Traveller sites	15

THIS PAGE IS INTENTIONALLY LEFT BLANK

Non-Technical Summary

Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the Havering Local Plan 2016-2031 on behalf of the London Borough of Havering. SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of the Local Plan is a legal requirement.

The London Borough of Havering is currently preparing a new Local Plan to replace the existing planning policies in the Havering Local Development Framework. The new Local Plan, which will cover the period to 2031, will be the key planning policy document for the borough and will guide decisions on the use and development of land. Replacing the Havering Local Development Framework, the Local Plan together with the London Plan will comprise the Development Plan for the borough and will be the primary basis against which planning applications are assessed.

The Local Plan is at an advanced stage of preparation, having been formally published in August 2017 ahead of being submitted to the Planning Inspectorate for examination in March 2018; and then having been the focus of examination hearings in October 2018 and May 2019.

As a result of discussion at the hearing sessions and representations received during examination a number of changes are being proposed to the Local Plan. These changes are referred to as Main Modifications and need to be considered through the SA process to determine if they significantly affect the findings of the previous SA work.

This is a Non-Technical Summary (NTS) of the SA Report Addendum, which is an Addendum to the SA Report [Exam ref: LBHLP.8] published alongside the Proposed Submission Plan. The aim of the SA Report Addendum is essentially to present information on the proposed modifications, and alternatives where appropriate, with a view to informing the current consultation and subsequent plan finalisation.

Appraising the Main Modifications

The Council is proposing a number of Minor and Main Modifications to the submitted Local Plan as a result of the examination hearing sessions and representations received. It is necessary to screen the Main Modifications to determine if they significantly affect the findings of the Proposed Submission version of the SA Report [Exam ref: LBHLP.8] and if further appraisal work is therefore required. Minor Modifications mainly relate to minor edits to the Plan text and have therefore been screened out as not being significant in terms of the SA, i.e. they would be inherently unlikely to give rise to significant effects.

The screening of the proposed Main Modifications concluded that the majority do not significantly affect the findings of the Proposed Submission SA Report (2017) [Exam ref: LBHLP.8]. The changes seek to provide further clarity and do not fundamentally alter the direction of the policies.

The screening identified three Main Modifications (MM3, MM9 and MM12) as needing to be carried forward for further consideration through the SA process given substantive changes to Policies 1 (Romford Strategic Development Area), 6 (Specialist Accommodation) and 11 (Gypsy and Traveller accommodation).

The appraisal of these Main Modifications found that in most cases they are unlikely to have a significant effect alone or significantly affect the findings of the Proposed Submission SA Report (2017) in Chapter 8. The appraisal of MM12 (Policy 11) identified that in terms of the population and communities theme the modification alone has the potential for a significant long term positive effect by ensuring that the needs of the Gypsy and Traveller community are met during the life of the plan. While this modification will help to enhance the significant long term positive effect identified for the Submission Local Plan in Section 8.8 and Table 8.6 of the SA Report (2017), it will not significantly change it. The conclusions were informed by the findings of the appraisal of Gypsy and Traveller

sites presented in Appendix I. Similarly the appraisal of MM9 highlighted some significant positive effects with regard to the population and communities theme, relating to the provision of older people's housing. However, whilst the previously identified significant positive effect will be enhanced, it will not significantly change it.

Next Steps

Following the current consultation, the Inspector will consider all representations received, before deciding whether to report on the Plan's soundness (with modifications as necessary), or resume examination hearings.

Assuming that the Inspector is ultimately able to find the Plan 'sound', it will then be adopted by the Council. At the time of adoption an 'SA Statement' will be published that explains the process of plan-making/SA in full and presents 'measures decided concerning monitoring'.

1. Introduction

Background

- 1.1 The London Borough of Havering is currently preparing a new Local Plan (Havering Local Plan 2016-2031) to replace the existing planning policies in the Havering Local Development Framework. The new Local Plan, which will cover the period to 2031, will be the key planning policy document for the borough and will guide decisions on the use and development of land. Replacing the Havering Local Development Framework, the Local Plan together with the London Plan will comprise the Development Plan for the borough and will be the primary basis against which planning applications are assessed.
- 1.2 The Local Plan is at an advanced stage of preparation, having been formally published in August 2017 ahead of being submitted to the Planning Inspectorate for examination in March 2018; and then having been the focus of examination hearings in October 2018 and May 2019.
- 1.3 As a result of discussion at the hearing sessions and representations received during examination a number of changes are being proposed to the Local Plan. These changes are referred to as Main Modifications and need to be considered through the SA process to determine if they significantly affect the findings of the previous SA work.

Sustainability Appraisal

- 1.4 AECOM is commissioned to undertake an independent Sustainability Appraisal (SA) in support of the London Borough of Havering Local Plan. SA is a legally required process that aims to ensure that the significant effects of an emerging draft plan (and alternatives) are systematically considered and communicated. It is a requirement that SA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations (the 'SEA Regulations') 2004.

Purpose and structure of this SA Report Addendum

- 1.1 The aim of this SA Report Addendum is essentially to present information on the proposed Main Modifications, and alternatives where appropriate, with a view to informing the current consultation and subsequent plan finalisation.
- 1.2 This report is known as an SA Report 'Addendum' on the basis that it is an Addendum to the SA Report published in August 2017 [Exam ref: LBHLP.8]. This SA Report Addendum is structured as follows:
 - **Chapter 2** - presents the scope of the SA;
 - **Chapter 3** - explains the method and presents the findings of the screening of proposed modifications;
 - **Chapter 4** - explains the method and presents the findings of the appraisal for proposed modifications that were 'screened in'; and
 - **Chapter 5** - sets out the next steps in plan-making and the SA process as well as any changes to previously proposed monitoring measures.

2. What's the scope of the SA?

- 2.1 The scope of SA work, with respect to the Havering Local Plan 2016-2031, is introduced within the Proposed Submission version of the SA Report published in August 2017. Essentially, the scope is reflected in a list of sustainability objectives, which collectively provide a methodological 'framework' for appraisal. The SA objectives are listed below in **Table 2.1**. It has not been necessary to update the SA framework for the purposes of this appraisal.

Table 2.1: The SA framework

SA theme	SA objectives
Biodiversity	Maintain and enhance biodiversity and geodiversity.
Climate Change	Reduce contributions to climate change and enhance the capability of the borough to adapt to climate change while promoting systems efficiency (water, energy, recycling, sustainable drainage systems, green infrastructure) and local renewable energy production.
	Avoid, reduce and manage all forms of flood risk, and encourage the use of SuDS.
Land, Soil and Water Resources	Minimise the production of waste and maximise the reuse, recycling and landfill diversion of waste.
	Ensure appropriate levels of aggregate extraction, whilst minimising adverse environment impacts.
	Protect water resources, while contributing to the objectives of water management plans.
Environmental Quality	Manage air quality, noise, land, water and light pollution throughout the borough.
	Reduce the adverse effect of traffic on the environment.
	Support land remediation that can improve the ecology of the area and mitigate flood risk.
Historic Environment, Landscape and Townscape	Conserve and enhance the historic environment, heritage assets and their settings where appropriate.
	Conserve and enhance cultural assets.
	Create, protect and enhance places, spaces and buildings that are of high quality, well designed and respect the character of the local area.
Population and Community	Provide the opportunity for all residents to live in an affordable, decent home.
	Improve accessibility to essential services, facilities and the workplace.
	Reduce poverty, inequality and social exclusion.
	Reduce crime, the fear of crime and increase community safety.
	Foster community identity and participation.
Health and wellbeing	Improve the health and wellbeing of the population.
Transportation	Reduce the need to travel particularly via environmentally harmful means by ensuring facilities and services are in sustainable locations and supporting flexible working conditions.
Economic Vitality, Employment and Skills	Improve opportunities for economic growth.
	Facilitate indigenous, inward and regional investment.
	Offer all residents the opportunity for rewarding, well-located and satisfying employment.
	Improve life-long learning, skills and education.

3. Screening of the Main Modifications

Introduction

- 3.1 The Council is proposing a number Main Modifications to the submitted Local Plan as a result of the examination hearing sessions and representations received. It is necessary to screen the Main Modifications to determine if they significantly affect the findings of the Proposed Submission version of the SA Report [Exam ref: LBHLP.8] and if further appraisal work is therefore required.

Method

- 3.2 All of the proposed Main Modifications were screened to determine if further SA work was required or they could be screened out from appraisal. The findings of the screening including the rationale for why a Main Modification was screened in or out are provided in **Table 3.1**.

Screening findings

- 3.3 **Table 3.1** below summarises the Main Modifications undertaken since submission and indicates which ones have been screened in or out for the purposes of SA. It also presents an overview of the rationale for the decision taken.

Table 3.1 Screening the Main Modifications for the purposes of SA

Main Modification	Focus (changes in relation to...)	Screened in?	Rationale
MM1	Section 1 Overview: 1.1 What is the Local Plan New paragraph that sets out which documents will be superseded by a new Local Plan.	No	Modification provides additional context and does not significantly affect the findings of the previous SA work.
MM2	Section 3: Strategic Objectives New objective to support greater use of the River Thames for freight and passenger transport.	No	The modification recognises the potential of the River Thames for freight transport in line with the London Plan, Mayor of London's strategies and the Council's transport policies. As a result, it is not considered that it significantly affects the findings of the previous SA work.
MM3	Section 6: Strategic Development Areas: 6.1 Romford Strategic Development Area A number of changes made to Policy 1 and supporting text, including a change to the housing figures in line with Policy 3 and updated evidence.	Yes	Substantive updates to the policy which should be appraised.
MM5	Section 6: Strategic Development Areas: 6.2 Rainham and Beam Park Strategic Development Area. A number of changes are made to Policy 2, including an emphasis that mixed uses will be required in the Rainham Strategic Development Area and a recognition of the importance of heritage considerations in the area.	No	Modification provides additional clarification as well as strengthens the policy in relation to the historic environment. It does not significantly affect the findings of the previous SA work.

Main Modification	Focus (changes in relation to...)	Screened in?	Rationale
MM6	Section 7: Successful Places to live: 7.1 Housing Supply Changes to Policy 3 and supporting text to reflect updated evidence, explain the application of a 'stepped' approach and ensure consistency with national planning policy and the London Plan.	No	The housing numbers have been reconfigured to reflect evidence and provide further clarity; however, the overall level of growth and the spatial distribution have not changed during the plan period. As a result, it is considered that the modification does not significantly affect the findings of the previous SA work.
MM7	Section 7: Successful Places to live: 7.2 Affordable housing Changes to Policy 4 and the supporting text to clarify the threshold at which the policy will apply as well as the overall policy target and confirm that it accords with the London Plan.	No	Modification provides additional clarification and does not significantly affect the findings of the previous SA work.
MM8	Section 7: Successful places to live: 7.3 Housing Mix Changes to Policy 5 to increase flexibility and clarify the circumstances that will apply to the provision of specialist housing.	No	Minor change that does not significantly affect the findings of the previous SA work.
MM9	Section 7: Successful Places to live: 7.4 Specialist accommodation Changes to Policy 6 and its supporting text, including an update to the strategic older persons housing target from 185 units per year to 255 units per year.	Yes	Substantive updates to the policy which should be appraised.
MM10	Section 7: Successful Places to live: 7.5 Residential design and amenity Changes to Policy 7 and its supporting text to ensure consistency with the London Plan and recognise the importance of green infrastructure and the provision of dual aspect accommodation.	No	Modification strengthens the policy, recognising the importance of GI, which will have enhanced indirect positive effects for SA themes relating to biodiversity, climate change, environmental quality and health and wellbeing. However, it does not significantly affect the findings of the previous SA work.
MM11	Section 7: Successful Places to live: 7.8 Garden and Backland Development Changes to Policy 10 to ensure that the impacts of development on green infrastructure are taken into account and mitigated.	No	The modification strengthens the policy by only supporting development if there are no adverse impacts on GI and biodiversity. Does not significantly affect the findings of the previous SA work.
MM12	Section 7: Successful Places to live: 7.9 Gypsy and Traveller accommodation Changes to Policy 11 and its supporting text to reflect updated evidence and ensure consistency with national planning policy.	Yes	Substantive updates to the policy which should be appraised.
MM13	Section 8: Thriving communities: 8.1 Healthy Communities Changes to Policy 12 to recognise the harmful effect of overconcentration of uses with negative health impacts and clarify the requirements for major development proposals.	No	Modification provides additional clarification and does not significantly affect the findings of the previous SA work.

Main Modification	Focus (changes in relation to...)	Screened in?	Rationale
MM14	Section 8: Thriving communities: 8.2 Town Centre development Changes to the supporting text of Policy 13 to reflect updated evidence and provide additional clarification.	No	Modification reflects updated evidence and provides additional clarification, does not significantly affect the findings of the previous SA work.
MM15	Section 8: Thriving communities: 8.4 Culture and creativity Changes to Policy 15 to recognise that it is inappropriate and unrealistic to require all major mixed use schemes to include arts and cultural facilities or to seek to secure financial contributions from development (particularly where there is a Community Infrastructure Levy in place).	No	The policy still supports the protection and enhancement of creative arts, cultural and performance spaces, including creative work and related facilities. Modification does not significantly affect the findings of the previous SA work.
MM16	Section 8: Thriving communities: 8.6 Education Changes to Policy 17 and its supporting text to ensure flexibility to allow for site specific circumstances to be taken into account.	No	Minor change that does not significantly affect the findings of the previous SA work.
MM17	Section 9: Opportunities to prosper: 9.1 Business Growth Changes to Policy 19 and its supporting text to reflect evidence, clarify targets, recognise the importance of site characteristics and set out the Council's intention to work with the Port of London Authority to realise infrastructure improvement and greater use of the River Thames for freight.	No	The modification does not significantly affect the findings of the previous SA work.
MM18	Section 9: Opportunities to prosper: 9.2 Loss of Industrial land Changes to Policy 20 and its supporting text to set out that the Council will keep the provision of industrial sites under review, clarify the criterion against which the loss of non-designated land will be assessed and delete a criterion linked to the environmental impacts of such uses.	No	The modification does not significantly affect the findings of the previous SA work. The environmental impacts of development are dealt with through other Local Plan policies.
MM19	Section 9: Opportunities to prosper: 9.3 Affordable workspace Changes to Policy 21 and its supporting text, including to enable the Council to set out its commitment to supporting smaller business enterprises and to highlight the role of these in the wider Havering economy; set a realistic and reasonable level of floorspace to be provided as 'affordable' and set out the exceptional circumstances in which financial contributions will be accepted.	No	The modification does not significantly affect the findings of the previous SA work. The policy still supports the delivery of affordable workspaces.
MM20	Section 9: Opportunities to prosper: 9.4 Skills and training Changes to the supporting text of Policy 22 to clarify what is meant by local policy.	No	Minor change that does not significantly affect the findings of the previous SA work.
MM21	Section 10: 10.1 Transport Connections Additional criterion added to Policy 23 to set out the Council's intention to work with partners to explore the opportunities for greater use of the River Thames for freight and transport to reduce traffic congestion and to support local businesses.	No	The modification does not significantly affect the findings of the previous SA work.

Main Modification	Focus (changes in relation to...)	Screened in?	Rationale
MM22	Section 10: Connections: 10.2 Parking provision and design Changes to Policy 24 and its supporting text for consistency with the London Plan and to provide further clarity.	No	The policy continues to seek the suitable provision of parking spaces alongside development. The modification does not significantly affect the findings of the previous SA work.
MM23	Section 11: High Quality Places: 11.3 Heritage assets Changes to Policy 28 to ensure that it is in line with national planning policy.	No	Minor change that does not significantly affect the findings of the previous SA work.
MM24	Section 12: Green Places: 12.2 Nature conservation Changes to Policy 30 to ensure that it is consistent with national planning policy.	No	The modification provides greater clarity and helps to strengthen the policy. It does not significantly affect the findings of the previous SA work.
MM25	Section 12: Green Places: 12.3 Rivers and river corridors Changes to Policy 31 to clarify that the Council will require major developments in close proximity to a river to investigate and where feasible secure opportunities for the restoration and enhancement of these waterways.	No	Modification provides additional clarification and does not significantly affect the findings of the previous SA work.
MM26	Section 12: Green Places: 12.8 Low carbon design, decentralised energy and renewable energy Changes to Policy 36 to ensure consistency with national planning policy.	No	Modification does not significantly affect the findings of the previous SA work.
MM27	Section 13: Minerals: 13.1 Mineral extraction Changes to Policy 38 to ensure consistency with the London Plan and highlight opportunities to use the River Thames for the transport of minerals.	No	Modification does not significantly affect the findings of the previous SA work.
MM28	Section 14: Delivery and Implementation Section updated to reflect evidence and other proposed modifications.	No	Modification does not significantly affect the findings of the previous SA work.
MM29	Changes to the Glossary.	No	Modification does not significantly affect the findings of the previous SA work.
MM 30	Annexes: A8 Monitoring New table that clarifies the targets and indicators that will be used to monitor the adopted Local Plan.	No	Modification does not significantly affect the findings of the previous SA work.

3.4 The Main Modifications identified in the table above as being screened in are carried forward for further consideration through the SA process in the following Chapter.

4. Appraisal of the Main Modifications

Introduction

- 4.1 This Chapter presents an appraisal of the ‘screened in’ proposed modifications (see Table 3.1). Also, consideration is given to the effects of ‘the submitted plan plus proposed modifications’.

Methodology

- 4.2 The appraisal identifies and evaluates ‘likely significant effects’ of certain proposed modifications on the baseline, drawing on the sustainability topics/objectives identified through scoping (see Table 2.1) as a methodological framework. To reiterate, the SA themes are as follows:
- Biodiversity
 - Climate change
 - Land, soil and water resources
 - Environmental quality
 - Historic environment, landscape and townscape
 - Population and community
 - Health and wellbeing
 - Transportation
 - Economic vitality, employment and skills
- 4.3 The focus of the appraisal is on the proposed Main Modifications (given that it is the proposed modifications that are currently the focus of consultation); however, explicit consideration is also given to the effects of the Havering Local Plan as modified (i.e. the cumulative effects of the proposed modifications and the rest of the Local Plan as submitted).
- 4.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration, and understanding of the baseline. Given uncertainties there is inevitably a need to make assumptions, e.g. in relation to the nature of plan implementation and aspects of the baseline that might be impacted.
- 4.5 Assumptions are made cautiously, and explained within the text. The aim is to strike a balance between comprehensiveness and conciseness/accessibility to the non-specialist. In many instances, given reasonable assumptions, it is not possible to predict significant effects, but it is possible to comment on effects in more general terms.
- 4.6 It is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as appropriate. Cumulative effects are also considered, i.e. effects that become apparent once the effects of the Local Plan are considered in a wider context (i.e. recognising that it will not be implemented ‘in a vacuum’).

Appraisal of the Main Modifications

- 4.7 The following sections present an appraisal of the Main Modifications which have been screened in (Table 3.1) as requiring closer examination through the SA process.

Main Modification MM3

- 4.8 The modification increases the number of new homes (from over 5,300 to over 6,000) supported within the Romford Strategic Development Area under Policy 1 (Romford Strategic Development Area). A number of other minor changes are also proposed to Policy 1 and its supporting text. The appraisal of MM3 is presented below in **Table 5.1**.

Table 4.1: Appraisal of Main Modification MM3

SA theme	Is the modification alone likely to have a significant effect?	Does the modification affect the conclusion of the SA for the Proposed Submission Plan?
Biodiversity	The modification, in particular the delivery of an additional 700 new homes within the Romford SDA during the life of the plan will not have a significant effect alone on biodiversity, taking into account the distance from the location to designated nature conservation sites and pathways for impacts.	The overall level of growth and the spatial distribution across the borough has not changed during the plan period. As a result, this modification does not significantly affect the findings of the SA for biodiversity, set out in Section 8.3 or the conclusions presented in Table 8.1 of the Proposed Submission SA Report (2017).
Climate change	The modification, in particular the delivery of an additional 700 new homes within the Romford SDA, a Metropolitan Centre, during the life of the plan will not have a significant effect alone on climate change. The additional housing is however being directed to a location with good access to a wide range of services and amenities as well as public transport.	The overall level of growth and the spatial distribution across the borough has not changed during the plan period. As a result, this modification does not significantly affect the findings of the SA for the climate change SA theme, set out in Section 8.4 or the conclusions presented in Table 8.2 of the Proposed Submission SA Report (2017).
Land, soil and water resources	Development in the Romford SDA will primarily take place on brownfield land and through intensification as a result the modification. This will support the efficient use of land. However, given intensification of uses, an additional 700 new homes is not likely to have significant impacts alone on land and soil resources. Water resources is a strategic regional and national issue; therefore, additional homes within the Romford SDA will not have a significant effect alone.	The overall level of growth and the spatial distribution across the borough has not changed during the plan period. As a result, this modification does not significantly affect the findings of the SA for land, soil and water resources, set out in Section 8.5 or the conclusions presented in Table 8.3 of the Proposed Submission SA Report (2017).
Environmental quality	The modification, in particular the delivery of an additional 700 new homes within the Romford SDA, during the life of the plan will not have a significant effect alone on environmental quality. This is given it is being directed to a location with good access to a wide range of services and amenities as well as public transport networks. As such the modification will not significantly affect air quality.	The overall level of growth and the spatial distribution across the borough has not changed during the plan period. As a result, this modification does not significantly affect the findings of the SA for environmental quality, set out in Section 8.6 or the conclusions presented in Table 8.4 of the Proposed Submission SA Report (2017).
Historic environment, landscape and townscape	It is assumed that an additional 700 dwellings will not result in a significant increase in the height of buildings. This is given the 700 homes will be delivered on smaller sites through intensification. In the context of the delivery of over 5,300 homes an additional 700 will not have a significant effect alone on the historic environment or townscape in Romford town centre if the Local Plan policy provisions for historic environment are applied (including relating to the conservation area and other areas of sensitivity in the town centre).	The overall level of growth and the spatial distribution across the borough has not changed during the plan period. As a result, this modification does not significantly affect the findings of the SA for historic environment, landscape and townscape, set out in Section 8.7 or the conclusions presented in Table 8.5 of the Proposed Submission SA Report (2017).

SA theme	Is the modification alone likely to have a significant effect?	Does the modification affect the conclusion of the SA for the Proposed Submission Plan?
Population and community	The delivery of more homes in the Romford SDA will be positive in terms of the population and community theme through directing growth to an area with good access to a wide range of services and amenities as well as public transport. However, in the context of the delivery of over 5,300 homes an additional 700, this modification is unlikely to have a significant effect alone.	The overall level of growth and the spatial distribution across the borough has not changed during the plan period. As a result, this modification does not significantly affect the findings of the SA for population and community, set out in Section 8.8 or the conclusions presented in Table 8.5 of the Proposed Submission SA Report (2017).
Health and wellbeing	It is assumed that the delivery of an additional 700 homes will not result in the loss of any important green or open space within the Romford SDA. Directing more growth to an area with good access to a wide range of services and amenities as well as public transport will support residents' health and wellbeing. Overall, the modification will not have a significant effect alone.	The overall level of growth and the spatial distribution across the borough has not changed during the plan period. As a result, this modification does not significantly affect the findings of the SA for health and wellbeing, set out in Section 8.9 or the conclusions presented in Table 8.6 of the Proposed Submission SA Report (2017).
Transportation	The delivery of more homes in the Romford SDA will support accessibility to services, facilities and public transport links. Romford is designated as a Metropolitan Centre through the London Plan and has good access to a wide range of services and amenities in the with a PTAL rating of 6a/b. Overall though, the modification will not have a significant effect alone.	The overall level of growth and the spatial distribution across the borough has not changed during the plan period. As a result, this modification does not significantly affect the findings of the SA for transportation, set out in Section 8.10 or the conclusions presented in Table 8.7 of the Proposed Submission SA Report (2017).
Economic vitality, employment and skills	The modification, in particular the delivery of an additional 700 new homes within the Romford SDA, a Metropolitan Centre, during the life of the plan will not have a significant effect alone on this theme. There is though the potential for positive effects by directing additional growth to an area with good access to employment opportunities and for supporting the vitality of Romford. It is assumed that the additional growth will not result in the significant loss of any existing employment.	The overall level of growth and the spatial distribution across the borough has not changed during the plan period. As a result, this modification does not significantly affect the findings of the SA for economic vitality, employment and skills, set out in Section 8.6 or the conclusions presented in Table 8.4 of the Proposed Submission SA Report (2017).

- 4.9 In summary, Main Modification MM3 is not likely to have a significant effect alone nor does it significantly affect the findings or conclusions of the SA for the Proposed Submission Plan.

Main Modification MM9

4.10 The modification proposes changes to Policy 6 (Specialist Accommodation) and its supporting text to include references to key evidence and update the strategic older persons housing target from 185 to 255 units per year. The appraisal of MM9 is presented below in **Table 5.2**.

Table 4.2: Appraisal of Main Modification MM9

SA theme	Is the modification alone likely to have a significant effect?	Does the modification affect the conclusion of the SA for the Proposed Submission Plan?
Biodiversity	The modification does not change the level or distribution of growth in the borough during the plan period. As a result it is not likely to have a significant effect alone on biodiversity.	This modification does not significantly affect the findings of the SA for biodiversity, set out in Section 8.3 or the conclusions presented in Table 8.1 of the Proposed Submission SA Report (2017).
Climate change	The modification does not change the level or distribution of growth in the borough during the plan period. As a result it is not likely to have a significant effect alone on climate change.	This modification does not significantly affect the findings of the SA for climate change, set out in Section 8.4 or the conclusions presented in Table 8.2 of the Proposed Submission SA Report (2017).
Land, soil and water resources	The modification does not change the level or distribution of growth in the borough during the plan period. As a result it is not likely to have a significant effect alone on land, soil and water resources.	This modification does not significantly affect the findings of the SA for land, soil and water resources, set out in Section 8.5 or the conclusions presented in Table 8.3 of the Proposed Submission SA Report (2017).
Environmental quality	The modification does not change the level or distribution of growth in the borough during the plan period. As a result it is not likely to have a significant effect alone on environmental quality.	This modification does not significantly affect the findings of the SA for environmental quality, set out in Section 8.6 or the conclusions presented in Table 8.4 of the Proposed Submission SA Report (2017).
Historic environment, landscape and townscape	The modification does not change the level or distribution of growth in the borough during the plan period. As a result it is not likely to have a significant effect alone on the historic environment, landscape or townscape.	This modification does not significantly affect the findings of the SA for historic environment, landscape and townscape, set out in Section 8.7 or the conclusions presented in Table 8.5 of the Proposed Submission SA Report (2017).
Population and community	Delivering more homes for older people will have a long term positive effect in relation to the population and community theme. This is given the shortage of appropriate housing for older people in the borough, and the continuing demographic trend of an ageing population which is likely to take place over the plan period. Given the need for older people's housing in the borough, these effects have the potential to be significant.	This modification will increase the significance of positive effects presented under the findings of the SA for the population and community theme, including those set out in Section 8.8 and the conclusions presented in Table 8.5 of the Proposed Submission SA Report (2017).
Health and wellbeing	The modification has the potential to support the health and wellbeing of older people through delivering improved housing provision for this group.	This modification does not significantly affect the findings of the SA for health and wellbeing, set out in Section 8.9 or the conclusions presented in Table 8.6 of the Proposed Submission SA Report (2017).
Transportation	The modification does not change the level or distribution of growth in the borough during the plan period, as a result it is not likely to have a significant effect alone on transportation.	This modification does not significantly affect the findings of the SA for transportation, set out in Section 8.10 or the conclusions presented in Table 8.7 of the Proposed Submission SA Report (2017).
Economic vitality, employment and skills	The modification does not change the level or distribution of growth in the borough during the plan period, as a result it is not likely to have a significant effect alone on economic vitality, employment and skills.	This modification does not significantly affect the findings of the SA for economic vitality, employment and skills, set out in Section 8.6 or the conclusions presented in Table 8.4 of the Proposed Submission SA Report (2017).

- 4.11 In summary, Main Modification MM9 has the potential to increase the significance of positive effects in relation to the population and communities SA theme.

Main Modification MM12

- 4.12 The modification proposes a number of changes to Policy 11 (Gypsy and Traveller accommodation) to ensure consistency with national planning policy and updated evidence in terms of need and site capacity and deliverability. In particular it identifies site allocations to meet identified needs.
- 4.13 An appraisal of the Gypsy and Traveller and Travelling Showpeople sites was carried out and the findings of this work are presented in Appendix I. The work informed the appraisal of MM12 in **Table 5.3** below.

Table 4.3: Appraisal of Main Modification MM12

SA theme	Is the modification alone likely to have a significant effect?	Does the modification affect the conclusion of the SA for the Proposed Submission Plan?
Biodiversity	Taking the findings of the site options appraisal into account (see Appendix I), it is considered unlikely that this modification alone will have a significant effect on biodiversity SA theme. The Benskins Road sites and the Church Road sites are within SSSI Impact Risk Zones. In addition a number of the sites partially overlap with a SINC or BAP Priority Habitats. However, the sites proposed are existing Gypsy and Traveller sites. This will help limit potential effects in relation to biodiversity. In addition, the policy provisions of the Local Plan (including the Gypsy and Traveller and Travelling Showpeople policy) set out a range of provisions with regard to biodiversity and green infrastructure provision. As such, additional significant effects are not anticipated.	Taking the findings of the appraisal of site options into account (Appendix I), it is considered that this modification does not significantly affect the overall findings of the SA for biodiversity, set out in Section 8.3 or the conclusions presented in Table 8.1 of the Proposed Submission SA Report (2017).
Climate change	Taking the findings of the site options appraisal into account (see Appendix I), it is considered unlikely that this modification alone will have a significant effect on the climate change SA theme. Whilst one of the sites (The Caravan Park, Putwell Bridge) has some significant flood risk issues, the provisions of the Gypsy and Traveller and Travelling Showpeople policy and other Local Plan policies seek to ensure that an appropriate response is put in place in relation to the sequential and exception test.	Taking the findings of the appraisal of site options into account (Appendix I), it is considered that this modification does not significantly affect the overall findings of the SA for climate change, set out in Section 8.4 or the conclusions presented in Table 8.2 of the Proposed Submission SA Report (2017).
Land, soil and water resources	Taking the findings of the site options appraisal into account (see Appendix I), it is considered unlikely that this modification alone will have a significant effect in relation to the land, soil and water resources SA theme. This is given the sites proposed are existing Gypsy and Traveller and Travelling Showpeople sites.	Taking the findings of the appraisal of site options into account (Appendix I), it is considered that this modification does not significantly affect the overall findings of the SA for land, soil and water resources, set out in Section 8.5 or the conclusions presented in Table 8.3 of the Proposed Submission SA Report (2017).

SA theme	Is the modification alone likely to have a significant effect?	Does the modification affect the conclusion of the SA for the Proposed Submission Plan?
Environmental quality	Taking the findings of the site options appraisal into account (see Appendix I), it is considered unlikely that this modification alone will have a significant effect on the environmental quality SA theme. This is given the sites proposed are existing Gypsy and Traveller and Travelling Showpeople sites.	Taking the findings of the appraisal of site options into account (Appendix I), it is considered that this modification does not significantly affect the overall findings of the SA for environmental quality, set out in Section 8.6 or the conclusions presented in Table 8.4 of the Proposed Submission SA Report (2017).
Historic environment, landscape and townscape	Taking the findings of the site options appraisal into account (see Appendix I), it is considered unlikely that this modification alone will have a significant effect in relation to the historic environment, landscape and townscape SA theme. None of the sites are located within proximity (or likely to affect the setting of) a conservation area, listed building, scheduled monument or a registered park and garden.	Taking the findings of the appraisal of site options into account (Appendix I), it is considered that this modification does not significantly affect the overall findings of the SA for historic environment, landscape and townscape, set out in Section 8.7 or the conclusions presented in Table 8.5 of the Proposed Submission SA Report (2017).
Population and community	The modification will help to ensure that the needs of the Gypsy and Traveller and Travelling Showpeople community are met during the lifetime of the Local Plan, with a significant long term positive effect on this theme.	A significant positive long term effect was already identified for the Proposed Submission Plan in Section 8.8 and Table 8.6 in the SA Report (2017) under the population and communities theme. While this modification will help to enhance this effect it does not significantly change it.
Health and wellbeing	The modification will support the health and wellbeing of Gypsy and Travellers and Travelling Showpeople through seeking to promote healthy lifestyles for residents at the sites and supporting enhanced green infrastructure provision. It is considered unlikely that this modification alone will have a significant effect in relation to this SA theme.	Taking the findings of the appraisal of site options into account (Appendix I), it is considered that this modification does not significantly affect the findings of the SA for health and wellbeing, set out in Section 8.9 or the conclusions presented in Table 8.7 of the Proposed Submission SA Report (2017).
Transportation	Taking the findings of the site options appraisal into account (see Appendix I), it is considered unlikely that this modification alone will have a significant effect in relation to this theme. This is given the sites are existing Gypsy and Traveller and Travelling Showpeople sites.	Taking the findings of the appraisal of site options into account (Appendix I), it is considered that this modification does not significantly affect the findings of the SA for transportation, set out in Section 8.10 or the conclusions presented in Table 8.8 of the Proposed Submission SA Report (2017).
Economic vitality, employment and skills	Taking the findings of the site options appraisal into account (see Appendix I), it is considered unlikely that this modification alone will have a significant effect in relation to this theme. This is given the sites are existing Gypsy and Traveller and Travelling Showpeople sites.	Taking the findings of the appraisal of site options into account (Appendix I), it is considered that this modification does not significantly affect the findings of the SA for economic vitality, employment and skills, set out in Section 8.11 or the conclusions presented in Table 8.9 of the Proposed Submission SA Report (2017).

- 4.14 In summary, Main Modification MM12 is not likely to have a significant effect alone nor does it significantly affect the findings or conclusions of the SA for the Proposed Submission Plan against the majority of SA themes. The appraisal identified though that in terms of the population and communities theme the modification alone has the potential for a significant long term positive effect by ensuring that the needs of the Gypsy and Traveller and Travelling Showpeople communities are met during the life of the plan. While this modification will help to enhance the significant long term positive effect identified for the Submission Local Plan in Section 8.8 and Table 8.6 of the SA Report (2017), it will not significantly change it.

5. Next steps

Plan finalisation

- 5.1 Following the current consultation, the Inspector will consider all representations received, before deciding whether to report on the Plan's soundness (with modifications as necessary), or resume examination hearings.
- 5.2 Assuming that the Inspector is ultimately able to find the Plan 'sound', it will then be adopted by the Council. At the time of adoption an 'SA Statement' will be published that explains the process of plan-making/SA in full and presents 'measures decided concerning monitoring'.

Monitoring

- 5.3 The SA Report [Exam ref: LBHLP.8] published alongside the Proposed Submission document sets out a range of 'proposed monitoring measures' in Chapter 9. The work carried out in relation to the proposed modifications does not necessitate any significant amendments to the proposed measures at this stage. A final list of monitoring measures will be presented within the SA Adoption Statement produced once the Local Plan is adopted.

THIS PAGE IS INTENTIONALLY LEFT BLANK

Appendix I: Appraisal of Gypsy and Traveller sites

Introduction

This appendix presents an appraisal of the Gypsy and Traveller and Travelling Showpeople sites taken forward through the Main Modifications for the Havering Local Plan 2016-2031.

A separate appraisal of each of the Gypsy and Traveller and Travelling Showpeople sites has been undertaken through the SA process. Evaluating the constraints and opportunities on each site, the sites have been appraised through the SA against a set of consistent criteria which were developed specifically for the SA process. Based on these criteria, a 'red/amber/green' rating was then applied to each site for each criterion to provide an indication of site constraints and opportunities on each site.

Note: The following site appraisal presents the appraisal of the Gypsy and Traveller and Travelling Showpeople sites undertaken as part of the SA process. This appraisal is in addition to the separate assessment of the sites undertaken for the Local Plan.

Methodology used for the assessment and criteria used

The site appraisal has taken a two-step process, which 1) considers the constraints present at a site and 2) the potential opportunities present at each site.

Step 1: Evaluation of constraints

Step 1 considers the constraints present at a site. The following criteria were utilised for evaluating at this step, utilising a red / amber / green (RAG) approach to scorings.

Table: Criteria used at Step 1

Criteria	'RAG' rules	Commentary/Question
SSSI Impact Risk Zones	<p>R = Within an SSSI IRZ for all development</p> <p>A = Within an SSSI IRZ for the type and scale of development likely to be proposed</p> <p>G = Not within an SSSI IRZ</p>	<p>Impact Risk Zones (IRZs) are a GIS tool developed by Natural England to make a rapid initial assessment of the potential risks to SSSIs posed by development proposals. They define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. The IRZs also cover the interest features and sensitivities of European sites, which are underpinned by the SSSI designation and "Compensation Sites", which have been secured as compensation for impacts on Natura 2000/Ramsar sites.</p> <p>LPAs have a duty to consult Natural England before granting planning permission on any development that is in or likely to affect a SSSI. As such IRZs enable a consideration of whether a proposed development is likely to affect a SSSI and determine whether they will need to consult Natural England to seek advice on the nature of any potential SSSI impacts and how they might be avoided or mitigated.</p>
Proximity to a Local Nature Reserve	<p>R = Includes or is adjacent</p> <p>A = <50m</p> <p>G = >50m</p>	<p>There are a number of Local Nature Reserves situated within the borough. The RAG distances reflect this, along with the assumption that the sites are of less significance/ are less sensitive than nationally designated SSSIs.</p>

Criteria	'RAG' rules	Commentary/Question
Proximity to a Site of Interest for Nature Conservation	R = Includes or is adjacent A = <50m G = >50m	There are a number of SINCs situated within the borough. The RAG distances reflect this, along with the assumption that the sites are of less significance/ are less sensitive than nationally designated SSSIs.
Proximity to a BAP priority habitat	R = Includes or is adjacent A = <50m G = >50m	This seeks to flag if a development at a site could result in the loss of and therefore fragmentation of BAP priority habitats. It also helps to flag if there is the potential for disturbance to priority habitats within 50m of the site.
Green Belt	R = Fundamental or High A = High/Moderate G = Weak	The 'RAG' assessment reflects site scorings determined by the Green Belt Assessment undertaken separately from the SA process on behalf of Havering by LUC in 2018 ¹ . This evaluated how each site performs against the role and function of Green Belt as set out in National Policy.
Proximity to a Conservation Area	R = Intersects or is adjacent A = <50m G = >50m	<p>It is appropriate to 'flag' as red where a site is within, intersects with or is adjacent to a Conservation Area. It is also appropriate to flag sites that might more widely impact on the setting of a Conservation Area and a 50m threshold has been assumed. It is recognised that distance in isolation is not a definitive guide to the likelihood or significance of effects on a heritage asset. It is also recognised that the historic environment encompasses more than just designated heritage assets.</p> <p>Whilst there is good potential to highlight where development in proximity to a heritage asset might impact negatively on that asset, or its setting, a limitation relates to the fact that it is unlikely to be possible to gather views from heritage specialists on sensitivity of assets / capacity to develop each of the sites. This is a notable limitation as potential for development to conflict with the setting of historic assets / local historic character can only really be considered on a case-by-case basis rather than through a distance based criteria. It will also sometimes be the case that development can enhance heritage assets.</p>
Proximity to a Registered Park or Garden	R = Is adjacent A = <50m G = >50m	As above.
Proximity to a Scheduled Monument	R = Is adjacent A = <50m G = >50m	As above.
Proximity to a listed building	R = Intersects or is adjacent A = <50m G = >50m	As above.
Proximity to an area of archaeological importance	A = Intersects or is adjacent G = Does not intersect and is not adjacent	It is assumed that any development within an area of archaeological importance is more likely to contain archaeology. This does not mean that sites outside these areas cannot contain archaeology and this would be investigated further through any planning applications.

¹ LUC on behalf of London Borough of Havering (March 2018) Site Green Belt Assessment and Sustainability Assessment: Final Report

Criteria	'RAG' rules	Commentary/Question
Agricultural land quality	R = Grade 1 or 2 A = Grade 3 G = Grade 4/5 or urban	Recent land classification has not been undertaken in many parts of the borough. As such the pre-1988 classification is the only means of consistently comparing sites. This does not however provide a distinction between Grade 3a (i.e. land classified as the 'best and most versatile') and Grade 3b land (i.e. land which is not classified as such). As such Grade 3 land has been assigned an 'amber' score.
Fluvial flood risk	R = > 50% intersects with Flood risk zone 2 or 3 A = < 50% intersects with Flood risk zone 2 or 3 G = Flood risk zone 1	Flood Zone 1 - land assessed as having a less than 1 in 1,000 annual probability of river flooding (<0.1%) Flood Zone 2 - land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding (1% – 0.1%) in any year Flood Zone 3 - land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%) in any year
Surface water flood risk	A = Areas of high or medium surface water flood risk is present in the site G = No areas of surface water flood risk are present in the site	High - each year, the area has a chance of flooding of greater than 1 in 30 (3.3%) Medium - each year, the area has a chance of flooding of between 1 in 100 (1%) and 1 in 30 (3.3%) This criterion will help to identify sites that fall within surface water flood risk areas. N.B. While it is important to avoid development in flood zones, there is the potential to address flood risk at the development management stage, when a 'sequential approach' can be taken to ensure that uses are compatible with flood risk. There is also the potential to design-in Sustainable Drainage Systems (SuDS).
Critical Drainage Areas	A = Within a Critical Drainage Area G = Outside of a Critical Drainage Area	The Development Management Procedure Order (2015) requires that the Environment Agency is consulted on developments within areas with critical drainage problems. In this respect a Critical Drainage Area (CDA) is an area that has critical drainage problems and which has been notified to the local planning authority as such by the Environment Agency in line with the National Planning Policy Framework.
Groundwater flood risk	A = Areas determined by the SFRA as being at risk of groundwater flooding G = No areas of groundwater present in the site	The Strategic Flood Risk Assessment identifies the areas in the borough at risk of groundwater flooding.

Criteria	'RAG' rules	Commentary/Question
Groundwater Source Protection Zones (SPZs)	<p>R = Within a Zone 1 SPZ</p> <p>A = Within a Zone 2 or 3 SPZ</p> <p>G = Not within an SPZ</p>	<p>Groundwater Source Protection Zones are designated zones around public water supply abstractions and other sensitive receptors that signal there are particular risks to the groundwater source they protect.</p> <p>The zones are based on an estimation of the time it would take for a pollutant which enters the saturated zone of an aquifer to reach the source abstraction or discharge point. For each source, three zones are defined around a particular water abstraction based on travel times, of the groundwater (Zone 1 = 50 days; Zone 2 = 400 days) and the total catchment area of the abstraction (Zone 3).</p>
Open space	<p>R = Loss of public open space</p> <p>G = No loss of public open space</p>	The presumption is that a loss of open space will lead to a negative impact in relation to a range of SA themes. However it should be noted that some loss of open space may not necessarily be a negative effects if green infrastructure enhancements are initiated on-site or nearby.
Minerals	<p>R = Within a Minerals Safeguarding Area</p> <p>G = Not within a Minerals Safeguarding Area</p>	The identification of MSAs does not necessarily mean that these areas will be worked in the future. MSAs should be viewed as a sign-post to indicate the presence of mineral resources and as a trigger for such issues to be considered in the decision-making processes for land-use planning, including consultation where non-minerals development is proposed.
Employment site	<p>R = Loss of allocated employment site</p> <p>G = No loss of allocated employment site</p>	Considers the loss of an allocated employment area.
Noise and air pollution and safety	<p>A = Located within 200m of rail corridors or the M25, A12, A127 or A13</p> <p>G = Located over 200m of rail corridors or the M25, A12, A127 or A13</p>	Criterion considers the impact of noise and air pollution and safety issues from major transport routes in the borough.

Step 2: Evaluation of opportunities

Step 2 considers the positive elements of each site and potential opportunities. The following criteria were utilised for this step, again utilising a red / amber / green (RAG) approach to scorings.

Table: Criteria used at Step 2

Criteria	'RAG' rules	Commentary
Proximity to a Town or Local Centre	R = >800m A = 400-800m G = <400m	Highlights walking distance to town or local centres in the borough. There is no clear guidance on distance thresholds and it is recognised that service centres will often be reached by car or public transport. The thresholds reflect the spread of the data. This will also provide an indication of the site's accessibility to employment opportunities.
Proximity to a school	R = >800m A = 400-800m G = <400m	Highlights walking distance to a school. Department for Transport guidance ² suggests 800m as a walkable distance to community facilities.
Proximity to a doctor or health centre	R = >800m A = 400-800m G = <400m	Highlights walking distance to a Doctor or Health Centre. Department for Transport guidance ³ suggests 800m as a walkable distance to community facilities.
Proximity to a railway station	A = >800m G = <800m	Highlights walking distance to a railway station. Department for Transport guidance ⁴ does not suggest a walkable distance for a train station. An assumption of 1,000m is considered appropriate in the context of Havering.
Proximity to a bus stop	R = >400m G = <400m	Highlights walking distance to a bus stop. Department for Transport guidance ⁵ suggests 400m as a walkable distance to a bus stop.
Proximity to a public right of way (PRoW)	A = >50m G = <50m	Highlights the proximity of site options to PRoW. Where a PRoW falls within a site it is assumed that this can be retained or an alternative route provided to ensure that links are not severed. It is also assumed that the closer a development is to a PRoW the more likely there is for an opportunity to enhance.
Proximity to a cycle route	A = >50m G = <50m	Highlights the proximity of site options to a cycle route. Where a cycle route falls within a site it is assumed that this can be retained or an alternative route provided to ensure that links are not severed. It is also assumed that the closer a development is to a cycle route the more likely there is for an opportunity to enhance linkages.

² WebTag (December 2015) Unit A4.2 paragraph 6.4.5, Department for Transport

³ Ibid.

⁴ Ibid.

⁵ Ibid.

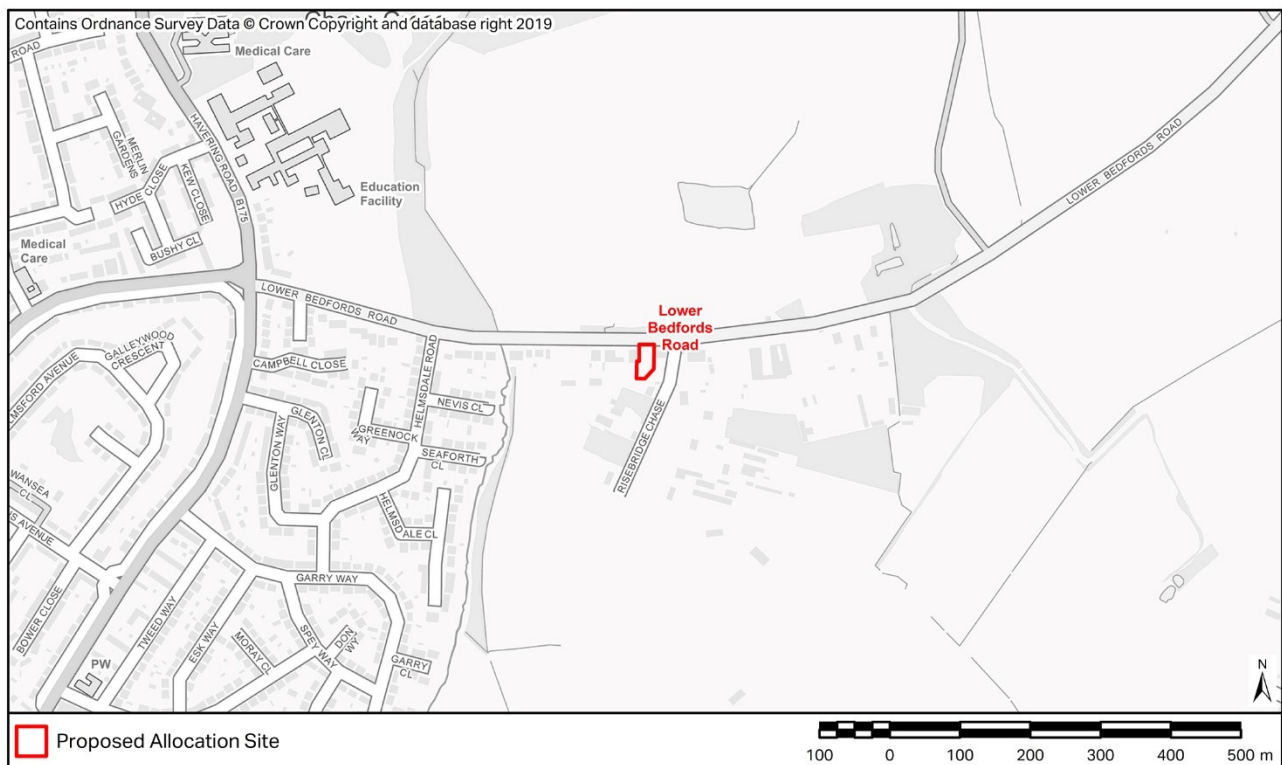
Appraisal of Gypsy and Traveller and Travelling Showpeople sites

The findings of the site appraisals have been presented below in a series of appraisal sheets. These set out the appraisal findings through a consistent approach which highlight the key constraints and opportunities associated with each group of sites.

Lower Bedfords Road

Site Area:

0.1 Ha

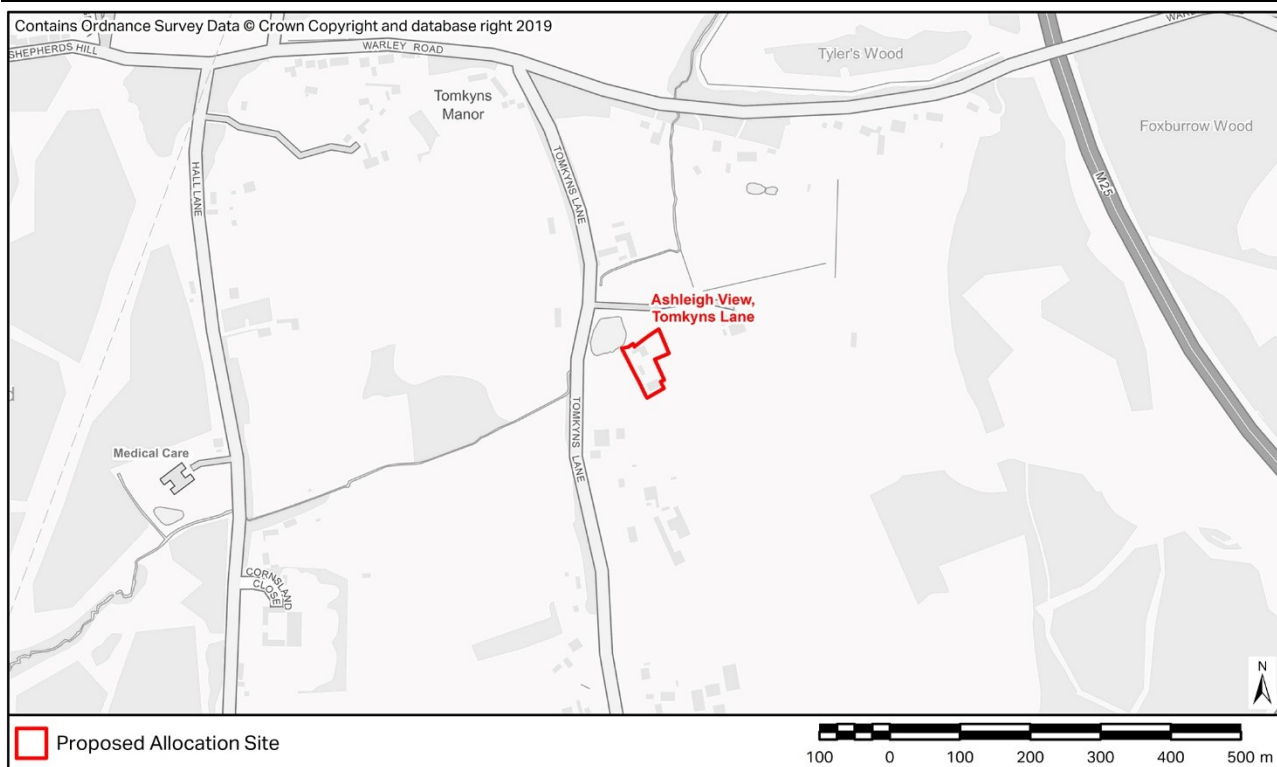


SSSI Impact Risk Zones	Not within a SSSI Impact Risk Zone
Local Wildlife Site	2961m (The Manor)
Site of Interest for Nature Conservation	15m (Bedfords Park)
BAP Priority Habitat	15m (Deciduous woodland)
Green Belt	Moderate
Conservation Area	884m (Gidea Park)
Registered Park or Garden	4957m (Weald Park)
Scheduled Monument	1610m (Section of Roman road on Gidea Park golf course)
Listed Building	1001m
Area of Archaeological Importance	672m (Bedford manor house)
Agricultural Land Classification	Grade 3
Fluvial Flood Risk	Flood Risk Zone 1
Surface Water Flood Risk	No areas of surface water flood risk are present in the site
Critical Drainage Areas	Outside of a Critical Drainage Area
Groundwater Flood Risk	Areas determined by the SFRA as being at risk of groundwater flooding
Groundwater Source Protection Zones	Not within a SPZ
Loss of Local Open Space	No loss of public open space
Minerals	Not within a Minerals Safeguarding Area
Employment Site	No loss of allocated employment sites
Noise and Air Pollution and Safety	Located over 200m of rail corridors or the M25, A12, A127 or A13
Proximity Town or Local Centre	600m - 700m
Proximity to Schools	1300m - 1400m (Rise Park Infants)
Proximity to Doctor or Health Centre	1700m - 1800m (Dr Joseph & Joseph)
Proximity to Railway Station	4km - 5km (Gidea Park, Harold Wood, Romford)
Proximity to Bus Stop	300m - 400m
Proximity to Public Right of Way	0m - 50m
Proximity to Regional Cycle Route	100m - 200m

Ashleigh View, Tomkyns Lane

Site Area:

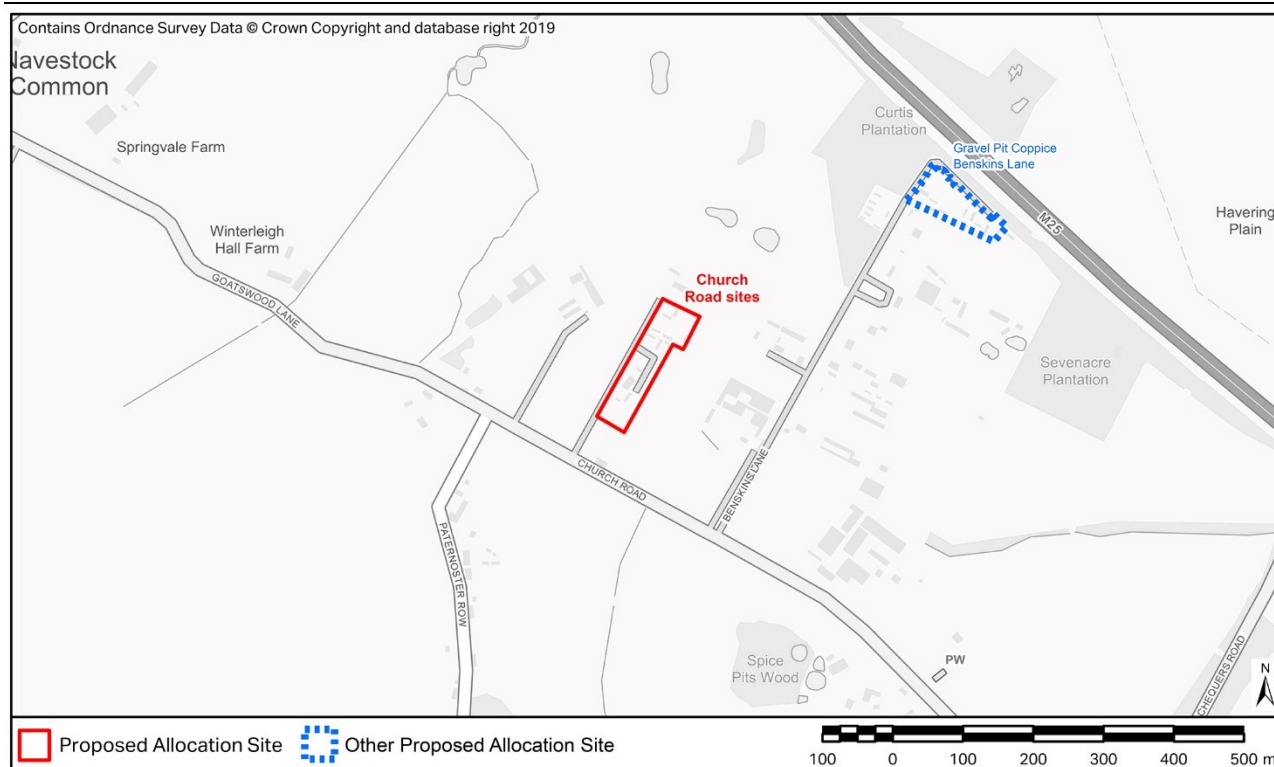
0.33 Ha



SSSI Impact Risk Zones	Not within a SSSI Impact Risk Zone
Local Wildlife Site	2453m (Cranham Brickfields)
Site of Interest for Nature Conservation	60m (Tylers Common)
BAP Priority Habitat	120m (Deciduous woodland)
Green Belt	Fundamental
Conservation Area	3169m (Cranham)
Registered Park or Garden	1646m (Warley Place)
Scheduled Monument	2142m (Medieval grange barn, 228m south-east of Upminster Court)
Listed Building	279m
Area of Archaeological Importance	318m (Great Tomkyns moated site)
Agricultural Land Classification	Grade 3
Fluvial Flood Risk	Flood Risk Zone 1
Surface Water Flood Risk	No areas of surface water flood risk are present in the site
Critical Drainage Areas	Outside of a Critical Drainage Area
Groundwater Flood Risk	Areas determined by the SFRA as being at risk of groundwater flooding
Groundwater Source Protection Zones	Not within a SPZ
Loss of Local Open Space	No loss of public open space
Minerals	Within a Minerals Safeguarding Area
Employment Site	No loss of allocated employment sites
Noise and Air Pollution and Safety	Located over 200m of rail corridors or the M25, A12, A127 or A13
Proximity Town or Local Centre	2km - 3km
Proximity to Schools	2km - 3km (Harold Court Primary)
Proximity to Doctor or Health Centre	2km - 3km (Dr Zachariah & Partners, Oak Road Medical Centre)
Proximity to Railway Station	2km - 3km (Harold Wood)
Proximity to Bus Stop	1100m - 1200m
Proximity to Public Right of Way	300m - 400m
Proximity to Regional Cycle Route	0m - 50m

Church Road sites

Site Area: 0.93 Ha

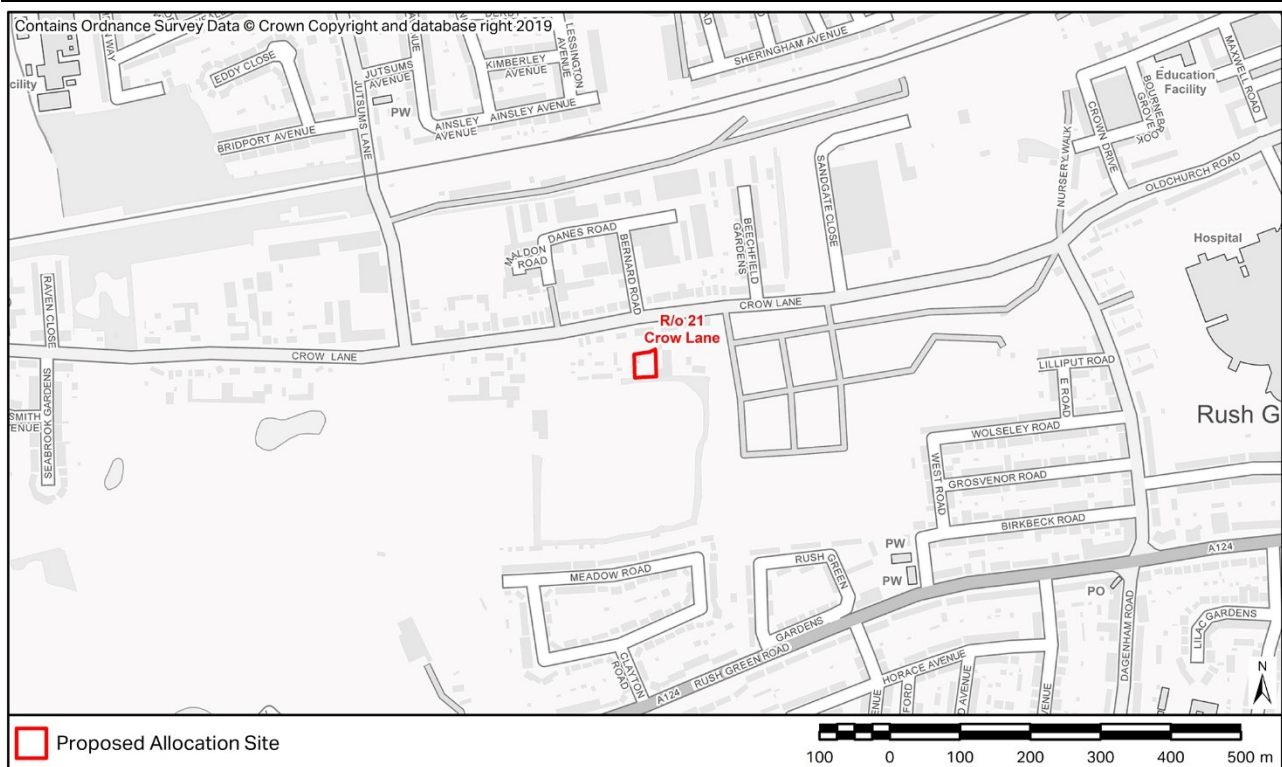


SSSI Impact Risk Zones	Within a SSSI Impact Risk Zone for the type and scale of development likely to be proposed
Local Wildlife Site	1565m (The Manor)
Site of Interest for Nature Conservation	283m (Curtis Plantation)
BAP Priority Habitat	281m (Deciduous woodland)
Green Belt	Fundamental
Conservation Area	2240m (Havering - Atte - Bower)
Registered Park or Garden	2444m (Weald Park)
Scheduled Monument	843m (Moated site at Watton Farm)
Listed Building	567m
Area of Archaeological Importance	40m (Paternoster Row)
Agricultural Land Classification	Grade 3
Fluvial Flood Risk	Flood Risk Zone 1
Surface Water Flood Risk	No areas of surface water flood risk are present in the site
Critical Drainage Areas	Outside of a Critical Drainage Area
Groundwater Flood Risk	No areas of groundwater present in the site
Groundwater Source Protection Zones	Not within a SPZ
Loss of Local Open Space	No loss of public open space
Minerals	Not within a Minerals Safeguarding Area
Employment Site	No loss of allocated employment sites
Noise and Air Pollution and Safety	Located over 200m of rail corridors or the M25, A12, A127 or A13
Proximity Town or Local Centre	2km - 3km
Proximity to Schools	2km - 3km (Brookside Infants, Drapers (within priority area), Draper's Pyrgo)
Proximity to Doctor or Health Centre	2km - 3km (The Robins Surgery)
Proximity to Railway Station	4km - 5km (Harold Wood)
Proximity to Bus Stop	1400m - 1500m
Proximity to Public Right of Way	100m - 200m
Proximity to Regional Cycle Route	300m - 400m

RO 21 Crow Lane

Site Area:

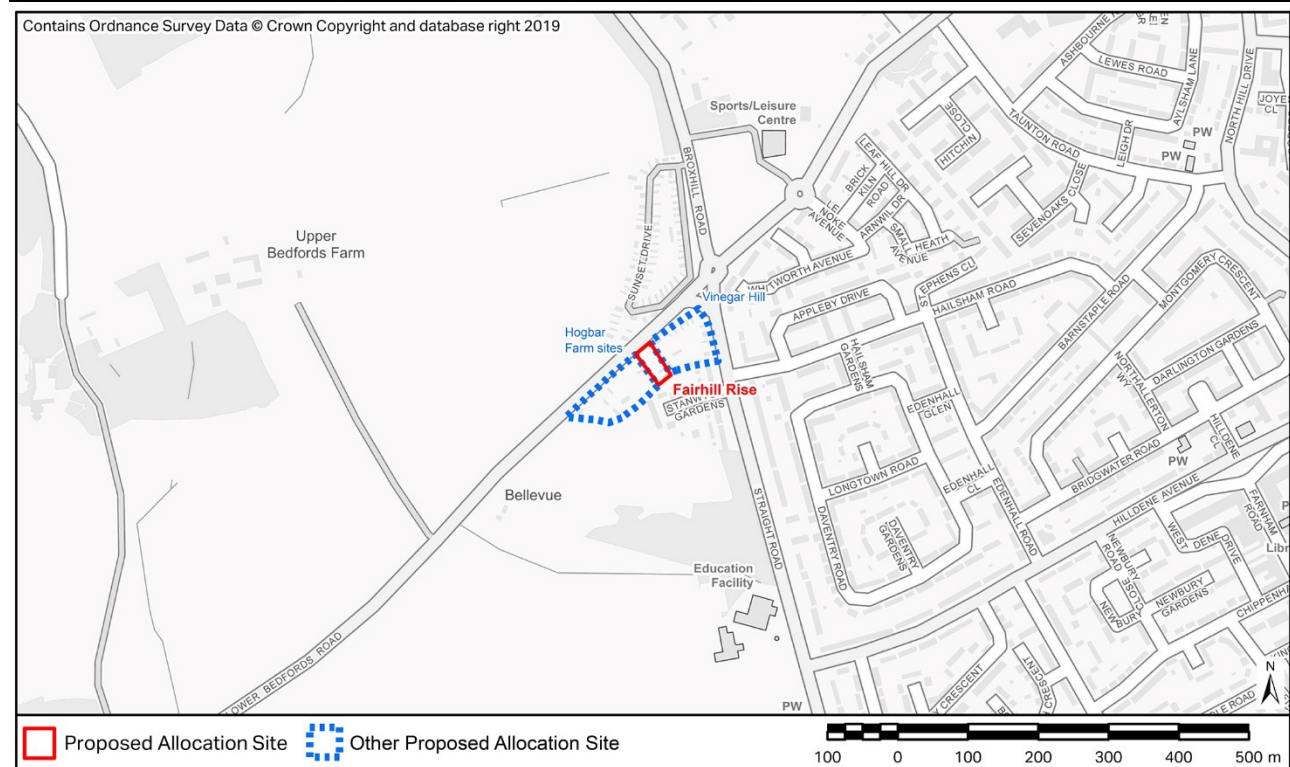
0.11 Ha



SSSI Impact Risk Zones	Not within a SSSI Impact Risk Zone
Local Wildlife Site	1018m (East Brookend Country Park)
Site of Interest for Nature Conservation	79m (Romford Cemetery)
BAP Priority Habitat	1247m (Deciduous woodland)
Green Belt	Low
Conservation Area	1266m (Romford)
Registered Park or Garden	6001m (Upminster Court)
Scheduled Monument	3141m (Section of Roman road on Gidea Park golf course)
Listed Building	735m
Area of Archaeological Importance	542m (Oldchurch settlement)
Agricultural Land Classification	Grade 4/5 or Urban
Fluvial Flood Risk	Flood Risk Zone 1
Surface Water Flood Risk	No areas of surface water flood risk are present in the site
Critical Drainage Areas	Outside of a Critical Drainage Area
Groundwater Flood Risk	Areas determined by the SFRA as being at risk of groundwater flooding
Groundwater Source Protection Zones	Not within a SPZ
Loss of Local Open Space	No loss of public open space
Minerals	Not within a Minerals Safeguarding Area
Employment Site	No loss of allocated employment sites
Noise and Air Pollution and Safety	Located over 200m of rail corridors or the M25, A12, A127 or A13
Proximity Town or Local Centre	800m - 900m
Proximity to Schools	1200m - 1300m (Crowlands Primary)
Proximity to Doctor or Health Centre	1000m - 1100m (Dr Kukathasan & Partner)
Proximity to Railway Station	1600m - 1700m (Romford)
Proximity to Bus Stop	100m - 200m
Proximity to Public Right of Way	100m - 200m
Proximity to Regional Cycle Route	0m - 50m

Fairhill Rise

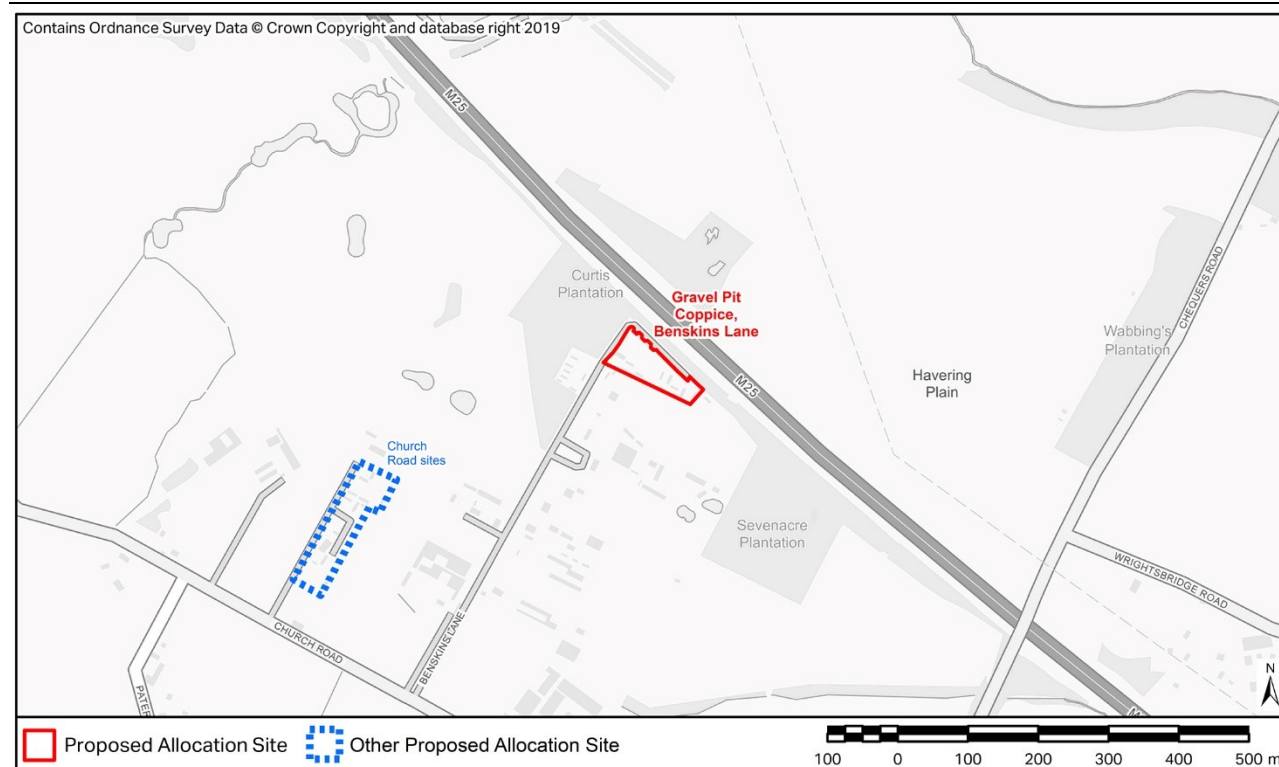
Site Area: 0.13 Ha



SSSI Impact Risk Zones	Not within a SSSI Impact Risk Zone
Local Wildlife Site	1626m (The Manor)
Site of Interest for Nature Conservation	71m (Bellvue)
BAP Priority Habitat	124m (Deciduous woodland)
Green Belt	Moderate
Conservation Area	1166m (Havering - Atte - Bower)
Registered Park or Garden	3588m (Weald Park)
Scheduled Monument	1946m (Section of Roman road on Gidea Park golf course)
Listed Building	283m
Area of Archaeological Importance	481m (Bedford manor house)
Agricultural Land Classification	Grade 3
Fluvial Flood Risk	Flood Risk Zone 1
Surface Water Flood Risk	No areas of surface water flood risk are present in the site
Critical Drainage Areas	Outside of a Critical Drainage Area
Groundwater Flood Risk	Areas determined by the SFRA as being at risk of groundwater flooding
Groundwater Source Protection Zones	Not within a SPZ
Loss of Local Open Space	No loss of public open space
Minerals	Not within a Minerals Safeguarding Area
Employment Site	No loss of allocated employment sites
Noise and Air Pollution and Safety	Located over 200m of rail corridors or the M25,A12, A127 or A13
Proximity Town or Local Centre	900m - 1000m
Proximity to Schools	800m - 900m (Hilldene Primary)
Proximity to Doctor or Health Centre	1300m - 1400m (Ingrebourn Medical Centre, Straight Road Doctor Surgery, The Surgery)
Proximity to Railway Station	3km - 4km (Gidea Park, Harold Wood)
Proximity to Bus Stop	0m - 50m
Proximity to Public Right of Way	300m - 400m
Proximity to Regional Cycle Route	50m - 100m

Gravel Pit Coppice, Benskins Lane

Site Area: 0.59 Ha

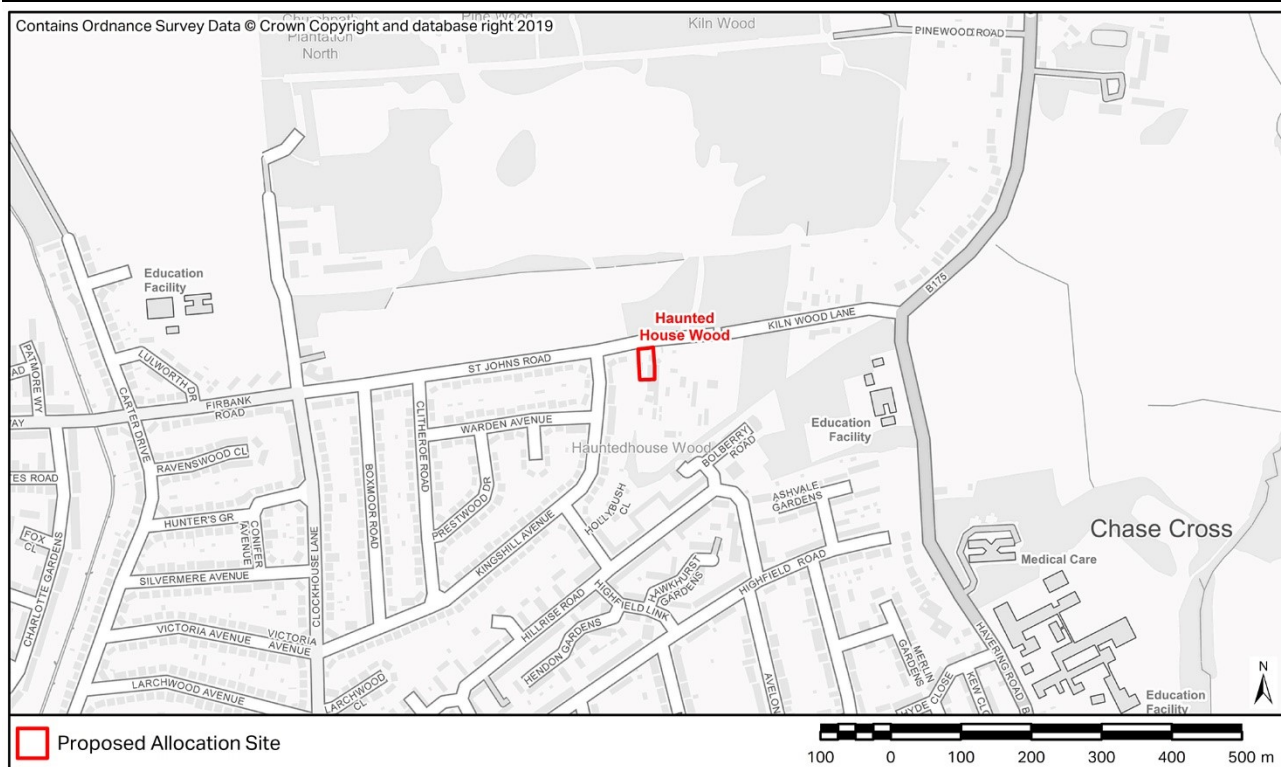


SSSI Impact Risk Zones	Within a SSSI Impact Risk Zone for the type and scale of development likely to be proposed
Local Wildlife Site	1408m (The Manor)
Site of Interest for Nature Conservation	0m (Curtis Plantation)
BAP Priority Habitat	0m (Deciduous woodland)
Green Belt	Fundamental
Conservation Area	2779m (Havering - Atte - Bower)
Registered Park or Garden	2020m (Weald Park)
Scheduled Monument	1005m (Moated site at Watton Farm)
Listed Building	623m
Area of Archaeological Importance	576m (Paternoster Row)
Agricultural Land Classification	Grade 3
Fluvial Flood Risk	Flood Risk Zone 1
Surface Water Flood Risk	No areas of surface water flood risk are present in the site
Critical Drainage Areas	Outside of a Critical Drainage Area
Groundwater Flood Risk	Areas determined by the SFRA as being at risk of groundwater flooding
Groundwater Source Protection Zones	Not within a SPZ
Loss of Local Open Space	No loss of public open space
Minerals	Not within a Minerals Safeguarding Area
Employment Site	No loss of allocated employment sites
Noise and Air Pollution and Safety	Located within 200m or rail corridors of the M25, A12, A127 or A13
Proximity Town or Local Centre	2km - 3km
Proximity to Schools	2km - 3km (Drapers (within priority area), Brookside Infants, Draper's Pyrgo)
Proximity to Doctor or Health Centre	3km - 4km (Dr Feldman & Partner, The Robins Surgery, Ingrebourne Medical Centre, Straight Road Doctor Surgery)
Proximity to Railway Station	4km - 5km (Harold Wood)
Proximity to Bus Stop	1600m - 1700m
Proximity to Public Right of Way	0m - 50m
Proximity to Regional Cycle Route	500m - 600m

Haunted House Wood

Site Area:

0.1 Ha

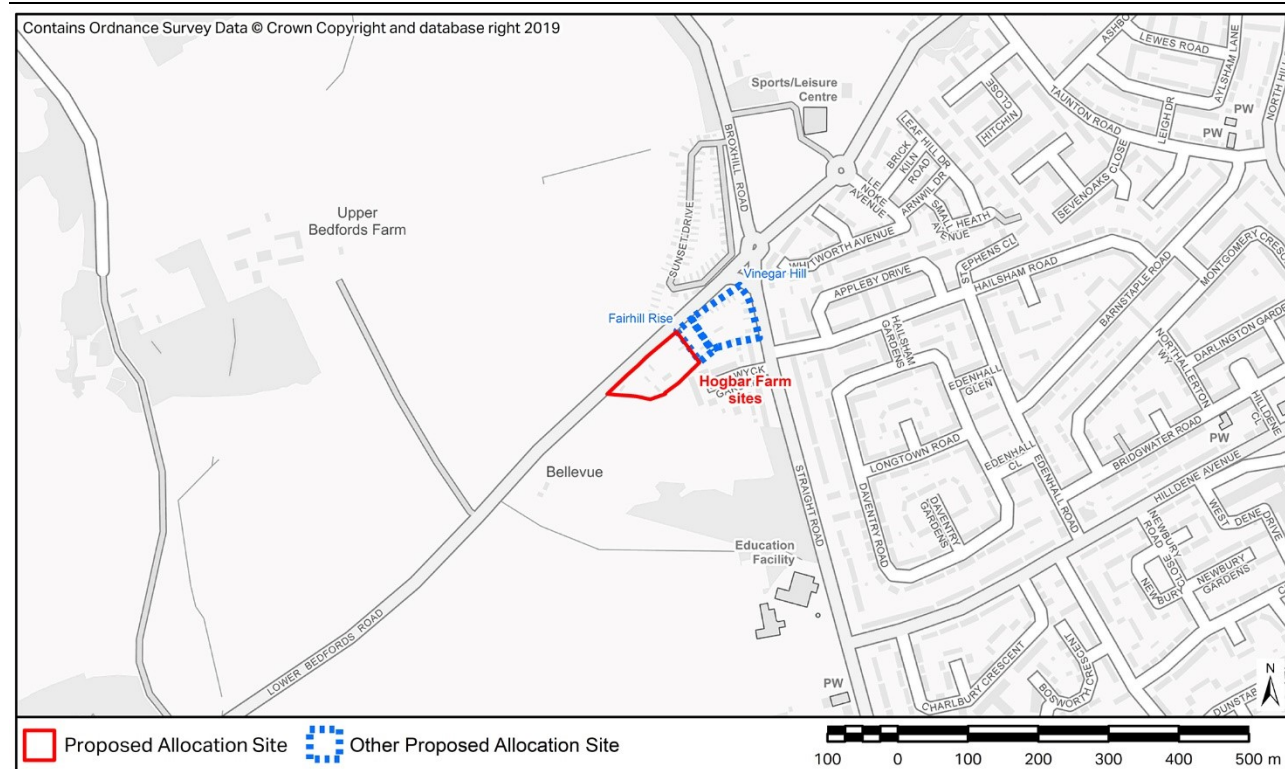


SSSI Impact Risk Zones	Not within a SSSI Impact Risk Zone
Local Wildlife Site	2862m (Hainault Lodge)
Site of Interest for Nature Conservation	0m (Immanuel School Wood)
BAP Priority Habitat	0m (Deciduous woodland)
Green Belt	Fundamental
Conservation Area	646m (Havering - Atte - Bower)
Registered Park or Garden	5877m (Weald Park)
Scheduled Monument	2816m (Section of Roman road on Gidea Park golf course)
Listed Building	734m
Area of Archaeological Importance	84m (Havering-atte-Bower)
Agricultural Land Classification	Grade 4/5 or Urban
Fluvial Flood Risk	Flood Risk Zone 1
Surface Water Flood Risk	No areas of surface water flood risk are present in the site
Critical Drainage Areas	Outside of a Critical Drainage Area
Groundwater Flood Risk	Areas determined by the SFRA as being at risk of groundwater flooding
Groundwater Source Protection Zones	Not within a SPZ
Loss of Local Open Space	No loss of public open space
Minerals	Not within a Minerals Safeguarding Area
Employment Site	No loss of allocated employment sites
Noise and Air Pollution and Safety	Located over 200m of rail corridors or the M25, A12, A127 or A13
Proximity Town or Local Centre	300m - 400m
Proximity to Schools	1100m - 1200m (Clockhouse Primary)
Proximity to Doctor or Health Centre	1200m - 1300m (Dr Palit & Partners)
Proximity to Railway Station	5km - 6km (Gidea Park, Romford)
Proximity to Bus Stop	400m - 500m
Proximity to Public Right of Way	300m - 400m
Proximity to Regional Cycle Route	0m - 50m

Hogbar Farm sites

Site Area:

0.59 Ha

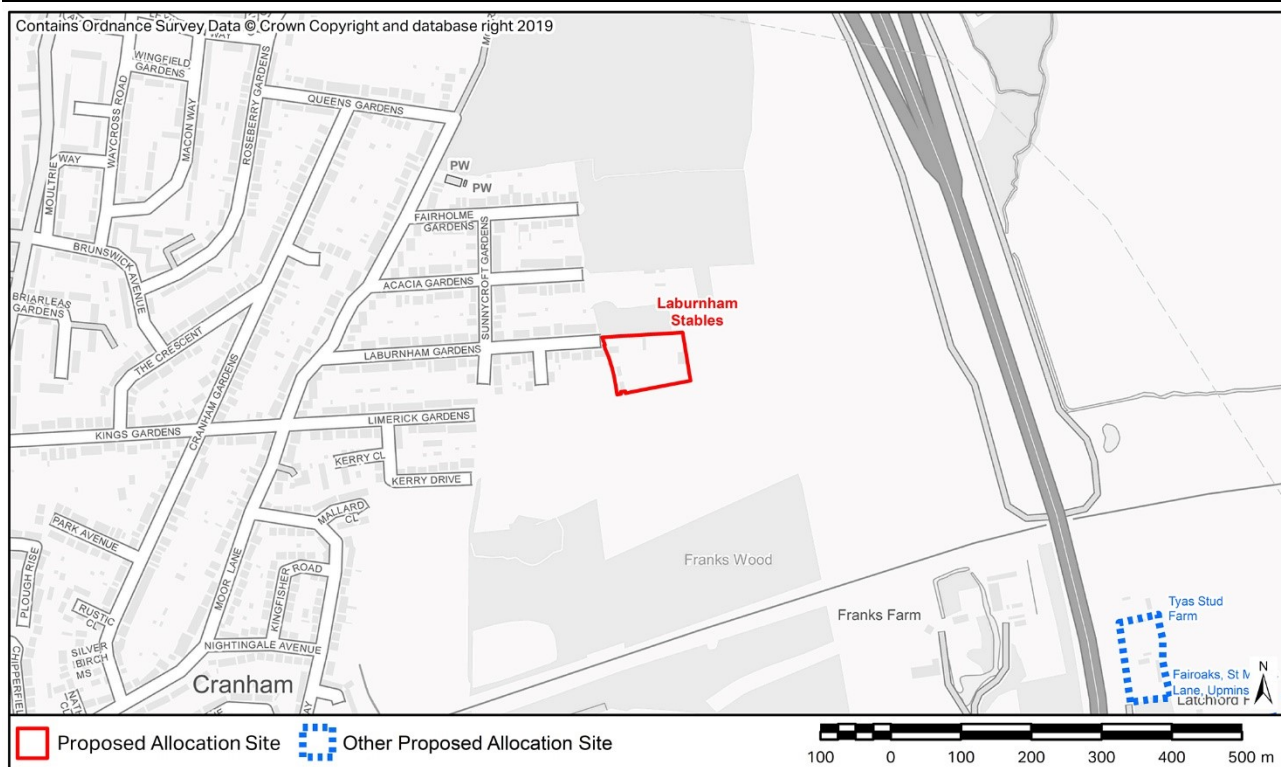


SSSI Impact Risk Zones	Not within a SSSI Impact Risk Zone
Local Wildlife Site	1646m (The Manor)
Site of Interest for Nature Conservation	0m (Bellvue)
BAP Priority Habitat	124m (Deciduous woodland)
Green Belt	Moderate
Conservation Area	1111m (Havering - Atte - Bower)
Registered Park or Garden	3610m (Weald Park)
Scheduled Monument	1892m (Section of Roman road on Gidea Park golf course)
Listed Building	159m
Area of Archaeological Importance	407m (Bedford manor house)
Agricultural Land Classification	Grade 3
Fluvial Flood Risk	Flood Risk Zone 1
Surface Water Flood Risk	No areas of surface water flood risk are present in the site
Critical Drainage Areas	Outside of a Critical Drainage Area
Groundwater Flood Risk	Areas determined by the SFRA as being at risk of groundwater flooding
Groundwater Source Protection Zones	Not within a SPZ
Loss of Local Open Space	No loss of public open space
Minerals	Not within a Minerals Safeguarding Area
Employment Site	No loss of allocated employment sites
Noise and Air Pollution and Safety	Located over 200m of rail corridors or the M25, A12, A127 or A13
Proximity Town or Local Centre	900m - 1000m
Proximity to Schools	800m - 900m (Hilldene Primary)
Proximity to Doctor or Health Centre	1300m - 1400m (Ingrebourne Medical Centre, Straight Road Doctor Surgery)
Proximity to Railway Station	3km - 4km (Gidea Park, Harold Wood)
Proximity to Bus Stop	50m - 100m
Proximity to Public Right of Way	300m - 400m
Proximity to Regional Cycle Route	100m - 200m

Laburnham Stables

Site Area:

0.83 Ha

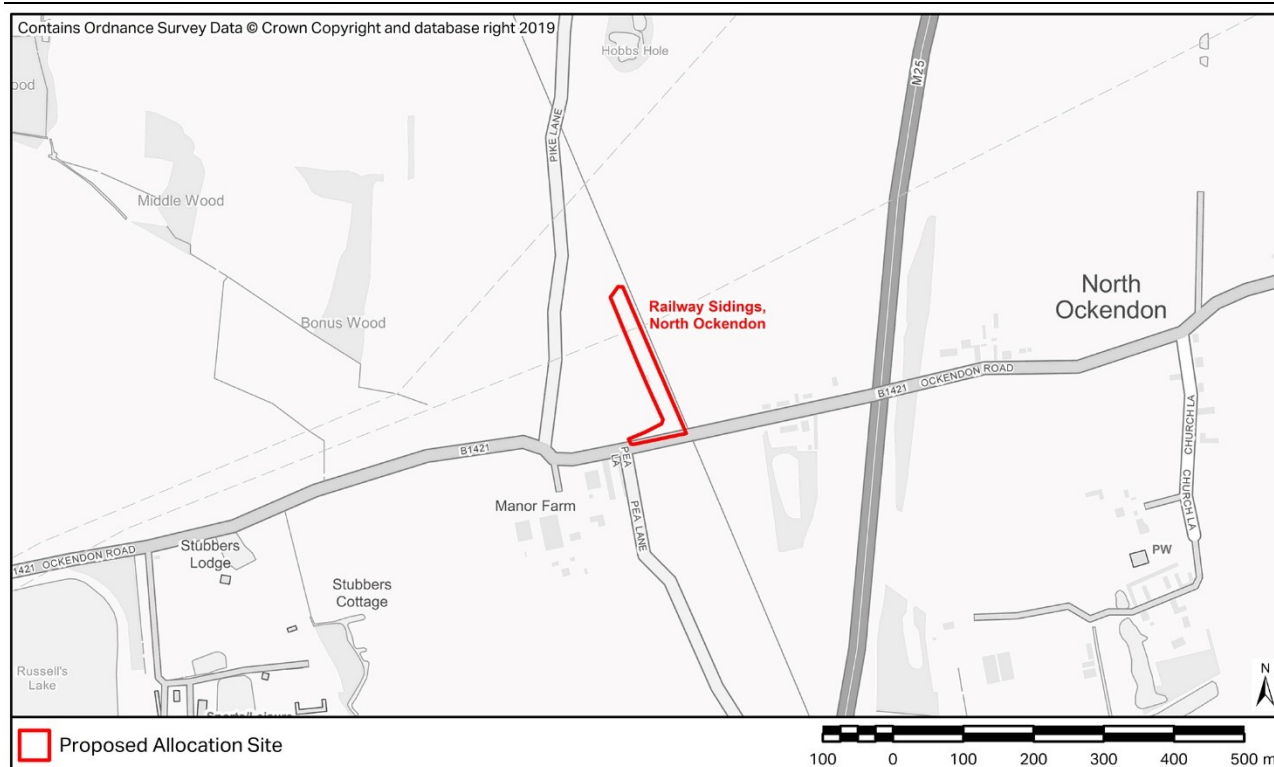


SSSI Impact Risk Zones	Not within a SSSI Impact Risk Zone
Local Wildlife Site	0m (Cranham Brickfields)
Site of Interest for Nature Conservation	0m (Franks Wood and Cranham Brickfields)
BAP Priority Habitat	0m (No main habitat but additional habitats present)
Green Belt	Fundamental
Conservation Area	973m (Cranham)
Registered Park or Garden	1657m (Upminster Court)
Scheduled Monument	1592m (Medieval grange barn, 228m south-east of Upminster Court)
Listed Building	516m
Area of Archaeological Importance	439m (Franks moated site)
Agricultural Land Classification	Grade 3
Fluvial Flood Risk	Flood Risk Zone 1
Surface Water Flood Risk	No areas of surface water flood risk are present in the site
Critical Drainage Areas	Outside of a Critical Drainage Area
Groundwater Flood Risk	Areas determined by the SFRA as being at risk of groundwater flooding
Groundwater Source Protection Zones	Not within a SPZ
Loss of Local Open Space	No loss of public open space
Minerals	Not within a Minerals Safeguarding Area
Employment Site	No loss of allocated employment sites
Noise and Air Pollution and Safety	Located over 200m of rail corridors or the M25, A12, A127 or A13
Proximity Town or Local Centre	900m - 1000m
Proximity to Schools	1300m - 1400m (Engayne Primary)
Proximity to Doctor or Health Centre	1000m - 1100m (The Surgery)
Proximity to Railway Station	2km - 3km (Upminster)
Proximity to Bus Stop	900m - 1000m
Proximity to Public Right of Way	100m - 200m
Proximity to Regional Cycle Route	100m - 200m

Railway Sidings, North Ockendon

Site Area:

0.6 Ha

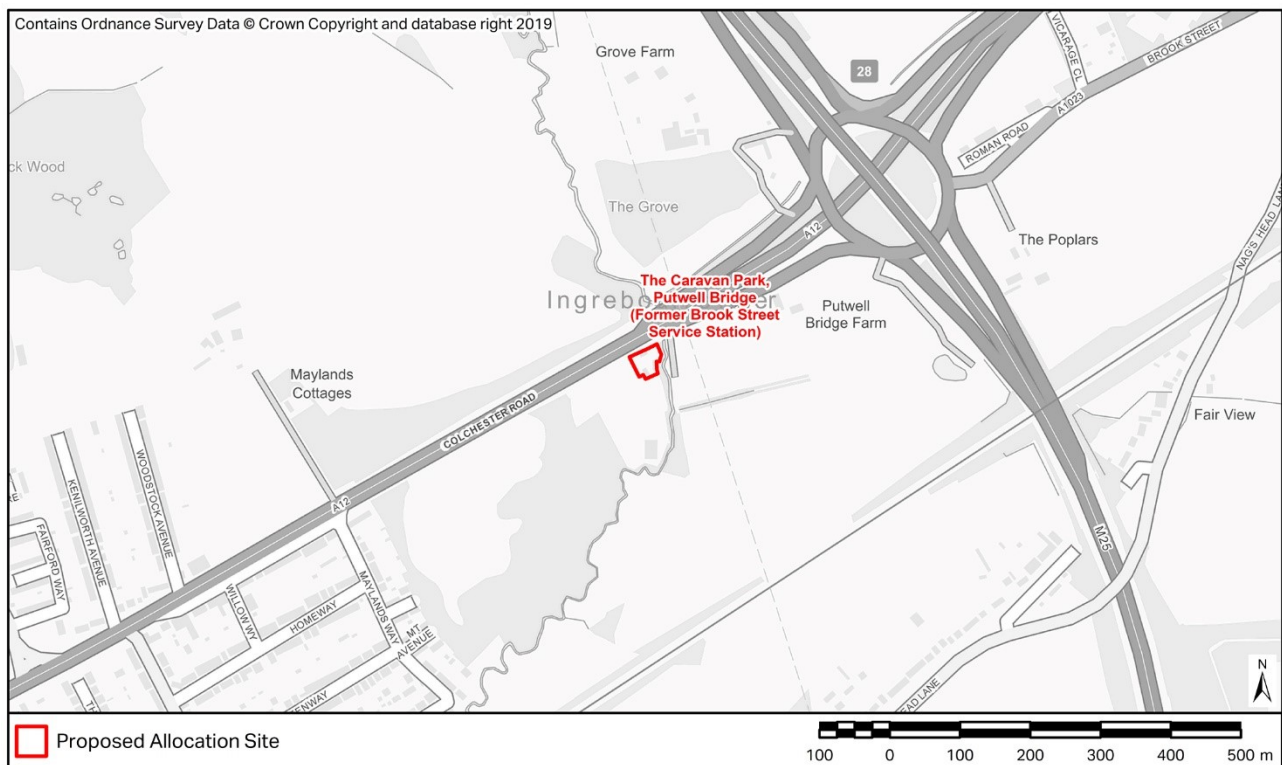


SSSI Impact Risk Zones	Not within a SSSI Impact Risk Zone
Local Wildlife Site	342m (Cranham Marsh)
Site of Interest for Nature Conservation	0m (Ockendon Railsides)
BAP Priority Habitat	108m (Traditional orchard)
Green Belt	Fundamental
Conservation Area	266m (Cranham)
Registered Park or Garden	2959m (Belhus Park)
Scheduled Monument	2752m (Roman barrow 260m north east of South Ockendon Hall)
Listed Building	547m
Area of Archaeological Importance	585m (North Ockendon Hall moated site)
Agricultural Land Classification	Grade 1 or 2
Fluvial Flood Risk	Flood Risk Zone 1
Surface Water Flood Risk	Areas of high or medium surface water flood risk is present in the site
Critical Drainage Areas	Outside of a Critical Drainage Area
Groundwater Flood Risk	Areas determined by the SFRA as being at risk of groundwater flooding
Groundwater Source Protection Zones	Not within a SPZ
Loss of Local Open Space	No loss of public open space
Minerals	Within a Minerals Safeguarding Area
Employment Site	No loss of allocated employment sites
Noise and Air Pollution and Safety	Located over 200m of rail corridors or the M25, A12, A127 or A13
Proximity Town or Local Centre	1900m - 2000m
Proximity to Schools	3km - 4km (Hall Mead, Upminster Infants)
Proximity to Doctor or Health Centre	2km - 3km (Haiderian Medical Centre, Little Gaynes Surgery)
Proximity to Railway Station	3km - 4km (Ockendon)
Proximity to Bus Stop	0m - 50m
Proximity to Public Right of Way	100m - 200m
Proximity to Regional Cycle Route	0m - 50m

The Caravan Park, Putwell Bridge (Former Brook Street Service Station)

Site Area:

0.13 Ha

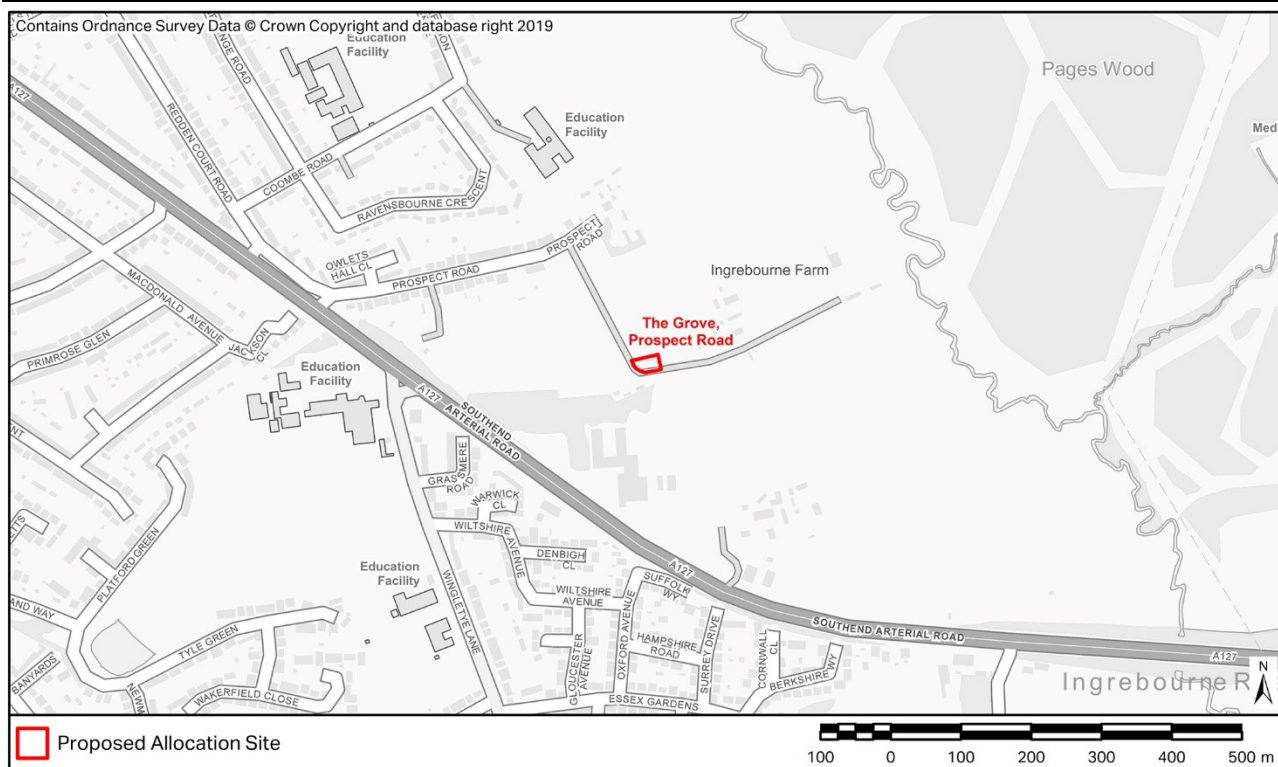


SSSI Impact Risk Zones	Not within a SSSI Impact Risk Zone
Local Wildlife Site	694m (The Manor)
Site of Interest for Nature Conservation	0m (Ingrebourne Valley)
BAP Priority Habitat	59m (Deciduous woodland)
Green Belt	Fundamental
Conservation Area	4335m (Gidea Park)
Registered Park or Garden	1057m (Weald Park)
Scheduled Monument	1475m (Dagnam Park Farm moated site, Noak Hill, Romford)
Listed Building	1068m
Area of Archaeological Importance	0m (London to Colchester road)
Agricultural Land Classification	Grade 3
Fluvial Flood Risk	>50% Intersects with Flood Risk Zone 2 and 3
Surface Water Flood Risk	Areas of high or medium surface water flood risk is present in the site
Critical Drainage Areas	Outside of a Critical Drainage Area
Groundwater Flood Risk	Areas determined by the SFRA as being at risk of groundwater flooding
Groundwater Source Protection Zones	Not within a SPZ
Loss of Local Open Space	No loss of public open space
Minerals	Not within a Minerals Safeguarding Area
Employment Site	No loss of allocated employment sites
Noise and Air Pollution and Safety	Located within 200m or rail corridors of the M25, A12, A127 or A13
Proximity Town or Local Centre	600m - 700m
Proximity to Schools	1600m - 1700m (Harold Court Primary)
Proximity to Doctor or Health Centre	2km - 3km (Dr Feldman & Partner, Dr Zachariah & Partners)
Proximity to Railway Station	2km - 3km (Harold Wood)
Proximity to Bus Stop	300m - 400m
Proximity to Public Right of Way	1000m - 1100m
Proximity to Regional Cycle Route	0m - 50m

The Grove, Prospect Road

Site Area:

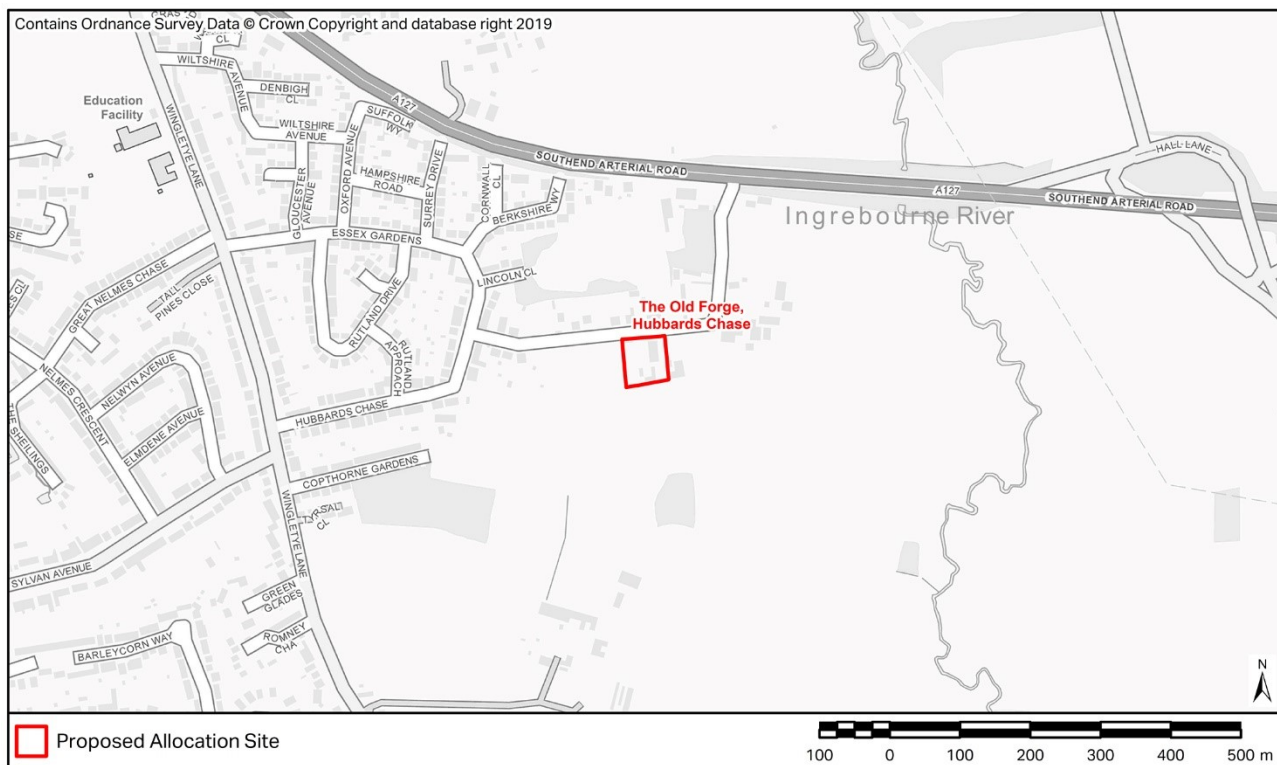
0.07 Ha



SSSI Impact Risk Zones	Not within a SSSI Impact Risk Zone
Local Wildlife Site	2836m (The Manor)
Site of Interest for Nature Conservation	0m (Foxlands Farm)
BAP Priority Habitat	113m (Deciduous woodland)
Green Belt	Fundamental
Conservation Area	2089m (Gidea Park)
Registered Park or Garden	1748m (Upminster Court)
Scheduled Monument	2155m (Medieval grange barn, 228m south-east of Upminster Court)
Listed Building	961m
Area of Archaeological Importance	867m (Nelmes moated manor)
Agricultural Land Classification	Grade 3
Fluvial Flood Risk	Flood Risk Zone 1
Surface Water Flood Risk	No areas of surface water flood risk are present in the site
Critical Drainage Areas	Outside of a Critical Drainage Area
Groundwater Flood Risk	Areas determined by the SFRA as being at risk of groundwater flooding
Groundwater Source Protection Zones	Not within a SPZ
Loss of Local Open Space	No loss of public open space
Minerals	Within a Minerals Safeguarding Area
Employment Site	No loss of allocated employment sites
Noise and Air Pollution and Safety	Located over 200m of rail corridors or the M25, A12, A127 or A13
Proximity Town or Local Centre	1600m - 1700m
Proximity to Schools	1600m - 1700m (Ardleigh Green Infants)
Proximity to Doctor or Health Centre	1800m - 1900m (Ardleigh Green Surgery)
Proximity to Railway Station	2km - 3km (Harold Wood)
Proximity to Bus Stop	1200m - 1300m
Proximity to Public Right of Way	700m - 800m
Proximity to Regional Cycle Route	500m - 600m

The Old Forge, Hubbards Chase

Site Area: 0.4 Ha

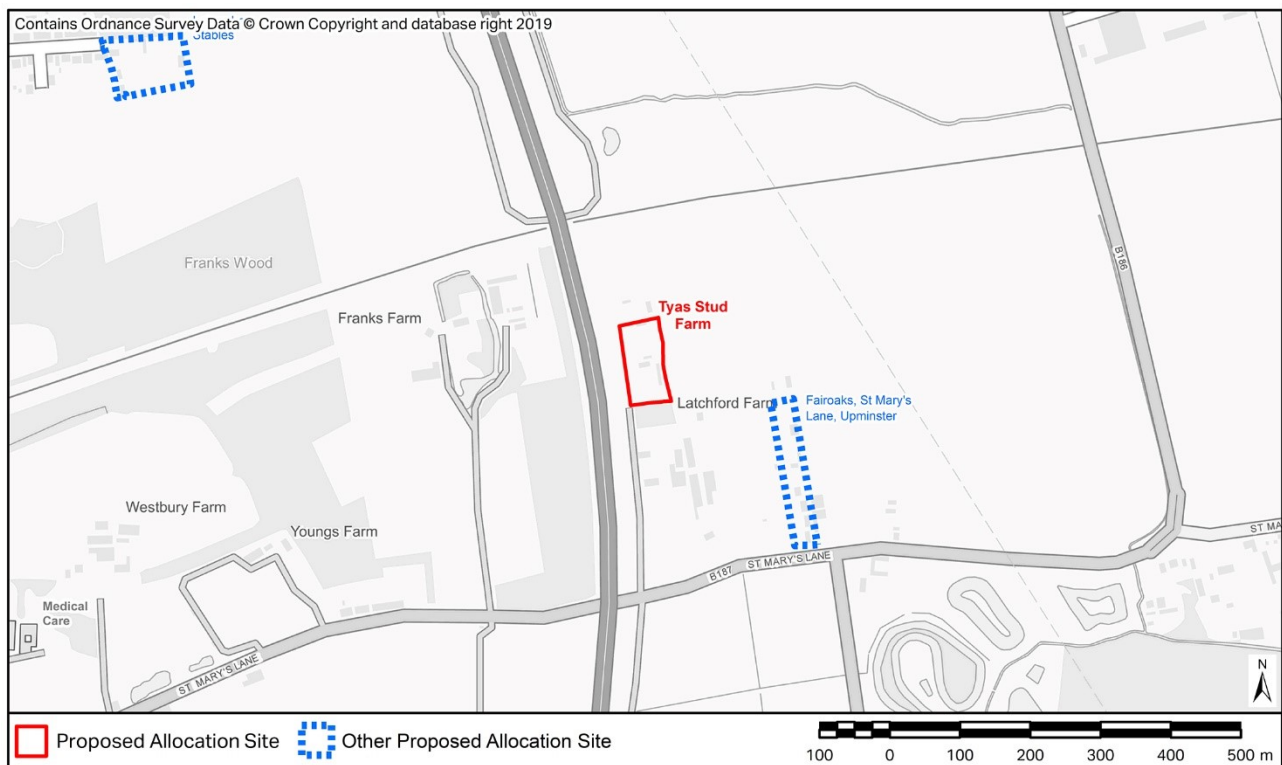


SSSI Impact Risk Zones	Not within a SSSI Impact Risk Zone
Local Wildlife Site	2599m (Cranham Brickfields)
Site of Interest for Nature Conservation	66m (Little Chef Pasture)
BAP Priority Habitat	237m (Deciduous woodland)
Green Belt	Fundamental
Conservation Area	1939m (St Andrews Church)
Registered Park or Garden	967m (Upminster Court)
Scheduled Monument	1374m (Medieval grange barn, 228m south-east of Upminster Court)
Listed Building	408m
Area of Archaeological Importance	336m (Lilliputs moated site)
Agricultural Land Classification	Grade 4/5 or Urban
Fluvial Flood Risk	Flood Risk Zone 1
Surface Water Flood Risk	No areas of surface water flood risk are present in the site
Critical Drainage Areas	Outside of a Critical Drainage Area
Groundwater Flood Risk	Areas determined by the SFRA as being at risk of groundwater flooding
Groundwater Source Protection Zones	Not within a SPZ
Loss of Local Open Space	No loss of public open space
Minerals	Within a Minerals Safeguarding Area
Employment Site	No loss of allocated employment sites
Noise and Air Pollution and Safety	Located over 200m of rail corridors or the M25, A12, A127 or A13
Proximity Town or Local Centre	400m - 500m
Proximity to Schools	800m - 900m (Nelmes Primary)
Proximity to Doctor or Health Centre	2km - 3km (Ardleigh Green Surgery)
Proximity to Railway Station	2km - 3km (Emerson Park)
Proximity to Bus Stop	200m - 300m
Proximity to Public Right of Way	0m - 50m
Proximity to Regional Cycle Route	0m - 50m

Tyas Stud Farm

Site Area:

0.65 Ha

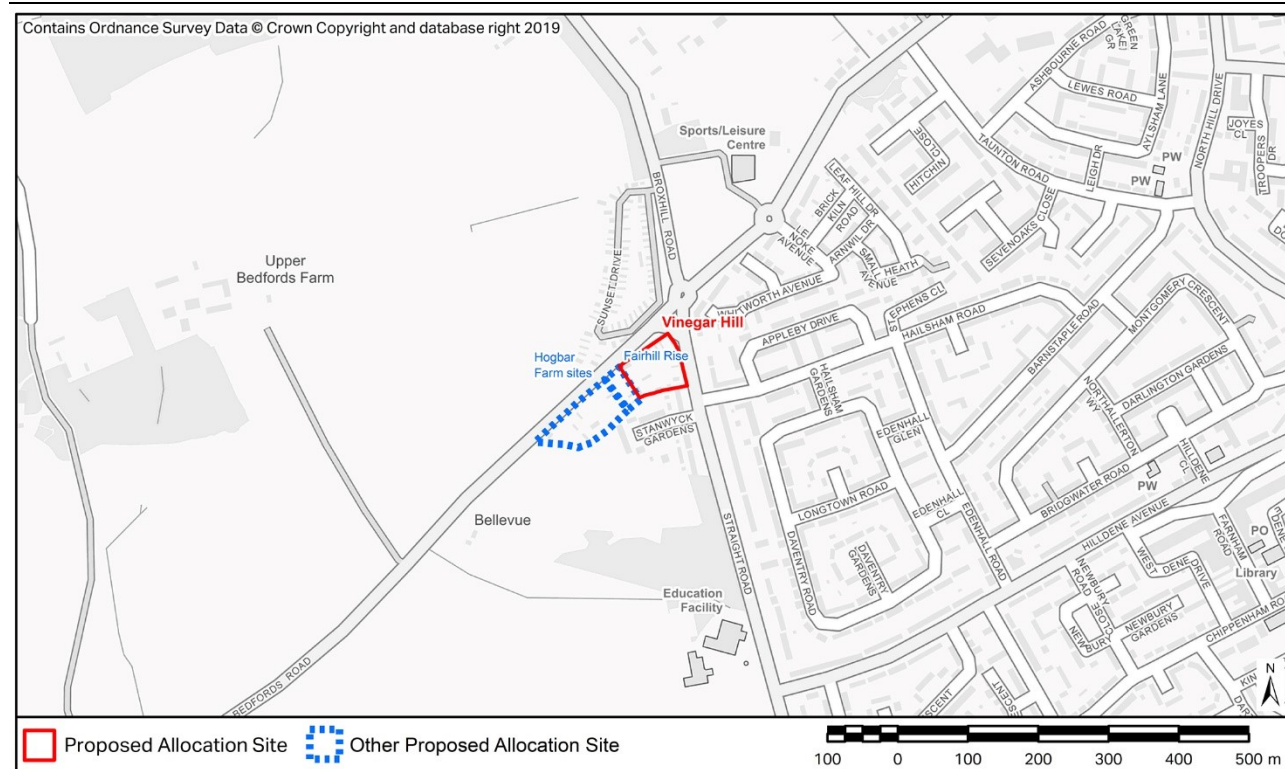


SSSI Impact Risk Zones	Not within a SSSI Impact Risk Zone
Local Wildlife Site	705m (Cranham Brickfields)
Site of Interest for Nature Conservation	329m (Puddle Dock Angling Centre)
BAP Priority Habitat	0m (Deciduous woodland)
Green Belt	High
Conservation Area	1085m (Cranham)
Registered Park or Garden	2445m (Upminster Court)
Scheduled Monument	2352m (Medieval grange barn, 228m south-east of Upminster Court)
Listed Building	221m
Area of Archaeological Importance	104m (Franks moated site)
Agricultural Land Classification	Grade 3
Fluvial Flood Risk	Flood Risk Zone 1
Surface Water Flood Risk	Areas of high or medium surface water flood risk is present in the site
Critical Drainage Areas	Outside of a Critical Drainage Area
Groundwater Flood Risk	Areas determined by the SFRA as being at risk of groundwater flooding
Groundwater Source Protection Zones	Not within a SPZ
Loss of Local Open Space	No loss of public open space
Minerals	Not within a Minerals Safeguarding Area
Employment Site	No loss of allocated employment sites
Noise and Air Pollution and Safety	Located within 200m or rail corridors of the M25, A12, A127 or A13
Proximity Town or Local Centre	1300m - 1400m
Proximity to Schools	3km - 4km (Upminster Infants, Engayne Primary, Hall Mead)
Proximity to Doctor or Health Centre	2km - 3km (The Surgery, Dr Dahs & Partner, Drs Baig, Baig & Baig)
Proximity to Railway Station	3km - 4km (Upminster)
Proximity to Bus Stop	400m - 500m
Proximity to Public Right of Way	500m - 600m
Proximity to Regional Cycle Route	200m - 300m

Vinegar Hill

Site Area:

0.51 Ha

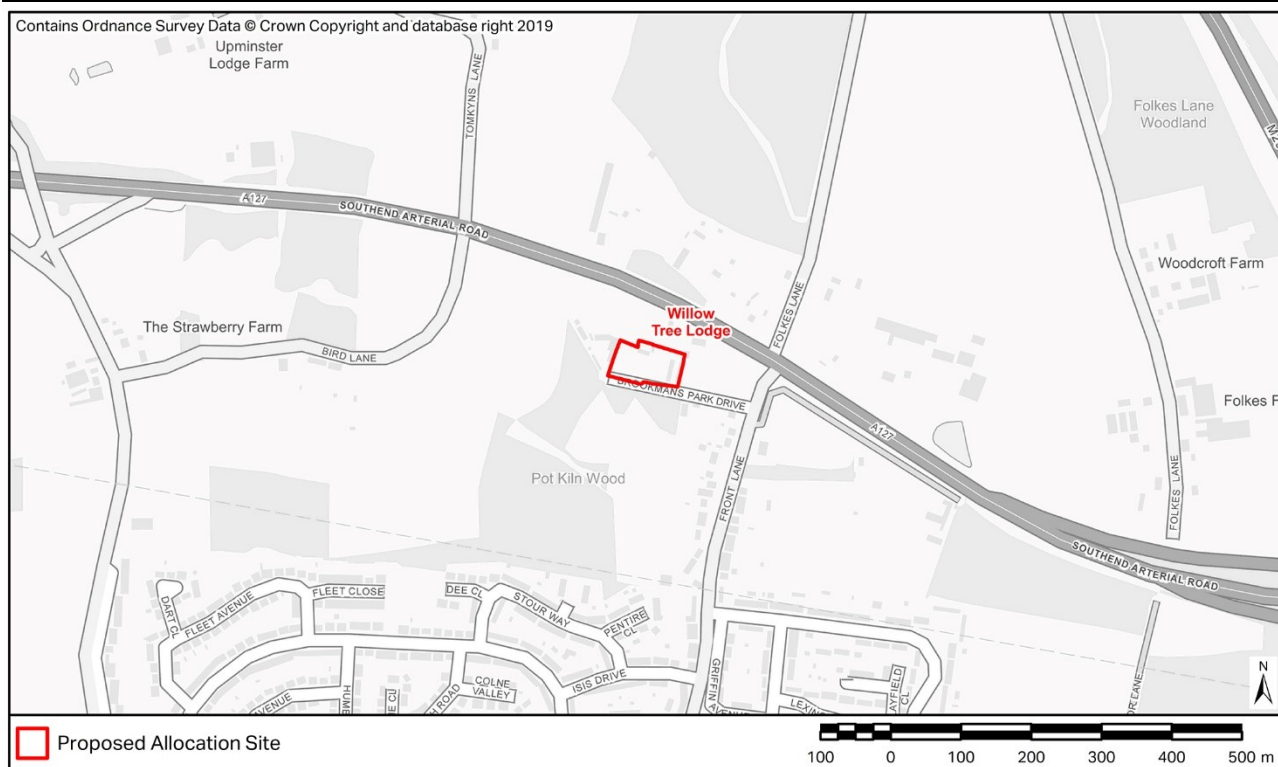


SSSI Impact Risk Zones	Not within a SSSI Impact Risk Zone
Local Wildlife Site	1558m (The Manor)
Site of Interest for Nature Conservation	91m (Bellvue)
BAP Priority Habitat	123m (Deciduous woodland)
Green Belt	Moderate
Conservation Area	1179m (Havering - Atte - Bower)
Registered Park or Garden	3518m (Weald Park)
Scheduled Monument	1964m (Section of Roman road on Gidea Park golf course)
Listed Building	306m
Area of Archaeological Importance	499m (Bedford manor house)
Agricultural Land Classification	Grade 3
Fluvial Flood Risk	Flood Risk Zone 1
Surface Water Flood Risk	No areas of surface water flood risk are present in the site
Critical Drainage Areas	Outside of a Critical Drainage Area
Groundwater Flood Risk	Areas determined by the SFRA as being at risk of groundwater flooding
Groundwater Source Protection Zones	Not within a SPZ
Loss of Local Open Space	No loss of public open space
Minerals	Not within a Minerals Safeguarding Area
Employment Site	No loss of allocated employment sites
Noise and Air Pollution and Safety	Located over 200m of rail corridors or the M25,A12, A127 or A13
Proximity Town or Local Centre	800m - 900m
Proximity to Schools	800m - 900m (Hilldene Primary)
Proximity to Doctor or Health Centre	1300m - 1400m (Ingrebourn Medical Centre, The Surgery, Straight Road Doctor Surgery)
Proximity to Railway Station	3km - 4km (Gidea Park, Harold Wood)
Proximity to Bus Stop	0m - 50m
Proximity to Public Right of Way	300m - 400m
Proximity to Regional Cycle Route	50m - 100m

Willow Tree Lodge

Site Area:

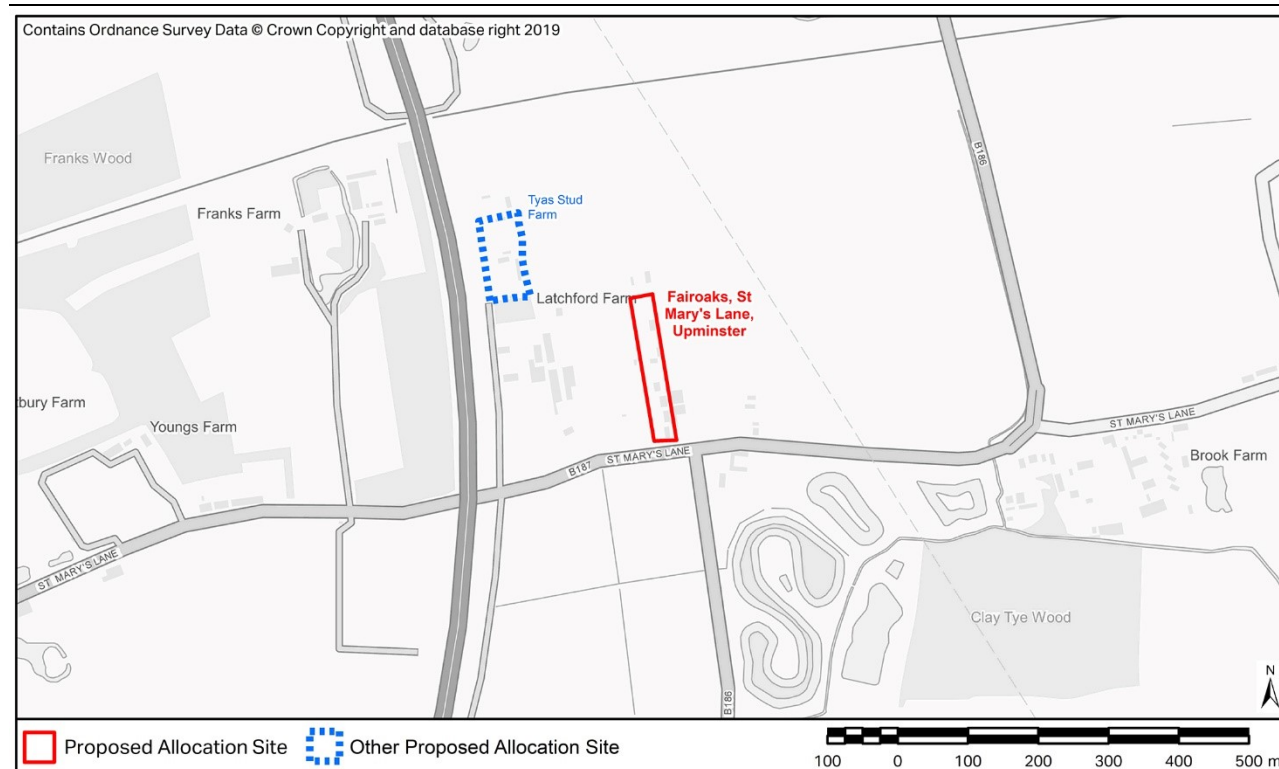
0.52 Ha



SSSI Impact Risk Zones	Not within a SSSI Impact Risk Zone
Local Wildlife Site	1179m (Cranham Brickfields)
Site of Interest for Nature Conservation	9m (Pot Kiln Wood and Sickie Wood)
BAP Priority Habitat	9m (Deciduous woodland)
Green Belt	Fundamental
Conservation Area	1965m (Cranham)
Registered Park or Garden	1023m (Upminster Court)
Scheduled Monument	1207m (Medieval grange barn, 228m south-east of Upminster Court)
Listed Building	919m
Area of Archaeological Importance	741m (Great Tomkyns moated site)
Agricultural Land Classification	Grade 3
Fluvial Flood Risk	Flood Risk Zone 1
Surface Water Flood Risk	No areas of surface water flood risk are present in the site
Critical Drainage Areas	Outside of a Critical Drainage Area
Groundwater Flood Risk	Areas determined by the SFRA as being at risk of groundwater flooding
Groundwater Source Protection Zones	Not within a SPZ
Loss of Local Open Space	No loss of public open space
Minerals	Within a Minerals Safeguarding Area
Employment Site	No loss of allocated employment sites
Noise and Air Pollution and Safety	Located within 200m or rail corridors of the M25, A12, A127 or A13
Proximity Town or Local Centre	700m - 800m
Proximity to Schools	800m - 900m (Engayne Primary)
Proximity to Doctor or Health Centre	1000m - 1100m (Avon Road Surgery)
Proximity to Railway Station	3km - 4km (Upminster)
Proximity to Bus Stop	600m - 700m
Proximity to Public Right of Way	200m - 300m
Proximity to Regional Cycle Route	50m - 100m

Fairoaks, St Mary's Lane, Upminster

Site Area: 0.67 Ha



SSSI Impact Risk Zones	Not within a SSSI Impact Risk Zone
Local Wildlife Site	924m (Cranham Brickfields)
Site of Interest for Nature Conservation	38m (Puddle Dock Angling Centre)
BAP Priority Habitat	137m (Deciduous woodland)
Green Belt	High
Conservation Area	1232m (Cranham)
Registered Park or Garden	2679m (Upminster Court)
Scheduled Monument	2582m (Medieval grange barn, 228m south-east of Upminster Court)
Listed Building	451m
Area of Archaeological Importance	326m (Franks moated site)
Agricultural Land Classification	Grade 3
Fluvial Flood Risk	Flood Risk Zone 1
Surface Water Flood Risk	No areas of surface water flood risk are present in the site
Critical Drainage Areas	Outside of a Critical Drainage Area
Groundwater Flood Risk	Areas determined by the SFRA as being at risk of groundwater flooding
Groundwater Source Protection Zones	Not within a SPZ
Loss of Local Open Space	No loss of public open space
Minerals	Not within a Minerals Safeguarding Area
Employment Site	No loss of allocated employment sites
Noise and Air Pollution and Safety	Located over 200m of rail corridors or the M25, A12, A127 or A13
Proximity Town or Local Centre	1300m - 1400m
Proximity to Schools	3km - 4km (Engayne Primary, Upminster Infants, Hall Mead)
Proximity to Doctor or Health Centre	2km - 3km (The Surgery, Drs Baig, Baig & Baig, Dr Dahs & Partner)
Proximity to Railway Station	3km - 4km (Upminster, West Horndon)
Proximity to Bus Stop	0m - 50m
Proximity to Public Right of Way	0m - 50m
Proximity to Regional Cycle Route	0m - 50m

Havering Cabinet Meeting on August 5 2020

Item to be approved for Havering Local Plan Main Modifications Public Consultation

**Review of 2018 Review of Specialist Older Persons
Housing**

August 2020



Examination into the Havering Local Plan 2016 - 2031

Document for Public Consultation alongside the Proposed Main Modifications

Review of 2018 Review of Specialist Older Persons' Housing

August 2020

Review of 2018 Review of Specialist Older Persons Housing

1. Introduction

1.1 In 2015 the council undertook a major review of the need and current supply of specialist older persons housing. The review also included an assessment of the council's own sheltered and extra care provision. This part of the review looked not only at the current condition of the council's stock but also made a number of recommendations concerning the future of that stock, these being based on the initial need's assessment, and how the council, as a major provider of older persons housing, could assist in meeting that need. The original 2015 report is attached as appendix 1. This review concentrates on two aspects of the 2015 report:

- A review of the 2015 needs analysis to see if it needed amending in light of any changes such as changes to demographics, social care policy etc.
- An update on actions that have been taken to implement the recommendations especially where these impact on the supply of accommodation for older people.

2. Needs Assessment

2.1 The original review of the current and projected need for specialist older persons housing need was undertaken in 2015. This looked at a wide variety of information, (section 4 of the report) including:

- GLA Report Assessing Potential Demand for older person housing in London 2014 (the figures of which were subsequently used in the GLA London Plan for establishing the need for specialist older persons accommodation)
- Housing LIN on-line assessment tool for establishing need for specialist older persons housing
- Examining Councils waiting lists for older persons housing (including sheltered and extra care)
- Residential and Nursing admissions
- Building on the council's previous Extra Care housing strategy
- Wide variety of Health statistics and projections relating to older people in Havering
- Long term population and general demographic projections for older people in Havering.

2.2 The resulting analysis and projection looked at not just the overall need for specialist older persons accommodation but also the different types of accommodation and different tenure mixes.

2.3 In arriving at the Havering older persons housing model it took into account a number of local factors which both the GLA and Housing LIN models being regionally and nationally based could not take into account. They therefore accept that these local variations could affect both the overall calculation of need and the type of specialist accommodation that will be required. These included:

- The policies and practices of the authority in relation to adult social care and the approach to keeping people in their own homes & long-term use of nursing and residential care.
- The actual condition of the existing sheltered housing stock.
- Local surveys regarding older persons preferences for different types of Housing.
- The tenure split amongst older people in Havering.

2.4 As with any long-term model any result was caveated, as if there were changes in any of the key factors such as the overall population projections or the long-term tenure assumptions this could

affect both the overall need analysis and tenure split. The key components that made up the model were:

- Population figures based on ONS 2015 projections
- That the level of homeownership amongst older people in Havering would remain at 79% Homeowners 21% Rented
- That for modelling purposes 100 people per 1000 over 75 would wish to move into retirement/sheltered housing
- That for modelling purposes 20 people per 1000 over 75 would wish to move into Enhanced Sheltered Housing
- That for modelling purposes 25 people per 1000 over 75 would wish to move into Extra Care Housing.

Note: These figures were similar to those used by Housing LIN except in respect of sheltered retirement housing where they use a figure of 110.

2.5 The resulting model showed that whilst there was an overall need for additional specialist accommodation there was an over supply of affordable sheltered housing and whilst there was a deficit for all tenures in the higher need housing (enhanced and extra care) the biggest demand was for private owned leased accommodation. This is a reflection of the high levels of existing homeownership amongst older people in Havering.

Table 1 below gives the details:

Assessment of Need for Specialist Older Persons Housing 2015 -2025

Havering	2015			2025		
	Demand	Supply	Variance	Demand	Supply	Variance
Sheltered Housing 100 per 1000+75	2260	1734	526	2870	1734	
-Rent	475	1024	+549	603	1024	+421
-Lease	1785	710	1075	2267	710	1643
Enhanced Sheltered 20 per 1000 +75	452	0	452	574	0	574
-Rent	95	0	95	121	0	121
-Lease	357	0	357	453	0	453
Extra Care 25 per 1000+75	565	195	370	718	195	523
-Rent	119	175	+56	151	175	+24
-Lease	446	20	426	567	20	547

Given that this review was carried out in 2015 we have taken the opportunity to see whether there have been any substantial changes to key factors which would lead to changes in these need figures.

Population

2.6 Since the review was completed there have been updates on the overall population projections in Havering. The base date was originally 2015 and this has now been changed to 2018. The overall growth in numbers of older people means that there is a small increase in the numbers requiring accommodation than in 2015. However, over the longer timeframe the increase in numbers is slightly lower than the 2015 projections. These changes are not significant enough to amend the overall conclusions that were drawn from the in the original report.

Tenure Mix

2.7 As you would expect over such a short period been any change to the tenure mix of older people and therefore the 21% affordable 79% private, owner occupy has been maintained. However, over time this may be an area which would need to be revisited with the overall reduction in owner occupation among the younger population.

2.8 A separate point is that the development of new schemes, especially in the not for profit sector, are increasingly developed on a mixed tenure basis which does give the ability for tenure of schemes to be changed over time thus giving greater flexibility to ensure that all Havering residents needs are catered for.

Adult Social Care Policy

2.9 The original report supported Havering's long held view that there were sufficient residential and nursing homes in the borough to cater for the needs of its residents and that additional specialist provision should concentrate on providing sheltered and extra care accommodation. Also, that there was an increasing ability for people to remain in their own home with appropriate adaptations, modern day telecare and where necessary home care support.

2.10 Havering adult social care services have continued to maximise people's independence and where possible this means ensuring that people remain in their own accommodation. This has meant that whilst overall numbers of people that are being assisted continues to increase, the numbers who are in nursing or residential care remained stable between 2015 and 2017 (552/557). In 2016/17 88% of people requiring respite care after leaving hospital were able to have this delivered in their own homes. These trends are continuing and within the current year there has been a further decrease in the use of residential and nursing care.

2. 11 There therefore seems strong evidence not to amend the underlying assumptions that the model is built on. If the latest population projections are applied and the table is updated to cover 2018 to 2028, then this does show a small reduction in the predicted need by 2028, as the Table 2 below illustrates. For purposes of consistency no change has been made to the supply section at this stage.

Table 2 Adjusted to include latest ONS projections and starting date updated to 2018 end date 2028. Calculation of need same as 2015 as detailed in paragraph 2.4

Assessment of Need for Specialist Older Persons housing 2018 -2028

Havering	2018			2028		
	Demand	Supply	Variance	Demand	Supply	Variance
Sheltered Housing 100 per 1000+75	2260	1734	526	2870	1734	1136
Rent	480	1024	+544	603	1024	+421
Lease	1805	710	1095	2267	710	1557
Enhanced Sheltered 20 per 1000 +75	457	0	457	574	0	574
Rent	96	0	96	121	0	121
Lease	361	0	361	453	0	453
Extra Care 25 per 1000+75	565	195	370	712	195	517
Rent	119	175	+56	150	175	+25
Lease	446	20	426	562	20	542

2.12 The results are therefore basically the same as in 2015. The main points emerging being that.

- If there is no change in supply between 2018 and 2028 there will be a need for additional leased properties in all the different categories of specialist older people housing (sheltered, enhanced sheltered and extracare). A total of 2552 new properties required.
- That for affordable rent properties that there would be a considerable surplus in sheltered housing a small surplus for extra care and only a deficit for the enhanced sheltered. This results in a net surplus of 325 properties.

3. Implementing the original Recommendations

3.1 The majority of action that has been taken in regard to the physical changes outlined in the report have to date related to the councils own sheltered housing stock. They have, however, been carried out in accordance with the overall needs that the report identified.

3.2 The report found that:

- That not all of the councils sheltered housing schemes were up to modern standards and that whilst some could be upgraded and were also popular, others would be difficult if not impossible to upgrade.

- That, as has already been stated, there was a projected surplus of affordable sheltered schemes within borough and this would continue even with the older persons population growth.
- That this contrasted with the current and projected deficit in sheltered/retirement housing for lease and sale in the borough.
- That although there was a current and projected deficit in enhanced and extra care housing it was greatest in the sale/lease sector.

3.3 In oct 2016 the council agreed a programme of closing and upgrading sheltered schemes, which is now being implemented. The table below demonstrates that based on current capacity studies there will be an 66% increase in the number of properties available to older people across the seven schemes. Specifically, in response to the recommendations of the report there is a net loss in the number of affordable sheltered properties across the schemes. 60% of new properties for older persons housing will be available for lease or sale. The development of two retirement villages will allow a people with varying care needs to be accommodated with Brunswick Court will be redeveloped to become an extra-care housing complex.

3.4 The projected units have not been included in any housing need calculations as detailed in Table 2. they will therefore contribute to meeting the assessed need. Overall they will deliver a net additional 190 units. However due to the projected change of tenure there will be an increase of 285 properties for sale/lease and a decrease in affordable housing of 91.

Table 3

Proposed Replacement Accommodation for Councils Existing Sheltered Schemes which are to be decommissioned

		Proposed no. of Units					
Site	Current no. of Units	Private	Affordable Rent	Total	Property Specification	Start on Site	Site Practical Completion
Queen Street	31				General Needs	Jan 2020	Nov-2028
Solar, Serena and Sunrise	55	135	55	190	Retirement Village	Oct-2019	June-2022
Brunswick Court	47	0	54	54	Extra Care	Sept-2022	Feb-2024
Dell Court	29	51	29	80	Over 55's	Sept-2024	Feb-2026
Delderfield House	14				General Needs	Sept-2024	Feb-2026
Royal Jubilee Court	79	99	53	152	Retirement Village	Sept-2026	Nov-2028
Maygreen Crescent and Park Lne	31				General Needs	Sept-2026	Nov-2028
Total	286	285	191	476			

3.5 The council's approach has been to redevelop existing sites, both big and small, ensuring that when they are redeveloped the density is increased where appropriate and to avoid developing on green field sites. The programme that has been developed will ensure that there is sufficient affordable sheltered, enhanced/ extra care accommodation to meet the projected needs of older residents who need this accommodation. There is still a deficit for people who want to either purchase or lease properties, which although the council has started to address by developing mixed tenure schemes will not be totally addressed and will need the input of the private market. Since 2015 there has only been one new private retirement scheme developed of 40 units. Two other proposals which applied for planning permission were refused due in part to them being built on green belt land. It is still the authority's contention that there are sufficient brown fields sites, which are detailed elsewhere in the local plan, in need of development to outweigh any consideration of making exceptions to the current and proposed greenbelt policy. There will need to be a variety of schemes developed of different sizes and offering varying degrees of housing support. This means that brownfield sites of differing sizes will be suitable. The council's own planned programme illustrates that using five of the seven available sites they have been able to increase overall number of units by 166% with differing size schemes.

3.6 Since the 2015 report the London Plan has been published which includes specific requirements for each borough for specialist older persons housing. Havering is allocated a figure of 185 units of additional specialist housing per year or 1850 over 10-year period. Of this they indicate that 135 should be for owner occupiers and 50 for intermediate (shared ownership). They considered that there was no need for any additional affordable specialist older people housing. The plan does not attempt to break this down between different types of specialist older person housing. It also acknowledges that it is based on regional assessment and common assumptions being applied across London, therefore that when a borough does undertake its own assessment that there might be variations. It was also originally undertaken in 2013 and it is unclear whether any changes have been made to take into account latest population projections.

3.7 When this data is compared with Havering's own model as and consolidating the different types of older persons housing then this shows that the Havering model assumes a slightly overall higher level of need over the 10-year period. Although in terms of affordable housing there is an estimated surplus of accommodation rather than the balanced figure that the London Plan produces. This is probably due to the fact that the London Plan figure assumes that 50% of the affordable housing stock does not meet modern standards. A figure which is accepted would need to be adjusted for each individual borough.

3.8 If we use a similar rationale as the GLA for Havering's own calculations then this produces a higher overall and annual figure than the GLA projections and arguable it would therefore be more appropriate to use this figure in Havering's own Local Plan than the GLA's. As is indicated below this would result in an annual requirement of 255. This is therefore the annual build figure that should be included in Havering's local plan rather than the GLA 185 figure. All of this requirement relates to lease for sale as there is still the overall surplus in the affordable Housing category. This is not to say that there will be no change to existing older persons specialist accommodation as stock will need to be updated and the level of social care support delivered in those schemes may also have to change. As has already been shown in Table 3 the council in its role as a landlord is already undertaking this change.

Table 4

Required Supply	Owner Occ /Intermediate	Affordable Rent	Total 10 years
London Plan	185	0	1850
Havering 2015 Review	256	-276	2560
Havering 2018 Update	255	-325	2552

3.9 The total demand figures to ensure consistency with the London Plan separate the demand for Affordable Rent and Owner Occ/ Intermediate (referred to as Lease by Havering). It is also assumed that a over supply of accommodation in the affordable Housing category cannot be automatically used for Lease accommodation. The 2552for intermediate/OO is therefore derived from the 2028 demand figure for lease accommodation across all different types of accommodation and the -325 calculated on the same basis for affordable Rent.

4. Conclusions

4.1 Unlike many other boroughs the council has established a clear model for identifying need for specialist older persons accommodation. This model draws heavily on both the GLA's model and the Housing LIN model, but then applies local information to ensure its relevance to Havering. The review of the need identifies a small change but the significant areas such as over provision in the affordable rent sector and a deficit in the private sale/lease accommodation remain.

4.2 This model will be need to be updated regularly to take into account changes in demographic projection, technological and building innovations and older persons assessment of how their own housing needs are best met. Getting the balance between enabling older person to remain in "normal" housing and the need for specialist housing is the key as is ensuring that the right mix between properties for sale and rent is achieved. The review should be every 3 years.

4.3 As a landlord the council has set out a clear plan to both update its own specialist housing and also to reduce the surplus capacity whilst ensuring that the new schemes are designed to modern standards and also accommodate mixed tenure to assist in meeting the deficit of sale/lease older persons accommodation.

This page is intentionally left blank

Havering Cabinet Meeting on August 5 2020

Item to be approved for Havering Local Plan Main Modifications Public Consultation

**Housing Position Statement 2019 – Technical Update
(October 2019)**

August 2020



Examination into the Havering Local Plan 2016 - 2031

Document for Public Consultation alongside the Proposed Main Modifications

Housing Position Statement 2019 – Technical Update (October 2019)

August 2020



Havering
LONDON BOROUGH

Housing Position Statement 2019: Technical Update

October 2019*

1. Introduction	2
2. Policy Context	8
National Planning Policy Framework	8
MHCLG Consultation: Planning for the right homes in the right places and the NPPF 2018	9
The London Plan 2016 (Consolidated with Alterations since 2011)	10
Draft London Plan 2017	10
3. Havering's past delivery	11
Overall Housing Numbers	11
Affordable Housing	13
4. Havering's Housing Need	14
Housing Need and the NPPF	14
Housing Need and the London Plan 2016	14
Havering's Housing Need: The Outer North East London SHMA 2016	15
Overall housing need	15
Affordable housing need	15
Specialist older persons housing	16
5. Havering's Housing Targets	18
Overall Housing Target	18
Havering Size Mix	21
Affordable Housing Targets	25
Havering's Affordable Housing Targets	25
6. Havering's Sources of Supply	28
Assessing whether sites are 'deliverable' or 'developable'	36
Build out rates, lead in times and phasing of development	38
Application of a Discount Rate	45
7. Calculating Havering's 5 Year Supply	47
Havering's 10 and 15 Year Supply	50
8. Housing Implementation Strategy	51
Strategic Planning	52
Future Sources of Supply	53
Active Involvement in Housing Delivery	53
The development management process	53
Infrastructure delivery	54

1.1 Monitoring and early review.....	55
Conclusion	56
List of Annexes.....	57

Introduction

- 1.1.** This updated Housing Position Statement has been prepared to support the Proposed Submission Local Plan. It follows discussions at the Local Plan Examination hearings in October 2018 and addresses the matters raised by the Inspector and third parties at the Examination.
- 1.2.** The purpose of this statement is to set out the Council’s approach to housing supply through the Proposed Submission Local Plan.
- **Section 2** outlines the National and Regional Policy Context for Havering
 - **Section 3** discusses previous housing delivery in Havering
 - **Section 4** discusses the objectively assessed need for new housing in Havering
 - **Section 5** outlines the proposed housing targets for Havering
 - **Section 6** sets out the various sources of housing supply and the criteria and evidence for including sites in the housing trajectory
 - **Section 7** identifies Havering’s position regarding its 5, 10 and 15 year supply of housing
 - **Section 8** sets out Havering’s Housing Implementation Strategy
- 1.3.** Attached to this strategy are an updated Housing Trajectory and a number of other appendices which support the Trajectory.
- 1.4.** The statement serves to update the Housing Position Statement 2018 (LBHLP.15) and the subsequent Housing Position Statement 2019: Technical Update in January 2019. In particular, this statement addresses the housing matters raised by the Inspector in her note on the Spatial Strategy and Housing (26 October 2018). Table 1.1 below outlines each of the housing matters raised by the Inspector and identifies where in the revised Housing Position Statement they are addressed.

Table 1.1

Matter Raised	Relevant Section of the Revised HPS
Demonstrate sufficient housing land supply to cover the 15 year plan period	Paragraphs 7.9-7.10
Demonstrate sufficient sites to provide a 5 year supply with an addition buffer of	Paragraphs 7.1-7.8

20% (with the buffer applied to the shortfall)	
An updated table including completions for 2016/17 and 17/18	2016/17 and 2017/18 completions are identified in the updated housing trajectory (Annex 1) and are discussed in Section 3
In the site by site breakdown the most up to date figures should be used. The Council should be able to justify its expectations in relation to delivery of the sites.	The updated Housing Trajectory (Annex 1) includes the most up to date figures and justifications for suitability, availability and achievability as well as overall conclusions on whether a site is deliverable or developable. The comprehensive, up to date site compendiums (Annexes 2-5) include this information, together with supporting evidence.
Details of assumptions in relation to build-out rates and lead-in times should be provided; evidence of developer interest should be provided where possible; for sites granted planning permission, are further approvals / discharge of conditions required? Are there infrastructure requirements/ s106 agreements and what is the timing of these if so?	Paragraphs 6.35 – 6.53 outline how the Council has made a site by site assessment as to deliverability. This includes research into build-out rates and lead in times, and consideration of a range of factors that affect deliverability. The site by site assessments are contained in (Annexes 2-5) as well as in the updated Housing Trajectory (Annex 1). These provide site specific information on what has been taken into account.
Should a discount rate be applied to the sites with planning permission and pre-application sites? If not, what is the evidence that all these sites are likely to come forward?	Paragraphs 6.60-6.68
<p>The concerns highlighted by representors regarding the following sites should be considered.</p> <ul style="list-style-type: none"> • Angel Way, Romford retail park (former Decathlon site). • St George's Hospital other sites - evidence site will go ahead and phasing. Time table for delivery intention of landowner (Bellway) confirm • Quarles Campus, Harold Hill – evidence site will proceed and phasing 	The concerns highlighted by representors have been addressed by revised approach that has been taken through the updated trajectory as outlined in this document. Specific details on each of the sites identified provided in Annexes 1-5.

<ul style="list-style-type: none"> • Beam Park, Rainham confirmation from Countryside intending to take forward including phasing details • Bridge Close, Romford update timeframe update • Rom Valley Way – confirm phasing and if any infrastructure issues • Depot Rainham • North Street site • Gasworks site - contamination • Matalan site- still trading. 	
<p>Consistency with GLA figures should be checked and any discrepancies explained.</p>	<p>As explained in Section 3, data from previous completions has now been taken directly from the London Development Database, which is considered to be more reliable.</p>
<p>The figures for small sites and vacant units should be justified by evidence. Do these constitute windfalls? What evidence is there that these will continue to come forward at the rate envisaged?</p>	<p>Paragraphs 6.27-6.28</p>
<p>Clarification of the figures in Policy 1 is also requested, having regard to the updated trajectory.</p>	<p>Policy 1 currently states that the Council will deliver over 5,300 new high quality homes in the Romford Strategic Development Area over the plan period and at least 4750 over the first 10 years of the plan period.</p> <p>The updated trajectory anticipates 6269 new high quality homes over the plan period and 5,319 over the first 10 years.</p> <p>As these figures are constantly evolving, it is proposed that Policy 1 should state that at least 6,000 new high quality homes will be built over the plan period, with at least 5,000 in the first 10 years of the plan.</p> <p>Note: This has not yet been updated in</p>

	the proposed modification table as of April 2019.
The five year supply figures for the stepped approach should be provided, demonstrated how they been calculated.	Section 5
The breakdown of sites within the trajectory need to demonstrate that the significant spikes in delivery in 2 years, 20/21 and 22/23 are based on robust and realistic assumptions of regarding delivery.	Section 6 and Annexes 1-5
A housing implementation strategy should be provided indicating the sources of land supply, where it expected to be delivered and how it will meet the plan target (in the emerging Plan).	Section 8 – Housing Implementation Strategy Section 6- Sources of Supply Section 5 – Five, Ten and Fifteen Year Supply
The housing implementation strategy should set out the 5 year land supply situation, including the buffer and should justify the method of dealing with any shortfall in delivery since the beginning of the plan period. The Council should set this out in relation to the approach in the Plan and the possible stepped approach.	Section 5
Clarify which sites are in the Strategic Development Areas and the Twelve Estates programme (to address concerns about tables)	Annex 1 clearly sets out where each site is located
Modification Policy 3 Housing Supply to identify plan period and when review of Local Plan will take place (link to London Plan adoption)	Annex 12
Explain time frame for Site Specific Allocation document.	As the Council awaits the Inspector's report on the draft Local Plan, an approval date for the Site Specific Allocations document has not been set. However, the Council intends to progress work on preparation of the document, with a call for sites anticipated in winter 2018/19.
Include Mercury / Ellandi proposal in Housing Trajectory	Whilst Ellandi have put forward development plans and provided a statement of intent, it has been clarified that they are not the owners of the site that they wish to develop (The Mercury

	<p>Centre and associated car parks). Grainhome Ltd, who is the freeholder of the site, does not support Ellandi's development plans and are seeking to bring forward their own plans for the site.</p> <p>Notwithstanding the comments at the examination hearing, the position in the current housing trajectory is that this site is not included as the Council have not had a clear message from the owners that they wish to develop and that the land is available for them to do so. If this situation changes the Council may incorporate the site at a later date.</p>
Check Sandgate Close site in Housing Position Statement	Annex 2 – a site assessment as to deliverability is overview is provided. The application has now received planning approval and a s106 has been signed.
Modification Policy 4 - change 1st paragraph where it says more than 10 units to say 10 or more units as per wording in London Plan	Included in proposed Modifications list
Modification Policy 4 – Council to consider whether the policy should reflect the viability assessment which indicates that 50% affordable housing would be viable in certain circumstances and / or consider trade-off between affordable and other elements such as workspace	Paragraphs 5.30-5.37
Modification Policy 5 - needs to be clearer the flexibility of policy	Response contained in the Further response from London Borough of Havering to Inspector document
Modification Policy 5 - Does the word 'robustly' need to be included as modification? Should originally wording be kept and does it provide the flexibility required in this policy?	Response contained in the Further response from London Borough of Havering to Inspector document
Policy 6- Reference at 7.4.4 of Plan to a review of the need but this is not in the evidence base. The Inspector needs evidence relating to the need and supply. Where and when will the supply be provided in order to meet the identified need?	<p>Response contained in the Further response from London Borough of Havering to Inspector document</p> <p>Older Person Report 2015</p> <p>A summary is provided at Paragraphs</p>

Is there a need for specific site allocations to meet the need? (ensure this evidence is consistent with evidence being provided for Matter 3)	4.12-4.19
Policy 6- Reference data to London Plan and where there might be discrepancies with Local Plan figures	Response contained in the Further response from London Borough of Havering to Inspector document
Modification- Policy 6 –In relation to Criterion (i) need to be clear in policy how the Council will expect need to be identified	Included in proposed Modifications list
Modification Policy 6 - criteria (vii) Delete 'all possible' before 'future needs'.	Included in proposed Modifications list
Modification Policy 6 - criteria (viii) need to revise wording to include 'unacceptable' before 'adverse impact' and refer to unacceptable levels of noise rather than 'significantly greater levels'	Included in proposed Modifications list
Modification Policy 10 - add 'significant' after 'results in'	Included in proposed Modifications list
Council to consider if specific Regeneration Policy is required	Included in proposed Modifications list

1.5. This statement should be considered alongside the other key evidence base documents, including:

- The London Strategic Housing Market Assessment 2013
- The London Strategy Housing Land Availability Assessment 2013
- The London Strategic Housing Market Assessment 2017
- The London Strategy Housing Land Availability Assessment 2017
- The Outer North East London Strategic Housing Market Assessment 2016
- The Outer North East London Strategic Housing Market Assessment: Update for Havering 2016
- The Havering Green Belt Study 2016
- Site Green Belt Assessment and Sustainability Assessment 2018

2. Policy Context

National Planning Policy Framework

- 2.1.** The National Planning Policy Framework (NPPF) sets out the Government's Planning policies for England and how these are expected to be applied. The Havering Local Plan is required to be consistent with the NPPF 2012. It was agreed at the Local Plan Examination that the Havering Local Plan would be considered against the NPPF 2012.
- 2.2.** The NPPF 2012 states that to boost significantly the supply of housing, local planning authorities should:
- use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period (paragraph 14 of the NPPF 2012);
 - identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land (paragraph 47 of the NPPF 2012);
 - identify a supply of developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 (paragraph 47 of the NPPF 2012);
 - for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period (paragraph 47 of the NPPF 2012); and
 - set out a housing implementation strategy for the full range of housing describing how they will maintain a delivery of a five- year supply of housing land to meet their housing target (paragraph 47 of the NPPF 2012).
- 2.3.** When preparing Local Plans the NPPF states that local planning authorities (LPAs) should have a clear understanding of housing needs in their areas. They should:

- Prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period.
- Prepare a Strategic Housing land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.

MHCLG Consultation: Planning for the right homes in the right places and the NPPF 2018

- 2.4.** In September 2017 the government published its consultation on ‘Planning for the right homes in the right places’. This consultation was part of the government’s initiative to increase the supply of new houses. A key proposal within the consultation document is the introduction of a standard methodology to determine housing needs. It also includes an indicative assessment of housing need (using the proposed methodology) for every authority over the period 2016 to 2026. For Havering this is 1,821 dwellings per annum.
- 2.5.** The provisions in the “Planning for the right homes in the right places” government paper, which were in draft when the Local Plan was at submission state, have now been incorporated into the new NPPF (2018) which was published in July 2018. The new NPPF (2018) makes it clear at paragraph 214 Annex 1: Implementation that policies in the previous framework will apply for the purpose of examining plans where those plans are submitted on or before 24 January 2019. The Havering Local Plan is therefore being assessed against the previous 2012 Framework and the standard methodology has not been used for this Plan.
- 2.6.** The NPPF (2018) also includes a new Housing Delivery test to measure each local authority’s performance in delivering new houses. The Test would result in a figure expressed as a percentage of the total net homes delivered against the total number of homes required over the previous three years. If the Housing Delivery Test shows that there has been significant under delivery of housing over the previous three years (in this context meaning less than 85%), the local authority must include a 20% buffer in its supply of specific deliverable sites in order to achieve the required five years supply.
- 2.7.** The Housing Delivery Test will apply from the day following the publication of the Housing Delivery Test results in November 2018.

The London Plan 2016 (Consolidated with Alterations since 2011)

- 2.8.** Havering forms part of a unique two tier planning system in London where the development plan for an area is composed of the borough's Local Plan and the London Plan. The Local Plan must be in 'general conformity' with the London Plan.
- 2.9.** The Mayor of London is responsible for preparing the London Plan. The current London Plan was originally published in 2011. In 2013 the Mayor undertook a London-wide Strategic Housing Land Availability Assessment (SHLAA) and Strategic Housing Market Assessment (SHMA) as key evidence base documents to inform the Further Alterations to the London Plan published in 2015.
- 2.10.** The London SHMA 2013 sets out an estimate of London's current and future housing requirements. The central projection in the SHMA indicates that London will require between 49,000 (2015-2036) and 62,000 (2015-2026) more homes a year. This range incorporates different levels of population change over the period, the time taken to address current need (backlog) and the anticipated under delivery between 2013 and 2015. The 2015-2036 figure of 49,000 additional homes a year provides the basis for the detailed housing need figures set out in the London Plan.
- 2.11.** The London SHLAA 2013 assesses London's capacity for new residential development. It shows that over the period 2015 to 2025, London has capacity for at least 420,000 additional homes or 42,000 per annum. The SHLAA formed the basis of the revised housing targets for each borough set out in the London Plan.
- 2.12.** Havering's Housing target, as set out in the current London Plan, is a minimum of 11,701 over the period 2015-2025, which equates to a minimum annual average housing target of 1,170. This target took effect from the 2015/16 reporting year. Policy 3.3D of the London Plan states that if a target beyond 2025 is required, boroughs should roll forward and seek to exceed that target.
- 2.13.** The proposed Havering Local Plan's target of 11,701 over the first 10 years of the Plan Period 2016-2026 is drawn from its London Plan target, rolling forward the annualised target of 1,170. The Council is proposing to meet its 10 year target through the use of a stepped trajectory, as outlined in section 5.

Draft London Plan 2017

- 2.14.** The new Mayor of London is in the process of preparing a new London Plan and published a draft plan for consultation in December 2017. As part of the evidence base for the emerging Plan, the GLA have prepared an updated London Strategic

Housing Market Assessment 2017 and London Strategic Housing Land Viability Assessment 2017. The Examination in Public for the draft London Plan (2017) will commence in January 2019.

- 2.15.** The London SHMA 2017 has identified a need for 66,000 additional homes per year between 2016-2041. The London SHLAA 2017 has identified capacity for 65,000 new homes per year between 2019/20 to 2028/29. The SHLAA 2017 is the basis of the revised housing targets set out in the draft London Plan. Havering's target is 18,750 homes between 2019/20 and 2028/29 or 1,875 homes per annum. Of the 1,875 new homes, 904 of these are expected to be delivered on small sites under 0.25ha.
- 2.16.** The Draft London Plan 2017 is currently undergoing an Examination in Public and is not yet adopted. The proposed Havering Local Plan should therefore be assessed against the adopted London Plan 2016.

Nb. LB Havering have objected to the London Plan housing targets – please refer to the Council's consultation response to the Draft London Plan for further information (attached as Annex 9). It has been involved in the London Plan Examination in Public with regard to Policy H2 (Small Sites).

3. Havering's past delivery

Overall Housing Numbers

- 3.1.** A review of Havering's past housing completions is set out below in Table 3.1. The data is drawn from the London Development Database (LDD) which has been running since 2004.
- 3.2.** Some of the figures listed in table 3.1 differ from those in table 3.1 of the Housing Position Statement 2018 (LBHLP.15). Part of the reason for this is that the Housing Position Statement 2018 relied on data from the Havering Authority Monitoring Reports. These reports are based on completions for the previous financial year which have been recorded as of 31 August. Completions within the previous financial year that are not reported by that date are not included and are not able to be included within the subsequent year's figures. Using the LDD database, which is continually updated, provides a more reliable dataset.

Table 3.1: Net housing completions financial years 2004 – 2017

	Target	Net Housing Completions	Housing target variance
2004 FY	350	551	+201
2005 FY	350	371	+21
2006 FY	535	847	+312
2007 FY	535	495	-40
2008 FY	535	637	+102
2009 FY	535	457	-87
2010 FY	535	234	-301
2011 FY	970	445	-525
2012 FY	970	289	-681
2013 FY	970	947	-23
2014 FY	970	741	-229
2015 FY	1170	1391	+221
2016 FY	1170	607	-563
2017 FY	1170	277	-893

- 3.3.** The NPPF introduces a buffer requirement for the 5 year supply of housing land of 5% or 20% depending on past performance. The NPPF states that a 20% buffer will be applied where there is a persistent record of under delivery.
- 3.4.** There is no definitive guidance on what constitutes ‘persistent’ under delivery. However, the NPPF is clear that a longer term view of housing delivery should be used to assess an authority’s record as this will account for the peaks and troughs of the housing market cycle. Lewis J in the Cotswold judgement (EWHC 3719 27 November 2013) said that persistent under deliver “should not be a temporary or short lived fluctuation”.
- 3.5.** Table 3.1 shows that over the period 2004/05 to 2016/17 Havering has met or exceeding its target in 5 years, and under delivered in 8 years. Havering’s delivery record is characterised by a mixture of over and under delivery connected to the peaks and troughs of the housing market cycle. Many of the years in which Havering under delivered were in the aftermath of the 2008 financial crisis or in the recession which followed. Since this period, the number of dwellings completed has increased and moved in a positive direction.
- 3.6.** It should also be noted that Havering has significantly increased its level of housing delivery since 2013/14. This marks a step change from the level of housing delivery in the decade before this and demonstrates that Havering is making serious efforts to

boost its housing delivery. Nevertheless, average annual completions remain below current annual London Plan target of 1,170. The only year this target has been exceeded is in 2015/16 where completions were 1391. This year saw a large number of unit completions from major schemes (10 or more units). The bulk of these completions came from a few large developments; Old Church Hospital (394 unit completions), Former Harold Wood Hospital (162 unit completions), Former Whitworth Centre (55 unit completions), Mardyke Estate (308 unit completions) and the Site at Roneo Corner (93 unit completions).

- 3.7.** It is recognised that previous delivery has not been at the level required and there has been persistent under-delivery. In light of this the 5 year housing land supply calculations set out in Section 7 of this statement have been based on a 20% buffer.

Affordable Housing

- 3.8.** A review of Havering's affordable housing completions as a percentage of total completions is set out below in Table 3.2 (the unit numbers are set out in Annex 8). The data is drawn from the London Development Database (LDD).

Table 3.2: Net market and affordable housing completion percentages: financial years 2004 – 2017

	Market	Intermediate	Social Rented	Affordable Rent	Not known	Total Affordable Housing
2004 FY	91%	0%	11%	0%	-2%	9%
2005 FY	85%	17%	2%	0%	-4%	15%
2006 FY	79%	6%	15%	0%	0%	21%
2007 FY	74%	5%	20%	0%	0%	26%
2008 FY	53%	30%	17%	0%	0%	47%
2009 FY	56%	37%	7%	0%	0%	44%
2010 FY	60%	6%	34%	0%	0%	40%
2011 FY	47%	5%	48%	0%	0%	53%
2012 FY	56%	11%	33%	0%	0%	44%
2013 FY	69%	8%	16%	7%	0%	31%
2014 FY	47%	3%	3%	48%	0%	53%
2015 FY	81%	7%	3%	10%	0%	19%
2016 FY	91%	8%	0%	0%	0%	9%
2017 FY	97%	5%	-3%	0%	0%	3%

- 3.9.** Affordable housing completions as a percentage of total completions have varied over the years. A key reason for this is the contribution of affordable housing from

development of major sites where affordable housing was sought and where large amounts of units were developed and acquired by housing associations. Overall, it is clear that there has been improvement in delivery levels from 2008 onwards. However, 2016 and 2017 saw a decrease in the percentage of affordable housing completions.

3.10. Looking at the entire period from 2004 - 2016, 29% of net units completed have been affordable. 2017 saw a small percentage of affordable housing completions. Part of the reason for this is that a high proportion of completions came from small sites or prior approvals for which an affordable housing contribution is not required¹.

4. Havering's Housing Need

Housing Need and the NPPF

4.1. Paragraph 159 of the NPPF 2012 states that local planning authorities should prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries.

4.2. The SHMA should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

- Meets household and population projections, taking account of migration and demographic change;
- Addresses the need for all types of housing, including affordable housing and the needs of different groups in the community; and
- Cater for housing demand and the scale of housing supply necessary to meet this demand

Housing Need and the London Plan 2016

4.3. The London Plan (at paragraph 3.15) and the Mayor's Housing Supplementary Planning Guidance 2016 (Housing SPG) (at paragraph 1.1.8) both note that for planning purposes, London is to be considered as a single housing market area.

4.4. The 2013 London SHMA identified housing need within the London market area and was prepared to inform the London Plan (2016). It estimated the total annualised

¹ For the 5 year period 2013-2017, 32% of net units completed were affordable.

housing need for London between 2015/16 and 2034/35 as being 48,841 new homes a year (paragraph 0.19 London SHMA 2013 (LBHLP.16)).

- 4.5. Reflecting the two tier nature of the planning system in London, there is a tiered approach to understanding housing needs. The strategic London wide study (the London SHMA 2013) is supplemented by more detailed sub-regional and local studies (paragraph 3.1.8 Housing SPG), addressing the requirements of the NPPF and those of Policy 3.8 of the London Plan.
- 4.6. Havering forms part of both the London-wide housing market area and the outer north east London sub housing market area with the London Boroughs of Barking and Dagenham and Redbridge. To meet the requirements of the NPPF and the directives from the London Plan, the Council has worked with these authorities to prepare a Strategic Housing Market Assessment (SHMA) (LBHLP.14) which forms part of the Local Plan evidence base.

Havering's Housing Need: The Outer North East London SHMA 2016

Overall housing need

- 4.7. The Outer North East London SHMA 2016 (LBHLP.14) indicated that Havering's full objectively assessed housing need was for 25,200 new homes over the period 2011-2033 or 1,145 homes per annum. Since the initial SHMA was undertaken, updated population projections have been published by the GLA. The updated population projections were reflected in an update of the SHMA 2016 (LBHLP.14.1) which identifies an increased housing need in Havering of 30,052 new homes over the period 2011-2033 (1,366 new homes per year) (LBHLP.14.1 at figure 7). Havering's overall housing targets are discussed at the start of Section 5.

Affordable housing need

- 4.8. The SHMA 2016: Update for Havering (LBHLP.14.1) also identifies a total affordable housing need as being 10,520 new homes from 2011-33, which equates to 35% of total housing need. The breakdown by size and tenure mix is detailed in Table 4.1 below has been drawn from Figure 8 of the SHMA 2016: Update for Havering.

Table 4.1: Havering's Objectively Assessed Housing Need (Outer North East London SHMA- Update for Havering 2016)

	Number	Percentage (%)
Market Housing		
1 Bedroom	1,590	8%
2 Bedrooms	3,030	15.5%

3 Bedrooms	12,490	64%
4 Bedrooms	2,260	11.5%
5+ Bedrooms	160	1%
Total Market Housing	19,530	100%
Affordable Housing		
1 Bedroom	640	6%
2 Bedrooms	2,840	27%
3 Bedrooms	5,400	51%
4 Bedrooms	1,610	15.5%
5+ Bedrooms	20	Less than .5%
Total Affordable Housing	10,520	100%
Total	30,050	

4.9. With regard to affordable housing mix, the results of the SHMA 2016 indicate that the vast majority of households who require affordable housing can only afford social housing if they receive housing benefit, while others could afford social housing without benefit, but would require housing benefit support to afford housing at Affordable Rent levels. Together these groups comprise 80% of the affordable housing need (affordable or social rent).

4.10. The remaining 20% constitute those households who require affordable housing and have sufficient income to afford to meet the costs of Affordable Rents. They can be considered as intermediate housing need.

4.11. Havering's affordable housing targets are discussed at paragraphs 5.30- 5.45.

Specialist older persons housing

4.12. Havering has a large and growing population of older people. It has the largest percentage of older people in all the London boroughs. There is a need to ensure that there is an appropriate provision of specialist accommodation across the borough to meet this need.

4.13. Paragraph 50 of the NPPF 2012 states that Local Planning Authorities should *"plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to... older people...)"*.

4.14. Policy 3.8B of the London Plan states that boroughs *"should work with the Mayor and local communities to identify the range of needs likely to arise within their areas and ensure that:...e) account is taken of the changing age structure of London's population and, in particular, the varied needs of older Londoner, including for supported and affordable provision."*

- 4.15.** Paragraph 3.50C states that boroughs should demonstrate that they have *“identified and addressed the local expression of these strategic needs including through targets and performance indicators. These should be informed by the indicative requirement benchmarks set out in Annex A5: Specialist housing for older people... Boroughs should work proactively with providers of specialist accommodation for older people to identify and bring forward appropriate sites, taking particular account of potential capacity anticipated from housing led, high density, mixed use redevelopment of town centres.”* Annex A5 notes an indicative annualised requirement for 185 units in Havering, of which 135 should be for owner occupiers and 50 for intermediate (shared ownership). No need for affordable rent is identified.
- 4.16.** In 2015, the Council produced a report detailing the need and current supply of specialist older person housing and the Council’s owned sheltered and extra care provision (Annex 10). The report identified an overall need for additional specialist accommodation. The level of need varied with regard to tenure, with an oversupply of affordable sheltered housing and a deficit for all tenures in the higher need housing (enhanced and extra care.) The biggest demand was for private owned leased accommodation. This is a reflection of the high levels of existing homeownership amongst older people in Havering. There was annual need for 256 owner occupied/ intermediate homes.
- 4.17.** In 2018, the 2015 report on specialist older person housing was reviewed in light of more recent population information (Annex 11). This review of the report came to similar conclusions, identifying an annual need for 255 owner occupier/ intermediate homes.
- 4.18.** The Council is taking a proactive approach to planning for and meeting specialist older person housing needs. The Council is looking to provide a significant amount of specialist older persons housing through its 12 Estates Regeneration Programme. The programme has been developed to ensure that there is sufficient affordable sheltered, enhanced/ extra care accommodation to meet the projected needs of older residents it has the responsibility for (refer to Annex 11 for more details on the anticipated tenure of units to be provided).
- 4.19.** While this programme will help to reduce the deficit for people who want to either purchase or lease properties, additional input will be needed from the private sector. Policy 6 of the Local Plan clearly identifies the types of sites and developments which are appropriate to meet the specialist needs of local people. The Spatial Strategy’s approach to emphasise housing delivery in the Strategic Development Areas, supported by the required infrastructure, will help to ensure a wide range appropriate sites are available in accessible locations, close to essential services. In addition, the Site Specific Allocations Local Plan Document will look to identify where sites are appropriate for specialist older persons housing.

5. Havering's Housing Targets

Overall Housing Target

- 5.1. As outlined in Section 2. Havering's 10 year target (2016-2026) is drawn from the London Plan 10 year target of 11,701. The Council has proposed to achieve this target and seek to exceed it in order to close the gap between identified housing need and supply. The Council proposes to achieve this target through the use of a 'stepped trajectory'.
- 5.2. In practice a stepped trajectory has been used by Local Authorities where housing delivery is reliant on development of large strategic sites/ areas which have long lead in times and/or when it appears unlikely that an annualised average target will be able to be met in the initial plan period.
- 5.3. The Local Plan is being assessed against the 2012 NPPF, where its guidance material, which does not discuss a "stepped trajectory". The 2018 NPPF now formalises the use of a stepped trajectory, stating at paragraph 033 of its guidance for Housing and Economic Land Availability Assessment that:

*A stepped requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies **and/or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period.** Strategic policy-makers will need to set out evidence to support using stepped requirement figures, and not seek to unnecessarily delay meeting identified development needs. In reviewing and revising policies, strategic policy-makers should ensure there is not continued delay in meeting identified development needs.*

- 5.4. The Inspector's Note – Spatial Strategy and Housing (26 October 2018) has requested that an updated housing trajectory be provided with more evidence to justify both housing numbers and anticipated delivery. As a result of updating this trajectory, the Council has deemed it necessary to revise the stepped approach outlined in the memo entitled 'Applying a Stepped Approach to Housing Targets' (26 September 2016), which was provided to the Inspector at the Examination Hearing on Matter 3.
- 5.5. Table 5.1 below sets out how housing delivery targets will be stepped so as to align with the 10 year housing target of the London Plan (rolling forward the target into 2025/26), and meet the 15 year target for the plan period (17,551). A stepped trajectory better reflects the most likely delivery scenario based on the identified supply of deliverable and developable sites, allowing for infrastructure, employment and services to be planned so as to match expected resident population growth. It is

acknowledged that this will result in targets for the first five years that are below both the OAN and the London Plan annualised target. However, the higher targets for years 6-10 will ensure that Havering's 10 year target is able to be met. Justifications for the proposed targets are set out below.

Table 5.1:

Plan period	Year	Target
Years 1-5	2016/17-2020/21	700 units per annum
Years 6-9	2021/22-2024/25	1640 units per annum
Year 10	2025/26	1641 units per annum
Years 11-15	2025/27- 2030/31	1170 units per annum

5.6. For the first five years of the plan period the trajectory target is below the annualised target of 1170 units per annum. A 700 units per annum target is considered to be appropriate for the following reasons:

- It aligns with the average annual net completions for the last 7 years (2012-2017) which is 715 units.
- It aligns with anticipated completions in the remaining 3 years of the first five year plan period.
- Most of Havering's housing supply is anticipated to come through the development of major strategic sites within the Strategic Development Areas and through its 12 Estates Regeneration Programme. Many of these developments have long 'lead in' times as a result of a need for land assembly, engagement with residents, decanting of existing residents, and phased construction. The vast majority of housing completions are expected to occur in years 6 -15 of the plan period. Only four developments with over 100 net units are expected to have completions between 2018 and 2020.
 - The former Harold Wood Hospital site, which is currently under construction and anticipated to be completed by the end of the 2019 financial year.
 - The Beam Park, St Georges Hospital and Dovers Corner sites, for which substantial completions are only anticipated to begin in the last two years of the five year period (2019 and 2020).
- Net housing numbers for the remaining three years of the first five year period are likely to be adversely affected by a large number of demolitions. These are required to enable the redevelopment of major sites which will make a substantial contribution to housing completions later in the plan period. Overall 291 demolitions are expected to occur within the 2018-2020 period as part of

the 12 Estates and Bridge Close redevelopments. These redevelopments are not anticipated to see completions occur until the year 6 of the plan period.

- Although the anticipated adoption of the Havering Local Plan in 2019 will have an impact on applications and approvals, most of the resulting completions are unlikely to occur until 2021 given average build out rates.
- Having higher targets, which are not likely to be achievable, could lead to the approval of schemes which compromise the overarching aims of the Local Plan, the Council's place-making objectives and the need to secure sustainable development as required in the NPPF. Risking the long term harm of unsustainable development is not considered to be justified given the shortfall in addressing housing need will be only for a short period before higher targets and anticipated supply in the following five years (2021/22- 2025/26) are able to make up for the shortfall.

5.7. For the second five years of the plan period the trajectory target is above the annualised target of 1170 units per annum. A 1640/1641 units per annum target is considered to be appropriate for the following reasons:

- This is the period in which most of the completions from the 12 Estates Regeneration Programme and other large developments within the Strategic Development Areas are anticipated to occur.
- The higher target enables the 10 year London Plan target to be met over the first 10 years of the plan period.

5.8. For the final five years of the plan period, the trajectory target is 1170 units per annum. This is considered to be appropriate because:

- Many of the identified deliverable and developable major brownfield sites will have been developed out.
- The market will have had time to adjust to a higher sustained level of delivery than has been experienced so far, supported by the policies of the adopted Local Plan and the policies that emerge from its early review.

5.9. Table 5.2 below depicts how a stepped approach will look when compared with anticipated supply. Anticipated supply is discussed further in Section 6. The spikes in the 2021 and 2022 financial years are the result of anticipated completions from major sites in the SDAs and from sites within the 12 Estates Regeneration Programme.

Table 5.2: Anticipated housing completions compared with target completions



Havering Size Mix

5.10. The SHMA determined the housing mix in terms of size for affordable housing to be around 50% for 3 bedroom properties and 10% for 4 bedrooms or more for the period 2011-13. This is supported as the baseline position.

5.11. The assessment for the larger dwelling mix in the SHMA is based on the following four key assumptions:

- A. The continued under-occupation of larger properties by smaller households.
- B. Current over-crowding in the 2 bedroom social housing stock.
- C. Growth in family households
- D. Other household types.

5.12. This category covers both single persons living together and also categories such as 3 generations of a family living together.

5.13. Each of these assumptions and further supporting evidence is explored in further detail below.

The continued under-occupation of larger properties by smaller households

5.14. Many households in Havering would have previously been allocated family housing when they had dependent children and were in need of a larger property. The

Council's strategy is to reduce the backlog of under-occupation. As the Council cannot force people to move from their homes, one of the ways of achieving this is to ensure that there are sufficient or smaller high quality properties that meet the needs of these changing households.

5.15. It is therefore important that the Council still support an element of smaller properties as set out in section 4.5 of the Housing Strategy 2014-17 (Annex 13).

5.16. The housing need and demand data shown in Table 6.1 is derived from those residents who are on the Council's housing register wishing to move into smaller alternative affordable housing. It shows that the majority of the need is for 1 bedroom and 2 bedroom properties at 56% and 41% respectively.

5.17. It should be stressed that these figures represent current needs for households who have identified that they wish to downsize. In practise there are many more under-occupying households in the social rented sector in Havering with the 2011 Census indicating that there were a total of 4,300 who had more bedrooms than were technically required under the bedroom standard assessment. Any increase in the rate of downsizing will free larger properties.

Table 6.1. Havering's under-occupying households on the housing register²

Current Bedroom size	Bedroom size required			
	1 bedroom	2 bedroom	3 bedrooms	Total
2 bedroom	91	0	0	91
3 bedrooms	19	77	0	96
4 bedrooms	0	3	5	8
Total	110 (56%)	80 (41%)	5	195

Current over-crowding in the 2 bedroom social housing stock

5.18. Households that are over-crowded in a 2 bedroom property will benefit from the provision of 3 bedroom properties as it will allow them to move to a more suitably sized dwelling. This will also free up the 2 bedroom property to meet the needs of another household. The housing need and demand data shown in Table 6.2 is derived from those residents who are on the Council's housing register who are overcrowded and seeking to move into larger alternative affordable social housing. It is in line with

² As at 31 January 2017

the SHMA assumption that households are overcrowded in 2 bedroom properties and therefore require 3 bedroom properties (47%).

5.19. The majority of these are in smaller 2 bed 3 person accommodation whose needs can be met in larger 2 bed 4 person properties. In addition, the data show that there are a considerable number of households who are overcrowded in 1 bedroom properties and therefore require 2 bedroom properties too (46%). Again we would note that these figures only consider households who are currently seeking to move. The 2011 Census indicated that there are a total of 1,300 households in the social rented sector in Havering who were overcrowded when assessed against the bedroom standard, whereas the SHMA assumed that all overcrowded household require moving, not just those on the transfer list.

Table 6.2: Havering's overcrowded household on the housing register³

Current Bedroom size	Bedroom size required					Total
	1 bedroom	2 bedroom	3 bedrooms	4 bedrooms	5 bedrooms	
1 bedroom	0	264	2	0	0	266
2 bedroom	0	0	269	3	1	273
3 bedrooms	0	0	0	33	1	34
4 bedrooms	0	0	0	0	2	2
Total	0	264 (46%)	271 (47%)	36 (6%)	4	575

Current over-crowding in the 2 bedroom social housing stock

5.20. The strongest growth in the Havering household projections is for lone parent and couple households with children. While many of these households will initially require a 2 bedroom property, the size of some of the households will grow, requiring 3 or more bedroom properties.

5.21. Table 6.3 shows the breakdown of the housing need by size mix based on Havering housing register, which the assumption that many of the households initially require a 2 bedroom property (43%). It is also accepted that over time as they grow, they will require larger accommodation. Some of this need can be met in a larger 2 bedroom 4 person property.

³ As at 31 January 2017

Table 6.3. Havering's housing register need⁴

Bedroom size	Number	Percentage (%)
1 bedroom	601	27%
2 bedrooms	937	43%
3 bedrooms	562	26%
4 bedrooms	72	3%
5 bedrooms	7	1%
Total	2179	

5.22. Table 6.4 also shows the breakdown of the housing need by size mix based on Havering households currently accommodated in temporary accommodation who are waiting to move into settled affordable accommodation. The current main need is for 44% of 2 bedroom properties.

Table 6.4 Havering households in temporary accommodation

Bedroom size	Number	Percentage (%)
1 bedroom	301	28%
2 bedrooms	468	44%
3 bedrooms	254	24%
4 bedrooms	36	3%
5 bedrooms	5	
Total	1064	

5.23. Therefore, with the current demand data suggesting a high need for 2 bedroom properties, it is important that the Council are also able to accommodate these families in the immediate period of the Local Plan leading up to 2033.

Other household types

5.24. This category covers both single persons living together and also categories such as 3 generations of a family living together. This category of household type has been rising recently and will include some who are considered to be in affordable housing need in the grounds of affordability in the SHMA figures. While sharing single persons under 35 years will not typically be considered for social housing allocations, many will still require affordable housing.

⁴ As at 31 January 2017

5.25. Their need is more likely to be met through the provision of good quality and well managed houses in multiple occupations (HMOs). In addition, the maximum housing benefit they can get is the rate for renting a single room in a shared house, likely to be in a HMO instead of a 3 bed house let to sharers.

Proposed approach to size mix

5.26. The Council is committed to providing a range a mix of affordable properties that provide a range of options for our residents and which meet their needs.

5.27. The key findings of the SHMA in relation to size mix show that over the Plan period there is a significant need for 3 bedroom properties. However, this can vary over the short and medium term and the current housing need and demand evidence indicates a comparatively significant need for 2 bedroom properties.

5.28. The evidence from both the SHMA and the Council's current housing register is showing that the Council's priority through the Local Plan should be for 2 and 3 bed properties, with 1 bed properties less of a priority. To create mixed and balanced communities, the Council considers it necessary to support a mix of affordable housing sizes.

5.29. The starting point for negotiations on individual sites will be:

Table 6.5 Approach to size mix

	1 bed	2 bed	3 bed	4bed plus
Intermediate	10%	40% - but with preference for higher % of 2 bed 4 person	40%	10%
	1 bed	2 bed	3 bed	4bed plus
Social/ Affordable	10%	40% but with preference for higher % of 2 bed 4 person	40%	10%

Havering's Affordable Housing Targets

5.30. Policy 3.11A of the London Plan states that the mayor, boroughs and other relevant agencies and partners should seek to ensure an average of at least 17,000 more affordable homes per year in London over the term of the Plan. Policy 3.11B states that boroughs should set an overall target of affordable housing provision in their areas and separate targets for social/ affordable rented and intermediate housing.

5.31. In doing so, boroughs should take account of (Policy 3.11C):

- a. *current and future housing requirements identified in line with Policies 3.8, 3.10 and 3.11*
- b. *the strategic targets and priority accorded to affordable family housing set out in section A above*
- c. *the approach to coordinating provision and targets to meet the range of strategic, sub-regional and local affordable housing needs in London set out in Policy 3.8, paragraphs 3.65 - 3.67 and Supplementary Planning Guidance and the Mayor's London Housing Strategy*
- d. *the need to promote mixed and balanced communities (see Policy 3.9)*
- e. *capacity to accommodate development including potential sources of supply outlined in para 3.67*
- f. *the viability of future development, taking into account future resources as far as possible.*

5.32. Havering has proposed a target of at least 35% affordable housing. This figure is based on the SHMA 2016: Update for Havering (LBHLP.14.1) which identifies Havering's affordable housing need as 35% of total housing need. A 35% target is also in line with the Mayor's Affordable Housing and Viability Supplementary Planning Guidance 2017, which sets out the Mayor's preferred approach to implementing affordable housing targets. The SPG states that:

"applications (for 10 units or more) that meet or exceed 35% affordable housing provision without public subsidy, provide affordable housing on-site, meet the specified tenure mix, and meet other planning requirements and obligations to the satisfaction of the LPA and the Mayor where relevant, are not required to submit viability information" (paragraph 9).

5.33. The viability of a 35% target has been tested in the Viability Assessment 2017 (LBHLP.24) which concludes that this target and Council's flexible approach to affordable housing delivery (i.e. subject to individual site circumstances and scheme viability) will ensure that most development can come forward over the economic cycle.

5.34. The Viability Assessment found that the higher density typologies were only viable in the higher value parts of the borough and would only support affordable housing at a rate of between 25% and 35%.

5.35. Although the assessment notes that lower density typologies are viable with affordable housing provided at 50%, these sites compromise a small proportion of the anticipated housing delivery, with the majority of development to occur within the Strategic Development Areas and through the 12 Estates Regeneration Programme.

5.36. The Council considers that a 35% target will be appropriate, effective and achievable. At the examination hearing on housing matters, the inspector queried whether a

higher target, such as 50%, might be appropriate. It is considered that a higher target, for example, 50%, is likely to result in adverse outcomes for the following reasons:

- Developers that are able to meet the 35% target are incentivised to meet it to avoid the time and cost of undertaking a viability assessment and negotiating with the Council and, in referable schemes, with the GLA. With a 50% target, this incentive is removed. Developers are very unlikely to voluntarily offer 50% affordable housing and will instead attempt to secure lower affordable housing numbers through the viability assessment process.
- Most developments at the lower density typologies in Havering seek to achieve unit numbers of around 10 units or below. The application of a 50% target, even if viable, to these typologies is more likely to encourage developers to lower their proposed densities so as to deliver less than 10 units, thereby avoiding the time and cost of affordable housing requirements. This would result in a loss of both affordable housing units and overall net housing units.

5.37. While in practice not all sites will be able to achieve a 35% target, many of the anticipated developments in the borough are seeking to provide for affordable housing in excess of this target. The Council, in particular, is very proactive in this area, with its 12 Estates Regeneration Programme anticipated to deliver over 1600 affordable units through affordable housing provision of greater than 35% on its sites. In addition, the GLA will be seeking a target of 50% affordable housing for schemes on public land⁵.

Affordable Housing Tenure Split

5.38. Policy 3.11A of the London Plan states that 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale. Local affordable housing targets are required to be in general conformity with the London Plan's strategic targets. The London Plan recognises that borough may wish to express their targets differently in light of local circumstances. (paragraph 3.69 of the London Plan).

5.39. The Mayor's Affordable Housing and Viability Supplementary Planning Guidance 2017, clarifies that this provides flexibility for LPA's to set separate targets for social/affordable rent and intermediate housing in their Local Plans (at paragraph 2.29). The preferred tenure split is:

- At least 30% social rent or affordable rent
- At least 30% as intermediate products
- The remaining 40% determined by the LPA taking account of Local Plan policy.

⁵ Threshold Approach to Affordable Housing on Public Land - GLA:
https://www.london.gov.uk/sites/default/files/practice_note_on_threshold_approach_to_affordable_housing_on_public_land_july_2018.pdf

5.40. As discussed at paragraphs 4.9 and 4.10, the SHMA 2016: Update for Havering (LBHLP.14.1) identifies social or affordable housing rent need to be 80% and intermediate rent to be 20%.

5.41. To ensure better conformity with the London Plan and its SPG, these targets have been moderated so that the Council will seek to achieve 70% social rent or affordable rent and 30% intermediate products.

6. Havering's Sources of Supply

6.1. This section provides details of the various sources of Housing supply in Havering, and how they have been identified, as well as the actions that Council is taking to ensure an increased in housing delivery.

6.2. Havering's Spatial Strategy is outlined in Chapter 5 of the proposed Local Plan. The Strategy seeks to ensure that there is the necessary growth in homes, jobs and critical infrastructure to support and sustain new and existing communities while also preserving and enhancing the borough's most valuable assets and maintaining its long established and strongly supported character and appearance as an outer London sub-urban borough. The strategy identifies two parts of Havering as the main areas for accommodating Havering's growth over the plan period - the Strategic Development Areas of Romford and Rainham and Beam Park. In addition, the Strategy notes that significant growth will be accommodated from the major regeneration of the Council's own housing estates, through the 12 Estates Regeneration Programme.

6.3. Overall, the key sources of supply that have been included in Havering's housing trajectory area:

- Major sites (with potential for the delivery of 10 or more dwellings) within the Romford Strategic Development Area;
- Major sites within the Rainham and Beam Park Strategic Development Area;
- Council Housing Estates Regeneration Sites;
- Major sites outside the Strategic Development Areas and 12 Estates Regeneration Programme
- Small sites (with potential for the delivery of 1-9 dwellings)
- Vacant units returning to use

6.4. Table 6.1 below identifies the supply anticipated to come from each of these key sources.

Table 6.1: Key sources of housing supply

Source of Supply	Net additional Homes 1-5 years	Net additional Homes 6-10 years	Total 10 year supply	Total 15 year supply
Major sites within the Romford Strategic Development Area (including 12 Estate Regeneration Programme sites)	124	5117	5241	6642
Major sites within the Rainham and Beam Park Strategic Development Area (including 12 Estate Regeneration Programme sites)	590	2515	3105	3105
12 Estates regeneration programme sites outside of the SDAs	-34	410	376	1288
Other major sites outside of the SDAs and estates regeneration programme (including permissions, applications, pre-applications and other sites)	1117	503	1620	1620
Small sites (with potential for the delivery of 1-9 dwellings)	540	900	1440	2340
Vacant units returning to use	78	130	208	338
Completions 2016/17 and 2017/18	884	NA*	884	884
Surplus from 2015/16	221	NA*	221	221
Total	3520	9,575	13,095	16,438

*Surplus completions from 2015/16 and completions in 2016/17 and 17/18 are not included in this period. They are included in the total 10 and 15 year supply.

- 6.5.** In addition, the Council has given full considerations to other options, in particular scope for the Green Belt to provide land for new homes.
- 6.6.** The assessment has considered all sites and broad locations capable of delivering 10 or more dwellings. This threshold accords with the borough's definition of major

applications. Anticipated supply through windfall development has also been identified through an assessment of previous delivery and research undertaken as part of the London SHMA 2013.

6.7. Sites have been identified from the following information sources:

- Sites with planning permission
- Sites with current live applications or applications with a committee resolution to grant consent
- Sites allocated for residential development in the Romford Area Action Plan 2008 or Site Specific Allocations Plan 2008 (Local Development Framework)
- Sites identified in the GLA SHLAA 2017
- Sites published in the Havering Brownfield Register
- Sites identified in the Romford Town Centre Development Framework 2015 and the Rainham and Beam Park Development Framework 2016
- Sites identified through call for sites
- Sites that have been the subject of a pre-application meeting
- Other robust evidence of developer interest
- Sites that are in public ownership and where there is intent to redevelop or dispose of. These include:
 - The Council's 12 Estates Housing Programme
 - Sites identified in Mercury Land Holdings Business Plan

Major sites within the Romford Strategic Development Area (Housing Zone)

- 6.8.** The planned arrival of Crossrail in 2019/20 alongside the relative affordability of this area are key drivers of growth. They have already placed Romford firmly in the minds of investors and developers who are keen to realise its opportunities. The Mayor of London has already recognised this and in early 2016 Romford was granted Housing Zone Status which will provide significant investment in order to accelerate the delivery of new homes. The area's significant growth potential is also recognised through its proposed designation by the Mayor of London as an Opportunity Area in the draft London Plan.
- 6.9.** There are a number of opportunity sites within the Romford Strategic Development Area which can accommodate housing growth. There is an increased demand for homes in east London, and with areas closer to central London becoming unaffordable to many, it is likely that both demand and house values will grow, especially with the arrival of Crossrail.
- 6.10.** The Romford Strategic Development Area is expected to provide for over 5,000 net new homes within the first 10 years of the plan and over 6,000 net new homes by the

end of the plan period. Annex 2 provides a site by site assessment of the deliverability of each site in the Romford Strategic Development Area.

6.11. The Council is taking an active role in the regeneration of Romford. Alongside its current development plans for the Waterloo and Oldchurch Gardens - 12 Estates sites, and Bridge Close, the regeneration department is actively looking into opportunities for a comprehensive redevelopment of some of the Council's sites within the town centre. These sites include:

- Como Street
- 37-59 High Street
- Angel Way Car Park and High Street Shops

6.12. Comprehensive development of Council sites within the Romford town centre would enable greater flexibility and efficiency in the layout and planning of sites and has the potential to provide a significant amount of housing within the Romford area. Planning for this comprehensive development has not reached a stage where political approval has been received and evidence is able to be released to support these figures. Therefore, for each site assessment, a conservative approach has been taken. Housing numbers have been calculated based on each site being developed separately, but still taking into account the likely timeframe for comprehensive development. For those sites where there are land ownership matters to be resolved, a discount has been applied to unit numbers.

Major sites within the Rainham and Beam Park Strategic Development Area

6.13. The Rainham and Beam Park Strategic Development area is a major growth and regeneration area and provides the opportunity to establish an exciting new residential neighbourhood linked to the delivery of a new railway station on the existing Essex Thameside line at Beam Park.

6.14. The area falls within the London Riverside Opportunity Area, identified in the London Plan as having the capacity to provide a significant number of new homes and jobs. In June 2015, following a successful bidding process, Rainham and Beam Park was identified as one of the GLA's Housing Zones which is providing much needed investment to help secure and accelerate the delivery of new homes by overcoming barrier to development and supporting the provision of social and physical infrastructure in the area to create attractive new places to live. The London Riverside Opportunity Area Planning Framework (2015) sets out the Mayor's strategic priorities and long term vision for the area over the next 20 years.

6.15. There are a number of development opportunities in the area on sites that are within public and private ownership. The GLA are an important land owner in the area and

have recently received a hybrid planning permission for the delivery of a residential and mixed use development together with Countryside and L&Q.

6.16. The Council is actively acquiring land along the A1306 corridor and in December 2017 the Council appointing Notting Hill Trust as its Joint Venture Partner. A number of outline planning applications for these sites have been approved or are currently awaiting a decision.

6.17. The Rainham and Beam Park Strategic Development Area is expected to provide over 3,000 net new homes over the plan period, all within the first 10 years of the plan. Annex 3 provides a site by site assessment of the deliverability of each site in the Rainham and Beam Park Strategic Development Area.

Council Housing 12 Estates Regeneration Sites

6.18. Further growth will be accommodated from major regeneration of the Council's own housing estates. The Council is planning to build a significant number of new homes in one of the most ambitious local authority home building programmes in the country. The initial programme focuses on 12 sites across the borough, delivering over 2,000 additional homes. The 12 sites are both inside and outside the Strategic Development Areas. In March 2018 the Council announced that it had entered into a joint venture agreement with Wates Residential in order to deliver the programme.

6.19. The overarching vision for the programme is to successfully establish vibrant and connected communities, supported by the provision of good quality new homes, tenure diversity, high quality public spaces, and well-used community facilities within safe and secure environments where people want to live and participate in local activities.

6.20. A key objective of the programme is to contribute to meeting the wider housing needs of Havering through the regeneration and transformation of the Council's existing stock for predominantly residential use; to provide a choice of good quality housing for people at all stages of life (including older persons), increasing tenure diversity through affordable rent, shared ownership, private rent, market sale and sheltered housing.

6.21. The initial 12 sites were identified as offering the greatest potential for the provision of new affordable homes or requiring intervention due to the costly or unacceptable quality of housing. The Council intend, where appropriate, to bring forward further sites for inclusion in the Joint Venture Partnership at a future date.

6.22. The Council will receive £33m grant monies from the GLA to deliver the new estates.

- 6.23.** Due to the size of the potential development on all 12 sites and the decant and financial viability issues it would not be practicable to start work on all sites simultaneously. It was therefore proposed that Waterloo Road, Queen Street, Napier & New Plymouth and Solar, Serena and Sunrise Court are prioritised. These sites provide over 50% of the total new housing to be delivered through this project.
- 6.24.** In the first 10 years of the plan period, the Council intends to build over 250 net new homes on its sites outside of the Strategic Development Areas. Over the whole plan period this figures increases to over 1,200 new homes. When looking at all sites within the 12 sites regeneration programme, over 1000 net new homes are anticipated in the first 10 years of the plan period and over 2,700 over the whole plan period. Annex 4 provides a site by site assessment of the deliverability of each of the estates sites outside of the Strategic Development Areas. More supply is anticipated to come from the estates regeneration programme, however, planning and political approval for these sites has not yet reached a point at which they could be considered deliverable or developable. The numbers used in the updated housing trajectory are based on information provided by the Council's regeneration department as of 15 January 2018. They are subject to change through the planning process.

Major sites outside of the 12 Estates Regeneration Programme and the Strategic Development Areas

- 6.25.** Outside of the Estates Regeneration Programme and the Strategic Development Areas, the Council has identified a number of sites with the potential to contribute to over 1,500 net new homes in Havering over the plan period. These include:
- Sites with existing planning permission, which can contribute over 1,200 new dwellings.
 - Sites with applications currently being processed, which have the capacity to contribute at least 100 new dwellings;
 - Two other sites. One of which has been the subject of a pre-application and the Council is aware of intent from the owner to develop (Station Approach). The other has recently been acquired by the Council and is identified as an area to be developed in Mercury Land Holdings Business Plan (Quarles Campus). These sites are capable of delivering at least 200 new dwellings.
- 6.26.** Annex 5 provides a site by site assessment of the deliverability of each of the major sites outside of the Estates Regeneration Programme and Strategic Development Areas.

Windfall – Small Sites and Vacant units returning to use

6.27. The NPPF 2012 supports the inclusion of windfalls in a 5-year supply if there is compelling evidence. Paragraph 48 states that:

Local planning authorities may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic, having regard to the Strategic Housing Land Availability Assessment, historical windfall delivery rates and expected future trends, and should not include residential gardens.

As set out in Table 6.2 below, Havering has undertaken an assessment of historical windfall delivery rates of small sites (being those with less than 10 units proposed and not including development on residential gardens). Average annual net completions have been 180 units. The Council considers this figure constitutes a realistic, if not slightly conservative windfall and on this basis has applied it to the trajectory. This windfall broadly accords with the 151 units identified as a small sites windfall in the London SHLAA 2013, however, is significantly below the 904 units per year identified in the London SHLAA 2017. The Council has contested the latter figure through the consultation process and considers it to be unjustified.

Table 6.2: Average completions on small sites 2012-2016

	Completions on Small Sites (net additional dwellings)
2016	164
2015	170
2014	225
2013	151
2012	191
Five Year Average Completions	180.2

6.28. An annual windfall of 26 units, representing vacant units returning to use has also been included in the trajectory. The 26 units estimate is drawn from the London SHLAA 2013 (page 40) which based this figure on a target of reducing the proportion of long term vacants to 0.75% of total stock. The 0.75% benchmark was adopted because it provided numbers that were realistic in relation to past delivery.

Green Belt

- 6.29.** In seeking to address the shortage of housing land supply, the Council has given full consideration to other options. In particular, the Council has looked at the scope for the Green Belt to provide land for new homes.
- 6.30.** Two Green Belt Studies have been undertaken as part of the evidence base for the Local Plan. The first Green Belt Study was undertaken by the London Borough of Havering in association with PBA and Enderby Consultants. This study assessed the contribution that land within the Green Belt makes to the Green Belt purposes (as defined in para 80 of the NPPF). To aid the assessments, the Green Belt in the Borough was divided into 24 land parcels. A performance value was attributed to the parcels for each purpose, based on predefined criteria. The study found that all 24 parcels make a contribution to Green Belt purposes, with 19 of the 24 Green Belt parcels making a fundamental contribution to the Green Belt purposes. A further four parcels were found to make a high or moderate/high contribution and only one parcel was found to make a low contribution.
- 6.31.** A second Green Belt Study was prepared by LUC in 2018. The aim of this study was to provide conclusions on the potential degree of harm that may occur if the sites (which had been submitted to the Council as part of the Local Plan process) were released from the Green Belt. This took account of three elements: 1) the contribution of the sites to the NPPF Green Belt purposes, 2) the potential impact on the wider integrity of the Green Belt and 3) the strength of revised Green Belt boundaries that would remain if the site was to be released. Out of a total of 84 sites assessed (with a total area of 849ha):
- 46 sites (total area of 682ha, which is 80.3% of the total area of the 84 sites) rated as 'high' in terms of harm to Green Belt resulting from release.
 - 21 sites (120ha, 14.1%) rated as 'moderate-high' in terms of harm to Green Belt resulting from release.
 - 9 sites (24ha, 2.9%) rated as 'moderate' in terms of harm to Green Belt resulting from release.
 - 4 sites (17ha, 2%) rated as 'low-moderate' in terms of harm to Green Belt resulting from release.
 - 4 sites (6ha, 0.7%) rated as 'low' in terms of harm to Green Belt resulting from release.
- 6.32.** The Council does not believe that there are 'exceptional circumstances' to warrant the release of Green Belt land to meet the Borough's housing need. As stated in the Housing White Paper (page 21), the Government "seeks to maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate

that they have fully examined all other reasonable options for meeting their identified housing requirements.

6.33. The Council is concerned that any release of Green Belt could undermine the delivery of housing on key brownfield sites within Rainham and Beam Park and Romford, both of which are important regeneration areas with committed funding programmes and which offer significant opportunities for new homes.

6.34. Opportunities for new housing are recognised at previously developed sites within the Green Belt at St Georges Hospital and Quarles Campus. Both sites were previously identified in the Local Development Framework as Major Developed Sites within the Green Belt. The St Georges site has planning permission.

Assessing whether sites are ‘deliverable’ or ‘developable’

6.35. Paragraph 47 of the NPPF (2012) states that to boost significantly the supply of housing, local authorities should:

- *Identify and update annually a supply of specific **deliverable** sites sufficient to provide five years worth of housing against their housing requirements(and)*
- *Identify a supply of specific, **developable** sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;*
- *For market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period...*

6.36. This is supplemented by two definitions in footnotes 11 and 12:

- *Footnote 11: To be considered **deliverable**, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.*
- *Footnote 12: To be considered **developable**, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.*

6.37. National Planning Policy Guidance (Housing and economic land availability assessment section)⁶ provides further clarification on considerations assessing the

⁶ This refers to the guidance prior to the new NPPF.

suitability, availability and achievability of sites. Table 6.3 below summarises this further guidance:

Table 6.3: National Planning Policy Guidance: Factors to be considered for suitability, availability and achievability of sites

	Factors to be considered
Suitability	<ul style="list-style-type: none"> Physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination; Potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation; Appropriateness and likely market attractiveness for the type of development proposed; Contribution to regeneration priority areas; Environmental/ amenity impacts experienced by would be occupiers and neighbouring areas <p><i>Note: Sites in existing development plans or with planning permission will generally be considered to be suitable, although it may be necessary to assess whether circumstances have changed which would alter their suitability</i></p>
Availability	<p>Sites are considered available, when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership problems. Where potential problems have been identified, then an assessment will need to be made as to how and when they can realistically be overcome.</p> <p>Consideration should also be given to the delivery record of the developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions.</p>
Achievability	<p>A site is considered achievability where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site and the capacity of the developer to complete and let or sell the development over a certain period.</p>

6.38. Based on the NPPF and its guidance, the Council has prepared a Housing Trajectory (see Annex 1) which demonstrates a 5 year supply of deliverable sites, a 6-10 year supply of deliverable or developable sites and, where possible, a 10-15 year supply of deliverable or developable sites. The threshold of deliverability has been applied to all

sites anticipated to come forward in the 5 years from anticipated adoption in 2019 (2019-2023). This enables an accurate assessment of Havering's 5 year supply from anticipated adoption.

- 6.39. The Housing Trajectory is accompanied by a Sites Compendium (Annexes 2-5) which contains assessments of whether each site is deliverable or developable, along with the evidential basis for this determination.

Build out rates, lead in times and phasing of development

- 6.40. Compiling a housing trajectory requires an assessment as to the likely timing of completions and phasing of development, particularly with regard to larger schemes.
- 6.41. The Inspector's Post Examination Note on Spatial Strategy and Housing (26 October 2018) asked the Council to provide details on the evidence behind its assumptions on build-out rates and lead-in times. This evidence is outlined below.

Build Out Rates

- 6.42. For the purposes of its assessment, the '**build out period**' is between the granting of full planning permission and completion of the last home on the site. **Build out rates** are considered to be the percentage of the site that is built out on average in each year within this period.

Sir Oliver Letwin's Independent Review of Build out Rates: Draft Analysis (June 2018)

- 6.43. Sir Oliver Letwin (MP)'s Independent Review of Build Out Rates: Draft Analysis (June 2018) examined build out rates on 15 large sites (1000 units and over⁷) and identified fundamental explanations for these rates. The review found a median "**build out period**" of 15.5 years, and a median build out rate of 6.5% across the 15 large sites examined.
- 6.44. The fundamental driver for this lengthy build out period and low build out rate was the '**absorption rate**' – the rate at which newly constructed homes can be sold into the local market without materially disturbing the market price. The key influencer of the absorption rate was determined to be the variety of homes on offer, in terms of style, size and tenure. Put simply, most large home builders tended to offer a homogenous type of dwelling which could only be absorbed by the market at a certain rate before the market was flooded, impacting the house price and therefore the anticipated price the developer had built their financial calculations on. The absorption rate was considered to be the fundamental driver of the slow rate of build out, however, the review also comments on several other drivers, including:

⁷ 14 out of 15 of the sites examined were for over 2,000 units

- **Lack of transport infrastructure** - which was considered not to be a key determining factor in build out rates, but likely to have an influence on when final permission is granted for the development;
- **Difficulties of land remediation** - where no systemic contrast between build out rates on 'greenfield' sites with no remediation requirements and large brownfield sites that have required intensive remediation was found.;
- **Constrained site logistics** - where the impression was that developers and major house builders had the capabilities to manage faster build out rates in a way that was compatible with both efficient construction and keeping impacts on early residents tolerable;

Nathaniel Litchfield & Partners report on housing delivery (November 2016)

6.45. In their report entitled "*Start to Finish: How Quickly do Large-Scale Housing Sites Deliver*" (November 2016)", Nathaniel Litchfield & Partners also examined the delivery rates of large-scale housing sites. The report looked at 70 large sites (500+ units proposed), as well as 83 small sites (<500 units proposed). The sites were predominately located outside London "due to the distinctive market and delivery factors applicable in the capital"⁸.

6.46. The time between planning approval (detailed or full) and the completion of the first units on the site was found to be just over 18 months for small sites (of under 500 units), however, interestingly it was substantially quicker for large-scale sites, particularly those over 2,000 dwellings where the average time was 0.8 years⁹.

6.47. The report also identified the 'absorption' rate as being a key determinate for build out rates. The absorption rate was noted as being influenced by a number of factors including:

- **The strength of the local housing market** – where stronger market demand was found to support higher build rates;
- **The tenure of housing being built**- where it was found that those developments with a larger proportion of affordable homes (more than 30%) delivered more quickly, where viable. For developments with 40% or more affordable housing the built out rate was 40% higher than those development of 10-19% affordable housing.
- **The size of the development** – where it was found that the larger the development, the higher the average number of units built per year (ranging from 27 units for sites of less than 100 units, to 161 units for sites of more than 2,000 units);and

⁸ Page 2, "*Start to Finish: How Quickly do Large-Scale Housing Sites Deliver*" (November 2016)

⁹ Page 8, "*Start to Finish: How Quickly do Large-Scale Housing Sites Deliver*" (November 2016)

6.48. The report found that delivery rates were not steady, with annual completions tending to be higher early in the build out period before dipping¹⁰ and the overall rate fluctuating in peaks and troughs. Brownfield sites saw an average of 83 completions per year.

The Havering Context

6.49. The research indicates that the absorption rate is the key determinate for build out rates and is dependent on a number of factors. These factors are considered below with comment regarding the Havering context:

- **Strength of the Housing Market:** The Havering Local Plan – Viability Assessment (LBHLP.24) notes that with regard to the housing market, the economic outlook remains uncertain and largely dependent on the UK's terms of exit from the EU. While the average house prices in London have decreased over the past year to June 2018¹¹, Havering has been one of the best performing boroughs with a 6.1% annual increase in the year to June 2018¹². The borough remains attractive due to its comparably low land values and the anticipated major infrastructure improvements coming through the new Beam Park Station and Crossrail. The Havering housing market is discussed in more detail in paragraphs 2.3-2.15 of the Viability Assessment (LBHLP.24).
- **The variety of homes on offer:** The Outer North East London SHMA 2016 (LBHLP.14) sets out Havering's housing need for a variety of housing tenures and sizes. Policies 4-6 of the proposed Local Plan seek to ensure that this need is met through proposed development. In addition, the Council is actively involved in housing delivery through its Joint Ventures (including the 12 Estates Regeneration Programme, Rainham and Beam Park redevelopment and Bridge Close redevelopment) which comprise a substantial proportion of anticipated delivery. Subject to viability, these developments aim to meet or exceed the 35% affordability target the Council has set out, which will likely assist in improving the build out rate. Variety through design is encouraged through Policies 26 and 27.
- **The size of development:** Many of the anticipated new homes in Havering are from large scale developments between 100 and 1000 proposed units. Most of the anticipated homes are expected to be built within the Strategic Development Areas where higher density typologies such as apartments are expected. Apartment developments are more likely to see a large number of completions occur at the same time as each block is finished.

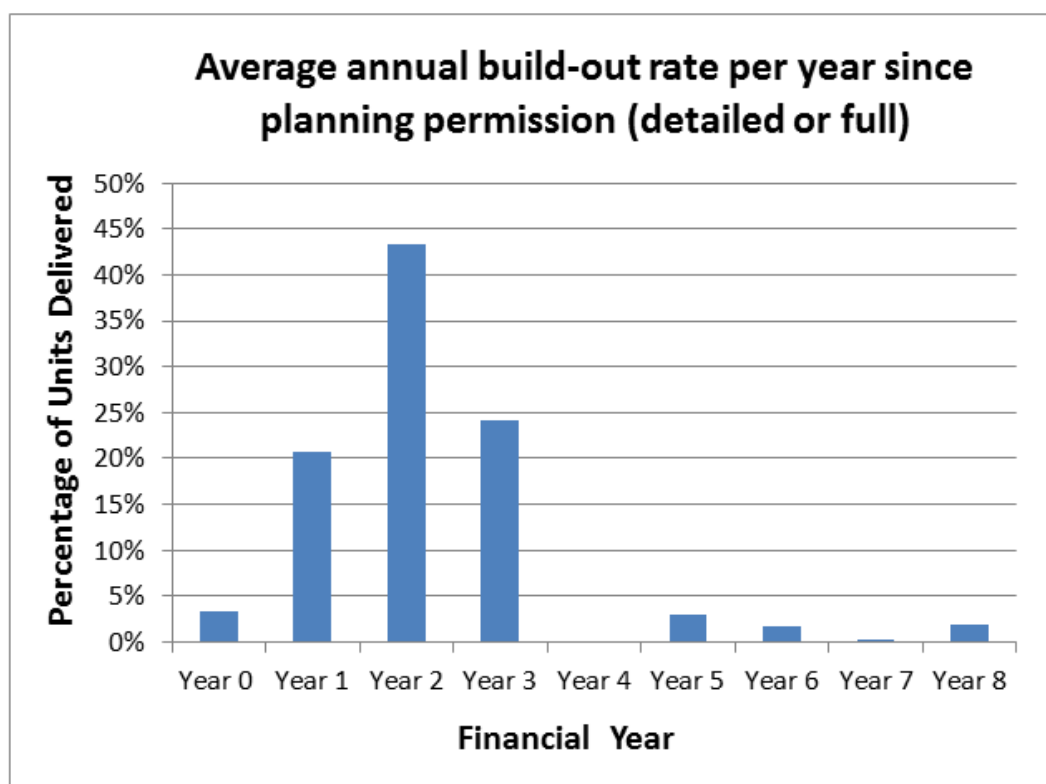
¹⁰ Page 16, 'Start to Finish: How Quickly do Large-Scale Housing Sites Deliver' (November 2016)

¹¹ GLA Quarterly Housing Market report (updated 21 September 2018)

¹² <https://www.homesandproperty.co.uk/property-news/uk-inflation-rises-as-london-house-prices-record-biggest-fall-since-2009-a123106.html>

6.50. The Council has undertaken an assessment of Havering's build out rates based on schemes of 10 or more units completed between 2011 and 2016. The average period between approval of full or detailed planning permission and final completion of the schemes was found to be 2.51 years, rising to 3 years for developments over 100 units (not including Prior Approvals¹³). Most completions for schemes of 10 or more units occurred in the 2nd financial year following approval, with the majority of completions occurring within 2-3 years of approval. The number of completions in each financial year ranged from 2 units to 339 units. For schemes of over 100 units the median number of completions (for years where substantial completions occurred) was 100 units¹⁴.

Table 6.4.



6.51. These findings generally align with those of in the Nathaniel Litchfield & Partners Report but differ from the build out rates and build period identified in the Sir Oliver Letwin review. This may be due to the small sample size of the Sir Oliver Letwin review and its focus on very large developments of predominately over 2,000 units of which Havering has not experienced and are not anticipated on the trajectory.

¹³ Prior approvals were not included in this calculation as change of use developments had a significantly lower build out rate that skewed results.

¹⁴ Substantial completions were deemed to be 5 or more units completed.

Trajectory Assumptions

6.52. For the purposes of this trajectory, an average build out period of 2.5 years (or 3 years for developments of over 100 units) has been used as an initial basis for determining when completions are to occur, in line with the assessment of previous completions in Havering. It has been assumed that the first units will be completed approximately 18 months from when permission has been granted, in line the findings of the Nathaniel Litchfield & Partners Report. For larger developments of over 100 units, it has been assumed that the annual completion rate will be slightly higher in the earlier years where completions occur and that average annual completions will not exceed 100 units per year unless more site specific information suggests otherwise.

6.53. The above assumptions have been used as a starting point for assessment of likely delivery; however, each assessment is also affected by a number of factors specific to each site, including:

- **Information from the land owner or developer:** In some circumstances, the Council has been provided with information from the relevant land owner or developer as to the planned timing of completions either through correspondence or through a phasing plan or construction management plan, submitted as part of the conditions.
- **Information from other Council departments:** Where the Council is the developer or is part of a Joint Venture developing the land, anticipated completion timings have been provided based on conversations with the relevant Council officers, business plans, outline delivery plans and public information available on the development website.
- **Information from the GLA:** In some circumstances, the GLA has provided funding to a development and has outlined anticipated start and completion dates within its expected outcomes.
- **The stage of development:** The average build out period is based on full or detail permission being received. Where only outline approval has been received, another 6 months has been added. Similarly, the assessments have taken into consideration whether conditions are or have been discharged, whether a section 106 agreement is in place and any payments made, and whether construction is underway. In these situations the build out period has been reduced accordingly (or increased if a section 106 agreement is not in place).
- **The type of development:** The assessments take into accounts whether developments involve a change of use, for example office to residential, and the retention of existing buildings. These developments typically have a much

lower build out period as there are less infrastructure constraints and largely only internal changes to be made.

- **Whether an application is likely to get refused and appealed:** This is determined through conversations with the relevant Council development management officer. If this is the case approximately 9 months has been added to the average build out period.
- **Whether the developer has a history of slow or fast 'build outs':** This information has been gathered from discussions with the Council's development management officers and the build out period has been reduced or increased accordingly.
- **Whether there are infrastructure or other planning constraints that may delay construction:** Where there are significant site constraints such as land contamination, the build out period has been adjusted accordingly.
- **Whether there are incentives in legal agreements to start work soon:** Some s106 agreements provide for an early review of affordable housing provision if the implementation of affordable housing does not occur within a specific period. In some circumstances, completion start dates have been brought forward as it is assumed developers will want to avoid having to provide more affordable housing as a result of the review clause.
- **Whether the site is identified in the GLA SHLAA 2017 for a particular phase:** For those sites which do not have a permission or application in process, the SHLAA 2017 phasing has been used to help estimate when development is likely to occur.

Lead in times and planning approval period

6.54. The assessments also take into account 'lead-in times' (the time from the site first being identified by the planning authority till submission of an application) and the planning approval period itself. The Nathaniel Lichfield & Partners report notes that lead in times are hard to estimate. The report's sample of sites with information on lead in times took an average of 3.9 years from first identification by the planning authority for housing to the first application being submitted. The sample size was too small to make clear conclusions, however, the case studies looked at identified the following trends:

- On average, larger sites take longer to complete the lead in and planning application process than smaller sites, however, they tend to have shorter build out periods.

- Where planning applications are determined more quickly than average this is generally due to these matter having being dealt with earlier either through development briefs, pre-application meetings and master planning.

6.55. The Council has undertaken an assessment of previous planning approval periods for schemes of 10 or more units completed within the 2011-2016 financial years. This identified that the average period from validation of the application (full, detailed or outline) to a decision was approximately half a year. This average was similar when looking at full or detailed applications separate. The average outline application took slightly longer at approximately 9 months, however, this was based on a sample size of two and therefore is not considered to be reliable.

6.56. For the period April 2017 to March 2018, 28 major applications were determined, 89% of which were determined within the statutory or agreed period. For the year to date (April 2018- December 2018) 29 major applications have been determined, 90% of which were within the statutory period or agreed date.

Trajectory Assumptions

6.57. The following assumptions have been made regarding lead in times as depicted on the housing trajectory.

- As a starting point a planning processing period of 1 year is assumed. This period includes the assessed average application processing time for Havering and adds an extra 6 months as a buffer period to take into account pre-application discussions that may occur, the potential for an initial refusal and re-application or delays.
- The trends discussed above (at paragraph 6.54) have been taken into account in assessing whether the lead in time should be increased or reduced.
- Where land assembly is required for sites to be developed, the lead in time has been extended by at least 1 year.

6.58. For sites where the Council has an involvement, the lead in time has been determined, in part, through conversations with relevant Council officers.

6.59. Finally, an assessment of whether sites are developable or deliverable has helped to determine the positioning of completions on the trajectory. Where a site has not met the deliverable threshold but has met the developable threshold, completions are placed outside the five year period (i.e. 2024 onwards).

Application of a Discount Rate

Sites with Planning Permission

6.60. Footnote 11 of the NPPF 2012 states that Sites with Planning Permission should be considered deliverable until permission expires unless there is **clear evidence** that schemes will not be implemented within five years, for example:

- They will not be viable
- There is no longer a demand for the type of units
- Sites have long term phasing plans

6.61. The guidance document 'Housing and Economic Land Availability Assessment' clarifies that planning permission pertains to both outline and full permissions that have not been implemented.

6.62. On this basis, a discount rate has not been applied to sites with existing planning permission. However, where a pre-application for greater density has been received on a site which has an existing permission, an assessment has been made of whether these numbers are likely to be approved and whether a discount rate should be applied. The assessment is based on conversations with the relevant planning officer and meeting minutes from Council hearings relating to the pre-application.

6.63. Using LDD data, the Council has undertaken an assessment of lapse rates for permissions granted for developments of 10 or more units between 2010 and 2015 (Annex 6). This found that Havering has a low lapse rate of approximately 8%.

Table 6.4. Status of Permissions for Major Sites granted between 2010 and 2015

Total	53	100%
Completed	38	72%
Lapsed	4	8%
Started	9	17%
Submitted	0	0%
Superseded	1	2%

Sites with Current Planning Applications

6.64. The housing trajectory includes a number of sites with current 'live' planning applications. An individual assessment based on conversations with planning officers has been undertaken for each site as to whether a 'discount' rate should be applied to these sites. This assessment takes into account whether the application has been recommended for approval or is likely to be.

6.65. In some cases a 10% or 20% discount has been applied. In other cases, where the proposals have come in at ambitious densities, a discount has been applied to bring the numbers into line with those in capacity studies for the sites that have been undertaken by Tibbalds on behalf of the Council.

The 12 Estates Regeneration Programme

6.66. A discount rate has not been applied to sites that form part of the 12 Estates Regeneration Programme. The Council is committed to the delivery of units on these sites and has undertaken extensive capacity and viability work to justify and support the delivery of this programme. Significant funds have been invested by both the Council and the GLA to ensure that this programme goes ahead. Furthermore, as the 12 Estates Regeneration Programme represents only the initial phase of development, the application of a discount rate would not be in keeping with anticipated delivery which is greater than what is currently depicted on the trajectory.

Pre-Applications

6.67. Where sites have been the subject of a pre-application meeting, an assessment has been made of whether these numbers are likely to be approved and whether a discount rate should be applied. The assessment is based on conversations with the relevant planning officer and meeting minutes from Strategic Planning Committee meetings, relating to the pre-application. In some cases, where the proposals have come in at ambitious densities, a discount has been applied to bring the numbers into line with those in the capacity studies for the sites that have been undertaken by Tibbalds on behalf of the Council. When applying a discount, consideration is also given to the likelihood that an application will come forward in the time anticipated.

Other Sites

6.68. An individual assessment on the application of a discount rate to other sites has been applied on the basis of the following considerations:

- The level of evidence that the sites will come forward in the period anticipated
- Whether the Council has control of the land and the ability to bring it forward for development.
- Whether the Council has undertaken any planning in relation to the site and whether political approval has been received to redevelop the land.
- Whether there is developer interest in the land
- Whether land assembly is required

7. Calculating Havering's 5 Year Supply

- 7.1. Section 5 outlines Havering's proposed housing requirements (targets), using a stepped trajectory and the justification for those targets. This section assesses whether Havering is able to demonstrate a 5 year supply of land based on those targets.

Table 7.1. Housing targets using a stepped trajectory

Plan period	Year	Target
Years 1-5	2016/17-2020/21	700 units per annum
Years 6-9	2021/22-2024/25	1640 units per annum
Year 10	2025/26	1641 units per annum
Years 11-15	2025/27- 2030/31	1170 units per annum

- 7.2. Paragraph 47 of the NPPF (2012) states that to boost significantly the supply of housing, local authorities should:
- *Identify and update annually a supply of specific **deliverable** sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planning supply and to ensure choice and competition in the market for land..*
- 7.3. As discussed in Section 3, a buffer of 20% has been applied on the basis of persistent under-delivery.
- 7.4. Havering's 5 year supply has been calculated on the basis of its proposed stepped targets with the application of a 20% buffer and using the Sedgfield Approach of accommodating the shortfall within the first 5 years. The 20% buffer has been applied to the shortfall in addition to the housing target. Where there is no shortfall but is instead a surplus a 20% buffer has not been applied to the surplus.
- 7.5. The five year supply has been calculated both at anticipated adoption of the plan in 2019 and at submission of the plan in 2018. Net completions are grouped by financial year (April 1 – March 31 the following year).

Table 7.2 Five Year Supply Based on a Stepped Trajectory as at Submission (2018) using the Sedgefield Approach*

Target	5380
Shortfall	295
Five year target plus shortfall	5675
Application of 20% Buffer	6810 (5675 x 1.2)
Annualised target with 20% buffer	1362 (6810/5)
Supply	6736 (2018-2022)
Supply divided by annualised target with 20% buffer	4.95 years supply (6736/1362)

Table 7.3 Five Year Supply Based on a Stepped Trajectory as at Adoption (2019) using the Sedgefield Approach*

Target	6320
Shortfall	414
Five year target plus shortfall	6734
Application of 20% Buffer	8081 (6734 x 1.2)
Annualised target with 20% buffer	1616 (8081/5)
Supply	8624 (2019 – 2023)
Supply divided by annualised target with 20% buffer	5.34 years supply (8624/1616)

7.6. The five year supply has also been calculated using the annualised target of 1,170 put forward in the plan at submission. Supply has been calculated both at anticipated adoption of the plan in 2019 and at submission of the plan in 2018. A 20% buffer has been applied to the shortfall and the Liverpool Approach has been used.

Table 7.4 Five Year Supply Based on a linear trajectory as at Submission (2018) using the Liverpool Approach^{15*}

Target	5850
Shortfall	1235
Shortfall spread over the remaining plan period	95 (per year)(1235/13)
Shortfall for 5 years (2018-2022)	475 (95 x 5)
Five year target plus shortfall	6325(475+ 5850)
Application of 20% Buffer	7590(6325 x 1.2)
Annualised target with 20% buffer	1518 (7590/5)
Supply	6736 (2018 – 2022)
Supply divided by annualised target with 20% buffer	4.44 years supply (6736 /1518)

^{15*}Calculations may not add up as the the numbers have been rounded.

Table 7.5 Five Year Supply Based on a linear trajectory as at Adoption (2019) using the Liverpool Approach*¹⁶	
Target	5850
Shortfall	1824
Shortfall spread over the remaining plan period	154 (per year)(1824/12)
Shortfall for 5 years (2018-2022)	760 (154 x 5)
Five year target plus shortfall	6610 (760 + 5850)
Application of 20% Buffer	7932 (6610 x 1.2)
Annualised target with 20% buffer	1586 (7932 /5)
Supply	8624(2019 – 2023)
Supply divided by annualised target with 20% buffer	5.44 years supply (8624/1586)

7.7. For completeness, the five year supply has also been calculated using the annualised target of 1,170 put forward in the plan at submission using the Sedgefield Approach. Supply has been calculated both at anticipated adoption of the plan in 2019 and at submission of the plan in 2018. A 20% buffer has been applied to the shortfall.

Table 7.6 Five Year Supply Based on a linear trajectory as at Submission (2018) using the Sedgefield Approach*	
Target	5850
Shortfall	1235
Five year target plus shortfall	7085 (5850+1235)
Application of 20% Buffer	8502 (7085 x 1.2)
Annualised target with 20% buffer	1700 (8531 /5)
Supply	6736 (2018-2022)
Supply divided by annualised target with 20% buffer	3.96 years supply (6736/1700)

Table 7.7 Five Year Supply Based on a linear trajectory as at Adoption (2019) using the Sedgefield Approach*	
Target	5850
Shortfall	1824
Five year target plus shortfall	7674 (5850+1824)
Application of 20% Buffer	9209 (7674 x 1.2)
Annualised target with 20% buffer	1842 (9209/5)
Supply	8624(2018-2022)
Supply divided by annualised	4.68 years supply (8624 /1842)

¹⁶ Calculations not add up as the numbers have been rounded.

7.8. In summary, a five year supply is able to be demonstrated both at submission and adoption under a stepped trajectory using the Sedgefield Approach (Tables 7.2 and 7.3) or at adoption under a linear trajectory when using the Liverpool Approach (Table 7.5). A five year supply is not able to be demonstrated either at submission or adoption using a linear trajectory and the Sedgefield approach, although it is close at 3.96 and 4.68 years respectively (Tables 7.6 and 7.7).

Havering's 10 and 15 Year Supply

Table 7.8: Havering's 10 and 15 year supply

Source of Supply	Total 10 year supply (2016/17-2025/26)	Total 15 year supply (2016/17-2030/31)
Major sites within the Romford Strategic Development Area	5241	6642
Major sites within the Rainham and Beam Park Strategic Development Area	3105	3105
Estates regeneration programme sites outside of the SDAs	376	1288
Other major sites outside of the SDAs and estates regeneration programme	1620	1620
Small sites	1440	2340
Vacant units returning to use	208	338
Completions 2016/17 and 2017/18	884	884
Surplus from 2015/16	221	221
Total Supply	13,095	16,438
Housing Target	11,701	17,551
Surplus (+)/ Shortfall (-)	+1,394	-1113

7.9. As demonstrated in Table 7.8, above, Havering is able both meet and exceed its 10 year housing target, thereby 'closing the gap' between the target and objectively assessed need. When this supply is averaged over the 10 year period the annual

supply figure of 1,310 is close to the 1,366 annual OAN identified in the SHMA 2016: Update for Havering (LBHLP.14.1).

7.10. The NPPF does not require local authorities to demonstrate a 15 year supply, however, does state that a supply should be identified where possible. Havering is not currently able to demonstrate a 15 year supply and has current shortfall of 1113 dwellings. However, the Council is actively looking at ways in which supply can be brought forward. The Housing Implementation Strategy (below) outlines these actions.

8. Housing Implementation Strategy

8.1. Section 7 concludes that Havering is able to meet its 5 year target at adoption in 2019 through the application of a stepped trajectory that takes into account an anticipated step change in housing delivery over the second five years of the plan period.

8.2. As required by Paragraph 47 of the NPPF, this section outlines Havering's Housing Implementation Strategy. It describes how the Council will ensure and maintain delivery of a five- year supply of housing land and meet its housing targets.

8.3. Havering's Spatial Strategy is set out in section 5 of the Local Plan. It outlines the Local Plan's approach to ensuring there is the necessary growth in homes to support and sustain new and existing communities. In support of its Spatial Strategy, the Council will implement a range of actions to bring forward existing and future development and redevelopment opportunities in order to meet both its housing targets and identified housing need.

8.4. These actions can be grouped into the following six categories:

- Facilitating sites to come forward through strategic planning
- Investigating future sources of housing supply
- Active involvement in housing delivery
- Facilitating development through the development management process
- Infrastructure delivery
- Monitoring and early review

Strategic Planning

The Romford Masterplan

- 8.5.** The Romford area contains several sites with large development potential which are not yet able to meet the criteria for inclusion in the housing trajectory. The preparation of a Romford Masterplan will enable the Council to influence, manage and co-ordinate the future character, design and layout of strategic development and infrastructure on key sites, particularly in light of the arrival of Crossrail and the enhanced profile of the area. The Masterplan will provide an opportunity for the Council to directly engage with relevant landowners and developers through the process to facilitate bringing forward these sites, build relationships with developers and other important stakeholders, and articulate the Council's aspirations for the area.
- 8.6.** The design guidance provided in the Masterplan will facilitate development coming forward by providing greater certainty to developers as to what is expected for proposals within Romford as well as helping to ensure that development outcomes achieve the Council's place-making objectives. In addition, it will enable the Council to identify what investments in infrastructure and the public realm are required to encourage development within the area. It will use this information in discussions with stakeholders such as the Mayor of London in the context of bringing forward improvements in public realm through measures such as 'Liveable Neighbourhoods' projects. Resolving infrastructure issues and enhancing the market attractiveness of the area will of course support overall housing deliverability.
- 8.7.** The Council has committed to completing a Romford Masterplan. Work is currently underway with public consultation having begun in **January 2019**. The Havering Plan 2019-2020 seeks to obtain Cabinet approval for the Romford Masterplan in March 2020.

The Site Specific Allocations Local Plan Document

- 8.8.** Similarly, the Council will prepare a Site Specific Allocations Document (SSA) to support its Local Plan.
- 8.9.** A call for sites to support the SSA is planned for summer 2019. A call for sites will provide an opportunity for additional development sites to be identified. The completed document will facilitate development by identifying sites with development potential and providing design guidance to support their development.
- 8.10.** Allocation in an SSA provides greater certainty and clarity to developers and landowners on the appropriate form and character of development on a site.

Future Sources of Supply

- 8.11.** The Council considers that there will be other sources of supply across the borough. Consideration has been given to the role of the borough's district centres and their potential for residential intensification. A review of sites in the district centres has found that whilst there may be some scope for intensification, it is unlikely that development will come forward in the early part of the plan due to land ownership issues and the availability of sites. However, the Council's positive strategy within the Local Plan would support such development if it were to come forward. Further investigation into this potential will occur as part of the development of a SSA.
- 8.12.** A further source of supply may arise from the One Public Estates Programme which takes a holistic view of public sector land and property requirements so that surplus land can be released for other uses.

Active Involvement in Housing Delivery

12 Estates Regeneration Programme

- 8.13.** The Council is currently undertaking one of the most ambitious local authority home building programmes in the country. The initial programme, focusing on 12 sites across the borough, has been identified within the housing trajectory. However, the Council is also looking into potential redevelopment across its other existing housing sites, as well as opportunities to redevelop areas adjacent to the 12 Estates Sites.

Other Regeneration Opportunities

- 8.14.** The Council is currently in the early stages of investigation into potential regeneration opportunities across its current land assets and is taking into account opportunities for comprehensive redevelopment through land assembly and the use of CPO powers if necessary. The Council has been successful in dramatically improving its ability to contribute to housing supply through its use of Joint Ventures. The developments in Rainham and Beam Park, Bridge Close and through the 12 Estates are examples of this and will help contribute to the Council meeting its 5 year supply.

The development management process

- 8.15.** The Council's pre-application service offers range of services, including meetings, written exchange of correspondence and site visits. Alongside this, for large or complex proposals, the Council offers Planning Performance Agreements (PPA) with the aim to work with applicants to get the proposal to an acceptable form prior to the submission of the planning application. This involves a development team approach working to a project plan.
- 8.16.** The pre-application system has been further refined in 2018 in the following ways:

- **Introduction of a Strategic Planning Committee (SPC) from May 2018** – the intention of the committee is to determine on major strategic planning applications. Part of the remit of the committee is to receive developer presentations at pre-application stage – ideally at an early stage and then closer to submission. The aim of the developer presentations is twofold. Firstly, it means that when applications are put before Members for decision they are already familiar with the proposal. Secondly, the early engagement allows Members to give feedback on the proposals at an early stage and later for the developer to explain how the scheme has evolved, including response to feedback given. Initial indications are that the process is working well where developers take the opportunity to engage at an early stage. The presentations to SPC form part of any PPA.
- **Introduction of Havering Quality Review Panel (QRP) from December 2018.** In accordance with Paragraph 129 of the NPPF, Havering have set up a design review panel. The QRP has a pool of 20 built environment professionals who have a record of achievement in their field. A panel, consisting of a Chair and 4 members from the pool of professionals, review development proposals, ideally at an early stage of the process with the aim of increasing the design quality of any proposal through feedback on the proposal. It is expected that for large major developments there would be a second presentation once the design has been further developed. The use of QRP is embedded in the PPA.
- **PPA's** – From January 2019 the pre-application service will be re-launched with proposals over 25 units requiring a Planning Performance Agreement and benefitting from a project managed Development Team approach. The aim is to ensure that a proposal is developed from early inception stage through to application submission so that it has the greatest possibility of being considered acceptable and granted planning permission.
- From Spring 2019, the pre-application process for developments less than 25 units will be revised and relaunched with specified timescales for response and differing level of service in terms of meetings, site visits and correspondence. The aim will be to give applicants certainty in developing their proposals through to planning application submission.

Infrastructure delivery

- 8.17.** Havering's Infrastructure Delivery Plan (IDP) sets out the type and scale of infrastructure required to underpin the Local Plan's vision and framework for the future development of Havering.
- 8.18.** The housing strategy for the Local Plan identified its Strategic Development Areas as the key source of future delivery. On this basis, the IDP sets out a number of priority projects within the SDA's in addition to other priority projects elsewhere in the borough.

Priority projects in the Rainham and Beam Park SDA
Utilities: diversion of electric cables, sewer and gas main
Transport: new Beam Park Station
Transport: Beam Parkway, improving connectivity along A1306
Education: new and expanded primary and secondary schools
Health: New primary care facilities, one in Beam Park development and one near Rainham Town Centre
Flood Protection: Opening up culverts and flood storage improvements

Priority projects in the Romford SDA
Transport: Crossrail serving Romford
Transport: Romford Station improvements
Transport: East West Link and improved accessibility for walking and cycling
Transport: Improved permeability of the Romford Ring Road through TfL's Liveable Neighbourhoods programme
Education: New and expanded primary and secondary schools in Romford
Health: Primary and community care hub in Romford Town Centre

8.19. The IDP identifies the main funding sources likely to be available to support delivery of Havering's infrastructure needs. These include:

- London Borough of Havering capital funding;
- Greater London Authority/ Transport for London;
- Developer contributions;
- Lotteries and charities;
- Direct charges for services, as in the case of utility companies.

8.20. It is also important to note that Havering contains two Housing Zones in (1) Romford and (2) Rainham and Beam Park. The provision of homes in these areas is supported by a range of planning and financial measures. Housing Zone programmes are funded by a combination of local authority funding, GLA direct and recoverable grant, and external funding. Housing Zone finance will be used predominately to delivery physical infrastructure in advance or parallel to development, which will significantly increase viability and hence improve Community Infrastructure Levy/ section 106 contribution potential.

1.1 Monitoring and early review

8.21. The Local Plan's Monitoring Framework identifies how the Council intends to monitor its housing land supply. As of November 2018, Local Plan is subject to the Housing Delivery Test in the new NPPF. If the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years, authorities will need to prepare an action plan in line with

national guidance to assess the causes of under-delivery and identify actions to increased delivery in future years (paragraph 75 of the NPPF 2018).

8.22. The results of the Housing Delivery Test: 2018 were published by the Ministry of Housing, Communities and Local Government (MHCLG) on 19 February 2019. Havering's housing delivery was calculated to be 49%. This is based on inaccurate information for the 2015/16 and 2016/17 years because not all completions had been recorded when the data was submitted to the MHCLG by the GLA. Actual delivery should have been calculated to be 64%. As delivery has fallen below 95%, Havering Council will be publishing an action plan in line with national guidance in early August 2019.

8.23. Havering Council will consider implementing the following measures to bring forward development as part of the development of its action plan:

- Working with developers and infrastructure providers to overcome obstacles to delivery.
- Investigating alternative sources of funding if problems with infrastructure provision are delaying the development of strategic sites.
- Actively approaching land-owners of key strategic sites to identify obstacles to their development.
- Identifying further opportunities for the Council assets and its powers to assist in delivery.

8.24. It is acknowledged that the Local Plan will require an early review, particularly in light of upcoming adoption of a new London Plan. An early review will provide the Council with an opportunity to assess the effectiveness of the policies of the Local Plan and adjust them where necessary to be in general conformity with the housing policies of the new London Plan and meet Havering's identified housing need. The Council will initiate early review of the Local Plan within 18 months of the adoption of the Draft London Plan.

Conclusion

8.25. Havering is making every effort to identify and bring forward suitable housing sites to exceed the London Plan housing target and meet housing need. The Council is able to demonstrate that it is able to deliver a 5 year supply at adoption using a linear trajectory and the Liverpool approach.

8.26. Overall, Havering is able to demonstrate that it will be able meet and exceed its 10 year target. While it is not currently able to meet objectively assessed need for this

period, it is able to demonstrate that it can significantly close the gap between its target and its need.

8.27. Havering is doing everything possible to bring forward development as quickly as possible, but constraints and lead in times on major sites mean that the identified sites will deliver the majority of their units over the second five years of the Local Plan.

8.28. In addition to the specific sites identified in Annexes 2-5, the Proposed Submission Local Plan sets out a positive approach to growth and welcomes applications for sustainable residential development on suitable brownfield sites.

List of Annexes

Annex 1: Havering Housing Trajectory

Annex 2: Site Compendium – Romford Strategic Development Area

Annex 3: Site Compendium – Rainham and Beam Park Strategic Development Area

Annex 4: 12 Site Compendium – 12 Estates Regeneration Sites (outside of the SDAs)

Annex 5: Site Compendium – Other major sites outside of the estates regeneration programme and SDAs

Annex 6: Assessment of lapse rates

Annex 7: Assessment of build out rates

Annex 8: Historical affordable housing completions

Annex 9: Havering's comments on the Draft London Plan

Annex 10: Havering Specialist Older Persons Housing Report 2015

Annex 11: Havering Specialist Older Persons Housing Review of 2015 report (2018)

Annex 12: Draft Revised Policy 3 (January 2019)

Annex 13: Housing Strategy 2014 -2017

Annex 14: 2014-2017 London Development Database Housing Completions

Havering Cabinet Meeting on August 5 2020

Item to be approved for Havering Local Plan Main Modifications Public Consultation

Update to Annex 8 of the Housing Position Statement

August 2020



Examination into the Havering Local Plan 2016 - 2031

Document for Public Consultation alongside the Proposed Main Modifications

Update to Annex 8 of the Housing Position Statement

August 2020

Annex 8: Historical affordable housing completions (net)

Financial Year	Market	Intermediate	Social Rented	Affordable Rent	Not known	Net (All Tenures)	Target	Housing Target Variance
2004	503	0	61	0	-13	551	350	201
2005	315	64	6	0	-14	371	350	21
2006	669	55	123	0	0	847	535	312
2007	370	25	100	0	0	495	535	-40
2008	336	192	109	0	0	637	535	102
2009	254	169	34	0	0	457	535	-78
2010	141	14	79	0	0	234	535	-301
2011	210	23	212	0	0	445	970	-525
2012	162	32	95	0	0	289	970	-681
2013	655	75	150	67	0	947	970	-23
2014	347	22	20	352	0	741	970	-229
2015	1123	99	11	134	0	1367	1170	221
2016	555	49	3	0	0	607	1170	-563
2017	270	15	-8	0	0	277	1170	-893
Totals	5640	819	1003	553	-27	7988		

This page is intentionally left blank

Havering Cabinet Meeting on August 5 2020

Item to be approved for Havering Local Plan Main Modifications Public Consultation

Updates to Annexes 14.1, 14.2, 14.3 and 14.4 of the Housing Position Statement (comprising completions in Financial Years 2014, 2015, 2016 and 2017)

August 2020

Updates to Annex 14.1 of the Housing Position Statement (completions in Financial Year 2014)

London Development Database - Residential units completed and units lost between and with number of bedrooms, development type and tenure for																																				
Borough	Borough Reference	Existing units	Proposed units	Net unit level	Number of bedrooms	Affordable (Yes/No)	Unit Tenure	Unit Provider	Unit Type	Multiple Occupancy (Y/N)	Other Sheltered (Y/N)	Maximum building height (storeys)	Maximum number of storeys (range)	Site size	Development type	Existing Total Floorspace	Existing Total Bedrooms	Proposed Total Floorspace	Proposed Total Bedrooms	Permission Status	Permission Date	Completed Date (Res)	Completed Financial Year (Res)	Scheme Name	Plot description	Site Name/Number	Primary Street Name	Secondary Street(s)	Post Code	Ward	Easting	Northing	Total proposed units	Residential Site Area	Total site area	Development Description
Havering	J0002/13	0	5	5	1	No	Market	Private	Studio or S/C Bedsit	No	No		Not known	Less than 0.25 hectares	Change of use	123	0	0	0	Completed	24/10/2013	31/03/2015	FY2014			34	Roneo Corner		RM12 4TN	HYLANDS	551722	187406	5	0.030	0.030	Change of use from office to residential including five parking spaces as indicate on the block plan.
Havering	J0003/13	0	1	1	2	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	Change of use	100	0	0	0	Completed	23/12/2013	15/01/2015	FY2014			Brooke House	Kingsmead Mansions		RM1 2BU	ROMFORD TOWN	551473	188374	1	0.008	0.008	Prior Approval request for the change of use from office to residential use by the conversion of 100sqm into 1 dwelling.
Havering	J0004/13	0	1	1	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Change of use	273	0	0	0	Completed	23/01/2014	12/02/2015	FY2014			Stirling House, 21-25	Station Lane		RM12 6JL	ST. ANDREW'S	554059	187005	9	0.019	0.019	Prior Approval request for the change of use from Office (B1) to residential (C3) of the upper floors.
Havering	J0004/13	0	8	8	2	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Change of use	273	0	0	0	Completed	23/01/2014	12/02/2015	FY2014			Stirling House, 21-25	Station Lane		RM12 6JL	ST. ANDREW'S	554059	187005	9	0.019	0.019	Prior Approval request for the change of use from Office (B1) to residential (C3) of the upper floors.
Havering	P0090/14	0	1	1	2	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Extension	204	0	108	0	Completed	25/06/2014	14/02/2015	FY2014			108	Upminster Road South		RM13 9AB	RAINHAM AND WENNING TON	552465	182316	1	0.020	0.033	Change of use from B1 Printing shop to A2 Estate Agency on ground floor and the creation of a two bedroom self contained flat at first floor, roof lights, a rear dormer window and external alterations
Havering	P0108/14	0	1	1	3	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	05/09/2014	07/08/2014	FY2014			Adj 18	Ainsley Avenue		RM7 9HU	BROOKLANDS	550023	188074	1	0.042	0.042	New three bedroom detached dwelling on land adj to 18 Ainsley Avenue
Havering	P0120/10	0	1	1	3	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	29/03/2010	29/04/2014	FY2014			56	Central Drive		RM12 6BA	HACTON	554510	186067	1	0.020	0.020	Detached dwelling.
Havering	P0120/13	0	2	2	3	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	04/11/2013	16/12/2014	FY2014			132	Lake Avenue		RM13 9SQ	RAINHAM AND WENNING TON	553871	183432	2	0.085	0.085	Alteration from one 4 bedroom detached dwelling to two 3 bedroom semi detached houses together with minor alterations to design. Erection of automatic vehicular and pedestrian gates and extension of footpath (Repositioning of the proposed gates).
Havering	P0120/13	1	0	-1		No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	04/11/2013	16/12/2014	FY2014		N/A	132	Lake Avenue		RM13 9SQ	RAINHAM AND WENNING TON	553871	183432	2	0.085	0.085	Alteration from one 4 bedroom detached dwelling to two 3 bedroom semi detached houses together with minor alterations to design. Erection of automatic vehicular and pedestrian gates and extension of footpath (Repositioning of the proposed gates).
Havering	P0170/11	0	1	1	5	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	01/04/2011	06/03/2015	FY2014			8	The Fairway		RM14 1BS	CRANHAM	556474	187540	1	0.143	0.143	Demolition of existing house and detached garage and

[illegible]

Havering	P0316/14	0	2	2	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Conversion	0	0	0	0	Completed	12/06/2014	24/11/2014	FY2014			105d	Mungo Park Road		RM13 7PP	ELM PARK	552129	184641	2	0.020	0.020	conversion from 1no 2bedroom flat to 2no 1 bedroom flats
Havering	P0360/13	0	2	2	3	Yes	Affordable Rent	Housing Association	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	23/05/2013	07/08/2014	FY2014	The Briar	2no semi detached 3 bedroom houses	Garage/Parking Court (Briar Site 1b)	Cloudberry Road	Lucerne Way	RM3 8ER	HEATON	553567	191622	2	0.058	0.058	Demolition of existing garages and erection of two storey pair semi detached houses (2 x 3 bed); creation of parking.
Havering	P0361/13	0	4	4	1	Yes	Affordable Rent	Housing Association	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	New build	765	0	0	0	Completed	19/12/2013	02/12/2014	FY2014			(Briar Site 2a) Garage/Parking Court Adj To 9a	Myrtle Road	Okehampton Road	RM3 8XS	HEATON	553241	191560	6	0.076	0.076	Demolition of garages and erection of two storey block of flats(4x1 bed) and pair of semi detached houses(2x3 bed); creation of parking
Havering	P0361/13	0	2	2	3	Yes	Affordable Rent	Housing Association	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	765	0	0	0	Completed	19/12/2013	02/12/2014	FY2014			(Briar Site 2a) Garage/Parking Court Adj To 9a	Myrtle Road	Okehampton Road	RM3 8XS	HEATON	553241	191560	6	0.076	0.076	Demolition of garages and erection of two storey block of flats(4x1 bed) and pair of semi detached houses(2x3 bed); creation of parking
Havering	P0362/13	0	4	4	3	Yes	Affordable Rent	Housing Association	House or Bungalow	No	No		Not known	Less than 0.25 hectares	Change of use	0	0	0	0	Completed	23/05/2013	04/02/2015	FY2014	Briar Site 3a	4no three bedroom terraced properties	Garage Court Adj To 1 & 13	Jenny Path	And 36 Harebell Way, Briar Road	RM3 8AS	HEATON	553725	191424	4	0.094	0.094	Demolition of existing garages and erection of a two storey building providing 4 terraced houses(4x3 bed); Creation of parking.
Havering	P0363/13	0	2	2	3	Yes	Affordable Rent	Housing Association	House or Bungalow	No	No		Not known	Less than 0.25 hectares	Change of use	210	0	0	0	Completed	23/05/2013	20/02/2015	FY2014	Briar Site 3b	2no two storey semi-detached 3 bedroom houses	Garage/Parking Court 8, 25 32	Harebell Way		RM3 8AS	HEATON	553682	191439	2	0.087	0.087	Demolition of existing garages and erection of a pair of two storey semi-detached houses (2 x 3 bed). Creation of parking.
Havering	P0364/13	0	5	5	2	Yes	Affordable Rent	Housing Association	House or Bungalow	No	No		Not known	Over 0.25 hectares	New build	0	0	0	0	Completed	30/08/2013	30/03/2015	FY2014	The Briar		(Briar Site 6a(1), Open Space And Footways Adj 43	Barberry Close	1-12 Betony Road, 20-26 Lavender Close, & 8, 71, 73, 75 Coltsfoot Path	RM3 8BP	HEATON	553502	191483	5	0.358	0.358	Erection of two storey building providing a terrace of 5 houses (5x2 bed); creation of parking and turning areas
Havering	P0365/13	0	2	2	2	Yes	Affordable Rent	Housing Association	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	30/08/2013	30/03/2015	FY2014			(Briar Site 6a.2) Open Space Adj 8-26	Coltsfoot Path	40-98 Barberry Close	RM3 8BH	HEATON	553465	191425	9	0.236	0.236	Erection of two/three storey building providing a terrace of 9 houses(2x 2 bed, 4x3 bed and 3x4 bed)
Havering	P0365/13	0	4	4	3	Yes	Affordable Rent	Housing Association	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	30/08/2013	30/03/2015	FY2014			(Briar Site 6a.2) Open Space Adj 8-26	Coltsfoot Path	40-98 Barberry Close	RM3 8BH	HEATON	553465	191425	9	0.236	0.236	Erection of two/three storey building providing a terrace of 9 houses(2x 2 bed, 4x3 bed and 3x4 bed)
Havering	P0365/13	0	3	3	4	Yes	Affordable Rent	Housing Association	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	30/08/2013	30/03/2015	FY2014			(Briar Site 6a.2) Open Space Adj 8-26	Coltsfoot Path	40-98 Barberry Close	RM3 8BH	HEATON	553465	191425	9	0.236	0.236	Erection of two/three storey building providing a terrace of 9 houses(2x 2 bed, 4x3 bed and 3x4 bed)
Havering	P0366/13	0	1	1	2	Yes	Affordable Rent	Housing Association	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	30/08/2013	30/03/2015	FY2014	The Briar		Briar Site 6b (1), Open Space Adj To	Coltsfoot Path	37-107 Bellflower Path & 23-31 Mimosa Close	RM3 8JF	HEATON	553393	191250	3	0.130	0.130	Erection of three terraced bungalows (1 x 2 bed and 2 x 3 bed). Creation of parking.
Havering	P0366/13	0	2	2	3	Yes	Affordable Rent	Housing Association	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	30/08/2013	30/03/2015	FY2014	The Briar		Briar Site 6b (1), Open Space Adj To	Coltsfoot Path	37-107 Bellflower Path & 23-31 Mimosa Close	RM3 8JF	HEATON	553393	191250	3	0.130	0.130	Erection of three terraced bungalows (1 x 2 bed and 2 x 3 bed). Creation of parking.
Havering	P0367/13	0	2	2	2	Yes	Affordable Rent	Housing Association	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	30/08/2013	10/12/2014	FY2014	The Briar		(Briar Site 6b (2), Open Space Adj To	Coltsfoot Path	23-31 And 32-40 Minosa Close	RM3 8JJ	HEATON	553370	191228	2	0.055	0.055	Erection of a pair of semi detached bungalows (2 x 2 bed); creation of parking.
Havering	P0368/13	0	2	2	3	Yes	Affordable Rent	Housing Association	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	23/05/2013	19/11/2014	FY2014	The Briar	2no three bedroom semi-detached houses	Briar Site 6c, Open Space Adj To 45 & 46	Lucerne Way	Coltsfoot Path	RM3 8BS	HEATON	553615	191529	2	0.036	0.036	Erection of a pair of two storey semi-detached houses (2 x 3 bed); creation of parking.
Havering	P0369/13	0	2	2	3	Yes	Affordable Rent	Housing Association	House or Bungalow	No	No		Not known	Less than 0.25 hectares	Change of use	0	0	0	0	Completed	23/05/2013	10/12/2014	FY2014	The Briar	Two/Three Storey terraced properties	Briar Site 6e, Open Space	Coltsfoot Path	Adj 24,25-28 Lucerne Way	RM3 8BS	HEATON	553686	191555	3	0.034	0.034	Erection of two/three storey building to provide terrace of thee houses (2x3 bed

[illegible]

Page 415	Having	P0490/13	0	4	4	1	Yes	Affordable Rent	Housing Associatio n	Flat Apartment or Maisonette	No	No		Not known	Over 0.25 hectares	New build	936	0	0	0	Completed	19/07/2013	20/10/2014	FY2014			Dukes Hall	Maygreen Crescent		RM11 1EJ	HYLANDS	552052	187594	58	0.500	0.500	Demolition of single storey Community Hall (Class D1 Non Residential Institution) and erection of four storey building comprising 58 residential units with 74 parking spaces and amenity space.
	Having	P0490/13	0	34	34	2	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Over 0.25 hectares	New build	936	0	0	0	Completed	19/07/2013	11/09/2014	FY2014			Dukes Hall	Maygreen Crescent		RM11 1EJ	HYLANDS	552052	187594	58	0.500	0.500	Demolition of single storey Community Hall (Class D1 Non Residential Institution) and erection of four storey building comprising 58 residential units with 74 parking spaces and amenity space.
	Having	P0490/13	0	8	8	2	Yes	Affordable Rent	Housing Associatio n	Flat Apartment or Maisonette	No	No		Not known	Over 0.25 hectares	New build	936	0	0	0	Completed	19/07/2013	20/10/2014	FY2014			Dukes Hall	Maygreen Crescent		RM11 1EJ	HYLANDS	552052	187594	58	0.500	0.500	Demolition of single storey Community Hall (Class D1 Non Residential Institution) and erection of four storey building comprising 58 residential units with 74 parking spaces and amenity space.
	Having	P0491/14	0	1	1	3	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	03/06/2014	27/01/2015	FY2014			10	Acer Avenue		RM13 9ST	RAINHAM AND WENNING TON	553887	182653	1	0.020	0.020	3 bedroom end of terrace dwelling with off street car parking and private amenity
	Having	P0500/11	0	3	3	3	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	146	0	0	0	Completed	26/05/2011	13/02/2015	FY2014			30	Longfield Avenue		RM11 1AL	ROMFORD TOWN	551868	187749	3	0.068	0.068	Removal of single-storey office buildings and the construction of 3 No. 3 bedroomed two storey terraced dwellings.
	Having	P0551/13	0	1	1	3	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	23/12/2013	12/06/2014	FY2014			Land R/O 17	Osborne Road		RM11 1EX	HYLANDS	552661	188356	1	0.035	0.035	New detached 3 bedroom house with integral garage
	Having	P0554/12	0	3	3	3	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	385	0	0	0	Completed	24/10/2012	15/09/2014	FY2014			Communit y Hall	Nelson Road		RM13 8AP	SOUTH HORNCH URCH	551781	183503	8	0.233	0.233	Demolition of existing community hall and construction of 8 new dwellings (4 detached and 4 semi detached) with associated parking and private amenity space, new access road and landscaping
	Having	P0554/12	0	5	5	4	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	385	0	0	0	Completed	24/10/2012	23/10/2014	FY2014			Communit y Hall	Nelson Road		RM13 8AP	SOUTH HORNCH URCH	551781	183503	8	0.233	0.233	Demolition of existing community hall and construction of 8 new dwellings (4 detached and 4 semi detached) with associated parking and private amenity space, new access road and landscaping
	Having	P0558/08	0	1	1	3	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	06/05/2008	18/03/2015	FY2014			84	Essex Road		RM7 8AX	MAWNEY S	549632	189500	1	0.029	0.029	Two storey rear extension to 84 Essex Road and new attached dwelling on land adjacent.
	Having	P0567/13	0	1	1	2	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	24/01/2014	28/10/2014	FY2014			Land Adj 36	Sowrey Avenue		RM13 7LX	ELM PARK	552066	184813	1	0.016	0.016	Attached dwelling on site adjacent to 36 Sowrey Avenue
	Having	P0588/11	0	1	1	3	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	14/07/2011	31/07/2014	FY2014			79	Avon Road		RM14 1RF	CRANHAM	556961	187999	1	0.019	0.019	Proposed 3 bed end-of-terrace dwelling, double storey rear extension to donor

Page 416

Having	P0636/10	0	1	1	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Conversion	0	0	0	0	Completed	06/12/2010	15/04/2014	FY2014			11	Victoria Avenue		RM5 2QH	HAVERING PARK	549994	191880	2	0.026	0.026	dwelling and internal alterations.
Having	P0636/10	0	1	1	2	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Conversion	0	0	0	0	Completed	06/12/2010	15/04/2014	FY2014			11	Victoria Avenue		RM5 2QH	HAVERING PARK	549994	191880	2	0.026	0.026	Conversion of dwelling to 2 x no. self-contained flats.
Having	P0636/10	1	0	-1		No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	Conversion	0	0	0	0	Completed	06/12/2010	15/04/2014	FY2014		N/A	11	Victoria Avenue		RM5 2QH	HAVERING PARK	549994	191880	2	0.026	0.026	Conversion of dwelling to 2 x no. self-contained flats.
Having	P0673/12	0	1	1	2	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	07/03/2013	17/03/2015	FY2014			Land Adj To 1 Kings Cottages	Bates Road		RM3 0JS	HAROLD WOOD	555505	191254	1	0.010	0.010	Conversion of dwelling to 2 x no. self-contained flats.
Having	P0733/13	0	1	1	2	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	15/08/2013	06/01/2015	FY2014			Site To Rear Of 142	Wennington Road		RM13 9DG	RAINHAM AND WENNINGTON	552687	181927	1	0.021	0.021	Erection of chalet style dwelling
Having	P0745/12	0	6	6	2	Yes	Intermediate	Housing Association	Flat Apartment or Maisonette	No	No		Not known	Over 0.25 hectares	New build	0	0	0	0	Completed	05/10/2012	16/04/2014	FY2014			Land At Corner Of	Lambs Lane North	New Road	RM13 9EB	RAINHAM AND WENNINGTON	553421	182306	28	0.629	0.629	Redevelopment to provide 28 residential units, new access road, associated car parking and landscaping.
Having	P0759/11	0	2	2	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Over 0.25 hectares	Change of use	359	0	92	0	Completed	30/03/2012	18/09/2014	FY2014			Former Woolpack Ph & Car Park	Angel Way	St. Edwards Way	RM1 1JH	ROMFORD TOWN	551020	188782	74	0.263	0.272	Change of Use of ground floor of 48 High Street to retail/financial and professional services/restaurant or cafe use(classes A1/A2/A3) and the conversion of the upper floors of this building to 4 dwellings; the erection of a part3/5/6/8 storey building to provide 70 dwellings, together with associated landscaping, amenity space, car and cycle parking
Having	P0759/11	0	30	30	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Over 0.25 hectares	New build	359	0	92	0	Completed	30/03/2012	18/09/2014	FY2014			Former Woolpack Ph & Car Park	Angel Way	St. Edwards Way	RM1 1JH	ROMFORD TOWN	551020	188782	74	0.263	0.272	Change of Use of ground floor of 48 High Street to retail/financial and professional services/restaurant or cafe use(classes A1/A2/A3) and the conversion of the upper floors of this building to 4 dwellings; the erection of a part3/5/6/8 storey building to provide 70 dwellings, together with associated landscaping, amenity space, car and cycle parking
Having	P0759/11	0	2	2	2	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Over 0.25 hectares	Change of use	359	0	92	0	Completed	30/03/2012	18/09/2014	FY2014			Former Woolpack Ph & Car Park	Angel Way	St. Edwards Way	RM1 1JH	ROMFORD TOWN	551020	188782	74	0.263	0.272	Change of Use of ground floor of 48 High Street to retail/financial and professional services/restaurant or cafe use(classes A1/A2/A3) and the conversion of the upper floors of this building to 4 dwellings; the erection of a part3/5/6/8 storey building to provide 70 dwellings, together with associated landscaping, amenity space, car and cycle parking
Having	P0759/11	0	34	34	2	No	Market	Private	Flat Apartment	No	No		Not known	Over 0.25 hectares	New build	359	0	92	0	Completed	30/03/2012	18/09/2014	FY2014			Former Woolpack	Angel Way	St. Edwards Way	RM1 1JH	ROMFORD TOWN	551020	188782	74	0.263	0.272	Change of Use of ground floor

[illegible]

[illegible]

[illegible]

Page 422

Havering	P1534/12	0	26	26	4	Yes	Affordable Rent	Housing Association	House or Bungalow	No	Yes	3	Below 10	Over 0.25 hectares	New build	0	0	0	0	Completed	02/07/2013	28/11/2014	FY2014		Former Amberley House	New Road		RM13 8QN	SOUTH HORNCH URCH	551745	182531	51	1.090	1.090	Proposed residential development comprising 51 units together with associated amenity space, car parking and cycle parking, vehicle access, hard and soft landscaping, pumping station and associated works.	
Havering	P1558/11	0	1	1	1	Yes	Intermediate	Housing Association	Flat Apartment or Maisonette	No	No		Not known	Over 0.25 hectares	New build	4700	0	0	0	Completed	29/03/2012	05/09/2014	FY2014		Plot 11	Former Whitworth Centre Plot 1	Noak Hill Road		RM3 7YA	HEATON	553089	192437	144	3.220	3.220	Demolition of existing buildings and redevelopment of the site to create 144 one, two, three and four bedroom houses and apartments, plus associated roads, paths, car parking, garages, other ancillary structures and landscaping.
Havering	P1558/11	0	1	1	1	Yes	Intermediate	Housing Association	Flat Apartment or Maisonette	No	No		Not known	Over 0.25 hectares	New build	4700	0	0	0	Completed	29/03/2012	05/09/2014	FY2014			Former Whitworth Centre Plot 1	Noak Hill Road		RM3 7YA	HEATON	553089	192437	144	3.220	3.220	Demolition of existing buildings and redevelopment of the site to create 144 one, two, three and four bedroom houses and apartments, plus associated roads, paths, car parking, garages, other ancillary structures and landscaping.
Havering	P1558/11	0	1	1	2	No	Market	Private	House or Bungalow	No	No		Not known	Over 0.25 hectares	New build	4700	0	0	0	Completed	29/03/2012	12/06/2014	FY2014		plot 94	Former Whitworth Centre Plot 1	Noak Hill Road		RM3 7YA	HEATON	553089	192437	144	3.220	3.220	Demolition of existing buildings and redevelopment of the site to create 144 one, two, three and four bedroom houses and apartments, plus associated roads, paths, car parking, garages, other ancillary structures and landscaping.
Havering	P1558/11	0	7	7	2	No	Market	Private	House or Bungalow	No	No		Not known	Over 0.25 hectares	New build	4700	0	0	0	Completed	29/03/2012	29/09/2014	FY2014			Former Whitworth Centre Plot 1	Noak Hill Road		RM3 7YA	HEATON	553089	192437	144	3.220	3.220	Demolition of existing buildings and redevelopment of the site to create 144 one, two, three and four bedroom houses and apartments, plus associated roads, paths, car parking, garages, other ancillary structures and landscaping.
Havering	P1558/11	0	3	3	2	No	Market	Private	House or Bungalow	No	No		Not known	Over 0.25 hectares	New build	4700	0	0	0	Completed	29/03/2012	29/09/2014	FY2014		plots 1,2,3	Former Whitworth Centre Plot 1	Noak Hill Road		RM3 7YA	HEATON	553089	192437	144	3.220	3.220	Demolition of existing buildings and redevelopment of the site to create 144 one, two, three and four bedroom houses and apartments, plus associated roads, paths, car parking, garages, other ancillary structures and landscaping.

Havering	P1558/11	0	1	1	2	No	Market	Private	House or Bungalow	No	No		Not known	Over 0.25 hectares	New build	4700	0	0	0	Completed	29/03/2012	19/12/2014	FY2014		plot 90	Former Whitworth Centre Plot 1	Noak Hill Road		RM3 7YA	HEATON	553089	192437	144	3.220	3.220	Demolition of existing buildings and redevelopm ent of the site to create 144 one, two, three and four bedroom houses and apartments, plus associated roads, paths, car parking,gara ges, other ancillary structures and landscaping.
Havering	P1558/11	0	2	2	2	No	Market	Private	House or Bungalow	No	No		Not known	Over 0.25 hectares	New build	4700	0	0	0	Completed	29/03/2012	22/12/2014	FY2014		plots 89 & 91	Former Whitworth Centre Plot 1	Noak Hill Road		RM3 7YA	HEATON	553089	192437	144	3.220	3.220	Demolition of existing buildings and redevelopm ent of the site to create 144 one, two, three and four bedroom houses and apartments, plus associated roads, paths, car parking,gara ges, other ancillary structures and landscaping.
Havering	P1574/11	0	1	1	2	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	263	0	0	0	Completed	09/12/2011	02/12/2014	FY2014			Former Stables, Epsticks Farm	Warwick Lane		RM13 9EW	UPMINST ER	555285	183046	1	0.040	0.040	Replacement of existing building creating a single dwelling (Approved for conversion into a single dwelling Application No. P1954.08).
Havering	P1592/14	1	0	-1	2	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	02/01/2015	24/03/2015	FY2014		N/A	60	Front Lane		RM14 1XW	CRANHAM	557198	187349	2	0.065	0.065	Demolition of existing bungalow and construction of 2no four bedroom, semi-detached chalet style bungalows
Havering	P1592/14	0	2	2	4	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	02/01/2015	24/03/2015	FY2014			60	Front Lane		RM14 1XW	CRANHAM	557198	187349	2	0.065	0.065	Demolition of existing bungalow and construction of 2no four bedroom, semi-detached chalet style bungalows
Havering	P1653/11	0	1	1	1	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	Conversion	0	0	0	0	Completed	23/12/2011	17/10/2014	FY2014		Rear Of 174		Ardleigh Green Road		RM11 2SU	SQUIRRELS HEATH	554093	189810	1	0.015	0.015	Conversion of outbuilding to Granny annex.
Havering	P1689/11	0	12	12	2	No	Market	Private	House or Bungalow	No	No		Not known	Over 0.25 hectares	New build	25600	0	0	0	Completed	30/03/2012	01/09/2014	FY2014			Former Dunningford School	Dunningford Close		RM12 5JP	ELM PARK	551860	185367	113	2.544	2.544	Demolition of existing buildings and the construction of 113 residential units, comprising 95 houses and 18 apartments, including affordable housing. Buildings rising between 2 and 3 storeys in height, together with associated car parking, landscaping and infrastructure works.
Havering	P1689/11	0	7	7	2	Yes	Intermediate	Housing Association	House or Bungalow	No	No		Not known	Over 0.25 hectares	New build	25600	0	0	0	Completed	30/03/2012	01/09/2014	FY2014			Former Dunningford School	Dunningford Close		RM12 5JP	ELM PARK	551860	185367	113	2.544	2.544	Demolition of existing buildings and the construction of 113 residential units, comprising 95 houses and 18 apartments, including affordable housing. Buildings rising between 2 and 3 storeys in height, together with associated car parking,

																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																										</
--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	----

Note: The totals in this report represent the Completions figure for the selected period. The Schemes Completed report should not be used for this purpose. The data was extracted on 06/11/2019 and represents the data as entered onto the London Development Database at that date. For further details, please email lddteam@london.gov.uk

Lonodn Development Database - Residential Non-conventional supply - bedrooms completed between and in Note: There is a minimum threshold of 7 bedrooms or more for inclusion in this report.																					
Borough Name	Borough Reference	Existing C1 Hall Bedrooms	Proposed C1 Hall Bedrooms	Existing C2 Bedrooms	Proposed C2 Bedrooms	Existing S6 Bedrooms	Proposed S6 Bedrooms	Net NSC rooms	Scheme Name	Subdivision of Building	Site Name/Number	Primary Street Name NSC	Secondary Street(s)	Post Code	Ward	Easting	Northing	Current permission status	Completed Date	Completed Financial Year	Development Description
Havering	P0420/11				70			70			227-229	London Road		RM7 9EH	BROOKLANDS	550150	188300	Completed	19/08/2014	FY2014	Demolition of existing empty and derelict buildings.Removal of car park surfacing in part to create garden and amenity space. Removal of advertising hoardings and boundary wall.
Havering	P1354/12			35				-35			Winifred Whittingham House	Brookway		RM13 9JE	RAINHAM AND WENNINGTON	552744	181847	Completed	13/06/2014	FY2014	Construction of a 70 bed Care Home with 17 car parking spaces including 2 disabled spaces Construction of 6x4 bedroom houses with 12 car parking spaces fronting Lessington Avenue. Creation of lay-by on London Road and associated re-alignment of pavement.
	Total:			35	70			35													Creation of 36 No. two and three bedroom semi-detached and terraced dwellings, plus associated roads, paths, car parking, landscaping and a new area of public open space.

Note - The non-conventional housing supply includes bedrooms in student halls and hostels. Bedrooms may contain more than one bed and dormitories count as a single bedroom. Student bedrooms may include some that are fully self-containd (i.e. they have a bathroom / toilet and cooking facilities behind a locakable front door). All student bedrooms are included regardless of whether they are on or off campus and technically fall within use class C1 or SG. The data was extracted on 06/11/2019. For further details, please email iddteam@london.gov.uk

Updates to Annex 14.2 of the Housing Position Statement (completions in Financial Years 2015)

London Development Database - Residential units completed and units lost between 2013 and 2015 with number of bedrooms, development type and tenure for Havering																																				
Borough	Borough Reference	Existing units	Proposed units	Net unit level	Number of bedrooms	Affordable (Yes/No)	Unit Tenure	Unit Provider	Unit Type	Multiple Occupancy (Y/N)	Other Sheltered (Y/N)	Maximum building height (storeys)	Maximum number of storeys (range)	Site size	Development type	Existing Total Floorspace	Existing Total Bedrooms	Proposed Total Floorspace	Proposed Total Bedrooms	Permission Status	Permission Date	Completed Date (Res)	Completed Financial Year (Res)	Scheme Name	Plot description	Site Name/Number	Primary Street Name	Secondary Street(s)	Post Code	Ward	Easting	Northing	Total proposed units	Residential Site Area	Total site area	Development Description
Havering	J0016/14	0	2	2	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Change of use	508	0	0	0	Completed	02/02/2015	29/03/2016	FY2015			York House, 48-50	Western Road		RM1 3LP	ROMFORD TOWN	551632	188859	11	0.050	0.050	Prior approval application for the change of use of the ground and first floors from office to residential (creation of 11 residential flats)
Havering	J0016/14	0	9	9	2	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Change of use	508	0	0	0	Completed	02/02/2015	29/03/2016	FY2015			York House, 48-50	Western Road		RM1 3LP	ROMFORD TOWN	551632	188859	11	0.050	0.050	Prior approval application for the change of use of the ground and first floors from office to residential (creation of 11 residential flats)
Havering	J0026/15	0	115	115	2	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Over 0.25 hectares	Change of use	5900	0	0	0	Completed	28/10/2015	06/11/2015	FY2015			Chaucer House And Hexagon House	Mercury Gardens		RM1 3JT	ROMFORD TOWN	551541	188774	115	0.542	0.542	Change of Use from (Class B1 (a)) to residential use (Class C3) for 115 proposed new flats
Havering	P0012/15	0	1	1	3	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	12/03/2015	22/01/2016	FY2015			27	Burwood Gardens		RM13 8JS	SOUTH HORNCHURCH	551767	182856	1	0.040	0.040	Erection of 1no two storey house attached to the side
Havering	P0019/15	1	0	-1	2	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	06/03/2015	22/12/2015	FY2015		N/A	3	Kingston Road		RM1 3NA	ROMFORD TOWN	551752	189102	2	0.052	0.052	2No 4 bed detached houses with rear dormers
Havering	P0019/15	0	2	2	4	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	06/03/2015	22/12/2015	FY2015			3	Kingston Road		RM1 3NA	ROMFORD TOWN	551752	189102	2	0.052	0.052	2No 4 bed detached houses with rear dormers
Havering	P0040/15	0	1	1	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Change of use	233	0	0	0	Completed	26/02/2016	24/02/2016	FY2015			168 - 170	South Street		RM1 1TR	ROMFORD TOWN	551428	188307	3	0.023	0.023	Change of use of first floor retail and office space to 3no. self contained apartments with additional windows and alterations to South Street elevation.
Havering	P0040/15	0	2	2	2	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Change of use	233	0	0	0	Completed	26/02/2016	24/02/2016	FY2015			168 - 170	South Street		RM1 1TR	ROMFORD TOWN	551428	188307	3	0.023	0.023	Change of use of first floor retail and office space to 3no. self contained apartments with additional windows and alterations to South Street elevation.
Havering	P0044/13	0	1	1	1	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	30/10/2013	21/04/2015	FY2015			102	Colne Drive		RM3 9JT	GOOSHAYS	554781	191929	1	0.026	0.026	Attached one bedroom dwelling
Havering	P0069/14	0	1	1	2	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	07/05/2014	08/10/2015	FY2015			Adj To 44	Chestnut Avenue		RM12 4HN	HYLANDS	551982	186753	1	0.017	0.017	Proposed 2 bedroom house on land adjacent to 44 Chestnut Avenue. Demolition of existing conservatory and erection of a single storey rear extension to 44 Chestnut Avenue.
Havering	P0092/13	0	2	2	2	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Conversion	0	0	0	0	Completed	30/10/2014	06/06/2015	FY2015			14	Slewins Lane		RM11 2BZ	EMERSON PARK	553129	188806	2	0.007	0.007	Two storey side and rear extensions including Juliet balcony, external alterations and conversion of dwelling into 2no two bedroom self

contained flats
Two storey side and rear extensions including Juliet balcony. external alterations and conversion of dwelling into 2no two bedroom self contained flats
contained flats
Construction of one 3 bedroom detached bungalow and two 1 bedroom semi-detached bungalows with associated parking and garden areas.
Creation of 1 No. 2 bed bungalow.
Creation of 1 No. 2 bed bungalow.
Proposed replacement dwelling. Note existing house to be retained during construction period for storage/office use then demolished and front area plus entrance erected
Demolition of the existing buildings and redevelopment of the site to create 9 x two and four bedroom semi-detached houses and a flat, plus associated roads, paths, car parking/garages, landscaping and environmental enhancements
Demolition of the existing buildings and redevelopment of the site to create 9 x two and four bedroom semi-detached houses and a flat, plus associated roads, paths, car parking/garages, landscaping and environmental enhancements
Reserved Matters application 2 refurbishing block 8+17 to provide 31 residential units + car parking pursuant to outline planning permission P01635.04
Reserved Matters application 2 refurbishing block 8+17 to provide 31 residential units + car parking pursuant to outline planning permission P01635.04

[illegible]

[illegible]

Havering	P0819/13	0	1	1	3	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	210	0	0	0	Completed	16/12/2013	18/11/2015	FY2015			2-6	Fitzilian Avenue		RM3 0QS	HAROLD WOOD	554909	190576	9	0.103	0.103	Demolish existing garage buildings. erect 8 apartments (3 storey) and 1no.3 storey detached house
Havering	P0819/14	0	1	1	2	No	Market	Private	House or Bungalow	No	No		Not known	Over 0.25 hectares	New build	314	0	0	0	Completed	14/04/2015	16/03/2016	FY2015	Hilldene North Parcel A	Plot 19	Adj	Hilldene Avenue	Hilldene Close	RM3 8DL	GOOSHA YS	553660	192187	21	0.250	0.250	Demolish Filling Station Console Building and Canopy, Remove Hardstandings and Erect 12No. Two-Storey Semi-Detached and Terraced Dwellings and 9No. Self-Contained Flats in a Three-Storey Apartment Block, Construct Bin and Cycle Stores, Lay Out Parking and Amenity Areas and Form New Vehicular Accesses onto Hilldene Close, Hilldene Avenue and Bridgewater Road
Havering	P0819/14	0	1	1	2	No	Market	Private	House or Bungalow	No	No		Not known	Over 0.25 hectares	New build	314	0	0	0	Completed	14/04/2015	16/03/2016	FY2015	Hilldene North Parcel A	Plot 20	Adj	Hilldene Avenue	Hilldene Close	RM3 8DL	GOOSHA YS	553660	192187	21	0.250	0.250	Demolish Filling Station Console Building and Canopy, Remove Hardstandings and Erect 12No. Two-Storey Semi-Detached and Terraced Dwellings and 9No. Self-Contained Flats in a Three-Storey Apartment Block, Construct Bin and Cycle Stores, Lay Out Parking and Amenity Areas and Form New Vehicular Accesses onto Hilldene Close, Hilldene Avenue and Bridgewater Road
Havering	P0819/14	0	1	1	2	No	Market	Private	House or Bungalow	No	No		Not known	Over 0.25 hectares	New build	314	0	0	0	Completed	14/04/2015	31/03/2016	FY2015	Hilldene North Parcel A	Plot 9	Adj	Hilldene Avenue	Hilldene Close	RM3 8DL	GOOSHA YS	553660	192187	21	0.250	0.250	Demolish Filling Station Console Building and Canopy, Remove Hardstandings and Erect 12No. Two-Storey Semi-Detached and Terraced Dwellings and 9No. Self-Contained Flats in a Three-Storey Apartment Block, Construct Bin and Cycle Stores, Lay Out Parking and Amenity Areas and Form New Vehicular Accesses onto Hilldene Close, Hilldene Avenue

Page 433

Havering	P0819/14		0	1	1	3	No	Market	Private	House or Bungalow	No	No		Not known	Over 0.25 hectares	New build	314	0	0	0	Completed	14/04/2015	31/03/2016	FY2015	Hilldene North Parcel A	Plot 8	Adj	Hilldene Avenue	Hilldene Close	RM3 8DL	GOOSHA YS	553660	192187	21	0.250	0.250	and Bridgegate r Road Demolish Filling Station Console Building and Canopy. Remove Hardstandings and Erect 12No. Two-Storey Semi-Detached and Terraced Dwellings and 9No. Self-Contained Flats in a Three-Storey Apartment Block, Construct Bin and Cycle Stores, Lay Out Parking and Amenity Areas and Form New Vehicular Accesses onto Hilldene Close, Hilldene Avenue and Bridgegate r Road
Havering	P0860/13		0	6	6	3	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	14/01/2014	28/07/2015	FY2015			Rear Of 2 - 24	Bell Avenue		RM3 7BL	HEATON	553029	190888	6	0.180	0.180	The erection of 4no 3 bed and 1no 4 bed dwellings with associated parking
Havering	P0863/13		0	1	1	2	No	Market	Private	House or Bungalow	No	No	2	Below 10	Over 0.25 hectares	New build	0	0	0	0	Completed	09/07/2014	15/04/2015	FY2015		plot 101	Plot 2 Former Whitworth Centre	Noak Hill Road		RM3 7YA	HEATON	553177	192613	105	2.028	2.028	Creation of 105no one and two bedroom apartments and two, three and four bedroom houses,plus assoc roads, paths car parking, ancillary structures and landscaping
Havering	P0863/13		0	3	3	2	No	Market	Private	House or Bungalow	No	No	2	Below 10	Over 0.25 hectares	New build	0	0	0	0	Completed	09/07/2014	15/04/2015	FY2015		plots 17 ,18 & 102	Plot 2 Former Whitworth Centre	Noak Hill Road		RM3 7YA	HEATON	553177	192613	105	2.028	2.028	Creation of 105no one and two bedroom apartments and two, three and four bedroom houses,plus assoc roads, paths car parking, ancillary structures and landscaping
Havering	P0863/13		0	1	1	2	No	Market	Private	House or Bungalow	No	No	2	Below 10	Over 0.25 hectares	New build	0	0	0	0	Completed	09/07/2014	20/04/2015	FY2015		plot 104	Plot 2 Former Whitworth Centre	Noak Hill Road		RM3 7YA	HEATON	553177	192613	105	2.028	2.028	Creation of 105no one and two bedroom apartments and two, three and four bedroom houses,plus assoc roads, paths car parking, ancillary structures and landscaping
Havering	P0863/13		0	1	1	2	No	Market	Private	House or Bungalow	No	No	2	Below 10	Over 0.25 hectares	New build	0	0	0	0	Completed	09/07/2014	26/06/2015	FY2015		plot 27	Plot 2 Former Whitworth Centre	Noak Hill Road		RM3 7YA	HEATON	553177	192613	105	2.028	2.028	Creation of 105no one and two bedroom apartments and two, three and four bedroom houses,plus assoc roads, paths car parking, ancillary structures and landscaping
Havering	P0863/13		0	1	1	2	No	Market	Private	House or Bungalow	No	No	2	Below 10	Over 0.25 hectares	New build	0	0	0	0	Completed	09/07/2014	15/07/2015	FY2015		plot 95	Plot 2 Former Whitworth Centre	Noak Hill Road		RM3 7YA	HEATON	553177	192613	105	2.028	2.028	Creation of 105no one and two bedroom apartments and two, three and four bedroom houses,plus assoc roads, paths car parking,

[illegible]

[illegible]

Page 438	Having	P0959/12	0	12	12	2	No	Market	Housing Association	Flat Apartment or Maisonette	No	No	6	Below 10	Over 0.25 hectares	New build	0	0	774	0	Completed	30/10/2012	19/05/2015	FY2015	Orchard Village	Block G	The Mardyke Estate	Lower Mardyke Avenue		RM13 8PU	SOUTH HORNBURCH	550672	183408	124	1.430	1.577	Reserved matters application pursuant to P2058.08 for the demolition of 190 residential units (33 to 125 Chantry Way, 26 to 88 Walden House, 2 to 40 Roman Close, Deasley House and Perry House) and erection of 124 new residential units in 5 blocks accessed from Lower Mardyke Avenue, South Street and Walden Avenue, together with a communal commercial hub and landscaped square, landscaping and parking areas.
	Having	P0959/12	0	11	11	2	No	Market	Housing Association	Flat Apartment or Maisonette	No	No	6	Below 10	Over 0.25 hectares	New build	0	0	774	0	Completed	30/10/2012	19/05/2015	FY2015	Orchard Village	Block G - wheelchair	The Mardyke Estate	Lower Mardyke Avenue		RM13 8PU	SOUTH HORNBURCH	550672	183408	124	1.430	1.577	Reserved matters application pursuant to P2058.08 for the demolition of 190 residential units (33 to 125 Chantry Way, 26 to 88 Walden House, 2 to 40 Roman Close, Deasley House and Perry House) and erection of 124 new residential units in 5 blocks accessed from Lower Mardyke Avenue, South Street and Walden Avenue, together with a communal commercial hub and landscaped square, landscaping and parking areas.
	Having	P0959/12	0	1	1	2	Yes	Affordable Rent	Housing Association	Flat Apartment or Maisonette	No	No	6	Below 10	Over 0.25 hectares	New build	0	0	774	0	Completed	30/10/2012	19/05/2015	FY2015	Orchard Village	Block E	The Mardyke Estate	Lower Mardyke Avenue		RM13 8PU	SOUTH HORNBURCH	550672	183408	124	1.430	1.577	Reserved matters application pursuant to P2058.08 for the demolition of 190 residential units (33 to 125 Chantry Way, 26 to 88 Walden House, 2 to 40 Roman Close, Deasley House and Perry House) and erection of 124 new residential units in 5 blocks accessed from Lower Mardyke Avenue, South Street and Walden Avenue, together with a communal commercial hub and landscaped square, landscaping and parking areas.

Page 441

Having	P0959/12	0	10	10	3	No	Market	Housing Association	House or Bungalow	No	No	6	Below 10	Over 0.25 hectares	New build	0	0	774	0	Completed	30/10/2012	31/03/2016	FY2015	Orchard Village	Block N	The Mardyke Estate	Lower Mardyke Avenue		RM13 8PU	SOUTH HORNCH URCH	550672	183408	124	1.430	1.577	I hub and landscaped square, landscaping and parking areas. Reserved matters application pursuant to P2058.08 for the demolition of 190 residential units (33 to 125 Chantry Way, 26 to 88 Walden House, 2 to 40 Roman Close, Deasley House and Perry House) and erection of 124 new residential units in 5 blocks accessed from Lower Mardyke Avenue, South Street and Walden Avenue, together with a communal commercial hub and landscaped square, landscaping and parking areas.
Having	P0959/12	0	3	3	3	Yes	Intermediate	Housing Association	House or Bungalow	No	No	6	Below 10	Over 0.25 hectares	New build	0	0	774	0	Completed	30/10/2012	19/05/2015	FY2015	Orchard Village	Block E	The Mardyke Estate	Lower Mardyke Avenue		RM13 8PU	SOUTH HORNCH URCH	550672	183408	124	1.430	1.577	Reserved matters application pursuant to P2058.08 for the demolition of 190 residential units (33 to 125 Chantry Way, 26 to 88 Walden House, 2 to 40 Roman Close, Deasley House and Perry House) and erection of 124 new residential units in 5 blocks accessed from Lower Mardyke Avenue, South Street and Walden Avenue, together with a communal commercial hub and landscaped square, landscaping and parking areas.
Having	P0959/12	0	2	2	3	Yes	Intermediate	Housing Association	House or Bungalow	No	No	6	Below 10	Over 0.25 hectares	New build	0	0	774	0	Completed	30/10/2012	19/05/2015	FY2015	Orchard Village	Block F	The Mardyke Estate	Lower Mardyke Avenue		RM13 8PU	SOUTH HORNCH URCH	550672	183408	124	1.430	1.577	Reserved matters application pursuant to P2058.08 for the demolition of 190 residential units (33 to 125 Chantry Way, 26 to 88 Walden House, 2 to 40 Roman Close, Deasley House and Perry House) and erection of 124 new residential units in 5 blocks accessed from Lower Mardyke Avenue, South Street and Walden Avenue, together with a communal commercial hub and landscaped square, landscaping and parking areas.

	Having	P0959/12	0	4	4	3	Yes	Intermediat e	Housing Associatio n	House or Bungalow	No	No	6	Below 10	Over 0.25 hectares	New build	0	0	774	0	Completed	30/10/2012	19/05/2015	FY2015	Orchard Village	Block G	The Mardyke Estate	Lower Mardyke Avenue		RM13 8PU	SOUTH HORNCH URCH	550672	183408	124	1.430	1.577	Reserved matters application pursuant to P2058.08 for the demolition of 190 residential units (33 to 125 Chantry Way, 26 to 88 Walden House, 2 to 40 Roman Close, Deasley House and Perry House) and erection of 124 new residential units in 5 blocks accessed from Lower Mardyke Avenue, South Street and Walden Avenue, together with a communal commercia l hub and landscape d square, landscapin g and parking areas.
Page 442	Having	P0959/12	46	0	-46	3	Yes	Social Rented	Housing Associatio n	Flat Apartment or Maisonette	No	No	6	Below 10	Over 0.25 hectares	New build	0	0	774	0	Completed	30/10/2012	31/03/2016	FY2015	Orchard Village	N/A	The Mardyke Estate	Lower Mardyke Avenue		RM13 8PU	SOUTH HORNCH URCH	550672	183408	124	1.430	1.577	Reserved matters application pursuant to P2058.08 for the demolition of 190 residential units (33 to 125 Chantry Way, 26 to 88 Walden House, 2 to 40 Roman Close, Deasley House and Perry House) and erection of 124 new residential units in 5 blocks accessed from Lower Mardyke Avenue, South Street and Walden Avenue, together with a communal commercia l hub and landscape d square, landscapin g and parking areas.
	Having	P0959/12	8	0	-8		No	Market	Private	Flat Apartment or Maisonette	No	No	6	Below 10	Over 0.25 hectares	New build	0	0	774	0	Completed	30/10/2012	31/03/2016	FY2015	Orchard Village	N/A	The Mardyke Estate	Lower Mardyke Avenue		RM13 8PU	SOUTH HORNCH URCH	550672	183408	124	1.430	1.577	Reserved matters application pursuant to P2058.08 for the demolition of 190 residential units (33 to 125 Chantry Way, 26 to 88 Walden House, 2 to 40 Roman Close, Deasley House and Perry House) and erection of 124 new residential units in 5 blocks accessed from Lower Mardyke Avenue, South Street and Walden Avenue, together with a communal commercia l hub and landscape d square, landscapin g and parking areas.
	Having	P0968/13	0	1	1	2	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	131	0	0	0	Completed	22/11/2013	16/06/2015	FY2015			The Chapel	Hall Lane		RM14 1TT	HAROLD WOOD	556174	189807	1	0.090	0.090	Demolition of existing chapel building, change of use of site for residential

[illegible]

Havering	P1276/12	0	12	12	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Over 0.25 hectares	New build	1052	0	0	0	Completed	24/01/2013	12/06/2015	FY2015					Hilldene Avenue	Hilldene Close	RM3 7XJ	GOOSHA YS	553659	192261	100	1.564	1.564	Redevelop ment of the part-vacant 'Hilldene North' site to provide 100 residential units (58% affordable housing) with ancillary car parking and associated landscapin g.
Havering	P1276/12	0	12	12	1	Yes	Intermediat e	Housing Associatio n	Flat Apartment or Maisonette	No	No		Not known	Over 0.25 hectares	New build	1052	0	0	0	Completed	24/01/2013	12/06/2015	FY2015					Hilldene Avenue	Hilldene Close	RM3 7XJ	GOOSHA YS	553659	192261	100	1.564	1.564	Redevelop ment of the part-vacant 'Hilldene North' site to provide 100 residential units (58% affordable housing) with ancillary car parking and associated landscapin g.
Havering	P1276/12	0	12	12	2	No	Market	Housing Associatio n	House or Bungalow	No	No		Not known	Over 0.25 hectares	New build	1052	0	0	0	Completed	24/01/2013	12/06/2015	FY2015					Hilldene Avenue	Hilldene Close	RM3 7XJ	GOOSHA YS	553659	192261	100	1.564	1.564	Redevelop ment of the part-vacant 'Hilldene North' site to provide 100 residential units (58% affordable housing) with ancillary car parking and associated landscapin g.
Havering	P1276/12	0	10	10	2	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Over 0.25 hectares	New build	1052	0	0	0	Completed	24/01/2013	12/06/2015	FY2015					Hilldene Avenue	Hilldene Close	RM3 7XJ	GOOSHA YS	553659	192261	100	1.564	1.564	Redevelop ment of the part-vacant 'Hilldene North' site to provide 100 residential units (58% affordable housing) with ancillary car parking and associated landscapin g.
Havering	P1276/12	0	10	10	2	Yes	Intermediat e	Housing Associatio n	Flat Apartment or Maisonette	No	No		Not known	Over 0.25 hectares	New build	1052	0	0	0	Completed	24/01/2013	12/06/2015	FY2015					Hilldene Avenue	Hilldene Close	RM3 7XJ	GOOSHA YS	553659	192261	100	1.564	1.564	Redevelop ment of the part-vacant 'Hilldene North' site to provide 100 residential units (58% affordable housing) with ancillary car parking and associated landscapin g.
Havering	P1276/12	0	12	12	2	Yes	Intermediat e	Housing Associatio n	House or Bungalow	No	No		Not known	Over 0.25 hectares	New build	1052	0	0	0	Completed	24/01/2013	12/06/2015	FY2015					Hilldene Avenue	Hilldene Close	RM3 7XJ	GOOSHA YS	553659	192261	100	1.564	1.564	Redevelop ment of the part-vacant 'Hilldene North' site to provide 100 residential units (58% affordable housing) with ancillary car parking and associated landscapin g.
Havering	P1276/12	0	4	4	2	Yes	Social Rented	Housing Associatio n	House or Bungalow	No	No		Not known	Over 0.25 hectares	New build	1052	0	0	0	Completed	24/01/2013	12/06/2015	FY2015					Hilldene Avenue	Hilldene Close	RM3 7XJ	GOOSHA YS	553659	192261	100	1.564	1.564	Redevelop ment of the part-vacant 'Hilldene North' site to provide 100 residential units (58% affordable housing) with ancillary car parking and associated landscapin g.
Havering	P1276/12	0	8	8	3	No	Market	Private	House or Bungalow	No	No		Not known	Over 0.25 hectares	New build	1052	0	0	0	Completed	24/01/2013	12/06/2015	FY2015					Hilldene Avenue	Hilldene Close	RM3 7XJ	GOOSHA YS	553659	192261	100	1.564	1.564	Redevelop ment of the part-vacant 'Hilldene North' site to provide 100 residential units (58% affordable housing) with ancillary car parking and associated landscapin g.
Havering	P1276/12	0	3	3	3	Yes	Intermediat e	Housing Associatio n	House or Bungalow	No	No		Not known	Over 0.25 hectares	New build	1052	0	0	0	Completed	24/01/2013	12/06/2015	FY2015					Hilldene Avenue	Hilldene Close	RM3 7XJ	GOOSHA YS	553659	192261	100	1.564	1.564	Redevelop ment of the part-vacant 'Hilldene

[illegible]

[illegible]

Page 456

Havinger	P1638/09	0	12	12	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Over 0.25 hectares	New build	0	0	0	0	Completed	20/08/2010	04/11/2015	FY2015	Reflections	Block 13	Former Oldchurch Hospital Site	Oldchurch Road		RM7 0BE	BROOKLANDS	551062	188098	508	2.260	3.440	Redevelopment of the former Oldchurch Hospital to provide 493 residential units, an energy centre, a local park, car parking, access and internal roads and hard and soft landscaping.
Havinger	P1638/09	0	22	22	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Over 0.25 hectares	New build	0	0	0	0	Completed	20/08/2010	17/12/2015	FY2015	Reflections	Block 10	Former Oldchurch Hospital Site	Oldchurch Road		RM7 0BE	BROOKLANDS	551062	188098	508	2.260	3.440	Redevelopment of the former Oldchurch Hospital to provide 493 residential units, an energy centre, a local park, car parking, access and internal roads and hard and soft landscaping.
Havinger	P1638/09	0	18	18	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Over 0.25 hectares	New build	0	0	0	0	Completed	20/08/2010	17/12/2015	FY2015	Reflections	Block 11a	Former Oldchurch Hospital Site	Oldchurch Road		RM7 0BE	BROOKLANDS	551062	188098	508	2.260	3.440	Redevelopment of the former Oldchurch Hospital to provide 493 residential units, an energy centre, a local park, car parking, access and internal roads and hard and soft landscaping.
Havinger	P1638/09	0	20	20	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Over 0.25 hectares	New build	0	0	0	0	Completed	20/08/2010	17/12/2015	FY2015	Reflections	Block 11b	Former Oldchurch Hospital Site	Oldchurch Road		RM7 0BE	BROOKLANDS	551062	188098	508	2.260	3.440	Redevelopment of the former Oldchurch Hospital to provide 493 residential units, an energy centre, a local park, car parking, access and internal roads and hard and soft landscaping.
Havinger	P1638/09	0	22	22	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Over 0.25 hectares	New build	0	0	0	0	Completed	20/08/2010	17/12/2015	FY2015	Reflections	Block 12	Former Oldchurch Hospital Site	Oldchurch Road		RM7 0BE	BROOKLANDS	551062	188098	508	2.260	3.440	Redevelopment of the former Oldchurch Hospital to provide 493 residential units, an energy centre, a local park, car parking, access and internal roads and hard and soft landscaping.
Havinger	P1638/09	0	18	18	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Over 0.25 hectares	New build	0	0	0	0	Completed	20/08/2010	17/12/2015	FY2015	Reflections	Block 14a	Former Oldchurch Hospital Site	Oldchurch Road		RM7 0BE	BROOKLANDS	551062	188098	508	2.260	3.440	Redevelopment of the former Oldchurch Hospital to provide 493 residential units, an energy centre, a local park, car parking, access and internal roads and hard and soft landscaping.
Havinger	P1638/09	0	20	20	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Over 0.25 hectares	New build	0	0	0	0	Completed	20/08/2010	17/12/2015	FY2015	Reflections	Block 14b	Former Oldchurch Hospital Site	Oldchurch Road		RM7 0BE	BROOKLANDS	551062	188098	508	2.260	3.440	Redevelopment of the former Oldchurch Hospital to provide 493 residential units, an energy

[illegible]

Page 459

Havering	P1918/11		0	19	19	2	Yes	Affordable Rent	Housing Association	Flat Apartment or Maisonette	No	No		Not known	Over 0.25 hectares	New build	0	0	0	0	Started	30/03/2012	31/03/2016	FY2015			Site At Roneo Corner, Junction Of	Rom Valley Way	Rush Green Road	RM1 2AR	BROOKLANDS	551639	187518	141	0.591	0.591	Construction of 2 part eight, part nine storey blocks containing a total of 141 flats; associated car, cycle & motor cycle parking; provision of relocated access from South Street; provision of landscaped pedestrian & cycle route linking South Street & Rush Green Road; formation of maintenance access ramp from South Street to the River Rom Culvert; and the stopping-up of no longer required highway land.
Havering	P1918/11		0	28	28	2	Yes	Social Rented	Housing Association	Flat Apartment or Maisonette	No	No		Not known	Over 0.25 hectares	New build	0	0	0	0	Started	30/03/2012	31/03/2016	FY2015			Site At Roneo Corner, Junction Of	Rom Valley Way	Rush Green Road	RM1 2AR	BROOKLANDS	551639	187518	141	0.591	0.591	Construction of 2 part eight, part nine storey blocks containing a total of 141 flats; associated car, cycle & motor cycle parking; provision of relocated access from South Street; provision of landscaped pedestrian & cycle route linking South Street & Rush Green Road; formation of maintenance access ramp from South Street to the River Rom Culvert; and the stopping-up of no longer required highway land.
Havering	P1918/11		0	6	6	3	Yes	Affordable Rent	Housing Association	Flat Apartment or Maisonette	No	No		Not known	Over 0.25 hectares	New build	0	0	0	0	Started	30/03/2012	31/03/2016	FY2015			Site At Roneo Corner, Junction Of	Rom Valley Way	Rush Green Road	RM1 2AR	BROOKLANDS	551639	187518	141	0.591	0.591	Construction of 2 part eight, part nine storey blocks containing a total of 141 flats; associated car, cycle & motor cycle parking; provision of relocated access from South Street; provision of landscaped pedestrian & cycle route linking South Street & Rush Green Road

[illegible]

Note: The totals in this report represent the Completions figure for the selected period. The Schemes Completed report should not be used for this purpose. The data was extracted on 06/11/2019 and represents the data as entered onto the London Development Database at that date. For further details, please email lddteam@london.gov.uk

Updates to Annex 14.3 of the Housing Position Statement (completions in Financial Year 2016)

Page462

London Development Database - Residential units completed and units lost between and with number of bedrooms, development type and tenure for																																				
Borough	Borough Reference	Existing units	Proposed units	Net unit level	Number of bedrooms	Affordable (Yes/No)	Unit Tenure	Unit Provider	Unit Type	Multiple Occupancy (Y/N)	Other Sheltered (Y/N)	Maximum building height (storeys)	Maximum number of storeys (range)	Site size	Development type	Existing Total Floorspace	Existing Total Bedrooms	Proposed Total Floorspace	Proposed Total Bedrooms	Permission Status	Permission Date	Completed Date (Res)	Completed Financial Year (Res)	Scheme Name	Plot description	Site Name/Number	Primary Street Name	Secondary Street(s)	Post Code	Ward	Easting	Northing	Total proposed units	Residential Site Area	Total site area	Development Description
Havering	J0001/15	0	6	6	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Change of use	1218	0	0	0	Completed	10/04/2015	05/11/2016	FY2016			Morland House, 12-16	Eastern Road	Romford	RM1 3PJ	ROMFORD TOWN	551520	188576	15	0.056	0.056	Prior Approval application for the change of use from office to residential
Havering	J0001/15	0	9	9	2	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Change of use	1218	0	0	0	Completed	10/04/2015	05/11/2016	FY2016			Morland House, 12-16	Eastern Road	Romford	RM1 3PJ	ROMFORD TOWN	551520	188576	15	0.056	0.056	Prior Approval application for the change of use from office to residential
Havering	J0003/16	0	5	5	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Change of use	145	0	0	0	Completed	12/05/2016	30/01/2017	FY2016			52	Station Lane		RM12 6NB	ST. ANDREW'S	554010	186955	5	0.014	0.014	Prior approval for the change of use of offices (Class B1a) to form 5no. flats.
Havering	J0004/14	0	1	1	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Change of use	222	0	0	0	Completed	09/06/2014	13/09/2016	FY2016			01-May	High Street		RM1 1JU	ROMFORD TOWN	551163	188844	3	0.050	0.050	Prior approval application for the change of use of the 2nd floor from office to residential.
Havering	J0004/14	0	2	2	2	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Change of use	222	0	0	0	Completed	09/06/2014	13/09/2016	FY2016			01-May	High Street		RM1 1JU	ROMFORD TOWN	551163	188844	3	0.050	0.050	Prior approval application for the change of use of the 2nd floor from office to residential.
Havering	J0006/14	0	1	1	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Change of use	51	0	0	0	Completed	13/08/2014	03/06/2016	FY2016			148	Hornchurch Road		RM11 1QH	HYLANDS	552759	187427	1	0.006	0.006	Prior approval application for a proposed change of use of first floor from office to residential.
Havering	J0007/14	0	1	1	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Change of use	51	0	0	0	Completed	13/08/2014	03/08/2016	FY2016			146	Hornchurch Road		RM11 1QH	HYLANDS	552756	187425	1	0.006	0.006	Prior approval application for a change of use of first floor from office to residential
Havering	J0008/14	0	16	16	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Change of use	1500	0	0	0	Completed	19/08/2014	25/05/2016	FY2016			Portman House, 16-20	Victoria Road		RM1 2JT	ROMFORD TOWN	551523	188410	24	0.142	0.142	Prior Approval application for change of use from office to residential for ground, first, second, third and fourth floors (24 residential units)in accordance with Drawing No.188_PD_00 Rev C, 188_PD_01 Rev C, 188_PD_02 Rev C and 188_PD_03 Rev C.
Havering	J0008/14	0	3	3	1	No	Market	Private	Studio or S/C Bedsit	No	No		Not known	Less than 0.25 hectares	Change of use	1500	0	0	0	Completed	19/08/2014	25/05/2016	FY2016			Portman House, 16-20	Victoria Road		RM1 2JT	ROMFORD TOWN	551523	188410	24	0.142	0.142	Prior Approval application for change of use from office to residential for ground, first, second, third and fourth floors (24 residential units)in accordance with Drawing No.188_PD_00 Rev C, 188_PD_01 Rev C, 188_PD_02 Rev C and 188_PD_03 Rev C.
Havering	J0008/14	0	5	5	2	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Change of use	1500	0	0	0	Completed	19/08/2014	25/05/2016	FY2016			Portman House, 16-20	Victoria Road		RM1 2JT	ROMFORD TOWN	551523	188410	24	0.142	0.142	Prior Approval application for change of use from

[illegible]

[illegible]

Havering	P0525/15	0	1	1	4	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	11/12/2015	27/10/2016	FY2016			35	Eastwood Drive		RM13 9HH	RAINHAM AND WENNING TON	552973	181434	2	0.040	0.040	New attached dwelling, new roof with dormers. Remove single storey extension to donor house	
Havering	P0539/12	0	6	6	3	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	345	0	0	0	Completed	24/01/2013	15/12/2016	FY2016				Duckwood Public House, 59	Whitchurch Road	Wigton Way	RM3 9EU	GOOSHA YS	554348	192705	6	0.140	0.140	Demolish existing public house and erect a terrace of 6 houses (2 + roof floors) with 10 parking spaces using existing accesses
Havering	P0568/11	0	2	2	2	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Conversion	0	0	0	0	Completed	02/06/2011	16/09/2016	FY2016			5	Birkbeck Road		RM7 QQR	BROOKLANDS	550889	187478	2	0.019	0.019	Formation of 2 two bedroom flats, two storey side, single storey rear extension and garage.	
Havering	P0568/11	1	0	-1		No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	Conversion	0	0	0	0	Completed	02/06/2011	16/09/2016	FY2016		N/A	5	Birkbeck Road		RM7 QQR	BROOKLANDS	550889	187478	2	0.019	0.019	Formation of 2 two bedroom flats, two storey side, single storey rear extension and garage.	
Havering	P0634/15	1	0	-1	3	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	24/07/2015	20/02/2017	FY2016		N/A	65	Lambs Lane South		RM13 9XJ	RAINHAM AND WENNING TON	553170	182066	2	0.170	0.170	Alteration of existing residential property at 65 Lambs Lane South along with the construction of two new self contained bungalows to the rear of the site.	
Havering	P0634/15	0	2	2	3	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	24/07/2015	20/02/2017	FY2016			65	Lambs Lane South		RM13 9XJ	RAINHAM AND WENNING TON	553170	182066	2	0.170	0.170	Alteration of existing residential property at 65 Lambs Lane South along with the construction of two new self contained bungalows to the rear of the site.	
Havering	P0659/08	0	2	2	4	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	16/05/2008	14/09/2016	FY2016			64	Wingletye Lane		RM11 3AU	CRANHAM	554985	187264	4	0.115	0.115	Construction of 2 No 4 bedroom detached houses with detached garage and 2 No link detached 3 bedroom houses and garages.	
Havering	P0659/08	1	0	-1		No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	16/05/2008	14/09/2016	FY2016		N/A	64	Wingletye Lane		RM11 3AU	CRANHAM	554985	187264	4	0.115	0.115	Construction of 2 No 4 bedroom detached houses with detached garage and 2 No link detached 3 bedroom houses and garages.	
Havering	P0665/14	0	1	1	2	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	Conversion	0	0	0	0	Completed	05/05/2015	13/06/2016	FY2016			87 The Drive	Collier Row	Romford	RM5 3UH	HAVERING PARK	550692	191239	2	0.025	0.025	Conversion of House into 2 separate dwellings together with new front porch, minor alterations and new vehicular access	
Havering	P0665/14	0	1	1	3	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	Conversion	0	0	0	0	Completed	05/05/2015	13/06/2016	FY2016			87 The Drive	Collier Row	Romford	RM5 3UH	HAVERING PARK	550692	191239	2	0.025	0.025	Conversion of House into 2 separate dwellings together with new front porch, minor alterations and new vehicular access	
Havering	P0665/14	1	0	-1	5	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	Conversion	0	0	0	0	Completed	05/05/2015	13/06/2016	FY2016		N/A	87 The Drive	Collier Row	Romford	RM5 3UH	HAVERING PARK	550692	191239	2	0.025	0.025	Conversion of House into 2 separate dwellings together with new front porch, minor alterations and new	

Havering	P0819/14	0	1	1	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Over 0.25 hectares	New build	314	0	0	0	Completed	14/04/2015	26/05/2016	FY2016	Hilldene North Parcel A	Plot 12	Adj	Hilldene Avenue	Hilldene Close	RM3 8DL	GOOSHA YS	553660	192187	21	0.250	0.250	Accesses onto Hilldene Close, Hilldene Avenue and Bridgewater Road
Havering	P0819/14	0	1	1	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Over 0.25 hectares	New build	314	0	0	0	Completed	14/04/2015	26/05/2016	FY2016	Hilldene North Parcel A	Plot 14	Adj	Hilldene Avenue	Hilldene Close	RM3 8DL	GOOSHA YS	553660	192187	21	0.250	0.250	Demolish Filling Station Console Building and Canopy, Remove Hardstandings and Erect 12No. Two-Storey Semi-Detached and Terraced Dwellings and 9No. Self-Contained Flats in a Three-Storey Apartment Block, Construct Bin and Cycle Stores, Lay Out Parking and Amenity Areas and Form New Vehicular Accesses onto Hilldene Close, Hilldene Avenue and Bridgewater Road
Havering	P0819/14	0	1	1	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Over 0.25 hectares	New build	314	0	0	0	Completed	14/04/2015	26/05/2016	FY2016	Hilldene North Parcel A	Plot 17	Adj	Hilldene Avenue	Hilldene Close	RM3 8DL	GOOSHA YS	553660	192187	21	0.250	0.250	Demolish Filling Station Console Building and Canopy, Remove Hardstandings and Erect 12No. Two-Storey Semi-Detached and Terraced Dwellings and 9No. Self-Contained Flats in a Three-Storey Apartment Block, Construct Bin and Cycle Stores, Lay Out Parking and Amenity Areas and Form New Vehicular Accesses onto Hilldene Close, Hilldene Avenue and

[illegible]

[illegible]

Page 473

Havering	P0819/14	0	1	1	3	No	Market	Private	House or Bungalow	No	No		Not known	Over 0.25 hectares	New build	314	0	0	0	Completed	14/04/2015	12/05/2016	FY2016	Hilldene North Parcel A	Plot 7	Adj	Hilldene Avenue	Hilldene Close	RM3 8DL	GOOSHA YS	553660	192187	21	0.250	0.250	Demolish Filling Station Console Building and Canopy, Remove Hardstandings and Erect 12No. Two-Storey Semi-Detached and Terraced Dwellings and 9No. Self-Contained Flats in a Three-Storey Apartment Block, Construct Bin and Cycle Stores, Lay Out Parking and Amenity Areas and Form New Vehicular Accesses onto Hilldene Close, Hilldene Avenue and Bridgewater Road
Havering	P0819/14	0	1	1	3	No	Market	Private	House or Bungalow	No	No		Not known	Over 0.25 hectares	New build	314	0	0	0	Completed	14/04/2015	26/05/2016	FY2016	Hilldene North Parcel A	Plot 21	Adj	Hilldene Avenue	Hilldene Close	RM3 8DL	GOOSHA YS	553660	192187	21	0.250	0.250	Demolish Filling Station Console Building and Canopy, Remove Hardstandings and Erect 12No. Two-Storey Semi-Detached and Terraced Dwellings and 9No. Self-Contained Flats in a Three-Storey Apartment Block, Construct Bin and Cycle Stores, Lay Out Parking and Amenity Areas and Form New Vehicular Accesses onto Hilldene Close, Hilldene Avenue and Bridgewater Road
Havering	P0830/14	0	1	1	1	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	13/03/2015	15/03/2017	FY2016			Land Rear Of 7	Hamlet Close		RM5 2DT	MAWNEY S	549082	191086	1	0.100	0.100	erection of 1no one bedroom detached bungalow
Havering	P0838/13	0	1	1	3	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	25/03/2014	27/02/2017	FY2016			2	Thames Close		RM13 9HP	RAINHAM AND WENNING TON	552772	181510	1	0.021	0.021	Detached 3 bedroom house with front driveway with off street parking and rear garden.
Havering	P0863/13	0	8	8	2	No	Market	Private	House or Bungalow	No	No	2	Below 10	Over 0.25 hectares	New build	0	0	0	0	Completed	09/07/2014	14/09/2016	FY2016			Plot 2 Former Whitworth Centre	Noak Hill Road		RM3 7YA	HEATON	553177	192613	105	2.028	2.028	Creation of 105no one and two bedroom apartments and two,

[illegible]

[illegible]

[illegible]

Havering	P1329/08	0	1	1	3	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	12/09/2008	19/09/2016	FY2016			'Camelot'	Lodge Lane		RM5 2HX	HAVERING PARK	549395	192682	1	0.110	0.110	Two storey 3 bedroomed dwelling house with detached garage.
Havering	P1329/08	1	0	-1		No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	12/09/2008	19/09/2016	FY2016		N/A	'Camelot'	Lodge Lane		RM5 2HX	HAVERING PARK	549395	192682	1	0.110	0.110	Two storey 3 bedroomed dwelling house with detached garage.
Havering	P1329/10	1	0	-1		No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Extension	0	0	70	0	Completed	05/11/2010	19/09/2016	FY2016		N/A	49	High Street		RM11 1TP	ST. ANDREW'S	553742	187247	1	0.006	0.012	First floor extension to rear, use of first floor as A3. External staircase, renew roof with new dormer to rear and use loft conversion as one bedroom self-contained flat.
Havering	P1354/14	1	0	-1	4	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	18/12/2014	28/07/2016	FY2016		N/A	8	Ernest Road		RM11 3JF	EMERSON PARK	554379	188225	1	0.018	0.018	replacement house (smaller), revised proposal
Havering	P1354/14	0	1	1	6	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	18/12/2014	28/07/2016	FY2016			8	Ernest Road		RM11 3JF	EMERSON PARK	554379	188225	1	0.018	0.018	replacement house (smaller), revised proposal
Havering	P1357/13	0	2	2	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	New build	1100	0	418	0	Completed	04/11/2014	21/06/2016	FY2016			Former Petrol Station Adj 2a	Suttons Lane		RM12 6RJ	HACTON	553888	186007	5	0.033	0.074	Mixed use development comprising retail store on ground floor with 5no flats over first and second floors. Provision of on site parking; 5 spaces for flats and 11 for retail. Formation of new service lay-by off Suttons Lane
Havering	P1357/13	0	3	3	2	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	New build	1100	0	418	0	Completed	04/11/2014	21/06/2016	FY2016			Former Petrol Station Adj 2a	Suttons Lane		RM12 6RJ	HACTON	553888	186007	5	0.033	0.074	Mixed use development comprising retail store on ground floor with 5no flats over first and second floors. Provision of on site parking; 5 spaces for flats and 11 for retail. Formation of new service lay-by off Suttons Lane
Havering	P1360/14	1	0	-1	2	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	13/02/2015	09/12/2016	FY2016		N/A	106	Lawns Way		RM5 3TB	MAWNEYS	550366	191287	1	0.060	0.060	Extension to existing bungalow to form an additional 2 bed bungalow and parking space to serve existing bungalow
Havering	P1360/14	0	1	1	2	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	13/02/2015	09/12/2016	FY2016			106	Lawns Way		RM5 3TB	MAWNEYS	550366	191287	1	0.060	0.060	Extension to existing bungalow to form an additional 2 bed bungalow and parking space to serve existing bungalow
Havering	P1366/09	0	1	1	4	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	21/11/2010	19/04/2016	FY2016			Land Adjacent 15	Freeman Way		RM11 3PH	EMERSON PARK	554447	188357	1	0.076	0.076	Proposed New Build Dwelling.
Havering	P1378/14	0	3	3	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Conversion	0	0	0	0	Completed	04/01/2016	21/09/2016	FY2016			50	Purbeck Road		RM11 1NA	HYLANDS	552497	187656	3	0.030	0.030	Retention of existing 1 bed flat
Havering	P1378/14	2	0	-2	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Conversion	0	0	0	0	Completed	04/01/2016	21/09/2016	FY2016		N/A	50	Purbeck Road		RM11 1NA	HYLANDS	552497	187656	3	0.030	0.030	Retention of existing 1 bed flat
Havering	P1406/08	0	2	2	3	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	24/09/2008	19/09/2016	FY2016			Rear Of 10-12	Farm Road		RM13 9JU	RAINHAM AND WENNINGTON	553440	183075	2	0.054	0.054	2 No. three bedroom semi-detached houses.
Havering	P1409/12	0	1	1	2	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	25/06/2013	19/09/2016	FY2016		Retrospective planning application for a two bedroom	7	Birkbeck Road		RM7 0QR	UPMINSTER	555675	184202	1	0.013	0.013	Retrospective planning application for a two bedroom house
Havering	P1426/13	0	1	1	1	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	Conversion	0	0	0	0	Completed	13/03/2014	19/12/2016	FY2016			12	Dunster Close		RM5 3AT	MAWNEYS	550147	190122	1	0.008	0.008	Proposed conversion of an existing 2 storey extension

[illegible]

Page 482	Havinger	P1552/14	0	2	2	3	Yes	Intermediat e	Housing Associatio n	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	12	0	0	Completed	12/03/2015	05/08/2016	FY2016			Delderfield House	Havinger Road		RM1 4DH	PETTITS	550763	190456	13	0.230	0.230	and landscapin g The demolition of an existing two storey building and the constructio n of 13no new houses comprising 9no 3 bed 5 person houses and 4no 2 bed 4 person houses together with associated parking and landscapin g
	Havinger	P1568/06	0	2	2	5	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	03/10/2006	19/09/2016	FY2016			24	Candover Road		RM12 4TZ	HYLANDS	552670	187235	2	0.071	0.071	Demolition of existing bungalow and garage and erection of 2 identical semi- detached single family dwellings
	Havinger	P1568/06	1	0	-1		No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	03/10/2006	19/09/2016	FY2016		N/A	24	Candover Road		RM12 4TZ	HYLANDS	552670	187235	2	0.071	0.071	Demolition of existing bungalow and garage and erection of 2 identical semi- detached single family dwellings
	Havinger	P1569/10	0	1	1	7	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	24/12/2010	19/09/2016	FY2016			33a	Woodlands Avenue		RM11 2QT	EMERSON PARK	554285	188526	1	0.072	0.072	Demolition of existing dwelling and replace with new dwelling house
	Havinger	P1569/10	1	0	-1		No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	24/12/2010	19/09/2016	FY2016		N/A	33a	Woodlands Avenue		RM11 2QT	EMERSON PARK	554285	188526	1	0.072	0.072	Demolition of existing dwelling and replace with new dwelling house
	Havinger	P1592/04	0	2	2	2	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	Conversion	0	0	0	0	Completed	05/11/2004	19/09/2016	FY2016			179	Hainault Road		RM5 3AR	MAWNEYS	550272	189999	2	0.047	0.047	Sub- division of house into two dwellings
	Havinger	P1592/04	1	0	-1		No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	Conversion	0	0	0	0	Completed	05/11/2004	19/09/2016	FY2016		N/A	179	Hainault Road		RM5 3AR	MAWNEYS	550272	189999	2	0.047	0.047	Sub- division of house into two dwellings
	Havinger	P1594/14	0	8	8	1	No	Market	Private	Flat Apartment or Maisonette	No	No	3	Below 10	Over 0.25 hectares	New build	16500	0	0	0	Completed	08/04/2015	16/09/2016	FY2016			Phase 4b, Harold Wood Hospital	Gubbins Lane		RM3 0BE	HAROLD WOOD	554477	190551	84	0.650	0.650	Reserved matters application for the approval of siting, design, external appearanc e and landscapin g (the reserved matters) pursuant to the outline planning permission P0702.08 for Phase 4B of the former Harold Wood Hospital, for the developme nt of 84 residential dwellings, plus associated infrastructu re and car parking. The outline application was an EIA Application and an ES was submitted with the outline application
	Havinger	P1594/14	0	18	18	2	No	Market	Private	Flat Apartment or Maisonette	No	No	3	Below 10	Over 0.25 hectares	New build	16500	0	0	0	Completed	08/04/2015	16/09/2016	FY2016			Phase 4b, Harold Wood Hospital	Gubbins Lane		RM3 0BE	HAROLD WOOD	554477	190551	84	0.650	0.650	Reserved matters application for the approval of siting, design, external appearanc e and landscapin g (the reserved matters) pursuant to the outline planning permission P0702.08

[illegible]

Page 484

Havering	P1594/14	0	6	6	4	No	Market	Private	House or Bungalow	No	No	3	Below 10	Over 0.25 hectares	New build	16500	0	0	0	Completed	08/04/2015	27/07/2016	FY2016		Plots 312 to 317 inclusive	Phase 4b, Harold Wood Hospital	Gubbins Lane		RM3 0BE	HAROLD WOOD	554477	190551	84	0.650	0.650	Hospital, for the development of 84 residential dwellings, plus associated infrastructure and car parking. The outline application was an EIA Application and an ES was submitted with the outline application
Havering	P1594/14	0	6	6	4	No	Market	Private	House or Bungalow	No	No	3	Below 10	Over 0.25 hectares	New build	16500	0	0	0	Completed	08/04/2015	16/09/2016	FY2016			Phase 4b, Harold Wood Hospital	Gubbins Lane		RM3 0BE	HAROLD WOOD	554477	190551	84	0.650	0.650	Reserved matters application for the approval of siting, design, external appearance and landscaping (the reserved matters) pursuant to the outline planning permission P0702.08 for Phase 4B of the former Harold Wood Hospital, for the development of 84 residential dwellings, plus associated infrastructure and car parking. The outline application was an EIA Application and an ES was submitted with the outline application
Havering	P1636/14	1	0	-1	4	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	30/03/2015	23/12/2016	FY2016		N/A	73	Harrow Drive		RM11 1NT	HYLANDS	552980	187803	2	0.153	0.153	Demolition of the existing dwelling and construction of 2 dwellings with associated landscaping, private amenity and off street car parking, including boundary wall and non-permeable block paver with drainage to forecourt and outbuilding to the rear

Note: The totals in this report represent the Completions figure for the selected period. The Schemes Completed report should not be used for this purpose. The data was extracted on 06/11/2019 and represents the data as entered onto the London Development Database at that date. For further details, please email lddteam@london.gov.uk

Lonodn Development Database - Residential Non-conventional supply - bedrooms completed between and in Note: There is a minimum threshold of 7 bedrooms or more for inclusion in this report.																					
Borough Name	Borough Reference	Existing C1 Hall Bedrooms	Proposed C1 Hall Bedrooms	Existing C2 Bedrooms	Proposed C2 Bedrooms	Existing SG Bedrooms	Proposed SG Bedrooms	Net NSC rooms	Scheme Name	Subdivision of Building	Site Name/Number	Primary Street Name NSC	Secondary Street(s)	Post Code	Ward	Easting	Northing	Current permission status	Completed Date	Completed Financial Year	Development Description
Havering	P1552/14			12				-12			Delderfield House	Havering Road		RM1 4DH	PETTITS	550763	190456	Completed	05/08/2016	FY2016	The demolition of an existing two storey building and the construction of 13no new houses comprising 9no 3 bed 5 person houses and 4no 2 bed 4 person houses together with associated parking and landscaping
	Total:			12				-12													

Note - The non-conventional housing supply includes bedrooms in student halls and hostels. Bedrooms may contain more than one bed and dormitories count as a single bedroom. Student bedrooms may include some that are fully self-containd (i.e. they have a bathroom / toilet and cooking facilities behind a locakable front door). All student bedrooms are included regardless of whether they are on or off campus and technically fall within use class C1 or SG. The data was extracted on 06/11/2019. For further details, please email ldteam@london.gov.uk

Updates to Annex 14.4 of the Housing Position Statement (completions in financial year 2017)

London Development Database - Residential units completed and units lost between 2010 and 2017 with number of bedrooms, development type and tenure for																																				
Borough	Borough Reference	Existing units	Proposed units	Net unit level	Number of bedrooms	Affordable (Yes/No)	Unit Tenure	Unit Provider	Unit Type	Multiple Occupancy (Y/N)	Other Sheltered (Y/N)	Maximum building height (storeys)	Maximum number of storeys (range)	Site size	Development type	Existing Total Floorspace	Existing Total Bedrooms	Proposed Total Floorspace	Proposed Total Bedrooms	Permission Status	Permission Date	Completed Date (Res)	Completed Financial Year (Res)	Scheme Name	Plot description	Site Name/Number	Primary Street Name	Secondary Street(s)	Post Code	Ward	Easting	Northing	Total proposed units	Residential Site Area	Total site area	Development Description
Havering	J0005/13	0	5	5	1	No	Market	Private	Studio or S/C Bedsit	No	No		Not known	Less than 0.25 hectares	Change of use	187	0	0	0	Completed	10/02/2014	14/06/2017	FY2017			268-272	North Street		RM1 4QD	PETTITS	550667	189701	5	0.049	0.049	Prior approval request for a change of use from office to residential of the first floor only
Havering	J0009/17	0	18	18	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Change of use	899	0	0	0	Completed	16/05/2017	29/03/2018	FY2017			89-90	South Street		RM1 1RX	ROMFORD TOWN	551323	188590	18	0.090	0.090	Change of use from office to residential for 18 self contained units (PRIOR APPROVAL)
Havering	J0010/17	0	3	3	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Change of use	244	0	0	0	Completed	14/06/2017	05/02/2018	FY2017			29-31	Malvern Road		RM11 1BG	ROMFORD TOWN	552178	188061	5	0.031	0.031	Change of Use of Class B1 (A) offices to 5 flats within Class C3 (dwelling houses) (PRIOR APPROVAL)
Havering	J0010/17	0	2	2	2	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Change of use	244	0	0	0	Completed	14/06/2017	05/02/2018	FY2017			29-31	Malvern Road		RM11 1BG	ROMFORD TOWN	552178	188061	5	0.031	0.031	Change of Use of Class B1 (A) offices to 5 flats within Class C3 (dwelling houses) (PRIOR APPROVAL)
Havering	J0023/16	0	5	5	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Change of use	98	0	0	0	Completed	20/01/2017	11/01/2018	FY2017			54	Station Lane		RM12 6NB	ST. ANDREW'S	554009	186951	5	0.009	0.009	Prior approval for the change of use of offices (Class B1a) to form 5no. flats
Havering	J0031/15	0	1	1	1	No	Market	Private	Flat Apartment or Maisonette	No	No		Not known	Less than 0.25 hectares	Change of use	47	0	0	0	Completed	11/12/2015	16/11/2017	FY2017			85	Craigdale Road		RM11 1AF	ROMFORD TOWN	551940	187849	1	0.005	0.005	Prior approval for the change of use from office to residential
Havering	P0010/15	0	1	1	3	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	06/08/2015	28/06/2017	FY2017			Land Adj 8	Albion Close		RM7 9BA	ROMFORD TOWN	550922	188288	1	0.020	0.020	Erection of a new two storey three bedroom detached dwelling house
Havering	P0039/17	0	1	1	4	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	05/04/2017	05/03/2018	FY2017			163 Land Rear Of	Haynes Road		RM11 2HX	SQUIRRELS HEATH	553733	188609	1	0.024	0.024	Proposed new three bedroom detached dwelling
Havering	P0049/15	0	3	3	2	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	01/11/2016	16/03/2018	FY2017			Moss Lane Nursery	Moss Lane		RM1 2PT	ROMFORD TOWN	552154	188366	7	0.177	0.177	A mixed development of residential housing comprising 3no. 2 bed homes, 2no. 3 bed homes and 2no. 4 bed homes.
Havering	P0049/15	0	2	2	3	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	01/11/2016	16/03/2018	FY2017			Moss Lane Nursery	Moss Lane		RM1 2PT	ROMFORD TOWN	552154	188366	7	0.177	0.177	A mixed development of residential housing comprising 3no. 2 bed homes, 2no. 3 bed homes and 2no. 4 bed homes.
Havering	P0049/15	1	0	-1	3	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	01/11/2016	16/03/2018	FY2017		N/A	Moss Lane Nursery	Moss Lane		RM1 2PT	ROMFORD TOWN	552154	188366	7	0.177	0.177	A mixed development of residential housing comprising 3no. 2 bed homes, 2no. 3 bed homes and 2no. 4 bed homes.
Havering	P0049/15	0	2	2	4	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	01/11/2016	16/03/2018	FY2017			Moss Lane Nursery	Moss Lane		RM1 2PT	ROMFORD TOWN	552154	188366	7	0.177	0.177	A mixed development of residential housing comprising 3no. 2 bed homes, 2no. 3 bed homes and 2no. 4 bed homes.
Havering	P0090/12	0	1	1	3	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	21/03/2012	10/05/2017	FY2017			Land Adjacent 28	Derby Avenue		RM7 9JR	BROOKLANDS	549977	188222	1	0.022	0.022	Extension of time of P1982.08 - construction of a single dwelling.
Havering	P0094/16	0	1	1	3	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	14/06/2016	30/11/2017	FY2017			Land Adj 84	Dorking Road		RM3 9YX	GOOSHAYS	553913	192538	1	0.087	0.087	Proposed detached two-storey

[illegible]

[illegible]

Havering	P1356/14	0	7	7	3	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	27/08/2015	27/10/2017	FY2017			Land At 215 - 227	St Mary's Lane		RM14 3BX	UPMINSTER	556349	186630	8	0.180	0.180	Erection of 8no. new dwellings
Havering	P1356/14	0	1	1	4	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	27/08/2015	27/10/2017	FY2017			Land At 215 - 227	St Mary's Lane		RM14 3BX	UPMINSTER	556349	186630	8	0.180	0.180	Erection of 8no. new dwellings
Havering	P1419/15	0	3	3	2	Yes	Intermediate	Local Authority	House or Bungalow	No	No		Not known	Over 0.25 hectares	New build	4000	0	0	0	Completed	08/04/2016	06/12/2017	FY2017			Lexington Way Garage Block	Lexington Way		RM14 1NW	CRANHAM	557610	188310	12	0.570	0.570	Demolition of existing garage court, to be replaced with 10 new dwellingho uses and 2no. flats with associated hard and soft landscaping and car parking.
Havering	P1419/15	0	2	2	2	Yes	Social Rented	Local Authority	Flat Apartment or Maisonette	No	No		Not known	Over 0.25 hectares	New build	4000	0	0	0	Completed	08/04/2016	06/12/2017	FY2017			Lexington Way Garage Block	Lexington Way		RM14 1NW	CRANHAM	557610	188310	12	0.570	0.570	Demolition of existing garage court, to be replaced with 10 new dwellingho uses and 2no. flats with associated hard and soft landscaping and car parking.
Havering	P1419/15	0	7	7	3	Yes	Intermediate	Local Authority	House or Bungalow	No	No		Not known	Over 0.25 hectares	New build	4000	0	0	0	Completed	08/04/2016	06/12/2017	FY2017			Lexington Way Garage Block	Lexington Way		RM14 1NW	CRANHAM	557610	188310	12	0.570	0.570	Demolition of existing garage court, to be replaced with 10 new dwellingho uses and 2no. flats with associated hard and soft landscaping and car parking.
Havering	P1420/15	1	0	-1	3	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	19/02/2015	15/12/2017	FY2017		N/A	14	Beverley Gardens		RM11 3PA	EMERSON PARK	554801	187607	1	0.070	0.070	The demolition of number 14 Beverley Gardens the formation of a new access road and footpath and the erection of a three bedroom bungalow with two associated car parking spaces.
Havering	P1420/15	0	1	1	3	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	19/02/2015	15/12/2017	FY2017			14	Beverley Gardens		RM11 3PA	EMERSON PARK	554801	187607	1	0.070	0.070	The demolition of number 14 Beverley Gardens the formation of a new access road and footpath and the erection of a three bedroom bungalow with two associated car parking spaces.
Havering	P1434/14	1	0	-1	2	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	22/12/2015	28/04/2017	FY2017		N/A	Rear Of 44	Chestnut Avenue		RM12 4HN	HYLANDS	551978	186750	1	0.005	0.005	New two bed dwelling house
Havering	P1434/14	0	1	1	2	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	22/12/2015	28/04/2017	FY2017			Rear Of 44	Chestnut Avenue		RM12 4HN	HYLANDS	551978	186750	1	0.005	0.005	New two bed dwelling house
Havering	P1453/15	0	2	2	4	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	05/07/2016	01/02/2018	FY2017			20	Farm Road		RM13 9JU	RAINHAM AND WENNINGTON	553392	183016	4	0.140	0.140	The demolition of the existing bungalow and the construction of 4no. dwellings.
Havering	P1465/14	0	1	1	3	No	Market	Private	House or Bungalow	No	No		Not known	Less than 0.25 hectares	New build	0	0	0	0	Completed	30/03/2015	15/05/2017	FY2017		27A Lindfield Road	27	Lindfield Road		RM3 9BJ	GOOSHAYS	554368	192466	1	0.010	0.010	New dwelling house
Havering	P1539/16	0	13	13	1	No	Market	Private	Flat Apartment or Maisonette	No	No	5	Below 10	Less than 0.25 hectares	New build	2114	0	0	0	Completed	23/12/2016	16/08/2017	FY2017	Kings Park		Phase 2a (Block B), Former Harold Wood Hospital	Gubbins Lane		RM3 0BE	HAROLD WOOD	554647	190668	48	0.211	0.211	Reserved matters application for the approval of siting, design, external appearance landscaping (the reserved matters) pursuant to the outline planning permission P0702.08 for Phase 2A Block B of the former Harold Wood Hospital, for the development of 48

[illegible]

[illegible]

Haverling Cabinet Meeting on August 5 2020

**Item to be approved for Haverling Local Plan
Main Modifications Public Consultation**

**Housing Trajectory October 2019 (Update for the Local
Plan Inspector)**

August 2020



Examination into the Havering Local Plan 2016 - 2031

Document for Public Consultation alongside the Proposed Main Modifications

Housing Trajectory October 2019 (Update for the Local Plan Inspector)

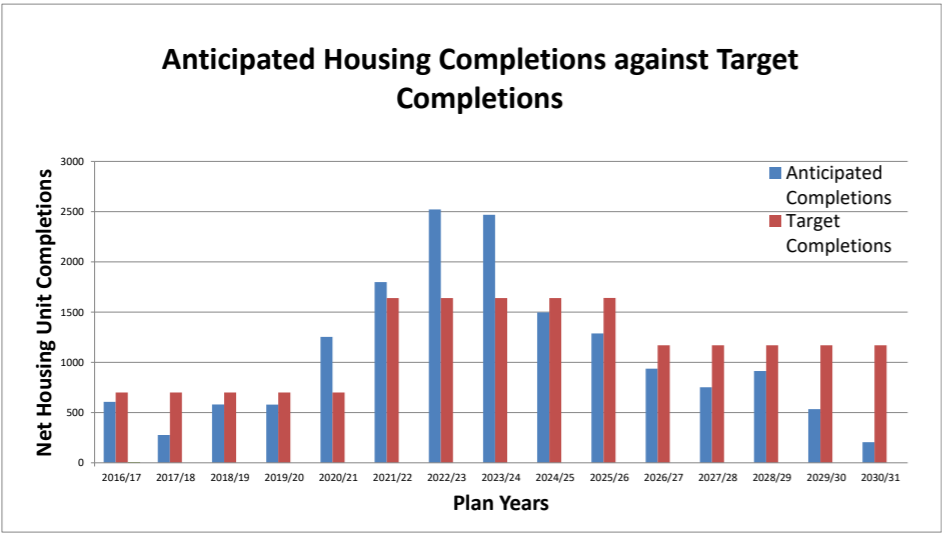
August 2020

SUMMARY SHEET

Site	Gross units	Demolitions	Net Units (Prior to Discounting)	Affordable Units	Actual Completions 2015/16	Actual/Expected Completions (First 5 Years)					Expected Completions (5-10 Years)					Expected Completions (10-15 Years)					Total Net Completions (with discounting applied)
						2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	
All Site Categories and Windfalls								First 5 years from Adoption													
Romford Sites	8214	443	7771	1301.5	N/A	NA	63	0	32	92	612	1451	1296	1050	708	513	299	401	188	0	6705
Rainham & Beam Park Sites	3316	123	3193	759	N/A	NA	0	0	53	537	703	642	813	265	92	0	0	0	0	0	3105
12 Estates	2022	734	1288	814	N/A	NA	0	0	-55	21	73	56	65	-66	282	218	247	307	140	0	1288
Planning Permission (outside of SDAs and 12 Estates)	1470	122	1358	358	N/A	NA	32	375	344	284	167	78	0	0	0	0	0	0	0	0	1280
Applications to be determined	139	0	139	60	N/A	NA	0	0	0	14	0	44	44	0	0	0	0	0	0	0	102
Pre-application and Other sites	243	0	243	54	N/A	NA	0	0	0	100	38	45	45	42	0	0	0	0	0	0	270
Small Sites	N/A	N/A	N/A	N/A	N/A	164	117	180	180	180	180	180	180	180	180	180	180	180	180	180	2621
Major Sites (10+ units) (windfall)	65	0	65	0	N/A	439	65	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	504
Vacant units returning to use	N/A	N/A	N/A	N/A	N/A	NA	NA	26	26	26	26	26	26	26	26	26	26	26	26	26	338
	15469	1422	14057	3346.5	1391	607	277	581	580	1254	1799	2522	2469	1497	1288	937	752	914	534	206	
					221 surplus	3299					9575					3343					

Net Units over Plan Period (including 2015 surplus)		16438																
Net Units over first 10 years (including 2015 surplus)		13095																
Year		2015/16	2016/17	2017/18	2018/19	2019/20	2020/21											
Targets stepped		1170	700	700	700	700	700	1640	1640	1640	1640	1641	1170	1170	1170	1170	1170	
Shortfall/ Surplus (cumulative) - stepped approach		221	128	-295	-414	-534	20											
Targets linear		1170	1170	1170	1170	1170	1170											
Shortfall/ Surplus(cumulative) - linear approach (note: a - sign in front of a figure should be read as a surplus. All other numbers should be read as a shortfalls)		-221	342	1235	1824	2414	2330											

	Five years Target	Shortfall	Five year target plus shortfall	20 percent buffer added	Annual target	Anticipated Supply	Five year figure
Five years at plan start (2016)-stepped	3500	0	3500	4200	840	3520	4.19
Five years at submission (2018) -stepped	5380	-295	5675	6810	1362	6736	4.95
Five years at adoption (2019) - stepped	6320	-414	6734	8080.8	1616.16	8624	5.34
Five years at 2020	7260	-534	7794	9352.8	1870.56	9541	5.10
Five years at plan start (2016)-linear sedgefield	5850	342	5508	6609.6	1321.92	3299	2.50
Five years at submission (2018) with linear, sedgefield	5850	-1235	7085	8502	1700.4	6736	3.96
Five years at adoption (2019) with linear, sedgefield	5850	-1824	7674	9208.8	1841.76	8624	4.68
Five years at 2020	5850	-2414	8264	9916.80	1983.36	9541	4.81
Five years at plan start- (2016)linear liverpool	5850	0.00	5850.00	7020.00	1404	3520	2.51
Five years at submission (2018) with linear, liverpool	5850	-475.00	6325.00	7590.00	1518	6736	4.44
Five years at adoption (2019) with linear, liverpool	5850	-760.00	6610.00	7932.00	1586.4	8624	5.44
Five years at 2020	5850	-1097.27	6947.27	8336.73	1667.3455	9541	5.72



SITES WITHIN THE ROMFORD SDA

Site number	Site	Ward	Industrial Land	Application No.	Date Granted	Gross units	Demolitions	Net Units	Net units within Plan Period (Discounting applied)	Affordable Units	Completions up to 31 st March 2019	Actual/Expected Completions (First 5 Years)					Expected Completions (5-10 Years)					Expected Completions (10-15 Years)					Developer/Land Owner	Suitability	Y/N	Availability	Y/N	Achievability	Y/N	Deliverable or Developable							
												2018/19					2019/20					2020/21																			
												2018/19	2019/20	2020/21	2021/22	2022/23	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30													
Permissions												First 5 years from Adoption																													
2	Queens Moat House	Romford Town		J0004.17	03-Apr-17	41	0	41	41	0	0				41															QHM Developments Ltd	Prior approval has been granted. No major site limitations or potential impacts that would render the site not suitable.	Y	No known legal complications.	Y	The site is currently under construction with units being advertised. https://www.primedocation.com/new-homes/details/489234895427elpZykeC7rrie.97	Y	Deliverable -Full planning permission has been granted. The units are currently being advertised. There is a realistic prospect of the development being completed in the 2019 financial year.				
3	143 North Street (rear of) Romford	Brooklands		P0096.15	05-Jun-18	40	0	40	40	0	0				40															Damer Property Ltd	Permission has been granted. Contaminated land and flooding constraints managed through conditions and planning process. No major site limitations or potential impacts that would render the site not suitable.	Y	Damer Property Ltd is the applicant and owner. S106 agreement signed.	Y	Pre-commencement conditions submitted for approval. Need to review affordable housing provision within 2 years if not developed by them. Therefore, likely to develop the land within the two year period. The education contribution of £120,000 was paid on 06/11/2018	Y	Deliverable - Full permission granted. Realistic prospect of completion 2019 FY given the submission of pre-commencement conditions and 2 year timeframe for affordable housing provision review.				
4	Angel Way Retail Park (Former Decathlon Site)	Romford Town		P2246.07 and P1443.15 also subject to pre-app	14-Dec-09	350	0	350	350	31	0					250	100													Regency Homes	Permission has been granted. No constraints that would render the site not suitable for development.	Y	Regency Homes is the applicant and owner. S106 agreement signed.	Y	Approval has been implemented, however, construction has stalled and applicants have come back for pre-app discussions. The land is market attractive and there is no evidence to suggest development would not be viable within the next 5 years. Developer is looking to obtain a higher density for the site. If this is not possible he will look to start on site soon after the 33-55 North Street application is approved.	Y	Deliverable - Full permission granted and construction has begun. Realistic prospect of completion in the 2022 and 2023 financial years, taking into account average build out rates and assuming a revised application in 2019. Numbers remain based on existing approval.				
5	89 Oldchurch road	Brooklands		P1020.12	18-Mar-15	36	0	36	36	0	0				11	25														Andrew Cooke (Dovetail)	Permission has been granted. No constraints that would render the site not suitable for development.	Y	s106 agreement signed	Y	Site is within a market desirable location inside the Romford SDA. First instalment of the education contribution of £14,918.51 was paid on 25/05/2018. The development has started with the enabling works undertaken and foundations for the houses put in.	Y	Deliverable - Site is suitable, available and achievable. Permitted plans show a phased development which is reflected in the trajectory. Realistic prospect of completion in 2019 and 2020 financial years, beginning in early 2020.				
6	St Edwards Court, Romford	Romford Town		J0020.18 and J0012.16	23-Jul-18	97	0	97	97	0	0				97															Galliard Homes	Two permissions granted. One for 97 units and one for 87 units. The former has been used as this is in line with advertising for the site. No limitations or potential impacts noted. Change of use from office to residential.	Y	Prior approval. Single owner. No known legal complications.	Y	Properties are already being advertised. These are office conversion so are anticipated to take less time to complete. https://www.onthemarket.com/details/4690246/	Y	Deliverable - properties are being advertised for sale. Realistic prospect of completion towards in the 2019 financial year				
7	St Edwards Court, London Road, Romford	Romford Town		P0569.17	01-Dec-17	8	0	8	8	0	0				8															Galliard Homes	Permission has been granted. No limitations or potential impacts to render site not suitable. Change of use from office to residential.	Y	Single owner. Unilateral undertaking signed by developer/ owner and the bank.	Y	Properties are already being advertised. These are office conversion so are anticipated to take less time to complete. https://www.onthemarket.com/details/4690246/	Y	Deliverable - properties are being advertised for sale. Realistic prospect of completion towards in the 2019 financial year				
8	Enterprise House	Romford Town		J0024.16 and P0046.18	20-Jan-17	17	0	17	17	0					17															Mr Dixon	Prior Approval has been granted for conversion to create 11 new residential units. An application for an additional storey to accommodate a further 6 residential units has been recommended approval but has not yet received a s106.	Y	No known legal complications. Application for an extra storey is still awaiting signing of a s106 agreement.	Y	No works have yet begun and building appears to be still in commercial use. The site is in a market attractive location within the Romford Town Centre. No clear evidence to suggest it will not be converted to residential within the next 5 years.	Y	Deliverable - Prior approval has been granted for 11 new units and a further 6 units have been recommended approval awaiting signing of a s106 agreement. There is no clear evidence to suggest this site will not be converted to residential within the next five years. There is a realistic prospect of completion in the 2020 financial year taking into account the lower build out rate for change of use developments, mitigated by the fact that the site appears to still be in commercial use.				
9	Oldchurch Hospital (Swan)	Brooklands		P0975.10	28-Jul-11	63	0	63	63	0	63		63																					Y	Development has been completed	Y	Development has been completed	Y	Development has been completed	Y	Deliverable - Completed
10	6 Holgate Court, Western Road, Romford	Romford Town		J0018.17 and P0525.18	19/09/2017 and TBC	17	0	17	17	0	0				17																Mr A Safar	Permissions granted. Change of use from office to residential. No limitations or potential impacts to render site not suitable. Current application in to add additional 3 units on top of existing building. These additional units are not included.	Y	Single Owner/ Applicant. No known legal complications. A unilateral understanding has been signed.	Y	Conditions still to be discharged. Office conversions so will take less time to complete. The site is in a market attractive location within the Romford Town Centre. No clear evidence to suggest it will not be converted to residential within the next 5 years.	Y	Deliverable - Prior approval has been granted and there is no clear evidence to suggest this site will not be converted to residential within the next five years. There is a realistic prospect of completion in the 2020 financial year taking into account the lower build out rate for change of use developments, mitigated by the fact that the site appears to still be in commercial use.			
11	Hexagon House	Romford Town		P0071.16	08-Mar-18	20	0	20	20	0	0				20															DPA London Ltd	Permission granted. No known limitations or potential impacts to render site not suitable.	Y	s106 agreement signed	Y	All pre-commencement conditions have been discharged. Development under construction. Advertising on building states completion in Spring 2019.	Y	Deliverable - Permission granted. As pre-commencement conditions have been discharged there is a realistic prospect of completion early in the 2019 financial year.				
12	29-31 Victoria Road	Romford Town		P0716.17	29-Nov-16	35	0	35	35	0	0				35															Mr Elder	Approval granted on Appeal.	Y	No known legal complications. A s106 has been signed.	Y	An appeal has been granted for the proposed development. There are no clear reasons why the development would not be built out within the next 5 years. There is a realistic prospect of completion in 2021 based on average build out rates.	Y	Deliverable - there is a realistic prospect of completion in the 2021 financial year.				
13	28-36 Eastern Road	Romford Town		J0009.16	28-Oct-16	52	0	52	52	0	0				52															Asses Rock Romford Ltd	Prior approval granted. No known limitations or potential impacts to render site not suitable.	Y	No known legal complications.	Y	Prior approval has been received. Development is change of use. Given shorter build out period there is a realistic prospect of completion in the 2019 financial year.	Y	Deliverable - there is a realistic prospect of completion in the 2019 financial year.				
14	7 Eastern Road	Romford Town		J0020.17	31-Oct-17	12	0	12	12	0	0				12															Mr Roy Clegg	Prior approval granted. No known limitations or potential impacts to render site not suitable.	Y	No known legal complications.	Y	Prior approval has been received. Development is change of use. Given shorter build out period there is a realistic prospect of completion in the 2020 financial year.	Y	Deliverable - there is a realistic prospect of completion in the 2020 financial year.				
17	64 South Street	Romford Town		P1212.14	15-Jun-15	22	0	22	22		0				22															Dawneila Properties Ltd	Permission granted. No known limitations or potential impacts to render site not suitable.	Y	s106 agreement signed	Y	Permission has been granted. Conditions have been discharged. There is a realistic prospect of completion in 2019 financial year based on average build out rates.	Y	Deliverable - there is a realistic prospect of completion in the 2019 financial year.				
18	113-117 South Street	Romford Town		J0004.18	19-Mar-18	11	0	11	11	0	0				11															Goffe Developments Ltd	Prior approval granted. No known limitations or potential impacts to render site not suitable.	Y	No known legal complications.	Y	Prior approval has been received. Development is change of use. Given shorter build out period there is a realistic prospect of completion in the 2020 financial year.	Y	Deliverable - there is a realistic prospect of completion in the 2020 financial year.				
19	Land at Rom Valley Way	Brooklands		P1389.17	23-Aug-18	620	0	620	620	124	0					207	207	206												Affinity Global Real Estate	Permission granted by Havering Council and the GLA. Heritage, Flooding, Ecology and Contamination matters managed through conditions/ planning process. No known limitations or potential impacts to render site not suitable. Site has been allocated in the Adopted Site Specific Allocations Document 2008.	Y	S106 agreement signed	Y	Identified in Phase 2 of the SHLAA 2017 (2019-2024). Conditions still to be met. Level of investment into approvals suggests that developers will build it out. In addition, the legal agreement states that substantial implementation of the affordable housing must be demonstrated within 2 years of the permission date or more affordable units will have to be provided. The developer has indicated completions are likely to occur between 2021 and 2023.	Y	Deliverable - Permission granted. Realistic prospect of phased completions between 2021 and 2023 PA based on average build out rates and correspondence with the developer.				

Site number	Site	Ward	Industrial Land	Application No.	Date Granted	Gross units	Demolitions	Net Units	Net units within Plan Period (Discounting applied)	Affordable Units	Completions up to 31 st March 2018	Actual/Expected Completions (First 5 Years)					Expected Completions (5-10 Years)					Expected Completions (10-15 Years)					Developer/Land Owner	Suitability	Y/N	Availability	Y/N	Achievability	Y/N	Deliverable or Developable
												2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31										
71	23 Eastern Road	Romford Town		P1366.16 and J0028.18		12	0	12	12	0	0			12												Scimitar House Ltd	Full planning permission granted for a roof extension to create 9 additional dwellings. In addition prior approval has been granted for a change of use from office to create three new dwellings.	Y	No known legal complications.	Y	Yes. Work has begun this development. Discussions with the site manager in October 2018 identified estimated completion of the flats as being May 2019. No further information has been provided regarding the change of use units, however, it is anticipated that these will also be completed in the 2019 financial year.	Y	Deliverable - permission has been granted. Site is under construction and there is a realistic prospect of completion in the 2019 financial year.	
72	Phoenix House, 102-106 South Street	Romford Town		J0006.18		10	0	10	10	0	0			10											Acrefield Investments Ltd	Prior approval has been granted for the change of use from office to residential with the creation of 10 self-contained flats.	Y	There are no known legal complications.	Y	Prior approval has been received. Development is change of use. Given shorter built out period there is a realistic prospect of completion in the 2019 financial year.	Y	Deliverable - there is a realistic prospect of completion in the 2019 financial year.		
Applications in Process (including those recommended approval but without a s106)																																		
20	213 North Street, Romford	Brooklands		P0915.17	NA	29	1	28	28	0	0				28										Swainland Builders Ltd	Recommended approval. Decision is pending completion of s106 agreement. Contamination, heritage and flooding matters managed through planning process/ conditions. No known limitations or potential impacts to render site not suitable.	Y	Owners are the developers. No known legal complications.	Y	Developer has made three previous applications for this development over the past 2 years. One invalid, one (with higher unit numbers) refused and one in process. This signals a commitment to develop out.	Y	Deliverable - Recommended approval. Realistic prospect of completion towards the end of 2021 FY, based on average built out rates, allowing time for s106 to be signed and pre-commencement conditions (including contamination) to be met.		
21	23-55 North Street, Romford	Romford Town		P1292.15	NA	98	0	98	85	20	0				85										Regency Homes Ltd	An application to provide 86 apartments was granted via Appeal in 2010. This permission has since lapsed, there is a structural frame already in place which the current application proposes to use. No known limitations or potential impacts to render site not suitable. The application is currently being processed and is due to go to committee in January 2019.	Y	Owners are the developers. No known legal complications.	Y	The site was identified in Phase 2 of the SHLAA 2017 (2019-2024). There is a risk that the application is refused at committee and will go to appeal. A 2022 completion is realistic, taking this into account. It is also noted that the existing construction frame already there which will aid build time. A 15% discount has been applied to reflect the risk that the application is refused and any appeal is unsuccessful.	Y	Deliverable - Realistic prospect of completion towards the end of 2022 FY, based on average built out rates, allowing time for and appeal, s106 to be signed and pre-commencement conditions met.		
22	Land at the Junction of Crow Lane / Sandgate Close	Brooklands	Crow Lane Site 3 (West) refer to page 85/86 of the Employment Land Review 2015	P1152.18	01-Feb-19	82	0	82	82	16	0				82										Hollybrook Ltd and National Grid Twenty Seven Ltd	An application to redevelop the site to provide 82 dwellings has been granted full planning permission.	Y	A s106 has been signed.	Y	Full planning permission has been received. Conditions have yet to be discharged. There is no clear evidence to suggest this development cannot be completed within the next 5 years. A 2021 financial year completion is assumed, based on the submitted Construction Environmental Management Plan which notes a 104 week construction programme (2 years).	Y	Deliverable - Recommended approval. There is a realistic prospect of development being completed in the 2021 financial year.		
23	Brooklands House and Detection House	Brooklands	0.459ha	P2075.17 and PE/01645/2015	22-Feb-19	67	0	67	67	0	0				67										SJJ Properties LLP	Full planning permission has been granted.	Y	A s106 agreement has been signed.	Y	Awaiting discharge of planning conditions. No clear evidence to suggest the development will not be completed within the next 5 years. Anticipated completion in 2021 based on average build out rates.	Y	Deliverable - Recommended approval. There is a realistic prospect of development being completed in the 2021 financial year.		
28 (new application submitted)	222-226 South Street	Romford Town		P0077.18 (withdrawn) - New application P0171.19	NA	79	0	79	51	TBD	0				51										Mercon Trading UK Ltd/ Mr K Anderson	Applicant appealed non-determination, the appeal was dismissed as it did was not filed in time. Officers had concerns over the design of the buildings in the submitted application, however, these are capable of being resolved. Possible flood risk concerns and potential highway objections can also be overcome through design. There are no known limitations or potential impacts to render site not suitable. The Tibbalds Capacity Study identifies potential for 51 dwellings on the site. A new application has now been submitted for 79 units.	Y	Applicant is the site owner. However, site currently contains a number of commercial tenants which may delay build times if approved.	Y	The site is suitable for development and is in a market attractive location. However, council officers have expressed concerns over the submitted proposal for 81 units. In light of this the lower capacity study figure (51 units) has been used instead of the units proposed in the original application. A subsequent application has now been received for 79 units. Until planning officers are able to provide advice on the density and design of the new application the figure from the Tibbalds Capacity (51 dwellings) continues to be used for the purpose of this trajectory. Completion of units is anticipated in 2021 FY. This takes into account a processing time of 6 months, resolving redevelopment issues regarding the existing tenancies, and average build out rates.	Y	Deliverable - The site is suitable and available. There is a realistic prospect of a lower unit figure, in line with the capacity study, being completed by 2021 FY.		
29 (new application submitted)	Land adjacent to Hexagon House	Romford Town		PE/01574/2016 and P1038.18 (withdrawn) - new application P1730.18	NA	92	0	92	84	36	0				84										Smith Homes 6 Ltd CIO CPA (London) Ltd	Following a pre-application meeting, an application came in for 100 units (35% affordable). This application was withdrawn as the documentation was not complete. Council officers previously noted concerns regarding the proposed density of the tower. The Tibbalds Capacity Study identifies a lower potential density of 84 units. A new application has since been received for 92 units.	Y	Applicant is the site owner. No known legal complications.	Y	Yes. The owners have a clear intent to develop this site. As the proposed development is higher in density than the Tibbalds capacity report, it has been assumed there is a realistic prospect of completions in the 2022 financial year based on revisions to the existing application or re-application at a lower density (using the 84 unit Tibbalds estimate in 2019 or 2020). This takes into account 9 months for processing of the application, as well as average build out rates.	Y	Deliverable - The site is suitable for development and the owner has signalled a clear intent to develop the site by applying for planning permission. There is a realistic prospect of completions occurring in the 2022 financial year based on approval of a revised application with unit numbers in line with those in the Tibbalds Capacity Study.		
73	6 Eastern Avenue	Brooklands		P1833.18	NA	21	0	21	21	7	0				21										Apex Development Trading Ltd	An application for the erection of a five storey apartment building containing 21 new dwellings has been recommended approval.	Y	There are no known legal complications. A s106 agreement has yet to be signed.	Y	Subject to signing of the s106 agreement there are no clear reasons as to why this site will not be developed within the next 5 years. Based on average build out rates and the time needed to sign a s106 agreement there is a realistic prospect of the units being completed in 2021.	Y	Deliverable - Recommended approval. There is a realistic prospect of development being completed in the 2021 financial year.		
12 Estates																																		
24	Waterloo (and Queen Street)	Romford Town		PE/00450/18	NA	1408	271	1137	1137	518	0			271		381	257	221	168	117	117	135	12		Havering Borough Council	The site is already in residential use. Capacity studies have been undertaken to determine appropriate development scale. Pre-application discussions currently underway. No known limitation or potential impacts to render site not suitable.	Y	Council-owned land Council will look to acquire outstanding land ownership issues via CPO.	Y	Pre-App in place Phased programme Start on site Dec 2019 Practical Completion Feb 2020.	Y	Deliverable - The site is suitable and available. The Council has signalled a strong intent to develop this site. Realistic prospect of completions between 2021 and 2028 FY.		
25	Old Church Gardens	Brooklands		NA	NA	306	86	220	220	122	0									86		166	140		Havering Borough Council	The site is already in residential use. Capacity studies have been undertaken to determine appropriate development scale. No known limitation or potential impacts to render site not suitable.	Y	Council-owned land Council will look to acquire outstanding land ownership issues via CPO	Y	Resident Decant process has started. Work Package 4 of the regeneration programme.	Y	Deliverable - The site is suitable and available. The Council has signalled a strong intent to develop this site. Realistic prospect of completions between 2028 and 2029 FYs.		
Pre-applications																																		
26	Bridge Close Estate	Romford Town	Bridge Close. Currently not designated in the LDF 2008. Employment Land Review 2015 (08/16) proposes to allow loss/ change away from industrial employment uses	PE/00213/2017	NA	1070	37	1033	926	375	0				37	243	240	240	240							Multiple ownership	The site is allocated in the Adopted Romford Area Action Plan 2008 and comes within the Romford Town Centre Development Framework 2015, Romford Housing Zone and Romford Strategic Development Area. On the basis of it being within the Housing Zone, the proposal has received a £12.4 million grant from the GLA for a scheme for 1070 homes of which 375 will be affordable.	Y	The site is in multiple ownership comprising 37 residential properties and 17 commercial interests. Land assembly is occurring by way of private treaty. Approximately 34% of land area within the red line is Council or joint Venture owned. Preparation is underway to use the Council's CPO powers with a resolution to promote the CPO expected to be approved by the Council in July 2019.	Y	There is a clear intent from the Council and the GLA to deliver these homes. The GLA Funding Decision identifies a planned delivery approach which sees housing starts on site in 2020, with the final homes being completed by March 2026, the end of the 2025 financial year. However, the Council's current delivery plan anticipates completions between 2023 and 2026. Several pre-application meetings have already occurred and the application has been to the strategic planning committee. A hybrid application is scheduled to be submitted around mid-2019. A 10% discount has been applied to take into account the risk of delays to the current delivery plan and changes to the development through the planning process. Anticipated unit completions on the trajectory have been averaged over the 2023-2026 period.	Y	Deliverable - There is a clear intent from the GLA and Council to develop this land. Based on the GLA Funding Decision there is a realistic prospect of completions occurring between 2023 and 2026 financial years.	
OTHER SITES																																		

Site number	Site	Ward	Industrial Land	Application No.	Date Granted	Gross units	Demolitions	Net Units	Net units within Plan Period (Discounting applied)	Affordable Units	Completions up to 31 st March 2018	Actual/Expected Completions (First 5 Years)					Expected Completions (5-10 Years)					Expected Completions (10-15 Years)					Developer/Land Owner	Suitability	Y/N	Availability	Y/N	Achievability	Y/N	Deliverable or Developable																
												2018/19		2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31																									
												1	2	3	4	5	6	7	8	9	10	11	12	13	14																									
27	Mothercare, Seedbed Centre	Romford Town	Recommended for retention as Secondary Employment Area. The current proposal looks to retain the same amount of employment floorspace	PE/00977/2018	NA	1144	0	1144	630	TBD	0															Romford SC LLP	The site has an area of approximately 3ha and includes a protected employment area. The proposal is seeking a redevelopment to provide a mixed use scheme providing 1,144 new dwellings and a replacement commercial floorspace for that being lost through the redevelopment of the Seedbed Centre. This would equate to a density of 381 units per hectare. On the basis that the redevelopment achieves a good replacement for the current employment space the scheme is likely to be supportable in principle. However, the density proposed is ambitious and possibly slightly too much for the site and in it's current very early form would present heights that would be challenging for Members to accept. Nevertheless the site falls within the Romford Strategic Development Area and offers opportunity for the improvement of important links such as along the River Rom. It is anticipated that Staff will continue to work with the site owners to bring forward a planning application which could be recommended favourably within the next 12 months. Further assessment has been undertaken on the appropriate density for the site based on approved and submitted applications for surrounding sites. A further 10% discount has been applied to this figure to take into account potential changes to the anticipated delivery timeline.	Y	The applicants are the owners of the site.	Y	The agent has provided Council with an estimate of when units will be completed (between 2021 and 2024), subject to planning approval. A planning application is anticipated to be received in 2019. The proposed timeframe is in line with the Council's estimates of the planning approval period and build out rates. A 10% discount has been applied to take into account the risk that the proposed development is not delivered within the anticipated timeframe.	Y	Deliverable: There is a clear intent from the land owner to develop this land. There is a realistic prospect of completions occurring between the 2021 and 2024 financial years based on the correspondence with the planning agent.																	
75	Homebase	Romford Town			NA	550	0	550	495	TBD	0						83	83	83	82	82	82							Y	Site is in single ownership. Lease is short term.	Y	Planning application is due to be submitted in January 2020. Developer anticipates commencement in Q3 2021	Y	Deliverable: There is a clear intent from the land owner to develop this land. There is a realistic prospect of completions occurring between the 2021 and 2024 financial years based on the correspondence with the planning agent.																
30	Como Street Car Park	Romford Town		NA	NA	150	0	150	150	52.5	0						100	50								Mercury Land Holdings	This site has been allocated in the Adopted Romford Area Action Plan 2008 and is identified in the Romford Town Centre Development Framework. It is currently in use as an at grade car park. The car park has low occupancy levels and the Council are looking to develop the land in the near future. The site has some flooding and traffic constraints. However, there is nothing to render the site not suitable for development.	Y	Council Owned (Mercury Land Holdings). Council are interested in developing this land and have undertaken viability, capacity and development modelling work. Plans have been drawn up to develop the site as a stand alone project, however, the Council are now looking include the site within a wider comprehensive development which would result in higher overall units numbers.	Y	The Council has been working on plans for this site's development. Plans to develop the site as a stand alone project are temporarily on hold while options to include it in a wider comprehensive development are now being considered. These plans are on the Council's forward plan to be considered by Cabinet in July. The trajectory assumes completions will occur in the 2022 and 2023 financial years based on an estimate of a planning application being received in the 2020 financial year. The site's inclusion in the Romford Masterplan will help support a quick planning approval period	Y	Deliverable: The Council has a clear intent to develop this site. The land is available and suitable for development. There is a realistic prospect of completions occurring in the 2022 and 2023 financial years.																	
31	Romford Gas Works	Brooklands	Crow Lane Site 3 (West) refer to page 85/86 and 96 of the Employment Land Review 2015. Recommended for least change of use away from industrial uses and utilities.	NA	NA	450	0	450	360	TBD	0						100	100	100	60						National Grid	The site is identified in the Romford Development Framework. It is located within a 20 minute walk of the town centre and Romford Train Station. A Development Brief prepared for the Council identifies contamination, gas pipelines, vehicular access, rationalisation of existing uses, noise and relocation of infrastructure as major constraints on development. However, a capacity assessment has been prepared taking into account the site constraints and opportunities. This identified the potential for 450 units on the site.	Y	The site is owned by National Grid Property Holdings and National Grid Gas. It was previously designated as a Secondary Employment Area in the Havering Local Development Framework 2008. The Havering Employment Land Review 2015 (ELRP 20) recommends the release of this site for residential development. The site has been put forward for residential development through the call for sites that was undertaken as part of the Employment Land Review.	Y	Yes. The site is largely vacant and is a market attractive site for residential use which accords with Council's ambitions for the site. The owners have signalled intent to develop the site, having put it put forward as part of the call for sites in the Employment Land Review. Given no application has been lodged and there are significant constraints to be overcome, a 20% discount has been applied to the unit numbers identified in the capacity study. Completions are anticipated between the 2023 and 2026 financial years assuming an application comes forward prior to the 2021 financial year and taking into account the average build out period for sites over 100 units, an additional year for land remediation and a phased development over 4 years.	Y	Deliverable: The site is suitable for development and the owners have registered an interest in developing the site. There is a realistic prospect of completions from 2023 to 2026 financial years taking into account no application has yet been submitted and the significant remediation that will need to occur to develop the site.																	
32	Station Gateway and Interchange	Romford Town		NA	NA	670	0	670	536	TBD	0								100	100	100	100	100	36		Multiple ownership	The site is directly adjacent to the Romford Crossrail Station, is allocated in the Adopted Romford Area Action Plan 2008 and is identified as having capacity for between 670 and 710 units within the Romford Town Centre Development Framework. The site is also within the Romford Housing Zone and Strategic Development Area.	Y	The site is in multiple ownership and is likely to require public intervention. This could be achieved through a similar approach to other Council regeneration projects i.e. a JV acquiring Land through private treaty and use of CPO powers if necessary. The Romford Master Plan, currently underway, will provide more guidance on the potential redevelopment of this site. A 20% discount has been applied to reflect the fact that no political decisions have yet been made about intervention to stimulate development of this site.	Y	The site has been identified in the London SHAA 2017 for completion in Phase 2 (2019-2024), however, given there has been no political approval for public intervention in the site the anticipated completion dates have been pushed back. There is a reasonable prospect of completions occurring between 2024 and 2029 following the completion of a Romford Master Plan and political approval for public intervention.	Y	Devellopable: The site is suitable for development, however, the land is in multiple ownership and no political decisions have yet been made on public intervention to encourage development of the site. Overall, there is a reasonable prospect of completions occurring between 2024 and 2029.																	
33	37-59 high street	Romford Town		NA	NA	88	18	70	49	TBD	0						49									Multiple ownership, largely Council owned	Site has been allocated in the Adopted Romford Area Action Plan 2008 and is located within the Romford Strategic Development Area and Romford Housing Zone. The Romford Town Centre Development Framework 2015 identifies the site as having capacity for 80-95 units with a density of 215-260 units per/ha.	Y	The site is largely in Council ownership, however, the remaining flats and shops would need to be purchased or CPO'd in order for comprehensive redevelopment to occur.	Y	The site has been identified in the London SHAA 2017 for completion in Phase 2 (2019-2024). The Council are actively looking into options to redevelop this site as part of a wider comprehensive development, however, no political approval for redevelopment or land acquisition has yet been received. These plans are on the Council's forward plan to be considered by Cabinet in July.	Y	Devellopable: There is a reasonable prospect of completions occurring in the 2024 financial year based on submission of an application by the end of 2022 and application of average build out rates. A 30% discount has been applied to take into account the fact that political approval for redevelopment has not yet been received, the need for land amalgamation, viability concerns and the likelihood that completions do not occur within the anticipated period.																	
34	Angel Way Car Park and High Street	Romford Town		NA	NA	300	30	270	203	TBD	0						103	100								London Borough of Havering	The site is located within the Romford Housing Zone and the Romford Strategic Development Area. The High Street Shops have been allocated in the Adopted Romford Area Action Plan 2008 and both the car park and high street shops are identified in the Romford Town Centre Development Framework 2015 with a capacity for 550-710 residential units with a density of 300-450dph, however, this includes the former Deacathalon Site (Angel Way Retail Park). Assuming a combined potential for 600 units and subtracting the 350 units approved in the Decathalon Site, it is estimated that 250 units (270 net) can be delivered on this site at a density of approximately 300dph. A primary concern of stakeholders is that the removal of the existing car park does not affect the ability of people to access Romford. This will be taken into consideration as part of the redevelopment.	Y	The land is in Council ownership, however, the properties are subject to numerous leases. This constraint would need to be resolved before redevelopment occurs. The Council's CPO powers could be used if necessary.	Y	The Council are looking into options to redevelop this site as part of a wider comprehensive development, however no political decisions have yet been made. These plans are on the Council's forward plan to be considered by Cabinet in July. There is a realistic prospect of completions in the 2022-23 financial year based on submission of an application in 2020 and application of the average build out period (3.2 years). A 25% discount has been applied to take into account the fact that political approval for the comprehensive redevelopment has not yet been received, the need to resolve the existing leases, and the likelihood that completions do not occur within the anticipated period.	Y	Deliverable: The Council is the land owner of this site and has an intent to develop it as part of a wider comprehensive development scheme. The site has been identified as suitable for development and there is a realistic prospect of unit completions occurring in the 2022 and 2023 financial years.																	
35	117 North Street, Romford (Matalan)	Brooklands		NA	NA	147	0	147	118	TBD	0								100	18						Matalan	The Matalan has been identified in the Romford Area Action Plan 2008 as appropriate for mixed use development. It is close to the town centre and has a PTAL rating of 5-6. There are flooding constraints but nothing to render the site not suitable for development. A capacity study undertaken by Tbbalds in 2018 identified a potential capacity for 147 flats.	Y	The site is in single private ownership and has a single retail use.	Y	As the site is in single ownership and use, it could be made available for development easily. However, Matalan is currently trading and there is no indication that a planning application is forthcoming. Therefore a 20% discount has been applied to the Tbbalds Capacity Study estimate and the likely delivery of houses is anticipated outside the 5 year period from adoption. The SHAA 2017 identifies development occurring in Phase 3 24-29.	Y	Devellopable: The site is suitable for development and is in single private ownership. However, the site is currently in use and as such a 20% discount has been applied to take into account the likelihood that the development does not come forward in the anticipated period. There is a reasonable prospect of completions occurring in the 2024 and 2025 financial years.																	
TOTALS						8214	443	7771	6705	1301.5	63	63	0	32	92	612	1451	1236	1050	708	513	299	401	188	0																									
												124		5117					1401																															
														3483																																				
Net Units in Romford SDA over Plan Period												6642																																						
Net Units in Romford SDA over a 10 year period												5241																																						

SITES WITHIN THE RAINHAM AND BEAM PARK SDA																																		
	Site	Ward	Industrial Land	Application No.	Date Granted	Gross units	Demolitions	Net Units	Net units within Plan Period) (Discounting applied)	Affordable Units	Completions up to 31 st March 2018	Actual/Expected Completions (First 5 Years)					Expected Completions (5-10 Years)					Expected Completions (10-15 Years)					Developer/Land Owner	Suitability	Y/N	Availability	Y/N	Achievability	Y/N	Deliverable or Developable
												2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31								
												Permissions												First 5 years from Adoption										
37	Former Somerfield Depot (90 New Road)	South Homchurch	Rainham West. Currently Other-designated in the LDF 2008. Employment Land Review 2015 (p96) proposes to allow loss/ change away from industrial employment uses.	P1813.11 and P1039.19	29-Jun-17	(497) 717	0	(497) 717	669	TBD (243)	0						96	195	194	92	92						St Annes Road Properties Limited	Permission has been granted. Previous issues regarding slip road ownership have been resolved potentially enabling greater development. Constraints of contaminated land, flooding, asbestos and high pressure gas pipelines are being managed through conditions/ planning process. No major site limitations or potential impacts that would render the site not suitable. An application is due to be submitted in late May for 717 units in light of resulation of the slip road access. A 20% discount has been applied to the 220 proposed additional units to reflect the risk that this is not approved.	Y	There are multiple owners for this site, however a S106 agreement has been signed.	Y	The planning permission has been implementing. Existing buildings demolished and pre-development conditions discharged. A revised application is due to be submitted in late May 2019.	Y	Deliverable - Full permission granted and implemented. There is a realistic prosepct of completions between 2021 and 2025 financial years correspondence with the developer.
38	Dovers Corner	South Homchurch	Rainham West. Currently Other-designated in the LDF 2008. Employment Land Review 2015 (p96) proposes to allow loss/ change away from industrial employment uses.	P0922.15	16-Oct-17	394	0	394	394	51	0			99	99	98	98										Persimmon Homes	Full planning permission has been granted. Constraints of potential contamination, flooding, and presence of gas pipeline has been managed through the planning process and conditions.No major site limitations or potential impacts that would render the site not suitable.	Y	s106 agreement has been signed.	Y	Currently discharing pre-commencement conditions. The approved construction method statement states that construction will begin in 2018 and be completed December 2022.	Y	Deliverable - Full permission granted with pre-commencement condition being discharged. Realistic prospect of a phased completion of units from between the 2019 and 2022 financial years.
40	Rainham Wall engineering, New Road	Rainham & Wennington		P0923.16	09-Feb-17	46	0	46	46	0	0			46													Bellway Homes	Permission has been granted. Constraints of potential contamination managed through the planning process and conditions.No major site limitations or potential impacts that would render the site not suitable.	Y	s106 agree ment has been signed.	Y	Pre-commencement conditions have begun to be discharged signalling intent to develop soon.	Y	Deliverable - Full permission granted with pre-commencement conditions being discharged. Realistic prospect of completion of units by late 2019 FY in line with average built out rates.
39.1	NR11 (21 New Road)	South Homchurch		P0782.17	01-Nov-17	24	3	21	21	8	0								21								Multiple owners. Developers are JV - Council and Notting Hill Genesis	Outline planning approved. Conditions not met yet. Reserved matters planning application to be submitted and s106 to be agreed. No known limitations or potential impacts to render site not suitable. Viability and deliverability assessments have incorporated continency for worst case scenarios.	Y	Multiple ownership. JV assembling sites by private treaty. Council has approved funding to acquire the site using CPO powers as a last resort.	Y	Outline delivery programme estimates completion of the 24 units by February 2014.	Y	Deliverable - outline planning is approved. Given the Council has a clear intent to develop the site, there is a realistic prospect of completion by 2023 FY.
39.2	NR2/3 (195-205 New Road)	South Homchurch		P1058.17	31-Oct-17	77	2	75	75	27	N/A								75								Multiple owners. Developers are JV - Council and Notting Hill Genesis	Outline planning approved. Conditions not met yet. Reserved matters planning application to be submitted and s106 to be agreed. No known limitations or potential impacts to render site not suitable. Viability and deliverability assessments have incorporated continency for worst case scenarios.	Y	Multiple ownership. JV assembling sites by private treaty. Council has approved funding to acquire the site using CPO powers as a last resort.	Y	Outline delivery programme estimates completion of the units by August 2023	Y	Deliverable - outline planning is approved. Given the Council has a clear intent to develop the site, there is a realistic prospect of completion by 2023 FY.
39.3	NR06b (149-153 New Road)	South Homchurch	Rainham West. Currently Other-designated in the LDF 2008. Employment Land Review 2015 (p96) proposes to allow loss/ change away from industrial employment uses.	P0726.17	12-Oct-17	14	0	14	14	5	0							14									Multiple owners. Developers are JV - Council and Notting Hill Genesis	Outline planning approved. Conditions not met yet. Reserved matters planning application to be submitted and s106 to be agreed. No known limitations or potential impacts to render site not suitable. Viability and deliverability assessments have incorporated continency for worst case scenarios.	Y	Multiple ownership. JV assembling sites by private treaty. Council has approved funding to acquire the site using CPO powers as a last resort.	Y	Development will be undertaken as a single phase. Outline delivery programme estimates completion of the units by April 2022.	Y	Deliverable - outline planning is approved. Given the Council has a clear intent to develop the site, there is a realistic prospect of completion by 2022 FY.
39.4	NR10 (35-43 New Road)	South Homchurch	Rainham West. Currently Other-designated in the LDF 2008. Employment Land Review 2015 (p96) proposes to allow loss/ change away from industrial employment uses.	P1241.17	08-Oct-18	62	4	58	58	22	0									58							Multiple owners. Developers are JV - Council and Notting Hill Genesis	Outline planning approved. Conditions not met yet. Reserve matters application to be submitted and s106 to be agreed. No known limitations or potential impacts to render site not suitable. Viability and deliverability assessments have incorporated continency for worst case scenarios.	Y	Multiple ownerships. JV assembling site by private treaty. Council has approved funding to acquire the site using CPO powers as a last resport.	Y	Outline planning received. Outline delivery programme estimates completion of the units by August 2024.	Y	Deliverable - outline planning is approved. Given the Council has a clear intent to develop the site, there is a realistic prospect of completion by 2024 FY.

	Site	Ward	Industrial Land	Application No.	Date Granted	Gross units	Demolitions	Net Units	Net units within Plan Period) (Discounting applied)	Affordable Units	Completions up to 31 st March 2018	Actual/Expected Completions (First 5 Years)					Expected Completions (5-10 Years)					Expected Completions (10-15 Years)					Developer/Land Owner	Suitability	Y/N	Availability	Y/N	Achievability	Y/N	Deliverable or Developable
												2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31								
39.5	NR08 (89-101 New Road)	South Hornchurch	Rainham West. Currently Other-designated in the LDF 2008. Employment Land Review 2015 (p96) proposes to allow loss/ change away from industrial employment uses.	P1229.17	28-Aug-18	62	2	60	60	22	0						30	30							Multiple owners. Developers are JV - Council and Notting Hill Genesis	Outline planning approved. Conditions not met yet. Reserve matters application to be submitted and s106 to be agreed. No known limitations or potential impacts to render site not suitable. Viability and deliverability assessments have incorporated contingency for worst case scenarios.	Y	Multiple ownerships. JV assembling site by private treaty. Council has approved funding to acquire the site using CPO powers as a last resort.	Y	Outline planning received. Outline delivery programme estimates completion of the units by July 2023.	Y	Deliverable - outline planning is approved. Given the Council has a clear intent to develop the site, there is a realistic prospect of completion by 2022 and 2023 Fys.		
39.6	NR06a (143 New Road)	South Hornchurch	Rainham West. Currently Other-designated in the LDF 2008. Employment Land Review 2015 (p96) proposes to allow loss/ change away from industrial employment uses.	P1239.17	17-Aug-18	34	0	34	34	12	0						34								Multiple owners. Developers are JV - Council and Notting Hill Genesis	Outline planning approved. Conditions not met yet. Reserve matters application to be submitted and s106 to be agreed. No known limitations or potential impacts to render site not suitable. Viability and deliverability assessments have incorporated contingency for worst case scenarios.	Y	Multiple ownerships. JV assembling site by private treaty. Council has approved funding to acquire the site using CPO powers as a last resort.	Y	Outline planning received. Outline delivery programme estimates completion of the units by April 2022.		Deliverable - outline planning is approved. Given the Council has a clear intent to develop the site, there is a realistic prospect of completion by 2022 FY.		
41	Beam Park	South Hornchurch	Beam Park. Currently Other-designated in the LDF 2008. Employment Land Review 2015 (p96) proposes to allow loss/ change away from industrial employment uses.	P1242.17	28-Sep-18	834	0	834	834	425	0				5	181	384	70	194						Countryside/ & L and Q Countryside Properties Plc	Hybrid Planning Application has been granted by the GLA.	Y	Countryside are the owners. A s106 agreement is in the process of being produced	Y	Countryside have a clear intent to develop this site. Through email correspondence they have confirmed their anticipated indicative completion dates.	Y	Deliverable- outline planning is approved and detailed planning for phase 1 which is within the Havering area. The developers have stated they expect completions for phase 1 to occur between 2019 and 2022. The Council has anticipated phase 2 completions the following year.		
Applications in Process																																		
42	Former Rainham Library offices at 21 Broadway and land to the rear of 29 Broadway	Rainham & Wennington		P1701.17	NA	57	0	57	57	6	0					57									Persimmon Homes	Approved by committee. s106 still to be signed. Constraints of conservation area location, listed buildings, contaminated land, flood zone (no habitable accommodation at ground floor) and ecology are able to be dealt with through planning process and conditions.No known limitations or potential impacts to render site not suitable.	Y	s106 is close to being finalised	Y	Identified in Phase 2 of the SHLAA 2017 (2019-2024). Historically developers generally tend to build out.	Y	Deliverable-Approved by committee. Historically these developers tend to build out. Realistic prospect of completion by 2020 FY based on average build out rates.		
39.7	NR09 (49-87 New Road)	South Hornchurch	Rainham West. Currently Other-designated in the LDF 2008. Employment Land Review 2015 (p96) proposes to allow loss/ change away from industrial employment uses.	P0947.17	NA	245	0	245	245	TBD	0						125	120							Multiple owners. Developers are JV - Council and Notting Hill Genesis	Outline planning application has been submitted. No known limitations or potential impacts to render site not suitable. Viability and deliverability assessments have incorporated contingency for worst case scenarios. A revised outline plan is due to be submitted with higher densities.Numbers are based on this revised figure.	Y	Multiple owners. JV assembling site by private treaty. Council has approved funding to acquire the site using CPO powers as a last resort.	Y	Outline delivery programme estimates completion of the units by July 2022.	Y	Deliverable - Council has a clear intent to develop the site. Realistic prospect of completion by 2021 and 2022 fys.		
39.8	NR4/5 (165-193 New Road)	South Hornchurch	Rainham West. Currently Other-designated in the LDF 2008. Employment Land Review 2015 (p96) proposes to allow loss/ change away from industrial employment uses.	P1057.17	NA	109	7	102	102	36	0							102							Multiple owners. Developers are JV - Council and Notting Hill Genesis	Outline planning application has been submitted. No known limitations or potential impacts to render site not suitable. Viability and deliverability assessments have incorporated contingency for worst case scenarios.	Y	JV assembling site by private treaty. Council has approved funding to acquire the site using CPO powers as a last resort.	Y	Outline delivery programme estimates completion of the 109 units by November 2023.	Y	Deliverable - Council has a clear intent to develop the site. Realistic prospect of completion by 2023 fy.		
39.9	RW4B (148-192 New Road)	South Hornchurch	Rainham West. Currently Other-designated in the LDF 2008. Employment Land Review 2015 (p96) proposes to allow loss/ change away from industrial employment uses.	P1604.17	NA	239	8	231	231	TBD	0							116	115						Multiple owners. Developers are JV - Council and Notting Hill Genesis	Outline planning application has been submitted. No known limitations or potential impacts to render site not suitable. Viability and deliverability assessments have incorporated contingency for worst case scenarios. A revised outline plan is due to be submitted with higher densities.Numbers are based on this revised figure.	Y	JV assembling site by private treaty. Council has approved funding to acquire the site using CPO powers as a last resort.	Y	Development will be undertaken as a single phase. Outline delivery programme estimates completion of the 245 units by March 2025.	Y	Deliverable - Council has a clear intent to develop the site. Realistic prospect of completions in 2023 and 2024 financial years.		
	12 Estates																																	

	Site	Ward	Industrial Land	Application No.	Date Granted	Gross units	Demolitions	Net Units	Net units within Plan Period) (Discounting applied)	Affordable Units	Completions up to 31 st March 2018	Actual/Expected Completions (First 5 Years)					Expected Completions (5-10 Years)					Expected Completions (10-15 Years)					Developer/Land Owner	Suitability	Y/N	Availability	Y/N	Achievability	Y/N	Deliverable or Developable		
												2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31										
43	NAPIER & NEW PLYMOUTH	South Homchurch		P0751.19	N/A	200	97	103	103	145	0					-97	200										London Borough of Havering	The site is already in residential use. Capacity studies have been undertaken to determine appropriate development scale. There are no known limitations or potential impacts to render site not suitable.	Y	Council-owned land	Y	The Cabinet Reports, allocated Council funding and the formation of a JV signal a clear intent to move forward with this development. An application has been submitted. The current outline delivery programme estimates completion in 2020 financial year.	Y	Deliverable - The site is suitable and available. The Council has signalled a strong intent to develop this site. Realistic prospect of completions by the end of the 2020 FY.		
	Other Sites																																			
44	Mudlands	South Homchurch	Rainham West. Currently Other-designated in the LDF 2008. Employment Land Review 2015 (p96) proposes to allow loss/ change away from industrial employment uses.	PE/00681/2017	N/A	202	0	202	162	TBD	0							81	81								Grovetworld	The site is identified in the Site Specific Allocations Document 2008 and the Rainham and Beam Park framework. It is also within the Rainham and Beam Park Housing Zone and SDA. The site sits among a number of other sites which are being developed for mixed and residential use as part of the regeneration of the area. The site contains a substation and transformer which will need to be retained. There are also high pressure gas mains and a sewer running through the site and which will restrict the developable area. Grovetworld is currently in discussions with the GLA regarding a proposal for around 200 residential units.		The land is in single ownership	Y	Given the recent interest expressed in developing the site and the likelihood that broader regeneration of the area stimulates further developer interest, it is considered realistic that completions could occur via a phased construction between 2022 and 2023. The SHLAA 2017 identifies this site as being developed within Phase 3 2024-29. A 20% discount has been applied to the proposed units to take into account the likelihood that completions will not come forward within the anticipated timeframe and at the currently proposed density.	Y	Deliverable/ Developable -The developer is currently in discussions with the GLA regarding development of the site. There is, overall, a realistic prospect of completions occurring between the 2022 and 2023 financial years.		
TOTALS						3316	123	3193	3105	759				0	53	537	703	642	813	265	92	0	0	0	0	0										
												590				2748				0																
										Net Units in Rainham and Beam Park SDA over Plan Period		3105																								
										Net Units in Rainham and Beam Park SDA over a 10 year period		3105																								

12 ESTATES SITES OUTSIDE OF THE SDAS																																	
	Site	Ward	Application No.	Date Granted	Gross units	Demoliti ons	Net Units	Affordable Units	Completions up to 31 st March 2018	Actual/Expected Completions (First 5 Years)					Expected Completions (5-10 Years)					Expected Completions (10-15 Years)					Developer/ Land Owner	Suitability	Y/ N	Availability	Y/ N	Achievability	Y/ N	Deliverable or Developable	
										2016 /17	2017 /18	2018 /19	2019 /20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31									
12 Estates (outside of SDAs)												First 5 years from Adoption																					
45	SOLAR - SRENA SUNRISE	St Andrews	N/A	N/A	178	55	123	55				0	-55	52	120	6		0	0	0	0	0	0	0	0	London Borough of Havering	The site is already in residential use and capacity studies have been undertaken to determine an appropriate development scale and financial viability. There are no known limitations or potential impacts to render site not suitable.	Y	The site is Council-owned land. There is a tenant rehousing programme in place to move Council tenants to alternative locations	Y	The Cabinet Reports, allocated Council funding and the formation of a JV signal a clear intent to move forward with this development. A pre-application has been submitted and the proposal has been seen by the Strategic Planning Committee. A planning application submission is due in September 2019. The current outline delivery programme estimates completion in 2020 and 2022 financial years.	Y	Deliverable - The Council has a clear intent to develop this site. There is a realistic prospect of completion in the 2021and 2022 financial years based on the current outline delivery programme.
45	MAYGREEN	Hylands	N/A	N/A	295	111	184	118				0	0	0	0	0	0	0		-111		155	140	0	London Borough of Havering	The site is already in residential use. Capacity studies have been undertaken to determine appropriate development scale. No known limitation or potential impacts to render site not suitable.	Y	Council-owned land Council will look to resolve outstanding land ownership issues via CPO as a final resort	Y	Resident Decant process has started Work Package 4 of the regeneration programme. Cabinet Reports, allocated Council and GLA funding and the formation of a JV signal a clear intent to move forward with this development . Current outline delivery programme estimates completion in 2028 financial year.	Y	Deliverable - The Council has a clear intent to develop this site. There is a realistic prospect of completion in the 2028 financial year based on the current outline delivery programme.	
45	ROYAL JUBILEE COURT	Pettits	N/A	N/A	152	79	73	53	0			0	0	0	0	0	0	0	0	-79	0	152	0	0	London Borough of Havering	The site is already in residential use. Capacity studies have been undertaken to determine appropriate development scale. No known limitation or potential impacts to render site not suitable.	Y	Council-owned land Council will look to resolve outstanding land ownership issues via CPO as a final resort	Y	Resident Decant process has started Work Package 4 of the regeneration programme. Cabinet Reports, allocated Council and GLA funding and the formation of a JV signal a clear intent to move forward with this development . Current outline delivery programme estimates completion in 2028 financial year.	Y	Deliverable - The Council has a clear intent to develop this site. There is a realistic prospect of completion in the 2028 financial year based on the current outline delivery programme.	
45	DELTA	Squirrels Heath	N/A	N/A	495	223	272	198	0			0	0	0	0	0	0	-223	0	248	247			0	London Borough of Havering	The site is already in residential use. Capacity studies have been undertaken to determine appropriate development scale. No known limitation or potential impacts to render site not suitable.	Y	Council-owned land Council will look to resolve outstanding land ownership issues via CPO as a final resort	Y	Work Package 3 of the Regeneration Programme. Cabinet Reports, allocated Council and GLA funding and the formation of a JV signal a clear intent to move forward with this development . Current outline delivery programme estimates completion in 2026 and 2027 financial years.	Y	Deliverable - The Council has a clear intent to develop this site. There is a realistic prospect of completion in the 2026 and 2027 financial years based on the current outline delivery programme.	
45	DELL COURT	St Andrews	N/A	N/A	80	29	51	29	0			0	0	0	0	0	0	-29	80		0	0	0	0	London Borough of Havering	The site is already in residential use. Capacity studies have been undertaken to determine appropriate development scale. No known limitation or potential impacts to render site not suitable.	Y	Council-owned land tenant rehousing programme in place to move Council tenants to alternative locations	Y	Resident Decant process has started Work Package 3 of the Regeneration Programme. Cabinet Reports, allocated Council and GLA funding and the formation of a JV signal a clear intent to move forward with this development . Current outline delivery programme estimates completion in 2025 financial year.	Y	Deliverable - The Council has a clear intent to develop this site. There is a realistic prospect of completion in the 2025 financial year based on the current outline delivery programme.	
45	DELDERFIELD	Pettits	N/A	N/A	22	14	8	22	0			0	0	0	0	0	0	-14	22	0	0	0	0	0	London Borough of Havering	The site is already in residential use. Capacity studies have been undertaken to determine appropriate development scale. No known limitation or potential impacts to render site not suitable.	Y	Council-owned land tenant rehousing programme in place to move Council tenants to alternative locations	Y	Resident Decant process has started Work Package 3 of the Regeneration Programme. Cabinet Reports, allocated Council and GLA funding and the formation of a JV signal a clear intent to move forward with this development . Current outline delivery programme estimates completion in 2025 financial year.	Y	Deliverable - The Council has a clear intent to develop this site. There is a realistic prospect of completion in the 2025 financial year based on the current outline delivery programme.	
45	FARNHAM HILLDENE	Goodshays	N/A	N/A	540	145	395	145	0			0	0	0	0	-145	0	200	180	160	0	0	0	0	London Borough of Havering	The site is already in residential use. Capacity studies have been undertaken to determine appropriate development scale. No known limitation or potential impacts to render site not suitable.	Y	Council-owned land Council will look to resolve outstanding land ownership issues via CPO as a final resort	Y	Resident Decant process has started Work Package 2 of the Regeneration Programme. Cabinet Reports, allocated Council and GLA funding and the formation of a JV signal a clear intent to move forward with this development . Current outline delivery programme estimates completion in 2024-26 financial years.	Y	Deliverable - The Council has a clear intent to develop this site. There is a realistic prospect of completion in the 2024-26 financial years based on the current outline delivery programme.	

	Site	Ward	Application No.	Date Granted	Gross units	Demoliti ons	Net Units	Affordable Units	Completions up to 31 st March 2018	Actual/Expected Completions (First 5 Years)					Expected Completions (5-10 Years)					Expected Completions (10-15 Years)					Developer/ Land Owner	Suitability	Y/ N	Availability	Y/ N	Achievability	Y/ N	Deliverable or Developable							
										2016 /17	2017 /18	2018 /19	2019 /20	2020/2 1	2021/2 2	2022/2 3	2023/2 4	2024/25	2025/2 6	2026/2 7	2027/2 8	2028/2 9	2029/3 0	2030/3 1															
45	BRUNSWICK	Cranham	N/A	N/A	54	47	7	54	0			0	0	0	-47	54	0	0	0	0	0	0	0	0	0	0	0	0	0	London Borough of Havering	The site is already in residential use. Capacity studies have been undertaken to determine appropriate development scale. No known limitation or potential impacts to render site not suitable.	Y	Council-owned land tenant rehousing programme in place to move Council tenants to alternative locations	Y	Resident Decant process has started Work Package 3 of the Regeneration Programme. Cabinet Reports, allocated Council and GLA funding and the formation of a JV signal a clear intent to move forward with this development . Current outline delivery programme estimates completion in 2022 financial year.	Y	Deliverable - The Council has a clear intent to develop this site. There is a realistic prospect of completion in the 2021 financial year based on the current outline delivery programme.		
45	CHIPPENHAM ROAD	Goodshays	N/A	N/A	206	31	175	140	0					-31		141	65												London Borough of Havering	The site is already in residential use. Capacity studies have been undertaken to determine appropriate development scale. No known limitation or potential impacts to render site not suitable.	Y	Council-owned land Council will look to acquire outstanding land ownership issues via CPO	Y	Resident Decant process has started Work Package 2 of the Regeneration Programme. Cabinet Reports, allocated Council and GLA funding and the formation of a JV signal a clear intent to move forward with this development . Current outline delivery programme estimates completion in 2022-23 financial years.	Y	Deliverable - The Council has a clear intent to develop this site. There is a realistic prospect of completion in the 2021-22 financial years based on the current outline delivery programme.			
	TOTALS				2022	734	1288	814				0	-55	21	73	56	65	-66	282	218	247	307	140	0															
											-34			410					912																				
													160																										
											Net Units in 12 Estates (outside of SDAs) over Plan Period					1288																							
											Net Units in 12 Estates (all sites) over Plan Period					2748																							
											Net Units in 12 Estates (outside of SDAs) over the 10 year period					376																							
											Net Units in 12 Estates (all sites) over the 10 year period					1235																							

PERMISSIONS OUTSIDE OF THE SDAS AND 12 ESTATES SITES

	Site	Ward	Applicatio n No.	Date Granted	Gross units	Demolitions	Net Units	Net units within Plan Period)	Affordable Units within the plan period	Completions up to 31 st March 2018	Actual/Expected Completions (First 5 Years)					Expected Completions (5-10 Years)					Expected Completions (10-15 Years)					Developer/Lan d Owner	Suitability	Y/N	Availability	Y/N	Achievability	Y/N	Deliverable or Developable
											2016/ 17	2017/ 18	2018/ 19	2019/ 20	2020/ 21	2021/ 22	2022/ 23	2023/ 24	2024/ 25	2025/ 26	2026/ 27	2027/ 28	2028/ 29	2029/ 30	2030/ 31								
											Permissions (outside of SDAs)											First 5 years from Adoption											
1	78-80 Straight Road, Romford	Heaton	P1463.17	15-Mar-18	19	0	19	19	0	0				19											Burney (Essex) Ltd. C/O Jillings Heynes Planning LTD	Full planning permission has been granted. No major site limitations or potential impacts that would render the site not suitable.	Y	Owner is also the applicant. Section 106 completed.	Y	Development is under construction. The education contribution has been paid and the first installment of the affordable housing contribution of £25,221.67 was paid on 14/11/2018.	Y	Deliverable- Full planning permission granted. Site is available and conditions are being cleared. Realistic prospect of completion in 2019 FY based on submitted project phasing plan.	
15	Crown Public House	Brooklands	P1154.15	15-Sep-16	24	9	15	15	0	0				15											Kunda Holdings LLP	Permission granted. No known limitations or potential impacts to render site not suitable.	Y	s106 agreement signed	Y	Permission has been granted. Conditions are in the process of being discharged. The development involves change of use therefore a Permission has been granted. Conditions are in the process of being discharged. There is a realistic prospect of completion in 2019 financial	Y	Deliverable - there is a realistic prospect of completion in the 2019 financial year.	
16	110 and 120 Balgores Lane	Romford Town	P1439.15	08-Sep-16	14	2	12	12	0	0				12											Mr Rory Anderson	Permission granted. No known limitations or potential impacts to render site not suitable.	Y	No known legal complications.	Y		Y	Deliverable - there is a realistic prospect of completion in the 2019 financial year.	
46	65 Gubbins Lane	Harold Wood	P0585.12	13-Nov-13	16	0	16	16	8	0				16											Imperial Developments Ltd	Full Planning Permission has been granted. The development is under construction and is properties are being advertised.	Y	s106 Agreement has been signed.	Y	All conditions have been discharged. Construction has started and properties are being advertised for sale: https://www.primelocation.com/new-homes/details/48058269#1aLHuOIPdi8mh8qJ.97 .	Y	Deliverable- Properties are being advertised for sale. There is a realistic prospect of completion in the 2018 financial year.	
47	120-126 High Street	St Andrews	J0030.17	12-Feb-18	23	0	23	23	0	23				23											N/A	Completed	Y	Completed	Y	Completed	Y	Deliverable- Completed	
48	Land bounded by New Zealand Way	South Hornchurch	P1004.18	01-Oct-18	30	0	30	30	30	0				30											HRA Development	Outline planning permission has been grained. Heritage, ecology and flooding constraints have/are being managed through the planning process and conditions.	Y	The Council owns the land. There are no known legal complications.	Y	The Council intends to move forward on delivering this development as part of its Affordable Housing Strategy. No conditions have been discharged as of yet.	Y	Deliverable- The Council has a clear intent to develop this site soon as part of its Affordable Housing Strategy. There is a realistic prospect of completions in the 2020 financial year allowing for reserved matters to be approved.	
49	Harold Wood Hospital	Harold Wood	P0702.08	14-Nov-11	160	0	160	160	0	0				80	80										Countryside Properties	Outline Planning Permission and Reserved Matters have been granted. Constraints of heritage, contamination and archaeology are dealt with through the conditions and planning process. Site has been allocated in the Adopted Site Specific Allocations Document 2008.	Y	The site has a sole owner. S106 Agreement has been signed	Y	The development is currently under construction.	Y	Deliverable- The development is currently under construction. There is a realistic prospect of the 160 units being completed in the 2018 and 2019 financial years.	
50	Harold Wood Hospital Phase 2B	Harold Wood	P0909.16	26-Aug-16	136	0	136	136	0	20				20	116										Countryside Properties	Outline Planning Permission and Reserved Matters have been granted. Constraints of heritage, contamination and archaeology are dealt with through the conditions and planning process. Site has been allocated in the Adopted Site Specific Allocations Document 2008.	Y	The site has a sole owner. S106 Agreement has been signed	Y	The development is currently under construction, with 20 units already completed in the 2017 financial year.	Y	Deliverable- The development is currently under construction. There is a realistic prospect of the remaining 116 units being completed in the 2018/19 financial year.	
51	Roneo Corner	Hylands	P1918.11	30-Mar-12	141	0	141	48	93	93				48											Inner London Developments Limited/ Estuary Housing Association Limited	Full Planning Permission has been granted. 93 affordable units have already been constructed.	Y	No ownership issues. Section 106 has been agreed to by the Bank, Estuary Housing Association (Owner) and (Inner London Development (Havering) Ltd)	Y	The development is currently under construction, with 93 units already completed in the 2017 financial year.	Y	Deliverable- The development is currently under construction. There is a realistic prospect of the remaining 48 units being completed in the 2018/19 financial year.	
52	Moreton Bay Industrial Estate, Southend Arterial Road	Squirrels Heath	P0439.15	13-May-16	42	1	41	42	7	0				42											GDI Developments/ East Anglian Facilities (both owners)	Full Planning Permission has been granted. Site has been cleared. LDD notes work has started. Pre-commencement conditions met.Study shows no contamination issues.	Y	Both owners have signed the s106 agreement. There are no known legal complications.	Y	Site has been cleared.Pre-commencement conditions have been met.	Y	Deliverable - The site has been cleared and pre-commencement conditions met. There is a realistic prospect of completion towards the end of the 2019 financial year.	

	Ward										Actual/Expected Completions (First 5 Years)					Expected Completions (5-10 Years)					Expected Completions (10-15 Years)					Developer/Land Owner	Suitability	Y/N	Availability	Y/N	Achievability	Y/N	Deliverable or Developable
	Site	Applicatio n No.	Date Granted	Gross units	Demolitions	Net Units	Net units within Plan Period) (Discounting applied)	Affordable Units within the plan period	Completions up to 31 st March 2018	2016/ 17	2017/ 18	2018/ 19	2019/ 20	2020/ 21	2021/ 22	2022/ 23	2023/ 24	2024/ 25	2025/ 26	2026/ 27	2027/ 28	2028/ 29	2029/ 30	2030/ 31									
53	St Georges Hospital	Hacton	P0321.15 and P1917.18	13-Jul-17	356	0	356	356	15% approx	0				111	167	78										Bellway	Outline planning permission has been granted for 290 units. Since then some of the building which were to be kept have been found structurally unsound. The applicants state that their demolition and redevelopment will allow for a total of 356 units. The developers have been working closely with the Council on this development. Minutes for the Strategic Planning Committee Agenda do not note any specific concerns from the members regarding density levels. Constraints include hertiage, ecology, contamination, and de-culverting a water course and are able to be resolved through the planning process and planning conditions as is the case for the current permission.	Y	The site has a sole owner. S106 Agreement has been signed.	Y	Buildings are currently being demolished. Phase 1 reserved matters have been signed off and Phase 2 reserved mattes have been submitted. Likely to have delivered units next year. Developer has a history of quick development. The developer has provided an indication of completion dates/ numbers which the trajectory is based on.	Y	Deliverable- The site is currently in the process of being cleared. The developer has a history of quick development and there is a realistic prospect of completions occurring between 2020 and 2022 financial years based on correspondence with the developer.
54	Old Windmill Hall Site, St Marys Lane	Upminster	P1220.14	02-Apr-15	22	0	22	22	0	0			22													LBH/ MCarthy and Stone.	Full Planning Permission has been granted and receipt of commencement was received on 19 March 2018.	Y	Council (owners) and developer have signed a s106.	Y	Works have started (as evidenced by LDD and Google Maps).Receipt of commencement received. Likely to be completed this financial year.	Y	Deliverable- Site works have begun. There is a realistic prospect of completion in the 2018 financial year.
55	75 North Street, Hornchurch	St Andrews	P0960.16/ P0995.18	NA	44	0	44	44	0	0			44													Mercury Land Holdings	Full Planning Permission has been granted and development is under construction.	Y	Mercury Land Holdings are the owner. A s106 agreement has been signed.	Y	Pre-commencement conditions have been met.Preparatory works are currently being undertaken	Y	Development is currently under construction since May 2018, with expected completion October 2019.
56	Land to the rear of Kent House and 37-59 White Hart Lane	Mawneys	P2031.16, P2032.16	12/2017, 25/9/17	23	0	23	23	23	0				23												HRA Development	Full Planning Permission has been granted.	Y	Council scheme. s106 agreement signed btw LBH Housing Services and LBH Local Planning Authority, (Education contribution) No known legal complications identified.	Y	The Council intends to move forward on delivering this development as part of its Housing Strategy 2014-17. No conditions have been discharged as of yet. Nov 2020 expected completion	Y	Deliverable- The Council has a clear intent to develop this site soon as part of its Housing Strategy 2014-17. There is a realistic prosepct of completions by Nov 2020. The Cabinet Report for 18th November 2015, 'Housing Revenue Account Affordable Housing Development Programme - Phase 3' approved a number of sites within the ownership of the LBH, after identifying them through a robust process of site selection, capacity study and feasibility assessment. One of these other sites identified and referred to as the 'Garage site', and has now completed (Lexington Way P1419.15).
57	1 Kilmartin Way	Elm Park	P1210.15	25-Nov-16	18	0	18	18	18			18														This is a Council scheme	Full Planning Permission Granted. No limitations or potential impacts noted. All pre-commencement conditions fulfilled.	Y	Council scheme. A s106 agreement has been signed..	Y	Pre-commencement conditions met. LDD notes as having started. Likely to be completed this financial year.	Y	Deliverable- Site works have begin. There is a realistic prospect of completion this financial year (2018).
58	Briar Road Shop Site	Heaton	P0382.15	08-Apr-16	46	11	35	35	46	0			35													This is a Council scheme	Permission granted/ No limitations or potential impacts noted.	Y	Council scheme. A s106 agreement has been signed.	Y	Commencement notice issued for 27 March 2017. 10 shared-ownership units were delivered in June of this year.	Y	Deliverable- Site works have begin and 10 units have already been completed. There is a realistic prospect of completion this financial year (2019).
59	Neopost House, South Street, Romford	Hylands	J0010.18	10-Apr-18	120	0	120	120	0	0				120												GHL Ltd	Prior Approval granted. No limitations or potential impacts to render the site not suitable. Change of use from office to residential.	Y	Single Owner. Tenant - Neopost has vacated.	Y	Tenants have vacated.	Y	Deliverable- Prior Approval has been granted. Tenants have vacated.There is a realistic prospect of completion in the 2020 financial year.
60	Pinewoods Public House	Havering park	P1241.15	17-Oct-16	32	0	32	32	0	0			32													Pinewoods Limited	Development completed.	Y	Unilateral Undertaking has been signed.	Y	Development completed.	Y	Deliverable- This development has been completed
61	Lexington Way Garage Block (1-12 Clayfied Close)	Cranham	P1419.15	08-Apr-16	12	0	12	12	12	12		12														London Borough of Havering	Development completed.	Y	Unilateral Undertaking has been signed.	Y	Development completed.	Y	Deliverable- This development has been completed

	Ward			Applicatio n No.	Date Granted	Gross units	Demolitions	Net Units	Net units within Plan Period)	Affordable Units within the plan period	Completions up to 31 st March 2018	Actual/Expected Completions (First 5 Years)					Expected Completions (5-10 Years)					Expected Completions (10-15 Years)					Developer/Lan d Owner	Suitability	Y/N	Availability	Y/N	Achievability	Y/N	Deliverable or Developable		
	2016/ 17	2017/ 18	2018/ 19									2019/ 20	2020/ 21	2021/ 22	2022/ 23	2023/ 24	2024/ 25	2025/ 26	2026/ 27	2027/ 28	2028/ 29	2029/ 30	2030/ 31													
																								(Discounting applied)												
62	Newstead House	Goodshays	P1513.16	05-Dec-17	28	0	28	28	0	0						28											Allstar Estatic Limited	Full Planning Permission granted on Appeal. Vacant carehome converted into self contained residential units. No limitations or potential impacts to render the site not suitable.	Y	Deed of Unilateral Planning Obligation signed. Education contribution has been provided.	Y	Planning conditions yet to be discharged.	Y	Deliverable - Planning permission has been granted. Conditions have yet to be discharged, however, as this is a conversion of a vacant property the anticipated build out period will be less. There is a realistic prospect of completions in the 2019 financial year.		
63	Excel House, Hornchurch	St Andrews	J0016.17	01-Aug-17	13	0	13	13	0	0						13											Mr Zebra	Outline Planning Permission has been granted for a change of use from office to residential. No infrastructural issues.	Y	Single owner.	Y	One outstanding planning conditions.	Y	Deliverable - Priori approval has been given. Google maps show the property has under construction in April 2018. There is a realistic prospect of completion in the 2018 financial year.		
64	Mardyke Estate (Phase 2)	South Hornchurch	P0356.09	05-Feb-10	121	86	45	13	121	0						13											Old Ford Housing Association	Reserved matters application approved pursuant to P2058.08	Y	s106 Agreement has been signed.	Y	Pre-commencement conditions have been met and sites are under construction.	Y	Deliverable - Planning permission has been granted and sites are under construction. Realistic prospect of completion in the 2019 financial year.		
66	Mardyke Estate (Phase 4)	South Hornchurch	P0047.14	19-Mar-14	87	24	63	63	0	0						7	56										Old Ford Housing Association	Reserved matters application approved pursuant to P2058.08	Y	s106 Agreement has been signed.	Y	Pre-commencement conditions have been met and sites are under construction.	Y	Deliverable - Planning permission has been granted and sites are under construction. Realistic prospect of completion in the 2019 financial year.		
	TOTALS				1470	122	1358	1234	358	148		0	32	375	344	284	167	78	0	0	0	0	0	0	0	0										
												1003					245					0														
																	873																			
												Net Units for Permissions (outside of SDAs) over Plan Period					1248																			
												Net Units for Permissions (outside of SDAs) over 10 year period					1248																			

APPLICATIONS OUTSIDE OF THE SDAS AND 12 ESTATES SITES

	Site	Ward	Application No.	Date Granted	Gross units	Demolitions	Net Units	Net units within Plan Period) (Discounting applied)	Affordable Units	Completions up to 31 st March 2018	Actual/Expected Completions (First 5 Years)					Expected Completions (5-10 Years)					Expected Completions (10-15 Years)					Developer/Land Owner	Suitability	Y/N	Availability	Y/N	Achievability	Y/N	Deliverable or Developable					
											2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31													
											Applications (outside of SDAs)					First 5 years from Adoption																						
67	The Pompadours, Edenhall, Romford	Goodshays	P1859.17	NA	21	0	21	0	TBA							0										Starstone Ventures Ltd	An application for 21 new units has been recommended for approval and is awaiting s106 sign off	Y	The developers are also the owners of the site and have a clear intent to develop the site, this being the second application they have invested in, the last one having gone to appeal.	Y	There is a clear intent to develop the site, this being the second application the developers have invested in, the last one having gone to appeal. The 2021 completion date takes into account completion of a s106 agreement and average build out rates.	Y	Deliverable -There is a clear intent to develop this site and it is suitable for residential development.Assuming approval is received in 2019, there is a realistic prospect of the development being completed in 2021 financial year based on average build out rates: Update - application has now been withdrawn and numbers removed from trajectory					
74	Neopost House	Hylands	P0030.19		104	0	104	88	55							44	44									GDL Limited	The principle of residential development is accepted, however, this application is still being accessed and there are existing concerns with the proposed design. A 15% reduction to the proposed unit numbers has been applied to take into account the likelihood that the proposed density of the site is not considered appropriate.	Y	The property is now vacant and has a single owner.	Y	There is a realistic prospect of completions occurring within the 2022 and 2023 financial years taking into account average build out rates and assuming a need for reapplication with a revised design in either 2019 or 2020.	Y	Deliverable -There is a realistic prospect of the development being completed in the 2022 and 2023 financial years.					
68	Ockendon Kennels		Upminster	P0862.18	NA	14	0	14	14	5				14												Linda Jefferies	Change of use from Kennels to residential. The site is within the Green Belt however has been approved at Committee.	Y	There applicant is the sole owner of the site. A s106 is currently being drafted. There are no known legal complications.	Y	There have been a number of applications on this site. This indicates the applicant has a clear intention to develop this site and is likely to do so now that this application has been approved .	Y	Deliverable - There is clear intent to develop this site. The application has been recommended for approval at committee and there is a realistic prospect of units being completed in the 2020 financial year given the lesser amount of time required to development where it is a change of use.					
	TOTALS				139	0	139	102	60		14					88					0																	
											14																											
									Net Units for Applications (outside of SDAs) over Plan Period		102																											
									Net Units for Applications (outside of SDAs) over10 year period.		102																											

PRE-APPLICATIONS AND OTHER SITES OUTSIDE OF THE SDAS AND 12 ESTATES SITES

	Site	Ward	Application No.	Date Granted	Gross units	Demolitions	Net Units	Net units within Plan Period) (Discounting applied)	Affordable Units	Completions up to 31 st March 2018	Actual/Expected Completions (First 5 Years)					Expected Completions (5-10 Years)					Expected Completions (10-15 Years)					Developer/ Land Owner	Suitability	Y/N	Availability	Y/N	Achievability	Y/N	Deliverable or Developable			
											2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31											
Pre-Applications and Other Sites (outside of SDAs)													First 5 years from Adoption																							
36	Victoria Hospital	Romford Town	NA	NA	52	0	52	42	TBD	0									42								NHS	The site is located to the north east of the Romford Town Centre in a residential area with a PTAL rating of 2/4. The principle of residential development is accepted here. The Tibbalds Capacity Study identifies the potential for 52 units on this site.	Y	The site is owned by the NHS who have signalled an interest in disposing of it as surplus to requirements. The site was submitted to the SHLAA call for sites (2016) by the NHS	Y	Although the NHS have indicated an interest in disposing of the site no planning application has yet come forward. As such a 20% discount has been applied to the unit numbers identified in the Tiabbalds capacity study commissioned by the Council.	Y	Developable -The site is suitable for development and has been identified as surplus to current NHS requirements. However, as the Council has not received a pre-application request or an application a 20% discount has been applied to take into account the risk that this is not forthcoming in the anticipated period. Overall, there is a reasonable prospect of the development being completed in the 2024 financial year.		
69	Station Approach, Upminster	Upminster	PE/01049/2016	NA	100	0	100	90	TBA								45	45									C2C, Network Rail	The site is within a Major District Centre in close proximity to Upminster high street and is adjacent to Upminster Station. The surrounding uses are a mix of residential and commercial. Through the pre-app process, staff have determined that there is no principle land objection to the re-development of the site for mixed use purposes. The Council has subsequently had a capacity study undertaken by Tibbalds which concluded that the site could accommodate 100 units.	Y	The site is in public ownership	Y	The site was the subject of a pre-application meeting in 2016, demonstrating an intent to development the site. No application has yet been received, however, the Council are in initial discussions with C2C. If an application was to come forward in 2019 it is realistic to assume completions in the 2022 and 2023 financial years, based on average build out rates.	Y	Deliverable - The site is suitable for redevelopment and interest has been expressed in developing the site. There is a realistic prospect of the site being developed with completions in 2022 and 2023 financial years. A discount rate of 10% has been applied to the unit figures in the Tibbalds Capacity Study, to take into account the risk that an application does not come forward in the period anticipated.		
70	Quarles Campus	Goodshays	NA	NA	143	0	143	138	54					100	38												Mercury Holdings	This is a green belt site which was identified in the LDF as a major developed site. A planning report commissioned by the Council concludes that it is possible to secure limited residential development of the land, given the site is comprised of previously developed land. The Council has subsequently had a capacity study undertaken by Tibbalds, which concluded that the site could accommodate 138 units on this basis. Current plans for the site for 143 units.	Y	The Council has acquired the freehold interest in Quarles Campus and is holding the property for 'planning purposes' under the Town & Country Planning Act 1990. It is being leased back to HCF&HE who can break the lease once they have vacated the site.	Y	The Mercury Land Holdings Business Plan 2017 includes a scheme for the development and sale of properties on the Quarles site. Funding from the Council has been sought and acquired for this. A planning application is anticipated to be submitted in spring 2019, with works starting in the spring of 2020 and practical completion by Autumn 2022.	Y	Deliverable - Clear intent from the Council to develop this site. The unit numbers included represent what can realistically be put on the site taking into account its Green Belt location. Based on works starting in Spring 2020, there is a realistic prospect of completions in the 2020 and 2021 Financial Year. No discount is required.		
TOTALS													0	0	100	38	45	45	42	0	0	0	0	0	0											
											100			170			0																			
											228																									
											Net Units for Applications (outside of SDAs) over Plan Period					270																				
											Net Units for Applications (outside of SDAs) over 10 year period					270																				

Havering Cabinet Meeting on August 5 2020

Item to be approved for Havering Local Plan Main Modifications Public Consultation

**Revised Gypsy and Traveller Accommodation Assessment
Update Report (July 2019)**

August 2020



Examination into the Havering Local Plan 2016 - 2031

Document for Public Consultation alongside the Proposed Main Modifications

Revised Gypsy and Traveller Accommodation Assessment Report (July 2019)

August 2020



Havering
LONDON BOROUGH

London Borough of Havering

Gypsy and Traveller Accommodation Assessment

Update Report
July 2019



Opinion Research Services | The Strand, Swansea SA1 1AF
Steve Jarman | Claire Thomas | Ciara Small
enquiries: 01792 535300 · info@ors.org.uk · www.ors.org.uk

© Copyright July 2019

Contains public sector information licensed under the Open Government licence v 3.0

Contains OS Data © Crown Copyright (2019)

Contents

1. Executive Summary	6
Introduction and Methodology.....	6
Key Findings.....	7
Additional Pitch Needs – Gypsies and Travellers	7
Additional Plot Needs - Travelling Showpeople	9
Transit Recommendations	9
Implications of Changes to Government Guidance	10
2. Introduction	11
Definitions	11
The Planning Definition in PPTS (2015)	11
Definition of Travelling.....	12
Legislation and Guidance for Gypsies and Travellers.....	14
PPTS (2015).....	14
Revised National Planning Policy Framework (2019).....	16
Local Guidance for Gypsies and Travellers.....	17
The Role of London Boroughs	17
The London Mayor	17
3. Methodology	20
Background.....	20
Glossary of Terms/Acronyms	21
Desk-Based Review	21
Stakeholder Engagement	21
Working Collaboratively with Neighbouring Planning Authorities	21
Survey of Travelling Communities.....	15
Engagement with Bricks and Mortar Households.....	16
Timing of the Fieldwork.....	17
Waiting Lists	17
Applying the Planning Definition.....	17
Planning Status of Children in Households	18
Undetermined Households	19
Households that Do Not Meet the PPTS Planning Definition	20
Calculating Current and Future Need.....	21
Supply of Pitches	21
Current Need.....	21
Future Need.....	21
Pitch Turnover	22
Transit Provision.....	23

4. Gypsy, Traveller & Travelling Showpeople Sites and Yards.....	24
Introduction.....	24
Sites and Yards in Havering	25
MHCLG Traveller Caravan Count.....	25
5. Stakeholder Engagement	26
Introduction.....	26
Views of Key Stakeholders and Council Officers in Havering.....	27
Neighbouring Authorities	28
Views from Community Representatives.....	33
6. Survey of Travelling Communities	35
Interviews with Gypsies and Travellers.....	35
Efforts to Contact Bricks and Mortar Households	37
7. Current and Future Pitch and Plot Provision.....	38
Introduction.....	38
New Household Formation Rates	38
Breakdown by 5 Year Bands	40
Applying the Planning Definition.....	40
Bricks and Mortar Interviews	41
Waiting Lists	42
Migration.....	42
Gypsies and Travellers.....	43
Travelling Showpeople	46
Transit Requirements.....	46
MHCLG Traveller Caravan Count.....	46
Stakeholder Interviews and Local Data	46
Potential Implications of PPTS (2015)	47
Transit Recommendations	47
8. Conclusions	49
Gypsies and Travellers.....	49
Travelling Showpeople	50
Transit Provision.....	50
Summary of Need to be Addressed	51
Implications of Changes to Government Guidance	51

List of Figures	52
Appendix A: Glossary of Terms / Acronyms	53
Appendix B: Undetermined Households	55
Appendix C: Households that did not meet the Planning Definition	56
Appendix D: Sites and Yards in Havering (December 2018)	57
Appendix E: Household Interview Questions	59
Appendix F: Technical Note on Household Formation	68

1. Executive Summary

Introduction and Methodology

- 1.1 The primary objective of this Gypsy and Traveller Accommodation Assessment (GTAA) Update is to provide a robust updated assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in the London Borough of Havering. As well as updating previous GTAAs, another key reason for completing the study was the publication of a revised version of Planning Policy for Traveller Sites (PPTS) in August 2015. This included a change to the definition of Travellers for planning purposes. The key change that was made was the removal of the term *persons...who have ceased to travel permanently*, meaning that those who have ceased to travel permanently will not now fall under the planning definition of a Traveller for the purposes of assessing accommodation need in a GTAA (see Paragraph 2.7 for the full definition).
- 1.2 The GTAA provides a credible evidence base which can be used to aid the implementation of Local Plan Policies and the provision of new Gypsy and Traveller pitches and Travelling Showpeople plots for the period up to 2031. The outcomes of this study supersede the outcomes of any previous Traveller and Travelling Showpeople Accommodation Needs Assessments completed in Havering including those published in 2017 and 2018.
- 1.3 The GTAA has sought to understand the accommodation needs of the Gypsy, Traveller and Travelling Showpeople population in Havering through a combination of desk-based research, stakeholder interviews and engagement with members of the travelling community living on all known sites and yards. A total of 125 interviews or proxy interviews were completed with Gypsies and Travellers on a total of 125 pitches occupied by Gypsies and Travellers – this represents a response rate of 96% when multiple interviews on a small number of pitches are taken into consideration. When refusals, vacant pitches and pitches occupied by non-Travellers are taken into consideration this gives a contact rate of 99%. A total of 5 interviews or proxy interviews were completed with Travelling Showpeople living on an authorised yard with 5 plots – representing a response rate of 100%. Despite extensive efforts to identify them it was only possible to interview 1 Traveller living in bricks and mortar. As this was an update of a recent GTAA study no additional stakeholder fieldwork was completed but the write-ups of the interviews have been updated based on other GTAA studies that have been completed by ORS and updates on the preparation of Local Plans.
- 1.4 The GTAA has been an ongoing study that initially commenced in June 2016. An initial update was completed in September 2017. Following the Local Plan Examination Sessions in October 2018 and May 2019 further updates were completed to ensure that the outcomes of the assessment are robust and up to date.
- 1.5 As a result of the updates the study makes use of the outcomes of 4 sets of household interviews. The first set of interviews were completed between June and September 2016; further interviews were completed in September 2017; a third set of interviews were completed between December 2018 and February 2019; and final interviews were completed in May 2019. The majority of the final set of interviews were with households where a proxy interview had been

completed in September 2017, or with households that had not been present during the previous fieldwork periods.

- 1.6 Whilst the baseline date for the study is **December 2016**, the assessment makes use of information from households and about sites and yards that has been collected throughout the assessment period.

Key Findings

Additional Pitch Needs – Gypsies and Travellers

- 1.7 Overall the additional pitch needs for Gypsies and Travellers from 2016-2031 are set out below. Additional needs are set out for those households that met the planning definition of a Gypsy or Traveller; for undetermined households¹ where an interview was not able to be completed (either due to households refusing to be interviewed, or not being present despite three visits to each site) who may meet the planning definition; and for those households that did not meet the planning definition – even though this is no longer a requirement for a GTAA.
- 1.8 Only the need from those households who met the planning definition and from those of the undetermined households who subsequently demonstrate that they meet it should be considered as need arising from the GTAA.
- 1.9 The need arising from households that met the planning definition should be addressed through Gypsy and Traveller Local Plan Policies, including considering the use of a criteria-based policy.
- 1.10 The Council will need to carefully consider how to address the needs associated with undetermined Travellers as it is unlikely that all of this need will have to be addressed through the provision of conditioned² Gypsy or Traveller pitches. In terms of Local Plan Policies, the Council could consider the use of a criteria-based policy (as suggested in PPTS) for any undetermined households – including any from in-migration or from bricks and mortar - that do provide evidence that they meet the planning definition.
- 1.11 In general terms, it is the Government's intention that the need for those households who do not fall within the PPTS planning definition should be met as part of general housing need and through separate Local Plan Policies, including those authorities that have adopted plans, as all Travellers will have been included as part of the overall Objectively Assessed Need (OAN).
- 1.12 This approach is specifically referenced in the revised National Planning Policy Framework (February 2019). Paragraph 60 of the NPPF sets out that in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment conducted using the standard method in national planning guidance. Paragraph 61 then states that (emphasis added) *'Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, **travellers**, people who rent their homes and people wishing to commission or build their own homes'*. The footnote to this section states that

¹ See Paragraph 3.22 for further information on undetermined households.

² Pitches with planning conditions restricting occupation to Gypsies and Travellers.

'Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document.'

- 1.13 This essentially sets out that the needs of households that meet the planning definition should be assessed under the PPTS and that the needs of households that are not found to meet the PPTS planning definition should be assessed as part of the wider housing needs of an area.
- 1.14 There were 96 Gypsy or Traveller households identified in Havering that met the planning definition; 7 undetermined households that may meet the planning definition; and 28 households that did not meet the planning definition.
- 1.15 There is a need for **174 additional pitches** for households that met the planning definition. This is made up of 67 currently unauthorised pitches, 5 pitches with temporary planning permission, 23 concealed or doubled-up households or adults, 40 teenage children in need of a pitch of their own in the next 5 years, 1 from in-migration, and 38 from new household formation using a formation rate of 2.00% derived from the household demographics.
- 1.16 Need for up to **3 additional pitches** for undetermined households is made up of 1 pitch with temporary planning permission, and 2 from new household formation from a maximum of 7 households. If the ORS national average³ of 25% were applied this could result in a need for 1 additional pitch. Whilst the proportion of households in Havering that met the planning definition (77%) is significantly higher than 25% this is based on a small household base. Therefore, it is felt that it would be more appropriate to consider the more statistically robust ORS national figure. However, if the locally derived proportion were to be applied this could result in a need for 2 additional pitches.
- 1.17 Whilst not now a requirement to include in a GTAA, there is a need for **43 additional pitches** for households that did not meet the planning definition. This is made up of 25 currently unauthorised pitches, 1 pitch with temporary planning permission, 3 concealed or doubled-up households or adults, 4 teenage children in need of a pitch of their own in the next 5 years, and 10 from new household formation using a rate of 2.45% derived from the household demographics.

Figure 1 – Additional need for Gypsy and Traveller households in Havering (2016-2031)

Status	Total
Meet Planning Definition	174
Undetermined	0-3 (25% = 1)
Do not meet Planning Definition	43

Figure 2 – Additional need for Gypsy and Traveller households in Havering by 5-year periods

Years	0-5	6-10	11-15	
	2016-21	2021-26	2026-31	Total
Meet Planning Definition	136	18	20	174
Undetermined	2	0	1	3
Do not meet Planning Definition	33	5	5	43
TOTAL	171	23	26	220

³Based on over 3,500 interviews completed by ORS across England.

Additional Plot Needs - Travelling Showpeople

- 1.18 Overall the additional plot needs for Travelling Showpeople from 2016 to 2031 are set out below. Additional needs are set out for those households that met the planning definition of a Travelling Showperson. There were no undetermined households or households that did not meet the planning definition as interviews or proxy interviews were completed with all households living on the yard in Havering.
- 1.19 Only the need from those households who met the planning definition should be considered as need arising from the GTAA.
- 1.20 The need arising from households that met the planning definition should be addressed through yard allocation/intensification/expansion Local Plan Policies.
- 1.21 There were 5 Travelling Showpeople households identified on a yard in Havering and all met the planning definition. The interviews with the residents identified that there was over-crowding on the yard and a need to provide additional space to accommodate older teenage children. It was stated that the families are looking to expand the yard on to adjacent land that they already own – and that this will meet all of their current and future needs. Combined the current yard and the proposed expansion will provide a total of 5 enlarged family plots.
- 1.22 It should be noted that this need is in addition to the need for Gypsies and Travellers set out in Figures 1 and 2.

Transit Recommendations

- 1.23 Whilst there is some evidence of a number of unauthorised encampments in Havering in recent years, it is recommended that there is currently no need to provide any new transit pitches or emergency stopping places. It is also recommended that the situation relating to levels of unauthorised encampments should be monitored whilst any potential changes associated with PPTS (2015) develop.
- 1.24 As well as information on the size and duration of the encampments, this monitoring should also seek to gather information from residents on the reasons for their stay in Havering; whether they have a permanent base or where they have travelled from; whether they have any need or preference to settle permanently in Havering; and whether their travelling is a result of changes to PPTS (2015). This information could be collected as part of a Welfare Assessment (or equivalent).
- 1.25 A review of the evidence base relating to unauthorised encampments, including the monitoring referred to above, should be completed on an annual basis. This will establish whether there is a need for investment in any formal transit sites or emergency stopping places, or whether a managed approach is preferable.
- 1.26 In the short-term, the Council should consider the use of management arrangements for dealing with unauthorised encampments and could also consider the use of Negotiated Stopping Agreements, as opposed to taking forward an infrastructure-based approach.
- 1.27 The term 'negotiated stopping' is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent 'built' transit sites but negotiated agreements

which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the authority and the (temporary) residents regarding expectations on both sides.

- 1.28 Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority, although they only need to provide basic facilities including: a cold-water supply; portaloos; sewerage disposal point and refuse disposal facilities.

Implications of Changes to Government Guidance

- 1.29 The draft London Plan (December 2017) is proposing to introduce a different definition of a Traveller for planning purposes. This is very similar to the repealed Housing Definition in that it would also include households that have not travelled for work providing that they live in a caravan. The Draft Policy also removes the requirement for households living in bricks and mortar to demonstrate a need to move to a pitch on a site. Should this definition be adopted following the Examination in Public that commenced in January 2019, it is likely that all households in Havering would meet it and total need will be for 220 additional pitches for Gypsies and Travellers, plus any additional need arising from households living in bricks and mortar.

2. Introduction

- 2.1 The primary objective of this Gypsy and Traveller Accommodation Assessment (GTAA) Update is to provide a robust updated assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in Havering. The outcomes of this study supersede the outcomes of any previous Traveller and Travelling Showpeople Accommodation Needs Assessments completed in Havering.
- 2.2 The study provides an evidence base to enable the Council to comply with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, Planning Practice Guidance (PPG) 2014, Planning Policy for Traveller Sites (PPTS) 2015, the Housing and Planning Act (2016), and the revised National Planning Policy Framework (NPPF) 2019.
- 2.3 The GTAA provides a robust assessment of need for Gypsy, Traveller and Travelling Showpeople accommodation in the study area. It is a credible evidence base which can be used to aid the implementation of Local Plan Policies and the provision of Traveller pitches and plots in five-year increments covering the period 2016 to 2031. As well as identifying current and future permanent accommodation needs, it also seeks to clarify any need for the provision of transit sites or emergency stopping places.
- 2.4 We would note at the outset that the study covers the needs of Gypsies (including English, Scottish, Welsh and Romany Gypsies), Irish Travellers, New (Age) Travellers, and Travelling Showpeople, but for ease of reference we have referred to the study as a Gypsy and Traveller (and Travelling Showpeople) Accommodation Assessment (GTAA).
- 2.5 Whilst the baseline date for the study is **December 2016**, the assessment makes use of information from households and about sites and yards that has been collected throughout the assessment period.

Definitions

- 2.6 The planning definition for a Gypsy, Traveller or Travelling Showperson is set out in PPTS (2015). The previous definition set out in the Housing Act (2004) was repealed by the Housing and Planning Act (2016).

The Planning Definition in PPTS (2015)

- 2.7 For the purposes of the planning system, the definition was changed in PPTS (2015). The planning definition is set out in Annex 1 and states that:

For the purposes of this planning policy “gypsies and travellers” means:

Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

In determining whether persons are “gypsies and travellers” for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:

- a) Whether they previously led a nomadic habit of life.*
- b) The reasons for ceasing their nomadic habit of life.*
- c) Whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.*

For the purposes of this planning policy, “travelling showpeople” means:

Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.

(Planning Policy for Traveller Sites, Department for Communities and Local Government (DCLG), August 2015)

- 2.8 The key change that was made to both definitions was the removal of the term *persons...who have ceased to travel permanently*, meaning that those who have ceased to travel permanently will no longer fall under the planning definition of a Traveller for the purposes of assessing accommodation need in a GTAA.

Definition of Travelling

- 2.9 One of the most important questions that GTAAs will need to address in terms of applying the planning definition is *what constitutes travelling?* This has been determined through case law that has tested the meaning of the term ‘nomadic’.
- 2.10 **R v South Hams District Council (1994)** – defined Gypsies as “persons who wander or travel for the purpose of making or seeking their livelihood (not persons who travel from place to place without any connection between their movements and their means of livelihood.)” This includes ‘born’ Gypsies and Travellers as well as ‘elective’ Travellers such as New Age Travellers.
- 2.11 In **Maidstone BC v Secretary of State for the Environment and Dunn (2006)**, it was held that a Romany Gypsy who bred horses and travelled to horse fairs at Appleby, Stow-in-the-Wold and the New Forest, where he bought and sold horses, and who remained away from his permanent site for up to two months of the year, at least partly in connection with this traditional Gypsy activity, was entitled to be accorded Gypsy status.
- 2.12 In **Greenwich LBC v Powell (1989)**, Lord Bridge of Harwich stated that a person could be a statutory Gypsy if he led a nomadic way of life *only seasonally*.
- 2.13 The definition was widened further by the decision in **R v Shropshire CC ex p Bungay (1990)**. The case concerned a Gypsy family that had not travelled for some 15 years in order to care for its elderly and infirm parents. An aggrieved resident living in the area of the family’s recently approved Gypsy site sought judicial review of the local authority’s decision to accept that the family had retained their Gypsy status even though they had not travelled for some considerable

time. Dismissing the claim, the judge held that a person could remain a Gypsy even if he or she did not travel, provided that their nomadism was held in abeyance and not abandoned.

- 2.14 That point was revisited in the case of **Hearne v National Assembly for Wales (1999)**, where a traditional Gypsy was held not to be a Gypsy for the purposes of planning law as he had stated that he intended to abandon his nomadic habit of life, lived in a permanent dwelling and was taking a course that led to permanent employment.
- 2.15 **Wrexham County Borough Council v National Assembly of Wales and Others (2003)** determined that households and individuals could continue to lead a nomadic way of life with a permanent base from which they set out from and return to.
- 2.16 The implication of these rulings in terms of applying the planning definition is that it will **only include those who travel (or have ceased to travel temporarily) for work purposes, or for seeking work, and in doing so stay away from their usual place of residence**. It can include those who have a permanent site or place of residence, but that it will not include those who travel for purposes other than work – such as visiting horse fairs and visiting friends or relatives. It will not cover those who commute to work daily from a permanent place of residence (see APP/E2205/C/15/3137477).
- 2.17 It will also be the case in that a household where some family members travel for nomadic purposes on a regular basis, but where other family members stay at home to look after children in education, or other dependents with health problems etc. the household unit would be defined as travelling under the planning definition.
- 2.18 Households will also fall under the planning definition if they can demonstrate that household members have ceased to travel temporarily as a result of their own or their family's or dependants' educational, health needs or old age. In order to have ceased to travel temporarily these households will still need to demonstrate that they have travelled for work in the past. In addition, households will also have to demonstrate that they plan to travel again for work in the future.
- 2.19 This approach was endorsed by a Planning Inspector in a recent Decision Notice for an appeal in East Hertfordshire (Appeal Ref: APP/J1915/W/16/3145267) that was issued in December 2016. A summary can be seen below.

Case law, including the R v South Hams District Council ex parte Gibb (1994) judgment referred to me at the hearing, despite its reference to 'purposive activities including work' also refers to a connection between the travelling and the means of livelihood, that is, an economic purpose. In this regard, there is no economic purpose... This situation is no different from that of many landlords and property investors or indeed anyone travelling to work in a fixed, pre-arranged location. In this regard there is not an essential connection between wandering and work... Whilst there does appear to be some connection between the travel and the work in this regard, it seems to me that these periods of travel for economic purposes are very short, amounting to an extremely small proportion of his time and income. Furthermore, the work is not carried out in a nomadic manner because it seems likely that it is done by appointment... I conclude, therefore, that XX does not meet the definition of a gypsy and traveller in terms of

planning policy because there is insufficient evidence that he is currently a person of a nomadic habit of life.

- 2.20 This was further reinforced in a more recent Decision Notice for an appeal in Norfolk that was issued in February 2018 (Ref: APP/V2635/W/17/3180533) that stated:

As discussed during the hearing, although the PPTS does not spell this [the planning definition] out, it has been established in case law (R v South Hams DC 1994) that the nomadism must have an economic purpose. In other words, gypsies and travellers wander of travel for the purposes of making or seeking their livelihood.

Legislation and Guidance for Gypsies and Travellers

- 2.21 Decision-making for policy concerning Gypsies, Travellers and Travelling Showpeople sits within a complex legislative and national policy framework and this study must be viewed in the context of this legislation and guidance. For example, the following key pieces of legislation and guidance are relevant when developing policies relating to Gypsies, Travellers and Travelling Showpeople:

- » The Housing Act, 1985
- » Planning Practice Guidance⁴ (PPG), 2014 and as updated
- » Planning Policy for Traveller Sites (PPTS), 2015
- » The Housing and Planning Act, 2016
- » The National Planning Policy Framework (NPPF), 2019

- 2.22 In addition, Case Law, Ministerial Statements, the outcomes of Local Plan Examinations and Planning Appeals, and Judicial Reviews need to be taken into consideration. Relevant examples have been included in this report.

- 2.23 The primary guidance for undertaking the assessment of housing need for Gypsies, Travellers and Travelling Showpeople is set out in PPTS (2015). It should be read in conjunction with the NPPF (2019) and the Housing and Planning Act (2016) which makes provision for the assessment of need for those Gypsy, Traveller and Travelling Showpeople households living on sites and yards who do not meet the planning definition – through the assessment of all households living in caravans.

PPTS (2015)

- 2.24 PPTS (2015), sets out the direction of Government policy. As well as introducing the planning definition of a Traveller, PPTS is closely linked to the NPPF. Among other objectives, the aims of the policy in respect of Traveller sites are (PPTS Paragraph 4):

- » *Local planning authorities should make their own assessment of need for the purposes of planning.*
- » *To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites.*

⁴With particular reference to the sections on Housing and Economic Development Needs Assessments.

- » *To encourage local planning authorities to plan for sites over a reasonable timescale.*
- » *That plan-making and decision-taking should protect Green Belt from inappropriate development.*
- » *To promote more private Traveller site provision while recognising that there will always be those Travellers who cannot provide their own sites.*
- » *That plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.*
- » *For local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies.*
- » *To increase the number of Traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply.*
- » *To reduce tensions between settled and Traveller communities in plan-making and planning decisions.*
- » *To enable provision of suitable accommodation from which Travellers can access education, health, welfare and employment infrastructure.*
- » *For local planning authorities to have due regard to the protection of local amenity and local environment.*

2.25 In practice, the document states that (PPTS Paragraph 9):

- » *Local planning authorities should set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople, which address the likely permanent and transit site accommodation needs of Travellers in their area, working collaboratively with neighbouring local planning authorities.*

2.26 PPTS goes on to state (Paragraph 10) that in producing their Local Plan local planning authorities should:

- » *Identify and annually update a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets.*
- » *Identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.*
- » *Consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a Duty-to-Cooperate on strategic planning issues that cross administrative boundaries).*
- » *Relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density.*
- » *Protect local amenity and environment.*

2.27 Local Authorities now have a duty to ensure a 5-year land supply to meet the identified needs for Traveller sites. However, 'Planning Policy for Traveller Sites' also notes in Paragraph 11 that:

- » *Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria-based policies should be fair and should facilitate the traditional and nomadic life of Travellers, while respecting the interests of the settled community.*

2.28 Policy E in Paragraphs 16 and 17 also sets out how Traveller sites in the Green Belt should be dealt with. This is of particular importance in Havering as all identified sites are located in the Green Belt:

- » *16. Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development. Subject to the best interests of the child, personal circumstances and unmet need are unlikely to clearly outweigh harm to the Green Belt and any other harm so as to establish very special circumstances.*
- » *17. Green Belt boundaries should be altered only in exceptional circumstances. If a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the plan making process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only.*

Revised National Planning Policy Framework (2019)

2.29 The revised National Planning Policy Framework was issued in February 2019. Paragraph 60 of the revised NPPF sets out that in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment conducted using the standard method in national planning guidance.

2.30 Paragraph 61 then states that '*Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes*'. The footnote to this section states that '*Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document.*'

2.31 This essentially sets out that the needs of households that meet the planning definition should be assessed under the PPTS and that the needs of households that are not found to meet the planning definition should be assessed as part of the wider housing needs of an area.

Local Guidance for Gypsies and Travellers

The Role of London Boroughs

- 2.32 Between 1968 and 1994 there was a statutory duty for each London Borough to provide 15 pitches which the majority of Boroughs complied with. Since the repeal of this statutory duty in 1994, few new sites have been built and some have been closed.
- 2.33 Prior to sections being repealed by the Housing and Planning Act (2016) Boroughs were required by the Housing Act (2004) to assess the accommodation needs of Gypsies and Travellers in their area when developing housing policy and produce a strategy on how these needs can be met.
- 2.34 Previously, housing requirements were calculated at a national level and regional spatial strategies were set as targets for each regional planning authority. This meant that local planning authorities would have to set aside enough land to satisfy that target. The findings of the Gypsy and Traveller Accommodation Assessment would have fed into the regional spatial strategy.
- 2.35 The Localism Act 2011 abolished regional spatial strategies and instead gave local planning authorities more control over planning and development in their areas. This bestowed the responsibility on each local authority to understand the need in its own area and to meet that need accordingly.
- 2.36 The Housing and Planning Act (2016) now requires local authorities to complete a wider assessment of pitches on which caravans can be stationed and moorings for boats. In addition, the PPTS (2015) requires Boroughs to use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions. This will form a subset of the wider assessment of need from caravan dwellers.

The London Mayor

- 2.37 The Mayor has several general powers which may be relevant to Gypsies and Travellers, including:
- » *Producing a statutory spatial development plan that sets the strategic framework for planning and regeneration across the capital, the London Plan.*
 - » *Distributing funding for delivering/improving pitches and regeneration.*
- 2.38 The London Plan published in 2011 highlighted that the planning system should ensure fairness between the settled and traveller communities and that the assessment of suitable provision and genuine need is best practised at a local level. As such, the previous Mayor considered that Boroughs were best placed to assess the needs of, and make provision for, Gypsies and Travellers. Thus, Boroughs were encouraged rather than compelled to provide new Gypsy and Traveller sites.
- 2.39 The London Plan (2011) advises Boroughs to set targets for provision based on robust evidence of local need, ensuring that the accommodation requirements of Gypsies and Travellers are identified and addressed in line with national policy and in coordination with neighbouring boroughs. The London Plan (2011) does not set specific targets for Boroughs.

- 2.40 In August 2017 Labour AM Tom Copley questioned the Mayor about how his London Plan and Housing Strategy will cater for the accommodation needs of London's Gypsy and Traveller community following the change to the planning definition in PPTS (2015). In his response the Mayor made assurances that he will require London Boroughs to adopt a more comprehensive definition of a Traveller in his new London Plan so that a more accurate assessment of need can be made.
- 2.41 The new draft London Plan (2017) includes a policy (H16 – Gypsy and Traveller Accommodation) on assessing accommodation need for Gypsies and Travellers. This policy includes a different definition of Gypsies and Travellers than is included in the PPTS (2015). This is essentially the housing definition that was repealed by the Housing and Planning Act (2016). This is a far less stringent definition to meet as it includes households with a cultural tradition of nomadism or living in a caravan; households currently living in a caravan; households with a cultural *preference* not to live bricks and mortar; and households that have ceased to travel temporarily *or* permanently.
- 2.42 Should the draft London Plan be adopted as it currently stands following an Examination in Public that commenced in January 2019, it is this definition that London Boroughs would need to apply in the future when assessing housing need for Travellers. An extract from the Policy can be found below.
- 2.43 It should be noted that the Havering Local Plan is being examined against the current London Plan and the 2012 NPPF as it was prepared before the new documents were issued.

Policy H16 Gypsy and Traveller accommodation

- A Boroughs should plan to meet the identified need for permanent Gypsy and Traveller pitches.
- B As of the start of this Plan period, boroughs should use the following definition of 'Gypsies and Travellers' as a basis for assessing need:
People with a cultural tradition of nomadism, or living in a caravan, whatever their race or origin, including:
- 1) those who are currently travelling or living in a caravan
 - 2) those who currently live in bricks and mortar dwelling households whose existing accommodation is unsuitable for them by virtue of their cultural preference not to live in bricks and mortar accommodation
 - 3) those who, on grounds of their own or their family's or dependants' educational or health needs or old age, have ceased to travel temporarily or permanently.
- C Boroughs that have not undertaken a needs assessment since 2008 should either:
- 1) undertake a Gypsy and Traveller accommodation needs assessment within the first two years of this Plan period (based on the definition set out above); or
 - 2) use the midpoint figure of need in Table 3 of GLA Gypsy and Traveller Accommodation Topic Paper 2017 as identified need for pitches (over the next 10 years) until a needs assessment is undertaken as part of their Development Plan review process.

3. Methodology

Background

- 3.1 Over the past 10 years, ORS has continually refined a methodology for undertaking robust and defensible Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessments. This has been updated in light of the introduction of the PPG in 2014, changes to PPTS in August 2015, the Housing and Planning Act (2016), and the revised NPPF (2019). It has also responded to changes set out by Planning Ministers, with particular reference to new household formation rates. This is an evolving methodology that has been adaptive to changes in planning policy as well as the outcomes of Local Plan Examinations and Planning Appeals.
- 3.2 PPTS (2015) contains a number of requirements for local authorities which must be addressed in any methodology. This includes the need to pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers' accommodation needs with travellers themselves); identification of permanent and transit site accommodation needs separately; working collaboratively with neighbouring local planning authorities; and establishing whether households fall within the planning definition for Gypsies, Travellers and Travelling Showpeople.
- 3.3 The ORS methodology has also been found to be sound following Local Plan Examinations including in Cambridge, Cheltenham, Cotswold, East Herts, Gloucester, Maldon, Milton Keynes, Newham, South Cambridgeshire and Tewkesbury.
- 3.4 The approach currently used by ORS was considered in April 2016 and July 2017 by the Planning Inspector for the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy. She concluded in her final Examination Report that was published in October 2017:
- 'The methodology behind this assessment incorporates a full demographic study of all occupied pitches, a comprehensive effort to undertake interviews with Gypsy and Traveller households, and consideration of the implications of the new national policy. I am satisfied that the GTAA provides a robust and credible evidence base and I accept its findings.'*
- 3.5 The Inspector for the East Herts District Plan also found the evidence base in relation to Gypsies and Travellers to be sound in her Inspection Report that was issued in July 2018. She concluded:
- The need of the travelling community has been carefully and robustly assessed and locations to meet identified needs have been allocated for the plan period. Policy HOU9 sets out the need for 5 permanent pitches for Gypsies and Travellers... the approach to the provision of housing is comprehensive, positively prepared, appropriate to the needs of the area and consistent with national policy.*
- 3.6 The stages below provide a summary of the methodology that was used to complete this study. More information on each stage is provided in the appropriate sections of this report.

Glossary of Terms/Acronyms

- 3.7 A Glossary of Terms/Acronyms can be found in **Appendix A**.

Desk-Based Review

- 3.8 ORS collated a range of secondary data that was used to support the study. This included:

- » Census data.
- » Traveller Caravan Count data.
- » Records of currently unauthorised sites/encampments.
- » Information on planning applications/appeals.
- » Information on enforcement actions.
- » Existing needs assessments and other relevant local studies.
- » Existing national and local policy, guidance and best practice.

Stakeholder Engagement

- 3.9 Engagement was undertaken with key Council Officers and with wider stakeholders through telephone interviews during the preparation of the 2018 GTAA Report and the outcomes of these interviews are still relevant. Three interviews were undertaken with Council Officers from Havering. Members of the Showmen's Guild and the London Gypsy Traveller Unit (now London Gypsies and Travellers) were also interviewed.

Working Collaboratively with Neighbouring Planning Authorities

- 3.10 To help support the Duty-to-Cooperate and provide background information for the study, telephone interviews were conducted with Planning Officers in neighbouring planning authorities during the preparation of the 2016 GTAA Report and most of the outcomes of these interviews are still relevant. Where appropriate the outcomes of the interviews have been updated where new GTAA studies have been completed or where progress has been made with Local Plan preparation. The outcomes of these interviews will help to ensure that wider issues that may impact on this project are fully understood. This included interviews with Officers from the Council set out below. Again, a detailed topic guide was agreed with the Council. Despite repeated attempts it was not possible to complete an interview with Essex County Council or the Greater London Authority.

- » Brentwood Borough Council
- » Epping Forest District Council
- » London Borough of Barking and Dagenham
- » London Borough of Redbridge
- » Thurrock Council

Survey of Travelling Communities

- 3.11 Through the desk-based research and the stakeholder interviews, ORS sought to identify all authorised and unauthorised sites/yards and encampments in the study area and attempted to complete an interview with the residents on all occupied pitches and plots. In order to gather robust information to use to assess households against the planning definition of a Traveller multiple visits were made to households where it was not initially possible to conduct an interview because they were not in or not available at the time.
- 3.12 Our experience suggests that an attempt to interview households on all pitches is more robust, as opposed to a sample-based approach which often leads to an under-estimate of need - an approach which is regularly challenged at Local Plan Examinations and at Planning Appeals.
- 3.13 ORS worked closely with the Council to ensure that the interviews collected all the necessary information to support the study. The household interview questions that were used have been updated to take account of recent changes to PPTS and to collect the information ORS feel is necessary to apply the planning definition. A copy of the household interview questions can be found in **Appendix E**.
- 3.14 All pitches and plots were visited by members of our dedicated team of experienced Researchers who work solely on our GTAA studies across England and Wales. They conducted semi-structured interviews with residents to determine their current demographic characteristics; their current or future accommodation needs; whether there is any over-crowding or the presence of concealed or doubled-up households or single adults; and travelling characteristics. Researchers also sought to identify contacts living in bricks and mortar to interview.
- 3.15 Researchers also completed an overall assessment of each site to determine any opportunities for intensification or expansion to meet current and future needs. They also sought information from residents on the type of pitches they may require in the future – for example private or socially rented, together with any features they may wish to be provided on a new pitch or site. The outcomes of this part of the fieldwork will be used to support further site and pitch deliverability assessments.
- 3.16 Where it was not possible to undertake an interview, Researchers sought to capture as much information as possible about each pitch from sources including neighbouring residents and site management (if present) through proxy interviews.
- 3.17 Researchers also distributed copies of an information leaflet that was prepared by Friends, Families and Travellers explaining the reasons for the need to complete the household interview as part of the GTAA process.
- 3.18 ORS would also like to thank a number of Planning Agents who represent households on some of the sites in Havering for their assistance in helping to arrange household interviews and encouraging their clients to participate in an interview.

Figure 3 – Friends, Families and Travellers Leaflet

fft
Friends Families and Travellers

We are writing to you from Friends, Families and Travellers (FFT) a national charity working on behalf of Gypsies and Travellers
www.gypsy-traveller.org

MORE PITCHES PLEASE!

Councils are currently carrying out new Accommodation Needs Assessments. The assessments are being done to work out if there is a need for more Gypsy/Traveller sites in your area and it is really important that you take part in the process so that your Council identifies the true level of need for sites in your area.

Questions about travelling are particularly important.
In 2015 the Government changed the planning definition of what it means to be a 'Gypsy or Traveller' and it now reads as follows:
Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

This means that if you have completely stopped travelling, even if it is as a result of ill-health or old age or because you care for people who are too old or too ill to travel then you will be unlikely to meet the planning definition and any need you or your dependants have for a caravan site will no longer be included in the Council's assessment of its need for Gypsy/Traveller sites in your area.

Your council will almost certainly employ consultants to carry out the assessment and you will probably be asked to complete a questionnaire.

How you answer the assessment questions is really important as it will affect the number of pitches required in an area.

So, if you are still travelling for work, even if it is only for part the year or in order to be and sell goods at any of the traditional horse fairs etc. then it is essential you make that clear to your Council when it assesses its need for sites in your area

We have already seen some examples of questionnaires being used by consultants to assess needs and have some concerns about the way in which the questions have been worded and the limited space on forms to give answers.

For example, on a form produced by ORS questionnaire there is a section in the questionnaire about travelling (Section F) which could cause people to give misleading answers.

For example, one question asks 'How many trips you have made in the last 12 months'
If you answer '0' to this question then you will probably not be deemed a Gypsy or Traveller according to the new planning definition, so don't forget to include trips such as for work, looking for work, going to horse fairs etc.

Another question asks 'When did you stop travelling'
Please think carefully before answering such a question. Have you stopped travelling for good? If so then you could be judged not to be a Gypsy or Traveller in planning terms.

Finally, a question asks 'Do family members plan to travel in the future?'
Again, please bear in mind that if you answer 'No' you will be judged not to be a Gypsy or Traveller in planning terms, so think carefully about whether you are ever likely to be travelling again in the future.

Another question asks 'Have you or family members ever travelled?'
If you answer 'No' to this question then you will be probably be judged not to be a Gypsy or Traveller in planning terms. So again don't forget to include trips looking for work, visiting horse fairs etc.

fft
Friends Families and Travellers

If you want to speak to us further please do not hesitate to call FFT on 01273 234 777 or your local Gypsy/Traveller group.

Engagement with Bricks and Mortar Households

- 3.19 The 2011 Census identified a total of 32 households in Havering living in a house or bungalow and 14 households in Havering living in a flat or maisonette who identified as Gypsies or Irish Travellers.
- 3.20 ORS apply a rigorous approach to making contact with bricks and mortar households as this is a common issue raised at Local Plan Examinations and Planning Appeals. Contacts were sought through a range of sources including the interviews with people on existing sites and yards, intelligence from the stakeholder interviews, and other local knowledge from stakeholders and adverts on social media. Through this approach the GTAA endeavoured to do everything possible to give households living in bricks and mortar the opportunity to make their views known.
- 3.21 As a rule, ORS do not make any assumptions on the overall needs from household in bricks and mortar based on the outcomes of any interviews that are completed as in our experience this leads to a significant over-estimate of the number of households wishing to move to a site or a yard. ORS work on the assumption that all those wishing to move will make their views known based on the wide range of publicity put in place. Thus, ORS are seeking to shift the burden of responsibility on to those living in bricks and mortar through demonstrating rigorous efforts to make them aware of the study.

Figure 4 – Bricks and Mortar Advert



Timing of the Fieldwork

- 3.22 ORS are fully aware of the transient nature of many travelling communities and subsequent seasonal variations in site and yard occupancy. As such, the majority of the fieldwork was undertaken during the non-travelling season, and also avoided days of known local or national events. The first round of fieldwork was completed between June and September 2016; further interviews were completed in September and October 2017 with households who had refused to be interviewed, or who were not present during the initial fieldwork period; a further round of fieldwork was completed between December 2018 and February 2019; and final interviews were completed in May 2019.

Waiting Lists

- 3.23 As there are no public sites in Havering there is no waiting list.

Applying the Planning Definition

- 3.24 Through the site interviews ORS sought to collect information necessary to assess each household against the PPTS planning definition. As the revised PPTS was only issued in 2015 only a small number of relevant Appeal Decisions have been issued by the Planning Inspectorate on how the PPTS planning definition should be applied (see Paragraphs 2.19 and 2.20 for examples) – these support the view that, to meet the PPTS planning definition, households need to be able to demonstrate that household members travel for work purposes, or for seeking work, and stay

away from their usual place of residence when doing so, or have ceased to travel for work purposes only temporarily due to education, ill health or old age.

3.25 The household survey included a structured section of questions to record information about the travelling characteristics of household members. This included questions on the following key issues:

- » Whether any household members have travelled in the past 12 months.
- » Whether household members have ever travelled.
- » The main reasons for travelling.
- » Where household members travelled to.
- » The times of the year that household members travelled.
- » Where household members stay when they are away travelling.
- » When household members stopped travelling.
- » The reasons why household members stopped travelling.
- » Whether household members intend to travel again in the future.
- » When and the reasons why household members plan to travel again in the future.

3.26 When the household survey was completed, the answers from these questions on travelling were used to determine the status of each household against the planning definition in PPTS (2015). Through a combination of responses, households need to provide sufficient information to demonstrate that household members travel for work purposes, or for seeking work, and in doing so stay away from their usual place of residence, or that they have ceased to travel temporarily due to education, ill health or old age, and plan to travel again for work purposes in the future.

3.27 Households that need to be considered in the GTAA fall under one of three classifications that will determine whether their housing needs will need to be assessed in the GTAA. Only those households that meet, or may meet, the planning definition will form the components of need to be formally included in the GTAA:

- » Households that travel under the planning definition.
- » Households that have ceased to travel temporarily under the planning definition.
- » Households where an interview was not possible who *may* fall under the planning definition (undetermined households).

3.28 Whilst the needs of those households that do not meet the planning definition do not need to be included in the GTAA, they have been assessed to provide the Council with components of need to consider as part of their work on wider housing needs assessments.

Planning Status of Children in Households

3.29 For the purpose of assessing need ORS assume that the children of households should be given the same planning status as their parents. The rationale for this is that the planning status of children cannot be properly determined until they reach the age they can be classed as economically active and formally occupy a pitch of their own i.e. the age of 18. Most Councils

update their GTAA's approximately every 3-5 years and this will allow for the planning definition to be properly applied to children in future years, or through future planning applications or appeals.

Undetermined Households

- 3.30 As well as calculating need for households that meet the PPTS planning definition, the needs of households who are understood to be Gypsies and Travellers where an interview was not completed (either due to refusal to be interviewed or households that were not present during the fieldwork period) whose planning status could not be determined also need to be considered as part of the GTAA. Whilst there is no specific guidance that sets out how the needs of these households should be assessed; where any interviews were not possible an approach has been taken that seeks an estimate of potential need from these households.
- 3.31 The estimate seeks to identify current and future need from pitches known to be temporary or unauthorised, and through an estimate of new household formation. For the latter the ORS national formation rate of 1.50% has been used as the demographics of the residents are unknown.
- 3.32 Should further information be made available to the Council that will allow for the PPTS planning definition to be applied, these households could either form a confirmed component of need to be considered through the GTAA or as part of the wider housing needs of the area.
- 3.33 ORS do not think that it would be appropriate when producing a robust assessment of need to make any firm assumptions about whether or not households where an interview was not completed meet the PPTS planning definition of a Traveller based on the outcomes of households where an interview was completed.
- 3.34 However, data that has been collected from approximately 3,500 household interviews that have been completed by ORS since the changes to PPTS in 2015 suggests that overall approximately 25% of households who have been interviewed met the PPTS planning definition (this rises to 70% for Travelling Showpeople based on over 300 interviews that have been completed).
- 3.35 ORS are not implying that this is an official government statistic - rather a national statistic based on the outcomes of our fieldwork since the introduction of PPTS (2015). It is estimated that there are 14,000 Gypsy and Traveller pitches in England and ORS have spoken to approximately 25% of them at a representative range of sites and approximately 25% met the PPTS planning definition. It is ORS' view therefore that this is the most comprehensive national statistic in relation to households that meet the PPTS planning definition and should be seen as a robust statistical figure.
- 3.36 This would suggest that it is likely that only a proportion of the potential need identified from undetermined households will need conditioned Gypsy and Traveller pitches, and that the needs of the majority will need to be considered as part of the wider housing needs of the area and through separate Local Plan Policies.
- 3.37 In terms of Local Plan Policies, the Council could consider a criteria-based policy in accordance with PPTS for any undetermined households that do provide evidence that they meet the PPTS planning definition.

- 3.38 An assessment of need for undetermined households can be found in **Appendix B**.
- 3.39 The ORS methodology to address the need arising from undetermined households was supported by the Planning Inspector for a Local Plan Examination for Maldon District Council, Essex. In his Report that was published on 29th June 2017 he concluded:
150. The Council's stance is that any need arising from 'unknowns' should be a matter left to the planning application process. Modifications to Policy H6 have been put forward by the Council setting out criteria for such a purpose, which I consider further below. To my mind, that is an appropriate approach. While there remains a possibility that up to 10 further pitches may be needed, that cannot be said to represent identified need. It would be unreasonable to demand that the Plan provide for needs that have not been established to exist. That being said, **MM242h** is nonetheless necessary in this regard. It commits the Council to a review of the Plan if future reviews of the GTAA reveal the necessity for land allocations to provide for presently 'unknown' needs. For effectiveness, I have altered this modification from the version put forward by the Council by replacing the word "may" with "will" in relation to undertaking the review committed to. I have also replaced "the Plan" with "Policy H6" – the whole Plan need not be reviewed.

Households that Do Not Meet the PPTS Planning Definition

- 3.40 Households who do not travel fall outside the PPTS planning definition of a Traveller. However Romany Gypsies, Irish and Scottish Travellers may be able to claim a right to culturally appropriate accommodation under the Equality Act (2010). In addition, provisions set out in the Housing and Planning Act (2016) now include a duty (under Section 8 of the 1985 Housing Act that covers the requirement for a periodical review of housing needs) for local authorities to consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored. Draft Guidance⁵ related to this section of the Act has been published setting out how the government would want local housing authorities to undertake this assessment and it is the same as the GTAA assessment process. The implication is therefore that the housing needs of any Gypsy and Traveller households who do not meet the PPTS planning definition of a Traveller will need to be assessed as part of the wider housing needs of the area and will form a subset of the wider need arising from households residing in caravans. This is echoed in the revised NPPF (July 2019).
- 3.41 Paragraph 61 of the revised NPPF states that '*Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes*'. The footnote to this section states that '*Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document.*'
- 3.42 An assessment of need for Travellers that did not meet the PPTS planning definition can be found in **Appendix C**.

⁵ Draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats. (March 2016).

Calculating Current and Future Need

- 3.43 The primary change introduced by PPTS (2015) in relation to the assessment of housing need is the change in the definition of a Gypsy, Traveller or Travelling Showperson for planning purposes. Through the site interviews ORS sought to collect information necessary to assess each household against the planning definition. As PPTS (2015) has only recently been issued only a small number of relevant appeal decisions have been issued by the Planning Inspectorate on how the planning definition should be applied – these support the view that households need to be able to demonstrate that they travel for work purposes, or for seeking work, to meet the planning definition, and stay away from their usual place of residence when doing so.
- 3.44 To identify need, PPTS (2015) requires an assessment for current and future pitch requirements but does not provide a methodology for this. However, as with any housing assessment, the underlying calculation can be broken down into a relatively small number of factors. In this case, the key issue is to compare the supply of pitches available for occupation with the current and future needs of the population.

Supply of Pitches

- 3.45 The first stage of the assessment sought to determine the number of occupied, vacant and potentially available supply in the study area:
- » Current vacant pitches.
 - » Pitches currently with planning consent due to be developed within 5 years.
 - » Pitches vacated by people moving to housing.
 - » Pitches vacated by people moving from the study area (out-migration).
- 3.46 It is important when seeking to identify supply from vacant pitches that they are in fact available for general occupation – i.e. on a public or social rented site, or on a private site that is run on a commercial basis with anyone being able to rent a pitch if they are available. Typically, vacant pitches on smaller private family sites are not included as components of available supply but can be used to meet any current and future need from the family living on the site.

Current Need

- 3.47 The second stage was to identify components of current need, which is not necessarily the need for additional pitches because they may be able to be addressed by space already available:
- » Households on currently unauthorised developments.
 - » Concealed, doubled-up or over-crowded households (including single adults).
 - » Households in bricks and mortar wishing to move to sites.
 - » Households in need on waiting lists for public sites.

Future Need

- 3.48 The final stage was to identify components of future need. This includes the following four components:

- » Teenage children in need of a pitch of their own in the next 5 years.
 - » Households living on sites with temporary planning permissions.
 - » New household formation.
 - » In-migration.
- 3.49 When considering need from teenage children consideration should be given as to whether this is need for a formal pitch or for additional accommodation units such as touring caravans. It is common for teenage Travellers to move from family statics or mobile homes into a touring caravan of their own on the family pitch, as opposed to needing a full pitch of their own in the short to medium term.
- 3.50 Household formation rates are often the subject of challenge at appeals or examinations. ORS agree with the position set by Ministers from DCLG in a Ministerial Statement in 2014 and firmly believe that any household formation rates should use a robust local evidence base, rather than simply relying on precedent. This is set out in more detail later in this report.
- 3.51 All of these components of supply and need are presented in easy to understand tables which identify the overall net need for current and future accommodation for both Gypsies and Travellers. This has proven to be a robust model for identifying needs. The residential and transit pitch needs for Gypsies and Travellers are identified separately and the needs are identified in 5-year periods to 2031.

Pitch Turnover

- 3.52 Some assessments of need make use of pitch turnover as an ongoing component of supply. ORS do not agree with this approach or about making any assumptions about annual turnover rates. This is an approach that usually ends up with a significant under-estimate of need as in the majority of cases vacant pitches on sites are not available to meet any additional need. The use of pitch turnover has been the subject of a number of Inspectors Decisions, for example APP/J3720/A/13/2208767 found a GTAA to be unsound when using pitch turnover and concluded:

West Oxfordshire Council relies on a GTAA published in 2013. This identifies an immediate need for 6 additional pitches. However, the GTAA methodology treats pitch turnover as a component of supply. This is only the case if there is net outward migration, yet no such scenario is apparent in West Oxfordshire. Based on the evidence before me I consider the underlying criticism of the GTAA to be justified and that unmet need is likely to be higher than that in the findings in the GTAA.

- 3.53 In addition, a recent GTAA Best Practice Guide produced by a number of organisations including Friends, Families and Travellers, the London Gypsy and Traveller Unit, the York Travellers Trust, the Derbyshire Gypsy Liaison Group, Garden Court Chambers and Leeds GATE concluded that:

Assessments involving any form of pitch turnover in their supply rely upon making assumptions; a practice best avoided. Turnover is naturally very difficult to assess accurately and in practice does not contribute meaningfully to additional supply so should be very carefully assessed in line with local trends. Mainstream housing

assessments are not based on the assumption that turnover within the existing stock can provide for general housing needs.

- 3.54 As such, other than current vacant pitches on sites that are known to be available, or pitches that are known to become available through the household interviews, pitch turnover has not been considered as a component of supply in this GTAA.

Transit Provision

- 3.55 PPTS also requires an assessment of the need for any transit sites or stopping places. While the majority of Gypsies, Travellers and have permanent bases either on Gypsy and Traveller sites or in bricks and mortar and no longer travel, other members of the community either travel permanently or for part of the year. Due to the mobile nature of the population, a range of sites or management approaches can be developed to accommodate Gypsies and Travellers as they move through different areas, including: -

- » Transit sites
- » Temporary/Emergency stopping places
- » Temporary (seasonal) sites
- » Negotiated Stopping Agreements

- 3.56 In order to investigate the potential need for transit provision when undertaking work to support the study, ORS sought to undertake analysis of any records of currently unauthorised sites and encampments, as well as information from the Ministry of Housing Communities and Local Government (MHCLG)⁶ Traveller Caravan Count. The outcomes of the interviews with Council Officers, Officers from neighbouring planning authorities and other stakeholders were also taken into consideration when determining this element of need in the study area.

⁶ Formerly the Department for Communities and Local Government (DCLG).

4. Gypsy, Traveller & Travelling Showpeople Sites and Yards

Introduction

- 4.1 One of the main considerations of this study is to provide evidence to support the provision of pitches and plots to meet the current and future accommodation needs of Gypsies, Travellers and Travelling Showpeople. A pitch is an area normally occupied by one household, which typically contains enough space for one or two caravans but can vary in size⁷. A site is a collection of pitches which form a development for Gypsies and Travellers. For Travelling Showpeople, the most common descriptions used are a plot for the space occupied by one household and a yard for a collection of plots which are typically occupied by Travelling Showpeople. Throughout this study the main focus is upon how many extra pitches for Gypsies and Travellers and plots for Travelling Showpeople are required in the study area.
- 4.2 The public and private provision of mainstream housing is also largely mirrored when considering Gypsy and Traveller accommodation. One common form of a Gypsy and Traveller site is the publicly provided residential site, which is provided by a Local Authority or by a Registered Provider (usually a Housing Association). Pitches on public sites can be obtained through signing up to a waiting list, and the costs of running the sites are met from the rent paid by the licensees (similar to social housing).
- 4.3 The alternative to public residential sites are private residential sites and yards for Gypsies, Travellers and Travelling Showpeople. These result from individuals or families buying areas of land and then obtaining planning permission to live on them. Households can also rent pitches on existing private sites. Therefore, these two forms of accommodation are the equivalent to private ownership and renting for those who live in bricks and mortar housing. Generally, the majority of Travelling Showpeople yards are privately owned and managed.
- 4.4 The Gypsy, Traveller and Travelling Showpeople population also has other forms of sites due to its mobile nature. Permanent transit sites tend to contain many of the same facilities as a residential site, except that there is a maximum period of residence which can vary from a few weeks to a period of months. An alternative to a transit site is an emergency or negotiated stopping place. This type of site also has restrictions on the length of time someone can stay on it but has much more limited facilities. Both of these two types of site are designed to accommodate, for a temporary period, Gypsies, Travellers and Travelling Showpeople whilst they travel. A number of authorities also operate an accepted encampments policy where short-term stopovers are tolerated without enforcement action.
- 4.5 Further considerations for the Gypsy and Traveller population are unauthorised developments and encampments. Unauthorised developments occur on land which is owned by the Gypsies

⁷ Whilst it has now been withdrawn, *Government Guidance on Designing Gypsy and Traveller Sites* recommended that, as a general guide, an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, parking space for two vehicles and a small garden area.

and Travellers or with the approval of the landowner, but for which they do not have planning permission to use for residential purposes. Unauthorised encampments occur on land which is not owned by the Gypsies and Travellers.

Sites and Yards in Havering

- 4.6 In Havering, at the base date for the GTAA, there were no public sites; 6 private sites with permanent planning permission (21 pitches⁸); 3 Private sites with temporary planning permission (7 pitches); 2 sites that are tolerated for planning purposes (5 pitches); 31 currently unauthorised sites (102 pitches); and 1 Travelling Showperson yard (5 plots). There were no public transit sites. Note that this includes 3 sites (Haunted House Wood, Laburnham Stables and Railway Sidings) that have a mixture of pitches with permanent planning permission, pitches with temporary planning permission or unauthorised pitches. See **Appendix D** for further details.

Figure 5 – Total amount of provision in Havering (December 2018)

Category	Sites/Yards	Pitches/Plots
Public sites (Council or Registered Providers)	0	0
Private sites with permanent planning permission	6	21
Private sites with temporary planning permission	3	7
Tolerated sites	2	5
Unauthorised sites	31	102
Public transit provision	0	0
Private transit provision	0	0
Travelling Showpeople yards	1	5
TOTAL	43	140

MHCLG Traveller Caravan Count

- 4.7 Another source of information available on the Gypsy, Traveller and Travelling Showpeople population is the bi-annual Traveller Caravan Count which is conducted by each Local Authority in England on a specific date in January and July of each year and reported to MHCLG. This is a statistical count of the number of *caravans* on both authorised and unauthorised sites across England. With effect from July 2013 it was renamed the Traveller Caravan Count due to the inclusion of data on Travelling Showpeople. As this count is of caravans and not households, it makes it more difficult to interpret for a study such as this because it does not count pitches or resident households. The count is merely a 'snapshot in time' conducted by the Local Authority on a specific day, and any unauthorised sites or encampments which occur on other dates will not be recorded. Likewise, any caravans that are away from sites on the day of the count will not be included. As such it is not considered appropriate to use the outcomes from the Traveller Caravan Count in the calculation of current and future need as the information collected during the site visits is seen as more robust and fit-for-purpose. However, the Traveller Caravan Count data has been used to *support* the identification of the need to provide for transit provision and this is set out later in this report.

⁸ A total of 6 of these pitches are the subject to the completion of a Legal Agreement that had not been concluded at the time of this report.

5. Stakeholder Engagement

Introduction

- 5.1 To be consistent with the guidance set out in PPTS (2015) and the methodology used in other GTAA studies, ORS undertook a stakeholder engagement programme to complement the information gathered through interviews with members of the Travelling Community. This consultation took the form of telephone interviews which were tailored to the role of the individual. Whilst these were completed during the preparation of the previous GTAA, the majority of the outcomes are still considered up-to-date and relevant. Some of the outcomes of the interviews have been updated where appropriate in light of new GTAA studies being completed and to reflect progress on the preparation of Local Plans.
- 5.2 The aim of these interviews was to provide an understanding of current provision and possible future need; short-term encampments and transit provision; and cross-border issues. Importantly, stakeholders who are in contact with members of the travelling community (who are in bricks and mortar or who are not known to the Council) were asked if they could inform them that the study is taking place and provide details about how they could participate in a confidential telephone interview with a member of the ORS research team.
- 5.3 Three interviews were undertaken with Council Officers from the study area. A representative of the Showmen's Guild also took part in the stakeholder interviews. An interview was also completed with the London Gypsy and Traveller Unit (now London Gypsies and Travellers).
- 5.4 Local Authorities have a duty-to-cooperate on strategic planning issues that cross administrative boundaries (S.110 Localism Act 2011). In order to explore issues relating to cross boundary working, ORS interviewed a planning officer from five of the local authorities that neighbour Havering:
- » Brentwood Borough Council.
 - » Epping Forest District Council.
 - » London Borough of Barking and Dagenham.
 - » London Borough of Redbridge.
 - » Thurrock Council.
- 5.5 Due to issues surrounding data protection, and in order to protect the anonymity of those who took part, this section presents a summary of the views expressed by interviewees and verbatim comments have not been used.
- 5.6 The views expressed in this section of the report represent a balanced summary of the views expressed by stakeholders, and on the views of the individuals concerned, rather than the official policy of their Council or organisation.

Views of Key Stakeholders and Council Officers in Havering

Accommodation for Gypsies and Travellers

- 5.7 There are no Council run sites in the area and there are only 21 pitches which have permanent planning permission. All the other pitches have temporary planning permission; are tolerated for planning purposes; or are currently unauthorised.
- 5.8 Officers were aware of overcrowding on some sites in the area and it was felt that need is not currently being met because most Gypsies and Travellers are on temporary, tolerated or unauthorised sites.
- 5.9 The results of this study will inform the new Local Plan.

Bricks and Mortar

- 5.10 Stakeholders who are in contact with members of the Traveller Community were asked if they could inform them that the study is taking place and provide details about how they could participate in a confidential telephone interview with a member of the ORS research team.
- 5.11 Twelve Housing Associations, who own properties in Havering, were contacted by ORS to explore whether they record the ethnicity of their tenants. They were also asked if they could identify Gypsy and Traveller tenants living within their properties and, if they did, whether they could contact them to advise them that the study is being undertaken and if they would like to discuss their accommodation needs via a confidential interview with the research team. Of the 12 contacted A2 Dominion, Metropolitan and Genesis provided a response and explained that people are nominated by the Local Authority and they do not record the ethnicity of their tenants once they have started their tenancy and therefore would not be in a position to assist.

Short-term Roadside Encampments

- 5.12 Some Gypsies and Travellers travel through the area for work purposes and some are known to travel to the area for social events or visiting family weddings. They usually stay on parks and vacant private land, or on existing sites. Some encampments also occur on private land. In addition, there have been some more recent occurrences of Travellers unlawfully occupying industrial premises and using them for large scale illegal fly tipping.
- 5.13 There is currently no public transit provision and it was felt that Gypsies and Travellers who travel through the area would not want to stay on a formal transit site. However, officers all agreed that there should be a London-wide approach to the provision of transit sites.

Cross-border Issues

- 5.14 Overall, there are not thought to be any significant cross-border issues. However, it was explained that the public site in Barking & Dagenham is located on the Havering border and a number of those residents will request help and support from Havering Council officers in relation to Council provided services (which they are unable to provide).
- 5.15 Havering are considered to be working closely with neighbouring boroughs and arrange stakeholder workshops to consult on Gypsy and Traveller issues and have held Duty-to-Cooperate

meetings with neighbouring boroughs to discuss Gypsy and Traveller issues and wider housing issues.

- 5.16 In addition, the Borough worked on a SHMA with Barking & Dagenham (LBBD) and Redbridge which is a key piece of joint working and the relationship with LBBD is considered to be positive and it is felt that they are a responsive borough.
- 5.17 The neighbouring boroughs are said to be meeting their own accommodation need and complying with the Duty-to-Cooperate.

Neighbouring Authorities

Brentwood Borough Council

- 5.18 With regard to overall accommodation need in Brentwood, the views of the officer interviewed were as follows:
- » The Greater Essex GTAA that was published in January 2018 identified that Brentwood Borough has 14 sites with full planning permission (30 pitches); 1 site with temporary permission (2 pitches); 2 sites that are tolerated for planning purposes (7 pitches); and 3 unauthorised sites (16 Pitches). There are no public Gypsy and Traveller sites or Travelling Showmen's yards.
 - » The Greater Essex GTAA identified an overall need for Brentwood for an additional 78 Gypsy and Traveller pitches between 2016 and 2033. Of this need 11 pitches are for households that met the PPTS planning definition; 59 were from households that did not meet the PPTs planning definition; and 8 were from undetermined households. These numbers are subject to revision following a forthcoming review of the GTAA as part of work to prepare a South Essex Strategic Plan covering the period to 2038.
 - » Brentwood are in the process of preparing a new Local Plan which will cover the period 2016-2033. Preparation of the Local Plan has now reached the Pre-Submission Stage with a final consultation period due to end in March 2019.
 - » The Brentwood Local Plan Pre-Submission Document (2013-2033) contains Policies HP07, HP08, HP09, HP10 and HP11 that seek to provide for Gypsies and Travellers based on the need identified in the Greater Essex GTAA, and to address any additional windfall sites.
 - » There is no transit provision in Brentwood. There is believed to be a need across Essex County as a whole, but the best location for such a site would need to be determined by discussions between all local authorities and the County Council.
 - » It was felt that short-term encampments are fairly infrequent and are more likely to occur in the summer months. Stakeholders stated that most families who stop off in Brentwood are either travelling around for work or are simply passing through and have permanent provision elsewhere.
- 5.19 With regard to the subject of cross-border issues and the Duty-to-Cooperate, the views of the officer interviewed were as follows:

- » The Borough have engaged with Havering during the preparation of their new Local Plan. The officer believed that one issue of key importance was the potential of cumulative impact – specifically, sites on both Epping Forest’s and Havering’s borders. To attempt to meet their identified need, one avenue being considered by Brentwood is the permanent allocation of pitches currently with temporary or personal permission, so working with Brentwood’s neighbours is necessary to identify any potential negative impact or cumulative effect.

Epping Forest District Council

5.20 With regard to overall accommodation need in Epping Forest, the views of the officer were as follows:

- » The Greater Essex GTAA (2018) identified a need for 69 additional pitches. Most of the identified need is due to pitches with temporary planning permission, unauthorised pitches, and overcrowding and concealed or doubled-up households, rather than new households coming to the district.
- » The number of unauthorised sites and temporary permissions has reduced in recent years due to more sites being granted permanent planning permission. At the time of the Greater Essex GTAA there were 8 sites with temporary permission (16 pitches) and 8 pitches on unauthorised sites.
- » The Epping Forest Local Plan is currently the subject of an Examination in Public (early 2019). The Submission Version Local Plan contains Policies SP 2 Spatial Development Strategy and H 4 Traveller Site Development, together with site allocations in selective ‘Places’ Policies which seek to meet need identified in the Greater Essex GTAA.
- » With regard to transit provision, there is an identified County-wide need for such provision, but there are no available sites within the District for that purpose.
- » Another local issue is the spatial distribution of sites across the District. There has traditionally been a concentration of Gypsies and Travellers in two of the twenty-four parish and town council areas. The officer highlighted that the allocations in the Local Plan Submission Version sought, where possible, to ‘even out’ that distribution across the District, but a sensible and logical approach is often to extend or intensify use on existing sites.

5.21 With regard to the subject of cross-border issues and the Duty-to-Cooperate, the views of the officer were as follows:

- » Epping Forest District Council have been in regular dialogue with their neighbouring authorities. They share common issues with neighbouring authorities including high percentages of Green Belt coverage.
- » The officer considers that Epping Forest and its neighbouring local authorities are complying with the Duty-to-Cooperate and this is evidenced by the now well-established Co-operation for Sustainable Development Board set up in October 2014. The core constituent administrative areas are identified as Epping Forest, Harlow and Uttlesford districts, Brentwood Borough, Chelmsford City and Essex County Council, East Herts and Broxbourne districts and Hertfordshire County Council, and the London

Boroughs of Waltham Forest, Redbridge and Enfield. LB Havering is invited to attend meetings. An officer forum is also in place that reports to the Board.

- » As identified in the Memorandum of Understanding on Distribution of Objectively Assessed Housing Need across the West Essex East Hertfordshire Housing Market Area March 2017, Harlow, Uttlesford and Epping Forest Districts have agreed to meet their own individual assessed need within their own boundaries. (While East Hertfordshire District Council envisages being able to accommodate its need within its boundaries, it should be noted that it is entering into Duty to Co-operate arrangements with Welwyn Hatfield Borough Council to enable meeting some of both councils' identified needs via provision of a new site at Birchall Garden Suburb, East of Welwyn Garden City).
- » LB Havering's engagement with EFDC has largely centred on the statutory stages of the Local Plan, with limited engagement at officer level in the Co-operation for Sustainable Development Officer Group and on evidence base documents such as the Green Belt Review and Statement of Community Involvement.
- » EFDC has not been approached by LB Havering in respect of meeting the needs of Gypsy and Traveller communities and this is also reflected in the statements contained within the Boroughs Duty to Co-operate Statement March 2018 i.e. that the Havering GTAA concludes that there are no cross-boundary matters affecting travellers and the Borough is intending to meet its own needs in this regard.

London Borough of Barking & Dagenham

5.22 With regard to overall accommodation need in Barking & Dagenham, the views of the officer interviewed were as follows:

- » There is one public site with 12 pitches and no private sites.
- » The officer was not aware of any overcrowding issues on the public site.
- » The most recent GTAA was published in September 2018 and identified an overall need for 29 additional pitches for the period 2016-35. Need for 19 additional pitches was identified for households that met the planning definition and all of this need originated from households living on unauthorised encampments and living in bricks and mortar. Need for 10 additional pitches was identified from households living on the public site, the majority of which is through new household formation.
- » In general, historically demand and need has been relatively low, but the officer believes Barking & Dagenham must be prepared for any emerging need identified in the new GTAA, particularly from the Irish Traveller community.
- » The officer was aware of recent illegal encampments in Barking Town Centre, although they are historically quite rare. The officer believes that this is due to Barking being quite built up, with little available space for such incursions to happen. Havering is more open, which probably contributes to their higher number of issues.
- » The officer does not believe that there is any need for transit provision, as it has never featured as high priority.

5.23 With regard to the subject of cross-border issues and the Duty-to-Cooperate, the views of the officer interviewed were as follows:

- » The officer was not aware of any cross-border issues. Mainly, Gypsies and Travellers stop in Newham or Havering, as opposed to Barking & Dagenham.

London Borough of Redbridge

5.24 With regard to overall accommodation need in Redbridge, the views of the officer interviewed were as follows:

- » There is one public site for Gypsy and Travellers and no Travelling Showpeople yards in the Borough.
- » The Borough completed a GTAA that was published in 2016 which identified a need for an additional seven pitches on the public site (2015-2030). Two of which need to be provided in the first five years of the Local Plan. The officer felt the Borough is meeting the accommodation needs of the Gypsy and Traveller community.
- » There are said to be a small number of unauthorised encampments and the officer referred to the 2016 study which did not identify a need for any transit provision.

5.25 With regard to the subject of cross-border issues and the Duty-to-Cooperate, the views of the officer interviewed were as follows:

- » The officer was not aware of any cross-border issues and was of the view that neighbouring boroughs (including the Study area) is meeting the Duty-to-Cooperate.
- » The officer was confident that neighbouring boroughs could meet their own assessed need and referred to conversations with neighbouring authorities which demonstrated that Redbridge would not have to deal with issues arising from neighbouring boroughs and would be able to meet its own local need.

Thurrock Borough Council

5.26 With regard to overall accommodation need in Thurrock, the views of the officer interviewed were as follows:

- » The Greater Essex GTAA identified that there were 3 public sites (65 pitches); 4 private sites with permanent planning permission (25 pitches); 2 private sites with temporary planning permission (9 pitches); 5 sites that are tolerated for planning purposes (19 pitches); 4 unauthorised sites (14 pitches); and 2 small Travelling Showmen's yards (8 plots). Since the GTAA was completed, one additional new private site (1 pitch) has been granted planning permission.
- » The Borough is home to the Buckles Lane development, one of the largest collections of Travelling Showpeople yards in Europe, with 109 plots of which a large number are unauthorised or have temporary permission. In addition, a recent study completed in Buckles Lane in 2018 identified high levels of sub-letting to non-Travellers.
- » The Greater Essex GTAA identified an overall need for 85 Gypsy and Traveller pitches and for 14 Travelling Showmen's plots in Thurrock for the period 2016-33. In addition, a separate assessment for Buckles Lane (2018-33) identified an overall need for up to 233 plots.

- » Part of the existing need is on longstanding tolerated sites – the officer explained that this this need is probably met on the existing sites which may remain tolerated or become authorised. The Council will look at need from unauthorised sites and future needs going forward.
- » In addition to the need identified in the GTAA, the proposed route of the Lower Thames Crossing in Thurrock will result in the loss of one of the public Gypsy sites and if the route is approved, there will be a need to provide a new site for the replacement of up to 21 pitches.
- » Due to the size of the Travelling Showpeople community, the number of plots required to meet current and future need is high. On the approved yards, the traditional Thurrock Travelling Showpeople families have become overcrowded as new households form. Thurrock Council will need to consider the approach to meeting current and future needs for Travelling Showpeople through the Local Plan process and duty-to-cooperate.
- » The new Local Plan is in its early stages, and a Stage 2 Issues and Options Consultation commenced in December 2018 and is due to end in March 2019. In terms of progressing the new Local Plan a new Local Development Scheme is due to be published in March 2019.

5.27 With regard to the subject of cross-border issues and the Duty-to-Cooperate, the views of the officer interviewed were as follows:

- » The officer referenced Basildon's high Gypsy and Travellers need and explained that Thurrock is unlikely to take into account the needs of any other areas due to its own high need.
- » The officer had some concerns about the approach of Basildon Borough Council in its new Local Plan and Thurrock Council had made representations on the Basildon Local plan to this effect. Thurrock Council's previously stated position is that it believes there needs to be a fairer distribution of new sites, as Thurrock and Basildon have much larger populations of Gypsies, Travellers and Travelling Showpeople than other neighbouring authorities. The officer believes authorities in Greater Essex need to have discussions regarding this.
- » Indeed, after taking advice from the Showman's Guild, Thurrock will need to discuss whether some of the future Travelling Showpeople population need should be redistributed to other parts of Essex. Part of the Buckles Lane site began as an unauthorised site including Travelling Showpeople coming from other areas of the country – including London – so the officer felt that it is not technically a local need. The Showman's Guild have recognised that the population did not necessarily need to be located in Thurrock and the rest of Essex should be attempting to make provision for the needs of Travelling Showpeople.
- » The Essex Planning Officers Association has coordinated the Greater Essex GTAA and has recognised potential strategic and cross-boundary issues need to be progressed in relation to transit need.

- » Duty-to-Cooperate is ongoing with Thurrock, amongst others. The South Essex Group of local authorities are all working together on Duty-to-Cooperate and are preparing an update of the Greater Essex GTAA for the South Essex area that will roll forward the assessment of need end date from 2033 to 2038 and therefore increase the need requirement for Gypsy and Traveller pitches and Travelling Showpeople plots.
- » Thurrock will be focussing on accommodating its own need going forward, and the officer believes it would be an issue should Thurrock be expected to accommodate the need of any other area. They may need to seek assistance from neighbouring authorities with the future need for the Travelling Showpeople population in Thurrock. The officer believes they should be seeking a fair and equitable agreement with neighbouring authorities with regards to distribution.
- » There is a concern about whether the draft London Plan addresses the issue, as traditionally there have been Gypsies and Travellers moving into the Thurrock area who have lost sites in London. The officer believes that London Plan needs to play its part in seeking to accommodate Gypsies and Travellers and Travelling Showpeople, and not get lost in the drive to regenerate and build houses all over London.
- » Thurrock would be seeking to engage with Havering one-on-one to discuss cross-boundary issues and their plan.

Views from Community Representatives

Response from the London Gypsy and Traveller Unit (LGTU)

- 5.28 ORS interviewed a representative of the LGTU (now called London Gypsies and Travellers), who support Gypsies and Travellers across London to:
- » Influence decisions affecting their lives.
 - » Improve their quality of life and the opportunities available to them.
 - » Challenge the discrimination they routinely experience.
- 5.29 The representative of the LGTU expressed concern that the Council doesn't have any policy or site allocations in place and that they have not done anything since the Gypsy and Traveller Development Plan Document was withdrawn in 2015. However, the representative acknowledged that the new GTAA should provide a more up-to-date evidence base for the new Local Plan.
- 5.30 If there are issues around unauthorised encampments, the representative felt that priority should be to identify suitable pieces of land for either negotiated stopping or transit sites, or sites that are available to be acquired by Travellers if they wish to develop their own site in the borough.

Response from the Showmen's Guild (London Section)

- 5.31 As part of the stakeholder engagement, ORS spoke with a representative of the Showman's Guild of Great Britain who is aware of Showmen's families living in the Borough. The representative explained that the Borough is adjacent to Thurrock and South Ockendon which has the largest Travelling Showpeople yard in Europe (Buckles Lane) and the representative was of the view that Havering should take into account their needs in their Local Plan.

- 5.32 ORS have undertaken GTAA's across the UK and regularly consult with organisations which promote and support Travelling Showpeople. Across the country, Traveling Showpeople sites are said to be overcrowded with a requirement for small expansions for family growth and most sites have reached maximum capacity.
- 5.33 The Guild feel there is a lack of site accommodation in the south east of England and where sites meet the site criteria, the local planning authority should base any decision on the need for additional sites regionally not locally. The key factors should be suitability of sites, sustainability, and access to transport links and not whether or not families can prove a specific local link. The representative called for a London-wide approach.
- 5.34 The representative agreed that it is difficult to source sites which are both affordable and suitable. The Guild's view is that it is less onerous to look at existing sites and to explore whether surrounding land can be purchased to enable a small expansion. This will have the least impact on local communities and would allow families to remain together.
- 5.35 The Guild suggested that new yards ideally contain between six to eight plots. Any smaller and this would become unsustainable as people could be left isolated when people are away, any larger and it can be intrusive and puts additional demands on local services. The average size of each plot is ½ an acre per plot and the Showmen's Guild has designed a model design for both a smaller and larger site which is available on its website.

6. Survey of Travelling Communities

Interviews with Gypsies and Travellers

- 6.1 One of the major components of this study was a detailed survey of the Gypsy and Traveller population living in the study area, and also efforts to engage with the bricks and mortar community.
- 6.2 Through the desk-based research and stakeholder interviews ORS identified 6 private sites with permanent planning permission, 3 private sites with temporary planning permission, 2 sites that are tolerated for planning purposes, 31 currently unauthorised sites and 1 Travelling Showperson's yard. Note that this includes 3 sites (Haunted House Wood, Laburnham Stables and Railway Sidings) that have a mixture of pitches with permanent planning permission, pitches with temporary planning permission or unauthorised pitches. The table below sets out the number of pitches, the number of interviews that were completed, and the reasons why interviews were not completed, or where additional interviews were completed.
- 6.3 A total of 88 interviews were completed with Gypsy and Traveller households in Havering. In addition, a total of 38 proxy interviews were completed where information was provided on households that were not present at the time of the interview by another occupant of a site or yard, from information submitted to support planning applications and planning appeals or from a planning agent representing the household. Taking account of multiple interviews on a small number of pitches and pitches found to be occupied by non-Travellers, this represents a response rate of 96%, with just 4 refusals and 1 non-contact.
- 6.4 In addition, a total of 5 interviews or proxy interviews were completed with Travelling Showpeople.

Figure 6 - Sites and yards visited in Havering

Planning Status	Pitches/Plots	Interviews	Reasons for not completing interviews
Public sites			
None	-	-	-
Private sites with permanent planning permission			
Haunted House Wood	3	3	-
Laburnham Stables	1	2	1 x doubled-up
Railway Sidings	2	2	-
The Old Forge	1	3	Multiple households permitted
The View, Prospect Road	3	3	-
Willow Tree Lodge	11	11	-
Private sites with temporary planning permission			
Laburnham Stables	2	3	1 x doubled-up

Railway Sidings	3	3	-
Tyas Stud Farm	2	2	2 on 1 pitch, 1 x no contact
Tolerated sites (without planning permission)			
Crow Lane (r/o 21)	1	1	-
Crow Lane (r/o 24)	4	0	4 x refusals
Unauthorised sites (without planning permission)			
66-72 Lower Bedfords Road	3	3	-
Ashleigh View	5	5	-
Blossom Hill View, Church Road	1	1	-
Cherry Blossom View, Church Road	1	1	-
Cherry Tree View, Church Road	1	1	-
Dunromin, Church Road	1	1	-
Fairhill Rise	4	4	-
Gravel Pit Coppice, Benskins Lane	6	6	-
Haunted House Wood	5	5	-
Hogbar Farm	11	11	-
Hogbar Farm East	8	8	-
Hogbar Farm West	7	7	-
Laburnham Stables	1	1	-
Land east of Rosewood Cottage	1	1	-
Land west of Benskins Lane	6	0	6 x non-Travellers
Meadow Rise, Church Road	4	4	-
Meadow View, Church Road	3	3	-
Paddock View, Church Road	2	2	-
Plot 3, Church Road	1	1	-
Plot 13, Church Road	1	1	-
Plot 14, Church Road	1	1	-
Putwell Bridge (The Former Brookstreet Garage Site)	4	4	-
Springfield, Church Road	2	2	-
The Grove, Prospect Road	5	5	-
The Oak View, Church Road	1	1	-
The Oak, Church Road	1	1	-
The Schoolhouse, Church Road	1	1	-
Vinegar Hill	9	9	-
White House, Benskins Lane	4	0	4 x non-Travellers
Willoughby Drive (Adj No 1)	1	1	-
Willow View, Church Road	1	1	-
Bricks and mortar			
1 Willoughby Drive	1	1	-
Travelling showpeople yards			
Fairoaks, St Mary's Lane, Upminster	5	5	-
TOTAL	141	131	

Note that the sites are listed alphabetically by planning status.

Efforts to Contact Bricks and Mortar Households

- ^{6.5} ORS attempted to make identify with bricks and mortar households by asking residents that were interviewed if they knew of any friend or family who were looking to move to a site; through the stakeholder interviews; and through adverts in the Traveller press and on social media. As a result of this 1 household was identified to be interviewed.

7. Current and Future Pitch and Plot Provision

Introduction

- 7.1 This section focuses on the additional pitch and plot provision which is needed in the study area currently and to 2031. This includes both current unmet need and need which is likely to arise in the future⁹. This time period allows for robust forecasts of the requirements for future provision, based upon the evidence contained within this study and also secondary data sources. Whilst the difficulty in making accurate assessments beyond 5 years has been highlighted in previous studies, the approach taken in this study to estimate new household formation has been accepted by Planning Inspectors as the most appropriate methodology to use.
- 7.2 We would note that this section is based upon a combination of the household interviews, planning records and stakeholder interviews. In many cases, the survey data is not used in isolation, but instead is used to validate information from planning records or other sources.
- 7.3 This section concentrates not only upon the total additional provision which is required in the area, but also whether there is a need for any transit sites and/or emergency stopping place provision.

New Household Formation Rates

- 7.4 Nationally, a household formation and growth rate of 3.00% net per annum has been commonly assumed and widely used in local Gypsy and Traveller assessments¹⁰, even though there is no statistical evidence of households growing so quickly. The result has been to inflate both national and local requirements for additional pitches unrealistically. In this context, ORS has prepared a *Technical Note on Household Formation and Growth Rates (2015)*. The main conclusions are set out here and the full paper is in **Appendix F**.
- 7.5 Those seeking to provide evidence of high annual net household growth rates for Gypsies and Travellers have sometimes sought to rely on increases in the number of caravans, as reflected in caravan counts. However, caravan count data is unreliable and erratic – so the only proper way to project future population and household growth is through demographic analysis.
- 7.6 The Technical Note concludes that in fact, the growth in the national Gypsy and Traveller population may be as low as 1.25% per annum – much less than the 3.00% per annum often assumed, but still greater than in the settled community. Even using extreme and unrealistic assumptions, it is hard to find evidence that net Gypsy and Traveller population and household growth rates are above 2.00% per annum nationally.

⁹ See Paragraphs 3.32 and 3.33 for details of components on current and future need.

¹⁰ Page 25, Gypsy and Traveller Accommodation Needs Assessments – Guidance (DCLG – 2007) *Now withdrawn*.

7.7 The often assumed 3.00% per annum net household growth rate is unrealistic and would require clear statistical evidence before being used for planning purposes. In practice, the best available evidence supports a national net household growth rate of 1.50% per annum for Gypsies and Travellers (in addition research by ORS has identified a national growth rate of 1.00% for Travelling Showpeople) and this has also been adjusted locally based on site demographics.

7.8 This view has been supported by Planning Inspectors in a number of Decision Notices. At an appeal in Doncaster that was issued in November 2016 (Ref: APP/F4410/W/15/3133490) where the agent acting on behalf of the appellant claimed that a rate closer to 3.00% should be used, the Inspector concluded:

In assessing need account also needs to be taken of likely household growth over the coming years. In determining an annual household growth rate, the Council relies on the work of Opinions Research Services (ORS), part of Swansea University. ORS's research considers migration, population profiles, births & fertility rates, death rates, household size data and household dissolution rates to determine average household growth rates for gypsies and travellers. The findings indicate that the average annual growth rate is in the order of 1.50% but that a 2.50% figure could be used if local data suggest a relatively youthful population. As the Council has found a strong correlation between Doncaster's gypsy and traveller population age profile and the national picture, a 1.50% annual household growth rate has been used in its 2016 GTANA. Given the rigour of ORS's research and the Council's application of its findings to the local area I accept that a 1.50% figure is justified in the case of Doncaster.

7.9 Another more recent was in relation to an appeal in Guildford that was issued in March 2018 (Ref: APP/W/16/3165526) where the agent acting on behalf of the appellant again claimed that a rate closer to 3.00% should be used. The Inspector concluded:

There is significant debate about household formation rates and the need to meet future growth in the district. The obvious point to make is that this issue is likely to be debated at the local-plan examination. In my opinion, projecting growth rates is not an exact science and the debate demonstrates some divergence of opinion between the experts. Different methodologies could be applied producing a wide range of data. However, on the available evidence it seems to me that the figures used in the GTAA are probably appropriate given that they are derived by using local demographic evidence. In my opinion, the use of a national growth rate and its adaptation to suit local or regional variation, or the use of local base data to refine the figure, is a reasonable approach.

7.10 In addition, the Technical Note has been accepted as a robust academic evidence base and was published by the Social Research Association in its journal Social Research Practice in December 2017.

7.11 ORS assessments take full account of the net local household growth rate per annum for each local authority, calculated on the basis of demographic evidence from the site surveys, and the baseline includes all current authorised households, all households identified as in current need (including concealed households, teenagers in need of a pitch of their own in the next 5 years, movement from bricks and mortar, those on waiting lists not currently living on a pitch or plot and in-migration), as well as households living on tolerated pitches or plots who are not included

as current need. The assessments of future need also take account of modelling projections based on birth and death rates, and in-/out-migration.

- 7.12 Overall, the household growth rate used for the assessment of future needs has been informed by local evidence. This demographic evidence has been used to adjust the national growth rate of 1.50% up or down based on the proportion of those aged under 18 (by travelling status).
- 7.13 In certain circumstances where the numbers of households and children are low it may not be appropriate to apply a percentage rate for new household formation. In these cases, a judgement will be made on likely new household formation based on the age and gender of the children. This will be based on the assumption that 50% of likely households to form will stay in the area. This is based on evidence from other GTAA's that ORS have completed across England and Wales.
- 7.14 The overall level of new household formation has also been adjusted to take account of any teenagers already counted as being in need of a pitch of their own in the first 5 years of the assessment in order to avoid any double counting of future need.

Breakdown by 5 Year Bands

- 7.15 In addition to tables which set out the overall need for Gypsies and Travellers, the overall need has also been broken down by 5-year bands as required by PPTS (2015). The way that this is calculated is by including all current need (from unauthorised pitches, pitches with temporary planning permission, concealed and doubled-up households, 5 year need from teenage children, and net movement from bricks and mortar) in the first 5 years. In addition, the total net new household formation is split across the 5-year bands based on the compound rate of growth that was applied – as opposed to being spread evenly.

Applying the Planning Definition

- 7.16 The outcomes from the household interviews were used to determine the planning status of each household against the PPTS planning definition. Only need from those households that met the PPTS planning definition (in that ORS were able to determine that they travel for work purposes and stay away from their usual place of residence when doing so, or have ceased to travel temporarily due to education, ill health or old age) need to be formally considered in the GTAA. Households where an interview was not completed who may meet the PPTS planning definition have also been included as a potential additional component of need from undetermined households. Whilst they do not need to be formally considered in the GTAA need from households that did not meet the PPTS planning definition have been assessed to provide the Council with information on levels of need that will have to be addressed through separate Local Plan Policies.
- 7.17 The information used to assess households against the PPTS planning definition included information on whether households have ever travelled; why they have stopped travelling; the reasons that they travel; and whether they plan to travel again in the future and for what reasons. The table below sets out the planning status of households living on sites in Havering

- 7.18 Whilst proxy interviews were completed for 2 households on a private Gypsy and Traveller site, there was not sufficient information provided to properly assess households against the planning definition, so these households have been included as undetermined.

Figure 7 – Planning status of households in Havering

Planning Status	Meet Planning Definition	Undetermined ¹¹	Do Not Meet Planning Definition
Gypsies and Travellers			
Private Sites	20	2	2
Temporary Sites	7	1	1
Tolerated Sites	1	4	0
Unauthorised Sites	67	0	25
Bricks and Mortar	1	0	0
Sub-Total	96	7	28
Travelling Showpeople			
Private Yards	5	0	0
Sub-Total	5	0	0
TOTAL	101	7	28

- 7.19 Figure 7 shows that for Gypsies and Travellers 96 households and for Travelling Showpeople 5 households met the planning definition of a Traveller in that they were able to provide information demonstrating that household members travel for work purposes and stay away from their usual place of residence or have ceased to travel temporarily.
- 7.20 A total of 28 Gypsy and Traveller households did not meet the planning definition as they were not able to demonstrate that they travel away from their usual place of residence for the purpose of work, or that they have ceased to travel temporarily due to children in education, ill health or old age. Some did travel for cultural reasons, to visit relatives or friends, and others had ceased to travel permanently – these households did not meet the planning definition.
- 7.21 The number of households where an interview was not possible are recorded as undetermined. The reasons for this included 4 households that refused to be interviewed and 1 household that was not present during the fieldwork period – despite up to three visits. The undetermined households also include 2 households where a proxy interview was completed where there was insufficient information provided to robustly apply the planning definition.

Bricks and Mortar Interviews

- 7.22 Whilst the 2011 Census identified 46 households living in bricks and mortar in Havering who identified as a Gypsy or Irish Traveller, it was only possible to complete one interview, despite all of the efforts that were made. Whilst this household does meet the planning definition, they stated that they live in bricks and mortar through choice and have no plans or wishes to move to a site.

¹¹ 2 households where a proxy interview was completed are included as undetermined as there was insufficient information to assess them against the planning definition.

Waiting Lists

- 7.23 There are no public sites in Havering so there is no waiting list.

Migration

- 7.24 The study has also sought to address in-migration (households requiring accommodation who move into the study area from outside) and out-migration (households moving away from the study area). Site surveys typically identify only small numbers of in-migrant and out-migrant households and the data is not normally robust enough to extrapolate long-term trends. At the national level, there is nil net migration of Gypsies and Travellers across the UK, but the assessment has taken into account local migration effects on the basis of the best evidence available.
- 7.25 Evidence drawn from stakeholder and household interviews has been considered alongside assessments of need that have been completed in other nearby local authorities. Whilst a number of households living on public sites stated that they wish to move, the majority wanted to move to another public site in Havering due to over-crowding. ORS have also found no evidence from other local studies that have been completed recently of any households wishing to move to Havering. Therefore, net migration to the sum of zero has been assumed for the GTAA – which means that net pitch requirements are driven by locally identifiable need rather than speculative modelling assumptions. Should any households from outside of Havering wish to develop a new site the proposal will need to be considered by a criteria-based Local Plan Policy.

Gypsies and Travellers

Pitch Needs – Gypsies and Travellers that met the Planning Definition

- 7.26 There were 96 households that met the planning definition. Analysis of the household interviews indicated that there is a need for 23 additional pitches as a result of concealed or doubled-up households or adults, 40 additional pitches for teenage children in need of a pitch of their own in the next 5 years, 67 pitches on currently unauthorised developments, 5 pitches with temporary planning permission, and 1 from in-migration. The household demographics suggest that a new household formation rate of 2.00% should be used. This gives a total of 38 additional pitches through new household formation.
- 7.27 Therefore, the overall level of additional need for those households who met the planning definition of a Gypsy or Traveller is for **174 additional pitches** over the 15-year GTAA period.

Figure 8 – Additional need for Gypsy and Traveller households in Havering that met the Planning Definition (2016-31)

Gypsies and Travellers - Meet Planning Definition	Pitches
Supply of Pitches	
Additional supply from vacant public and private pitches	0
Additional supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	67
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	23
Movement from bricks and mortar	0
Households on waiting lists for public sites	0
Total Current Need	90
Future Need	
5 year need from teenage children	40
Households on sites with temporary planning permission	5
In-migration	1
New household formation	38
<i>(Base number of households 155 and formation rate 2.00%)¹²</i>	
Total Future Needs	84
Net Pitch Need = (Current and Future Need – Total Supply)	174

Figure 9 – Additional need for Gypsy and Traveller households in Havering that met the Planning Definition by 5-year periods

2016-21	2021-26	2026-31	Total
Years 1-5	Years 6-10	Years 11-15	
136	18	20	174

¹² See Paragraph 7.10 for the components that make up the household base.

Pitch Needs – Undetermined Gypsies and Travellers

- 7.28 Whilst it was not possible to determine the planning status of a total of 7 households as they either refused to be interviewed, were not on site at the time of the fieldwork, or there was insufficient information provided in a proxy interview, the needs of these households still need to be recognised by the GTAA as they are believed to be Gypsies and Travellers and may meet the planning definition.
- 7.29 ORS are of the opinion that it would not be appropriate when producing a robust assessment of need to make any firm assumptions about whether or not households where an interview was not completed meet the planning definition based on the outcomes of households in that local authority where an interview was completed.
- 7.30 However, data that has been collected from over 3,500 household interviews that have been completed by ORS since the changes to PPTS in 2015 suggests that nationally approximately 25% of households that have been interviewed meet the planning definition.
- 7.31 This would suggest that it is likely that only a proportion of the potential need identified from these households will need new Gypsy and Traveller pitches, and that the needs of the majority will need to be addressed through separate Local Plan Policies.
- 7.32 Should further information be made available to the Council that will allow for the planning definition to be applied to the undetermined households, the overall level of need could rise by up to 1 from pitch with temporary planning consent, and by up to 2 pitches from new household formation (this uses a base of the 7 households¹³ and a net growth rate of 1.50%¹⁴). Therefore, additional need could increase by **up to a further 3 pitches**, plus any concealed adult households or 5-year need arising from teenagers living in these households (if all undetermined pitches are deemed to meet the planning definition). However, as an illustration, if the ORS national average of 25% were to be applied this could be as few as 1 additional pitch.
- 7.33 Whilst the proportion of households in Havering that meet the planning definition is significantly higher (77%) than 25% this is based on a small household base. Therefore, it is felt that it would be more appropriate to consider the more statistically robust national figure. However, if the locally derived proportion were to be applied this could result in a need for 2 additional pitches.
- 7.34 Tables setting out the components of need for undetermined households can be found in **Appendix B**.

¹³ The proxy interviews identified a teenage child who will be in need of a pitch of their own in the next 5 years.

¹⁴ The ORS *Technical Note on Population and Household Growth (2015)* has identified a national growth rate of 1.50% for Gypsies and Travellers which has been applied in the absence of further demographic information about these households.

Pitch Needs – Gypsies and Travellers that did not meet the Planning Definition

- 7.35 It is not now a requirement for a GTAA to include an assessment of need for households that do not meet the PPTS planning definition. However, this assessment is included for illustrative purposes and to provide the Council with information on levels of need that will have to be addressed through separate Local Plan Policies. On this basis, it is evident that whilst the needs of the 25 households living on sites who did not meet the PPTS planning definition will represent only a very small proportion of the overall housing need, the Council will still need to ensure that arrangements are in place to properly address these needs – especially as the majority identified as Irish Travellers, Romany Gypsies or Scottish Gypsies and may claim that the Council should meet their housing needs through culturally appropriate housing as a result of their protected ethnic characteristic.
- 7.36 There is a need for **43 additional pitches** for households that did not meet the PPTS planning definition. This is made up of 25 currently unauthorised pitches; 3 concealed or doubled-up households or adults; 4 teenage children who will be in need of a pitch of their own in the next 5 years; 1 temporary pitch; and 10 from new household formation using a formation rate of 2.45% derived from the household demographics.
- 7.37 A summary of this need for households that did not meet the PPTS planning definition can be found in **Appendix C**.

Travelling Showpeople

Plot Needs – Travelling Showpeople that meet the Planning Definition

- 7.38 There were 5 Travelling Showpeople households identified in Havering that met the planning definition, no undetermined households that may meet the planning definition and no households that did not meet the planning definition.
- 7.39 The interviews with the residents identified that there was over-crowding on the yard and a need to provide additional space to accommodate older teenage children. It was stated that the families are looking to expand the yard on to adjacent land that they already own – and that this will meet all of their current and future needs. Combined the current yard and the proposed expansion will provide a total of 5 enlarged family plots.

Transit Requirements

- 7.40 When determining the potential need for transit provision the assessment has looked at data from the MHCLG Caravan Count, the outcomes of the stakeholder interviews, local records on numbers of unauthorised encampments, and the potential wider issues related to changes made to PPTS in 2015.

MHCLG Traveller Caravan Count

- 7.41 Whilst it is considered to be a comprehensive national dataset on numbers of authorised and unauthorised caravans across England, it is acknowledged that the Traveller Caravan Count is a count of caravans and not households. It also does not record the reasons for unauthorised caravans. This makes it very difficult to interpret in relation to assessing future need because it does not count pitches or resident households. The count is also only a twice yearly (January and July) 'snapshot in time' conducted by local authorities on a specific day, and any caravans on unauthorised sites or encampments which occur on other dates are not recorded. Likewise, any caravans that are away from sites on the day of the count are not included. As such it is not considered appropriate to use the outcomes from the Traveller Caravan Count in the assessment of future transit provision. It does however provide valuable historic and trend data on whether there are instances of unauthorised caravans in local authority areas.
- 7.42 Data from the Traveller Caravan Count shows that apart from one large encampment comprising 35 caravans in July 2015 and a further encampment comprising 10 caravans in January 2017, there have been no further non-tolerated unauthorised caravans recorded on land not owned by Travellers recorded in the study area in recent years.

Stakeholder Interviews and Local Data

- 7.43 Information from the previous stakeholder interviews identified that there are low levels of unauthorised encampments in Havering, and that the majority were short-term visiting family or friends, transient and simply passing through.
- 7.44 There is currently no formal transit provision in Havering, and it was felt by officers that Gypsies and Travellers who travel through the area would not want to stay on a formal transit site.

However, officers all agreed that there should be a London-wide approach to the provision of transit sites.

- 7.45 More recent information provided by the Council in 2018 indicated that there were 11 encampments recorded in 2015, 34 in 2016, 4 in 2017 and 22 in 2018. In all cases it was reported that the Travellers were not travelling around Havering but were visiting for between a few days and up to 2 weeks. Reasons given for stopping included attending an event (funeral/wedding), looking for work, visiting relatives, passing through on the way to somewhere else, and being on holiday.
- 7.46 The officer also reported that since 2016 there had been an increase in the number of encampments on industrial land that have involved the criminal dumping of waste. There is a view that this may be as a result of neighbouring Boroughs now having High Court Injunctions in place to prevent unauthorised encampments.
- 7.47 The officer did not feel that transit provision would address any issues related to the illegal dumping of waste, and that the current levels of other encampments were too low to justify any formal transit provision in Havering.

Potential Implications of PPTS (2015)

- 7.48 It has been suggested by some organisation representing the Travelling Community that there will need to be an increase in transit provision across the country as a result of changes to PPTS leading to more households travelling. This may well be the case, but it will take some time for any changes to happen. As such the use of historic evidence to make an assessment of future transit need is not recommended at this time. Any recommendation for future transit provision will need to make use of a robust post-PPTS (2015) evidence base and there has not been sufficient time yet for this to happen at this point in time.

Transit Recommendations

- 7.49 Whilst there is some evidence of a number of unauthorised encampments in Havering in recent years, it is recommended that there is currently no need to provide any new transit pitches or emergency stopping places. It is also recommended that the situation relating to levels of unauthorised encampments should be monitored whilst any potential changes associated with PPTS (2015) develop.
- 7.50 As well as information on the size and duration of the encampments, this monitoring should also seek to gather information from residents on the reasons for their stay in Havering; whether they have a permanent base or where they have travelled from; whether they have any need or preference to settle permanently in Havering; and whether their travelling is a result of changes to PPTS (2015). This information could be collected as part of a Welfare Assessment (or equivalent).
- 7.51 A review of the evidence base relating to unauthorised encampments, including the monitoring referred to above, should be completed on an annual basis. This will establish whether there is a need for investment in any formal transit sites or emergency stopping places, or whether a managed approach is preferable.

- 7.52 In the short-term, the Council should consider the use of management arrangements for dealing with unauthorised encampments and could also consider the use of Negotiated Stopping Agreements, as opposed to taking forward an infrastructure-based approach.
- 7.53 The term 'negotiated stopping' is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent 'built' transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the authority and the (temporary) residents regarding expectations on both sides.
- 7.54 Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority, although they only need to provide basic facilities including: a cold-water supply; portaloos; sewerage disposal point and refuse disposal facilities.

8. Conclusions

- 8.1 This study provides an evidence base to enable the Council to assess the housing needs of the Travelling Community as well as complying with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, Planning Practice Guidance (PPG) 2014, Planning Policy for Traveller Sites (PPTS) 2015, the Housing and Planning Act 2016, and the revised NPPF (2019).
- 8.2 As a result of the various updates to the assessment of need between 2016 and 2019, the very high response rate, and cooperation of local Travellers and Planning Agents; the outcomes of the GTAA should be seen as robust and up to date, and an accurate reflection of housing need for Gypsies, Travellers and Travelling Showpeople in the London Borough of Havering.

Gypsies and Travellers

- 8.3 In summary there is a need for:
- » 174 additional pitches in Havering over the GTAA period to 2031 for Gypsy and Traveller households that met the planning definition;
 - » 3 additional pitches for undetermined Gypsy and Traveller households that may meet the planning definition; and
 - » 43 additional pitches for Gypsy and Traveller households who did not meet the planning definition.
- 8.4 In general terms need identified in a GTAA is seen as need for additional pitches. As set out in Chapter 4 of this report, the now withdrawn *Government Guidance on Designing Gypsy and Traveller Sites* recommended that, as a general guide, an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, parking space for two vehicles and a small garden area.
- 8.5 However, it is recommended that alternative approaches should also be considered when seeking to address the levels of need identified in this GTAA, especially when seeking to meet the need through the intensification of existing sites – many of which are already reaching capacity and have no means to expand onto adjacent land.
- 8.6 The first approach to consider is in relation to single concealed or doubled-up adults and teenagers who will be in need of a pitch of their own in the next 5 years. In the short to medium term it is likely that the accommodation need of these individuals could be met through additional touring caravans as opposed to fully set out family pitches.
- 8.7 The second approach to consider is for sites occupied by larger extended family groups. Again, sites like this may be able to meet the overall accommodation needs through a combination of shared static caravans, tourers and dayrooms – as opposed to more formally set out sites with separate pitches. It is common for conditions in Decision Notices for Travellers sites to simply place limits on the numbers and types of caravans as opposed to placing limits on the number of pitches.

- 8.8 It is recommended that need for households that met the PPTS planning definition is addressed through new pitch allocations and the intensification of existing sites – considering some of the alternative approaches set out above. Given that the majority of identified need comes from households living on private sites it is likely that it will need to be addressed through the provision of private pitches or sites.
- 8.9 The Council will need to carefully consider how to address any additional needs from undetermined households, from households seeking to move to Havering or from additional households currently living in bricks and mortar. In terms of Local Plan Policies, the Council could consider the use of a criteria-based policy (as suggested in PPTS).
- 8.10 In general terms, it is the Government’s intention that the need for those households who do not fall within the PPTS planning definition should be met as part of general housing need and through separate Local Plan Policies (including those authorities that have adopted plans, as all Travellers will have been included as part of the overall Objectively Assessed Need – OAN).
- 8.11 It is recognised that the Council already have in place an adopted Local Plan that sets out overall housing need. When the new Local Plan is prepared, the findings of this report should be considered as part of future housing mix and type within the context of the assessment of overall housing need in relation to those households that did not meet the PPTS planning definition of a Traveller.

Travelling Showpeople

- 8.12 There were 5 Travelling Showpeople households identified in Havering that met the planning definition; no undetermined households that may meet the planning definition; and no households that did not meet the planning definition.
- 8.13 The interviews with the residents identified that there was over-crowding on the yard and a need to provide additional space to accommodate older teenage children. It was stated that the families are looking to expand the yard on to adjacent land that they already own – and that this will meet all of their current and future needs. Combined the current yard and the proposed expansion will provide a total of 5 enlarged family plots.

Transit Provision

- 8.14 Whilst there is some evidence of a number of unauthorised encampments in Havering in recent years, it is recommended that there is currently no need to provide any new transit pitches or emergency stopping places. It is also recommended that the situation relating to levels of unauthorised encampments should be monitored whilst any potential changes associated with PPTS (2015) develop.
- 8.15 A review of the evidence base relating to unauthorised encampments, including the monitoring referred to above, should be completed on an annual basis. This will establish whether there is a need for investment in any formal transit sites or emergency stopping places, or whether a managed approach is preferable.

- 8.16 In the short-term, the Council should consider the use of management arrangements for dealing with unauthorised encampments and could also consider the use of Negotiated Stopping Agreements, as opposed to taking forward an infrastructure-based approach.

Summary of Need to be Addressed

- 8.17 Taking into consideration all of the elements of need that have been assessed, together with the assumptions on the proportion of undetermined households that are likely to meet the planning definition, the table below sets out the likely number of pitches that will need to be addressed either as a result of the GTAA, or through the SHMA and through separate Local Plan Policies.
- 8.18 Total need from Gypsy and Traveller households that met the planning definition, from undetermined households, and from households that did not meet the planning definition is for 220 additional pitches. The table below breaks need down by the GTAA and SHMA by taking 25% (the ORS national average for Gypsies and Travellers) of need from undetermined households and adding this to the need from households that met the planning definition, and by adding the remaining 75% of need from undetermined households to the need from households that did not meet the planning definition.

Figure 10 – Additional need for Gypsy and Traveller households broken down by potential delivery method

Site Status	GTAA	SHMA	TOTAL
Met Planning Definition (+ 25% Undetermined)	175 (174+1)	0	175
Did not meet Planning Definition (+ 75% Undetermined)	0	45 (43+2)	45
TOTAL	175	45	220

Implications of Changes to Government Guidance

- 8.19 In addition, the draft London Plan (December 2017) is proposing to introduce a different definition of a Traveller for planning purposes. This is very similar to the repealed Housing Definition in that it would also include households that have not travelled for work providing that they live in a caravan. Should this definition be more widely adopted it is likely that all households in Havering would meet it and total need will be for 220 additional pitches for Gypsies and Travellers, plus any additional need arising from bricks and mortar households.

List of Figures

Figure 1 – Additional need for Gypsy and Traveller households in Havering (2016-2031)	8
Figure 2 – Additional need for Gypsy and Traveller households in Havering by 5-year periods.....	8
Figure 3 – Friends, Families and Traveller Leaflet.....	16
Figure 4 – Bricks and Mortar Advert.....	17
Figure 5 - Total amount of provision in Havering (December 2018)	25
Figure 6 - Sites and yards visited in Havering	35
Figure 7 – Planning status of households in Havering	41
Figure 8 – Additional need for Gypsy and Traveller households in Havering that met the Planning Definition (2016-31)	43
Figure 9 – Additional need for Gypsy and Traveller households in Havering that met the Planning Definition by 5-year periods	43
Figure 10 – Additional need for Gypsy and Traveller households broken down by potential delivery method	51
Figure 11 – Additional need for undetermined Gypsy and Traveller households in Havering (2016-31).....	55
Figure 12 – Additional need for undetermined Gypsy and Traveller households by 5-year periods....	55
Figure 13 - Additional need for Gypsy and Traveller households in Havering that did not meet the Planning Definition (2016-31)	56
Figure 14 - Additional Need for households that did not meet the Planning Definition by 5 Year Periods.....	56

Appendix A: Glossary of Terms / Acronyms

Amenity block/shed	A building where basic plumbing amenities (bath/shower, WC, sink) are provided.
Bricks and mortar	Mainstream housing.
Caravan	Mobile living vehicle used by Gypsies and Travellers. Also referred to as trailers.
Chalet	A single storey residential unit which can be dismantled. Sometimes referred to as mobile homes.
Concealed household	Households, living within other households, who are unable to set up separate family units.
Dayroom	An extended amenity block including a family kitchen/dining/lounge area.
Doubling-Up	Where there are more than the permitted number of caravans on a pitch or plot.
Emergency Stopping Place	A temporary site with limited facilities to be occupied by Gypsies and Travellers while they travel.
Green Belt	A land use designation used to check the unrestricted sprawl of large built-up areas; prevent neighbouring towns from merging into one another; assist in safeguarding the countryside from encroachment; preserve the setting and special character of historic towns; and assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
Household formation	The process where individuals form separate households. This is normally through adult children setting up their own household.
In-migration	Movement of households into a region or community
Local Plans	Local Authority spatial planning documents that can include specific policies and/or site allocations for Gypsies, Travellers and Travelling Showpeople.
Out-migration	Movement from one region or community in order to settle in another.
Personal planning permission	A private site where the planning permission specifies who can occupy the site and doesn't allow transfer of ownership.
Pitch/plot	Area of land on a site/development generally home to one household. Can be varying sizes and have varying caravan numbers. Pitches refer to Gypsy and Traveller sites and Plots to Travelling Showpeople yards.

Private site	An authorised site owned privately. Can be owner-occupied, rented or a mixture of owner-occupied and rented pitches.
Site	An area of land on which Gypsies, Travellers and Travelling Showpeople are accommodated in caravans/chalets/vehicles. Can contain one or multiple pitches/plots.
Social/Public/Council Site	An authorised site owned by either the local authority or a Registered Housing Provider.
Temporary planning permission	A private site with planning permission for a fixed period of time.
Tolerated site/yard	Long-term tolerated sites or yards where enforcement action is not expedient, and a certificate of lawful use would be granted if sought.
Transit provision	Site intended for short stays and containing a range of facilities. There is normally a limit on the length of time residents can stay.
Unauthorised Development	Caravans on land owned by Gypsies and Travellers and without planning permission.
Unauthorised Encampment	Caravans on land not owned by Gypsies and Travellers and without planning permission.
Waiting list	Record held by the local authority or site managers of applications to live on a site.
Yard	A name often used by Travelling Showpeople to refer to a site.

DCLG	Department for Communities and Local Government
GTAA	Gypsy and Traveller Accommodation Assessment
HEDNA	Housing and Economic Development Needs Assessment
LPA	Local Planning Authority
MHCLG	Ministry of Housing, Communities and Local Government
ORS	Opinion Research Services
PPTS	Planning Policy for Traveller Sites
SHMA	Strategic Housing Market Assessment
TSP	Travelling Showpeople

Appendix B: Undetermined Households

Figure 11 – Additional need for undetermined Gypsy and Traveller households in Havering (2016-31)

Gypsies and Travellers – Undetermined	Pitches
Supply of Pitches	
Additional supply from vacant public and private pitches	0
Additional supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	0
Movement from bricks and mortar	0
Households on waiting lists for public sites	0
Total Current Need	0
Future Need	
5 year need from teenage children	0
Households on sites with temporary planning permission	1
In-migration	0
New household formation	2
<i>(Base number of households 7 and formation rate 1.50%)</i>	
Total Future Needs	2
Net Pitch Need = (Current and Future Need – Total Supply)	3

Figure 12 – Additional need for undetermined Gypsy and Traveller households by 5-year periods

2016-21	2021-26	2026-31	Total
Years 0-5	Years 6-10	Years 11-15	
2	0	1	3

There were no undetermined Travelling Showpeople in Havering.

Appendix C: Households that did not meet the Planning Definition

Figure 13 - Additional need for Gypsy and Traveller households in Havering that did not meet the Planning Definition (2016-31)

Gypsies and Travellers - Not Meeting Planning definition	Pitches
Supply of Pitches	
Additional supply from vacant public and private pitches	0
Additional supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	25
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	3
Movement from bricks and mortar	0
Households on waiting lists for public sites	0
Total Current Need	28
Future Need	
5 year need from teenage children	4
Households on sites with temporary planning permission	1
In-migration	0
New household formation	10
<i>(Household base 35 and formation rate 2.45%)</i>	
Total Future Needs	15
Net Pitch Need = (Current and Future Need – Total Supply)	43

Figure 14 - Additional Need for households that did not meet the Planning Definition by 5 Year Periods

2016-21	2021-26	2026-31	Total
Years 0-5	Years 6-10	Years 11-15	
33	5	5	43

There were no Travelling Showpeople that did not meet the Planning Definition in Havering.

Appendix D: Sites and Yards in Havering (December 2018)

Site/Yard	Authorised Pitches or Plots	Unauthorised Pitches or Plots
Public sites		
None	-	-
Private sites with permanent planning permission		
Haunted House Wood	3	-
Laburnham Stables	1	-
Railway Sidings	2	-
The Old Forge	1	-
The View, Prospect Road	3	-
Willow Tree Lodge ¹⁵	11	-
Private sites with temporary planning permission		
Laburnham Stables	2	-
Railway Sidings	3	-
Tyas Farm Stud	2	-
Tolerated sites (without planning permission)		
Crow Lane (r/o 21)	-	1
Crow Lane (r/o 24)	-	4
Unauthorised sites (without planning permission)		
Lower Bedfords Road	-	3
Ashleigh View, Tomkyns Lane	-	5
Blossom Hill View, Church Road	-	1
Cherry Blossom View, Church Road	-	1
Cherry Tree View, Church Road	-	1
Dunromin, Church Road	-	1
Fairhill Rise	-	4
Gravel Pit Coppice	-	6
Haunted House Wood	-	5
Hogbar Farm	-	11
Hogbar Farm East	-	8
Hogbar Farm West	-	7
Laburnham Stables	-	1
Land east of Rosewood Cottage	-	1
Land west of Benskins Lane	-	6
Meadow Rise, Church Road	-	4
Meadow View, Church Road	-	3
Paddock View, Church Road	-	2
Plot 3, Church Road	-	1
Plot 13, Church Road	-	1
Plot 14, Church Road	-	1
Putwell Bridge (The Former Brookstreet Garage Site)	-	4

¹⁵ A total of 6 of these pitches are the subject of a Legal Agreement that had not been concluded at the time of this report.

Springfield, Church Road	-	2
The Grove, Prospect Road ¹⁶	-	5
The Oak View, Church Road	-	1
The Oak, Church Road	-	1
The Schoolhouse, Church Road	-	1
Vinegar Hill	-	9
White House, Benskins Lane	-	4
Willoughby Drive (Adj No 1)	-	1
Willow View, Church Road	-	1
TOTAL PITCHES	28	107
Travelling showpeople yards		
Fairoaks	5	-
TOTAL PLOTS	5	0
Public transit provision		
None	-	-

¹⁶ This site was granted temporary planning permission for 18 months after the base date for the GTAA, this has now lapsed, and the site is unauthorised.

Appendix E: Household Interview Questions

NOT FOR CIRCULATION**GTAA Questionnaire 2017**

INTERVIEWER: Good Morning/afternoon/evening. My name is < > from Opinion Research Services, working on behalf of XXXX Council.

The Council are undertaking a study of Gypsy, Traveller and Travelling Showpeople accommodation needs assessment in this area. This is needed to make sure that accommodation needs are properly assessed and to get a better understanding of the needs of the Travelling Community.

The Council need to try and speak with every Gypsy, Traveller and Travelling Showpeople household in the area to make sure that the assessment of need is accurate.

Your household will not be identified and all the information collected will be anonymous and will only be used to help understand the needs of Gypsy, Traveller and Travelling Showpeople households.

ORS is registered under the Data Protection Act 1998. Your responses will be stored and processed electronically and securely. This paper form will be securely destroyed after processing. Your household will not be identified to the council and only anonymous data and results will be submitted, though verbatim comments may be reported in full, and the data from this survey will only be used to help understand the needs of Gypsy, Traveller and Travelling Showpeople households

A	General Information
---	---------------------

A1 Name of planning authority:

INTERVIEWER please write in

A2 Date/time of site visit(s):

INTERVIEWER please write in

DD/MM/YY

TIME

A3 Name of interviewer:

INTERVIEWER please write in

A4 Address and pitch number:

INTERVIEWER please write in

A5 Type of accommodation: *INTERVIEWER please cross one box only*

Council

☐

Private rented

☐

Private owned

☐

Unauthorised

☐

Bricks and Mortar

☐

A6 Name of Family:

INTERVIEWER please write in

A7 Ethnicity of Family:

INTERVIEWER please cross one box only

Romany Gypsy

☐

Irish Traveller

☐

Scots Gypsy or Traveller

☐

Show Person

☐

New Traveller

☐

English Traveller

☐

Welsh Gypsy

☐

Non-Traveller

☐

Other (please specify)

A8 Number of units on the pitch:

INTERVIEWER please write in

Mobile homes

Touring Caravans

Day Rooms

Other (please specify)

--	--	--	--

NOT FOR CIRCULATION

A9 Is this site your main place of residence? If not where is?
INTERVIEWER: Please cross one box only

Yes ☐ No ☐

A10 How long have you lived here? If you have moved in the past 5 years, where did you move from? *INTERVIEWER: Please write in below*

Years	Months	If you have moved in the past 5 years, where did you move from? Include ALL moves
-------	--------	---

A11 Did you live here out of your own choice or because there was no other option? If there was no other option, why? *INTERVIEWER: Please cross one box only*

Choice ☐ No option ☐

A12 Is this site suitable for your household? If so why and if not why not?
 (For example close to schools, work, healthcare, family and friends etc.)
INTERVIEWER: Please cross one box only

Yes ☐ No ☐

A13 How many separate families or unmarried adults live on this pitch?
INTERVIEWER: Please cross one box only

1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ 6 ☐ 7 ☐ 8 ☐ 9 ☐ 10 ☐

B Demographics

B1 Demographics — Household 1 *INTERVIEWER: Please write-in*

Person 1		Person 2		Person 3	
Sex	Age	Sex	Age	Sex	Age

Complete additional forms for each household on pitch *INTERVIEWER: Please write-in*

Person 4		Person 5		Person 6		Person 7		Person 8	
Sex	Age	Sex	Age	Sex	Age	Sex	Age	Sex	Age

C Accommodation Needs

C1 How many families or unmarried adults living on this pitch are in need of a pitch of their own in the next 5 years? *INTERVIEWER: Please cross one box only*

INTERVIEWER: AN ADULT IS DEFINED AS 16+

1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ 6 ☐ 7 ☐ 8 ☐ 9 ☐ 10 ☐

Other *Please specify*

NOT FOR CIRCULATION

- C2** How many of your children will need a home of their own in the next 5 years? If they live here now, will they want to stay on this site? If not, where would they wish to move? (e.g. other site, in bricks and mortar etc.) If they do not live on this site, where do they currently live and would they want to move on to this site or another local site if they could get a pitch? *INTERVIEWER: Please cross one box only*

1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ 6 ☐ 7 ☐ 8 ☐ 9 ☐ 10 ☐

Other *Please specify*

Details *(Please specify)*

D Waiting List

- D1** Is anyone living here on the waiting list for a pitch in this area?

INTERVIEWER: Please cross one box only

Yes ☐ → Continue to D2
No ☐ → Go to D4

- D2** How many people living here are on the waiting list for a pitch in this area?

INTERVIEWER: Please cross one box only

1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ 6 ☐ 7 ☐ 8 ☐ 9 ☐ 10 ☐

Other *(Please specify)*

Details *(Please specify)*

- D3** How long have they been on the waiting list? *INTERVIEWER: Please cross one box only*

0-3 months ☐ 3-6 months ☐ 6-12 months ☐ 1-2 years ☐ 2+ years ☐

Other *(Please specify)*

Details *(Please specify)*

- D4** If they are not on the waiting list, do any of the people living here want to be on the waiting list? (*INTERVIEWER if they do - please take their contact details*)

INTERVIEWER: Please cross one box only

1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ 6 ☐ 7 ☐ 8 ☐ 9 ☐ 10 ☐

No ☐

Other *(Please specify)*

Details *(Please specify) and take contact details)*

NOT FOR CIRCULATION

E

Future Accommodation Needs

E1 Do you plan to move from this site in the next 5 years? If so, why?

INTERVIEWER: Please cross one box only

Yes ☐ If yes → Continue to E2
No ☐ If no → Go to E5

If so, why? (please specify)

E2 Where would you move to? *INTERVIEWER: Please cross one box only*

Another site in this area (specify where)	A site in another council area (specify where)	Bricks and mortar in this area (specify where)	Bricks and mortar in another council area (specify where)	Other (e.g. land they own elsewhere) (Please specify)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please specify where they would move to
If they own land elsewhere - probe for details

E3 If you want to move would you prefer to buy a private pitch or site, or rent a pitch on a public or private site? *INTERVIEWER: Please cross one box only*

Private buy

☐

Private rent

☐

Public rent

☐

E4 Can you afford to buy a private pitch or site? *INTERVIEWER: Please cross one box only*

Yes

☐

No

☐

E5 Are you aware of, or do you own any land that could have potential for new pitches? *INTERVIEWER: Please cross one box only*

Yes

☐

No

☐

Please ask for details on where land/site is located and who owns the land/site?

NOT FOR CIRCULATION

F Travelling													
F1	<p>How many trips, living in a caravan or trailer, have you or members of your family made away from your permanent base in the last 12 months?</p> <p><i>INTERVIEWER: Please cross one box only</i></p> <table> <tr> <td>0</td> <td>1</td> <td>2</td> <td>3</td> <td>4</td> <td>5+</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table> <p>Go to F6a</p> <p>Continue to F2</p>	0	1	2	3	4	5+	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
0	1	2	3	4	5+								
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>								
F2	<p>If you or members of your family have travelled in the last 12 months, which family members travelled? <i>INTERVIEWER: Please cross one box only</i></p> <table> <tr> <td>All the family</td> <td>Adult males</td> <td>Other</td> <td><input type="text" value="If other, please specify"/></td> </tr> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td></td> </tr> </table>	All the family	Adult males	Other	<input type="text" value="If other, please specify"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
All the family	Adult males	Other	<input type="text" value="If other, please specify"/>										
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>											
F3	<p>What were the reasons for travelling? <i>INTERVIEWER: Please cross all that apply</i></p> <table> <tr> <td>Work</td> <td>Holidays</td> <td>Visiting family</td> <td>Fairs</td> <td>Other</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table> <p><input type="text" value="Details / specify if necessary. If fairs—probe for whether this involves work"/></p>	Work	Holidays	Visiting family	Fairs	Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Work	Holidays	Visiting family	Fairs	Other									
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>									
F4	<p>At what time of year do you or family members usually travel? And for how long? <i>INTERVIEWER: Please cross one box only</i></p> <table> <tr> <td>All year</td> <td>Summer</td> <td>Winter</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table> <p><input style="width: 100%;" type="text" value="And for how long?"/></p>	All year	Summer	Winter	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>						
All year	Summer	Winter											
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>											
F5	<p>Where do you or family members usually stay when they are travelling? <i>INTERVIEWER: Please cross all boxes that apply</i></p> <table> <tr> <td>LA transit sites</td> <td>Private transit sites</td> <td>Roadside</td> <td>Friends/family</td> <td>Other</td> <td><input type="text" value="If other, please specify"/></td> </tr> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td></td> </tr> </table> <p><input type="text" value="INTERVIEWER: Ask F6a — F8 ONLY if F1 = 0. Otherwise, go to F9"/></p>	LA transit sites	Private transit sites	Roadside	Friends/family	Other	<input type="text" value="If other, please specify"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
LA transit sites	Private transit sites	Roadside	Friends/family	Other	<input type="text" value="If other, please specify"/>								
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>									
F6a	<p>Are there any reasons why you don't you travel at the moment?</p> <p><input style="width: 100%;" type="text" value="Details"/></p>												
F6b	<p>Have you or family members ever travelled? <i>INTERVIEWER: Please cross one box only</i></p> <table> <tr> <td>Yes</td> <td><input type="checkbox"/></td> <td>→ Continue to F7</td> </tr> <tr> <td>No</td> <td><input type="checkbox"/></td> <td>→ Go to F9</td> </tr> </table>	Yes	<input type="checkbox"/>	→ Continue to F7	No	<input type="checkbox"/>	→ Go to F9						
Yes	<input type="checkbox"/>	→ Continue to F7											
No	<input type="checkbox"/>	→ Go to F9											
F7a	<p>When did you or family members last travel? <i>INTERVIEWER: Please write in</i></p> <p><input style="width: 100%;" type="text" value="Details"/></p>												
F7b	<p>What were the reasons for travelling? <i>INTERVIEWER: Please cross all that apply</i></p> <table> <tr> <td>Work</td> <td>Holidays</td> <td>Visiting family</td> <td>Fairs</td> <td>Other</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table> <p><input type="text" value="Details / specify if necessary. If fairs—probe for whether this involves work"/></p>	Work	Holidays	Visiting family	Fairs	Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Work	Holidays	Visiting family	Fairs	Other									
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>									

NOT FOR CIRCULATION

F8 Why do you not travel anymore? *INTERVIEWER: Cross all boxes that apply & probe for details*

Children in school	Ill health	Old age	Settled now	Nowhere to stop	No work opportunities	Other
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If other, please specify

Details about children in school, types of ill health, or looking after relative with poor health, and specific problems/issues relating to old age

F9 Do you or other family members plan to travel in the future?

INTERVIEWER: Please cross one box only

Yes	<input type="checkbox"/>	→	Continue to F10
No	<input type="checkbox"/>	→	Go to G1
Don't know	<input type="checkbox"/>	→	Go to G1

F10 When, and for what purpose do you/they plan to travel?

Details

F11 Is there anything else you would like to tell us about your travelling patterns?

Details

NOT FOR CIRCULATION

■	G	Any other information	■
■	G1	Any other information about this site or your accommodation needs? <i>INTERVIEWER: Please write in</i>	■
		<div data-bbox="571 730 1123 808">Details (e.g. can current and future needs be met by expanding or intensifying the existing site?)</div>	
■	G2	Site/Pitch plan? Any concerns? <i>INTERVIEWER: Please sketch & write in</i>	■
		<div data-bbox="632 1357 1054 1391">Sketch of Site/Pitch — any concerns?</div> <div data-bbox="679 1447 1007 1480">Are any adaptations needed?</div> <div data-bbox="344 1536 1342 1648">Why does the current accommodation not meet the household's needs; and could their needs could be addressed in situ e.g. extra caravans. This could cover people wanting to live with that household but who cannot currently</div>	
■			■

Page 7

NOT FOR CIRCULATION

H Bricks & Mortar Contacts					
H1	Contacts for Bricks and Mortar interviews? <i>INTERVIEWER: Please write in</i>				
<div>Details</div>					
Council contact?					
<p>Would you like the council to contact you about any of the issues raised in this interview? Please note that although ORS will pass on your contact details to the Council we cannot guarantee when they will contact you?</p> <p><i>INTERVIEWER: Please cross one box only</i></p> <table><tr><td>Yes</td><td>No</td></tr><tr><td><input type="checkbox"/></td><td><input type="checkbox"/></td></tr></table>		Yes	No	<input type="checkbox"/>	<input type="checkbox"/>
Yes	No				
<input type="checkbox"/>	<input type="checkbox"/>				
<p><i>INTERVIEWER: Can I confirm your name and telephone number so that we can pass them on to the Council for this purpose only. Your details will only be used for this purpose and will not be passed onto anyone else.</i></p>					
Respondent's Name.....	<input type="text"/>				
Respondent's Telephone.....	<input type="text"/>				
Respondent's Email.....	<input type="text"/>				
Interview log					
<p><i>INTERVIEWER: Please record the date and time that the interview was carried out</i></p>					
Date.....	<input type="text"/>				
Time of interview.....	<input type="text"/>				

Appendix F: Technical Note on Household Formation

This page is intentionally left blank

Havering Cabinet Meeting on August 5 2020

Item to be approved for Havering Local Plan Main Modifications Public Consultation

**Site Layout Drawings (Supporting site layout material for
revised Policy 11 Gypsy and Traveller Accommodation)**

August 2020

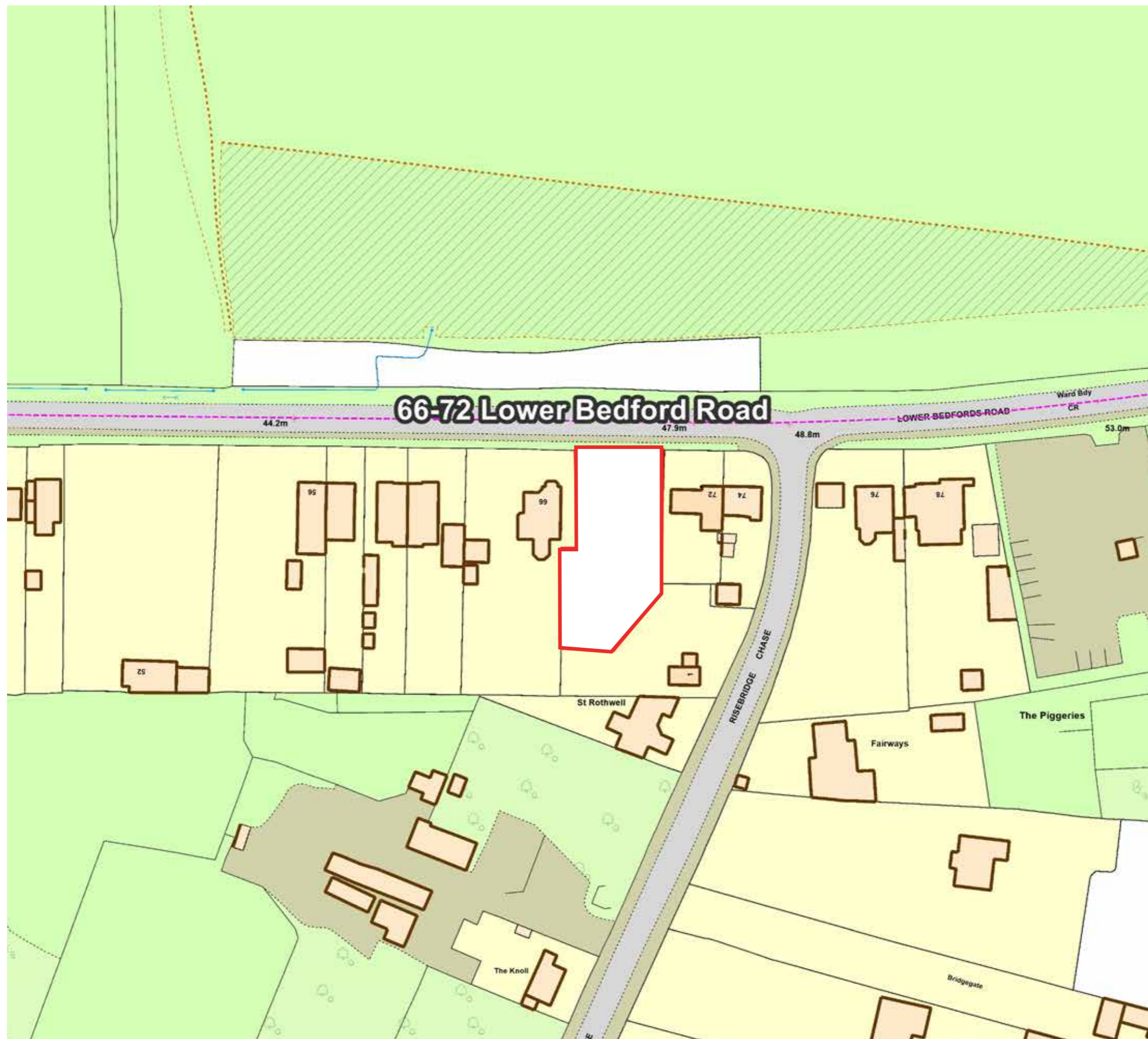


Examination into the Havering Local Plan 2016 - 2031

Document for Public Consultation alongside the Proposed Main Modifications

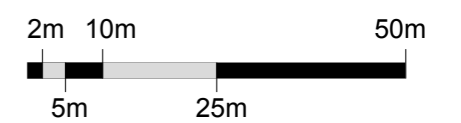
Site Layout Drawings (Supporting site layout material for revised Policy 11 Gypsy and Traveller Accommodation)

August 2020



Key

- Site ownership
- ▨ Area allocated to meet 5 Year Need 2016-2021
- ▨ Area allocated to meet 6-15 Year Need 2021-2031
- Park 3.0 x 10.5m
Dotted line denotes 6m offset
- Mobile (s) 3.7 x 12.2m
Dotted line denotes 6m offset
- Touring 2.3 x 7.0m
Dotted line denotes 6m offset
- Day Room
- 6m roadway
- Existing structure
- Borough boundary



66-72 Lower Bedfords Road

These are indicative layouts only of the purpose of Local Plan evidence base and should not be used for planning application purposes.

1:1000 @ A3



Key

Site ownership

Area allocated to meet 5 Year Need 2016-2021

Area allocated to meet 6-15 Year Need 2021-2031

Park

3.0 x 10.5m

Dotted line denotes 6m offset

Mobile (s)

3.7 x 12.2m

Dotted line denotes 6m offset

Touring

2.3 x 7.0m

Dotted line denotes 6m offset

Day Room

Day Room

6m roadway

6m roadway

Existing structure

Existing structure

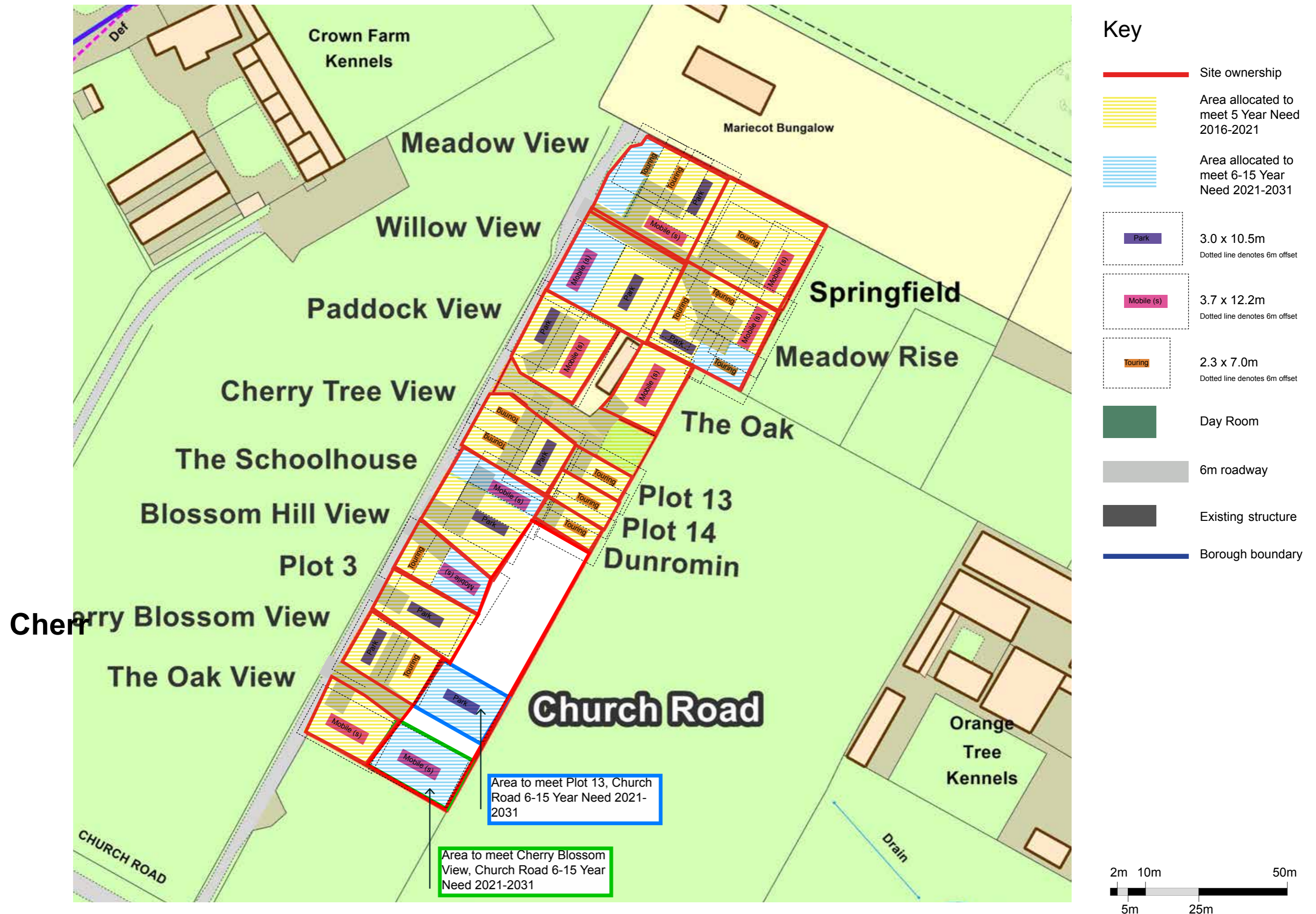
Borough boundary

Borough boundary

Ashlea View, Tomkyns Lane

These are indicative layouts only of the purpose of Local Plan evidence base and should not be used for planning application purposes.

1:1000 @ A3



Church Road sites

These are indicative layouts only of the purpose of Local Plan evidence base and should not be used for planning application purposes.

1:1000 @ A3



Key

Site ownership

Area allocated to meet 5 Year Need 2016-2021

Area allocated to meet 6-15 Year Need 2021-2031

Park

3.0 x 10.5m
Dotted line denotes 6m offset

Mobile (s)

3.7 x 12.2m
Dotted line denotes 6m offset

Touring

2.3 x 7.0m
Dotted line denotes 6m offset

Day Room

6m roadway

Existing structure

Borough boundary

Crow Lane (r/o 21)

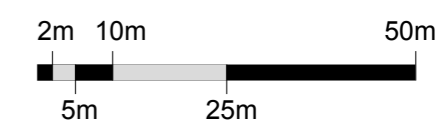
These are indicative layouts only of the purpose of Local Plan evidence base and should not be used for planning application purposes.

1:1000 @ A3



Key

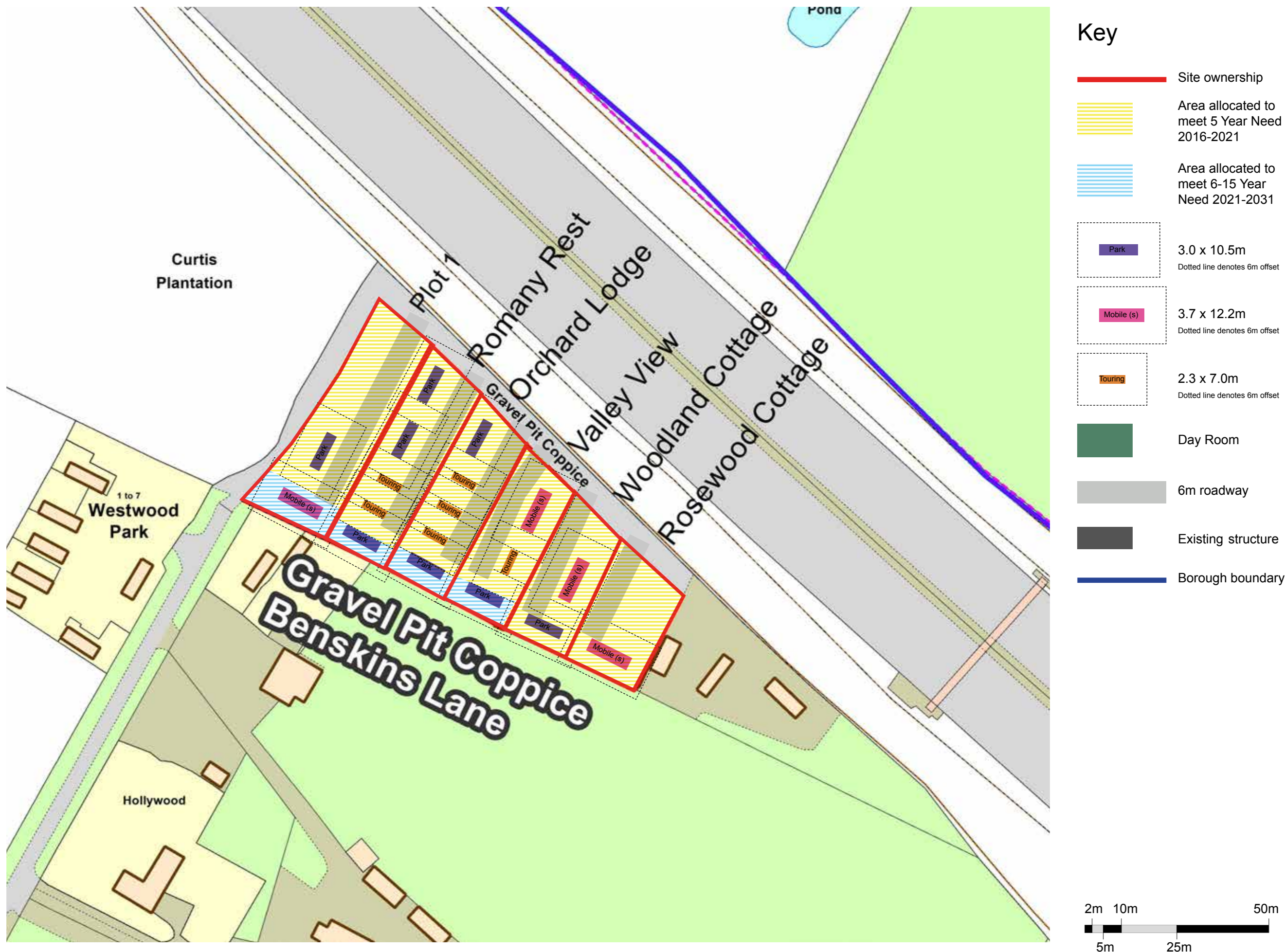
- Site ownership
- Area allocated to meet 5 Year Need 2016-2021
- Area allocated to meet 6-15 Year Need 2021-2031
- Park
3.0 x 10.5m
Dotted line denotes 6m offset
- Mobile (s)
3.7 x 12.2m
Dotted line denotes 6m offset
- Touring
2.3 x 7.0m
Dotted line denotes 6m offset
- Day Room
- 6m roadway
- Existing structure
- Borough boundary



Fairhills Rise, Hogbar Farm, Hogbar Farm East, Hogbar Farm West and Vinegar Hill, Lower Bedfords Road

These are indicative layouts only of the purpose of Local Plan evidence base and should not be used for planning application purposes.

1:1000 @ A3



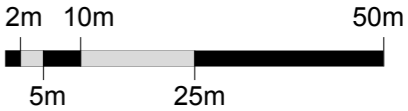
Gravel Pit Coppice sites, Benskins Lane

These are indicative layouts only of the purpose of Local Plan evidence base and should not be used for planning application purposes.



Key

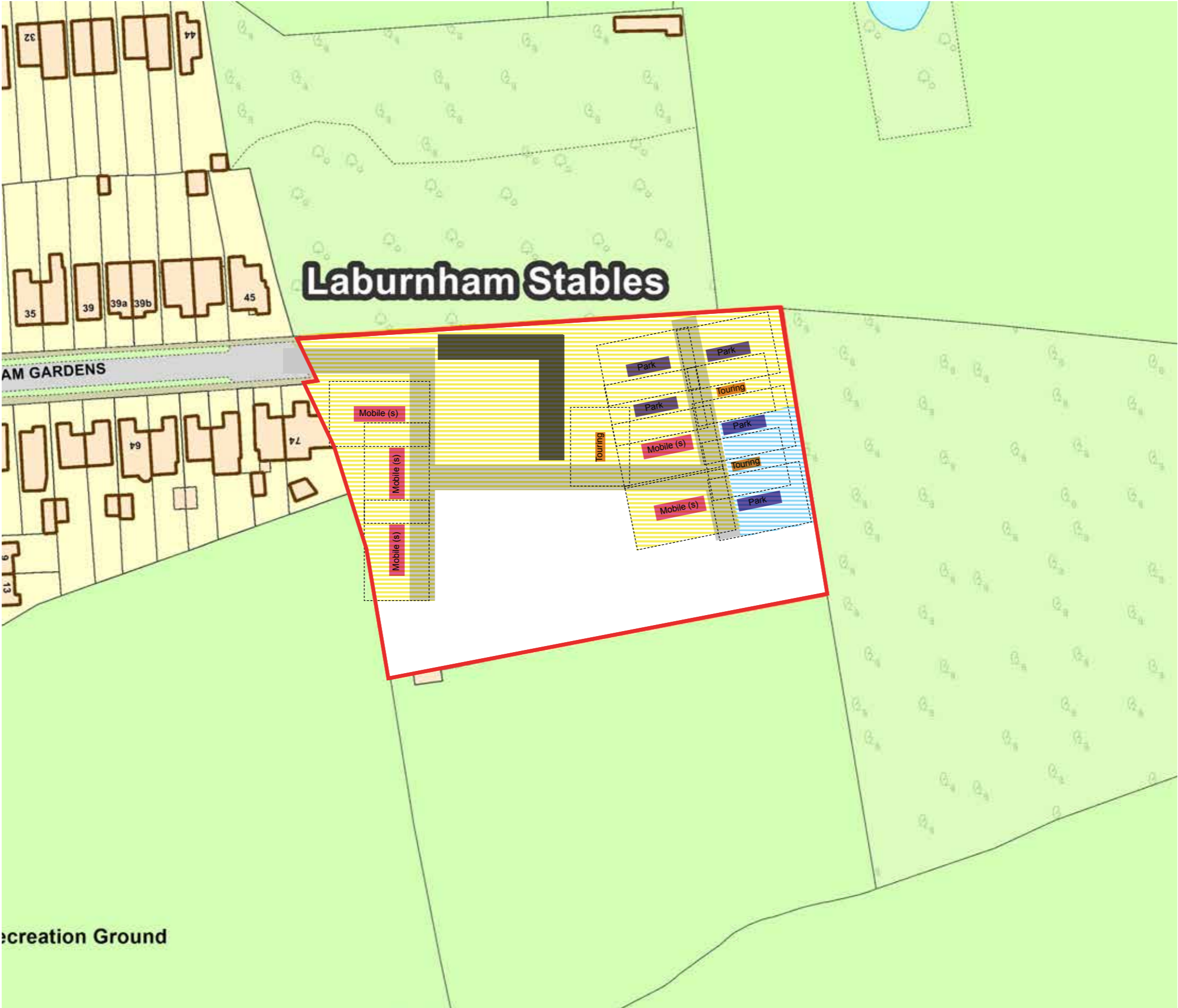
- Site ownership
- Area allocated to meet 5 Year Need 2016-2021
- Area allocated to meet 6-15 Year Need 2021-2031
- Park 3.0 x 10.5m
Dotted line denotes 6m offset
- Mobile (s) 3.7 x 12.2m
Dotted line denotes 6m offset
- Touring 2.3 x 7.0m
Dotted line denotes 6m offset
- Day Room
- 6m roadway
- Existing structure
- Borough boundary



Haunted House Woods, 102 St John’s Road

These are indicative layouts only of the purpose of Local Plan evidence base and should not be used for planning application purposes.

1:1000 @ A3



Key

- Site ownership
- Area allocated to meet 5 Year Need 2016-2021
- Area allocated to meet 6-15 Year Need 2021-2031
- Park

3.0 x 10.5m

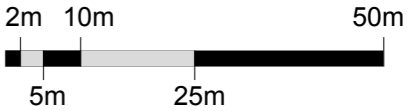
Dotted line denotes 6m offset
- Mobile (s)

3.7 x 12.2m

Dotted line denotes 6m offset
- Touring

2.3 x 7.0m

Dotted line denotes 6m offset
- Day Room
- 6m roadway
- Existing structure
- Borough boundary



Laburnum Stables

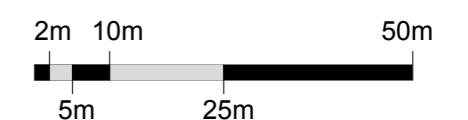
These are indicative layouts only of the purpose of Local Plan evidence base and should not be used for planning application purposes.

1:1000 @ A3



Key

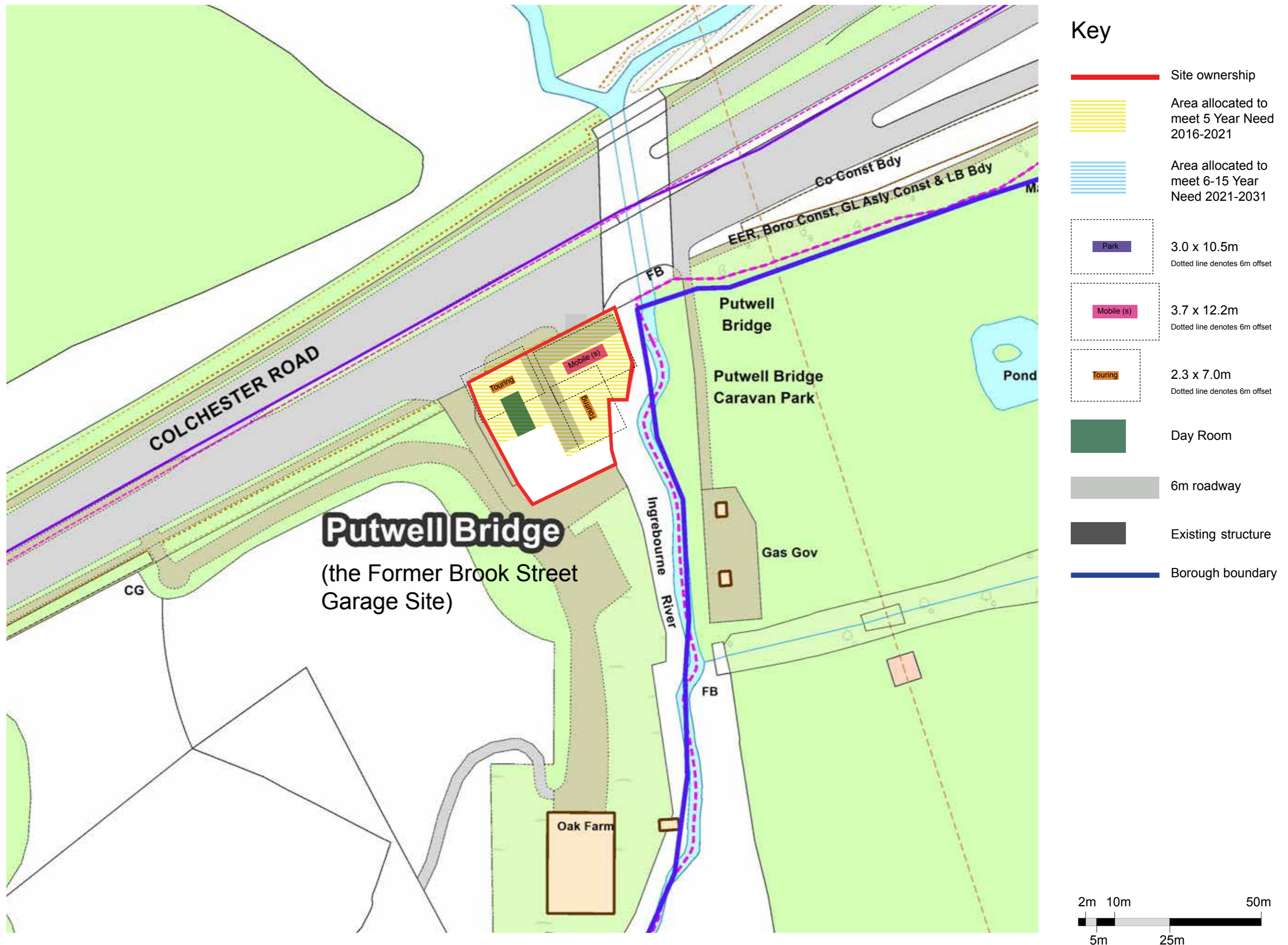
- Site ownership
- Area allocated to meet 5 Year Need 2016-2021
- Area allocated to meet 6-15 Year Need 2021-2031
- Park 3.0 x 10.5m
Dotted line denotes 6m offset
- Mobile (s) 3.7 x 12.2m
Dotted line denotes 6m offset
- Touring 2.3 x 7.0m
Dotted line denotes 6m offset
- Day Room
- 6m roadway
- Existing structure
- Borough boundary



Railway Sidings, Ockendon Road

These are indicative layouts only of the purpose of Local Plan evidence base and should not be used for planning application purposes.

1:1000 @ A3



Putwell Bridge (the Former Brook Street Garage Site)

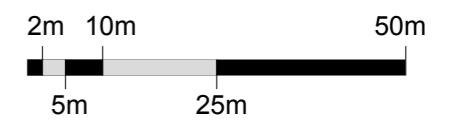
These are indicative layouts only of the purpose of Local Plan evidence base and should not be used for planning application purposes.

1:1000 @ A3



Key

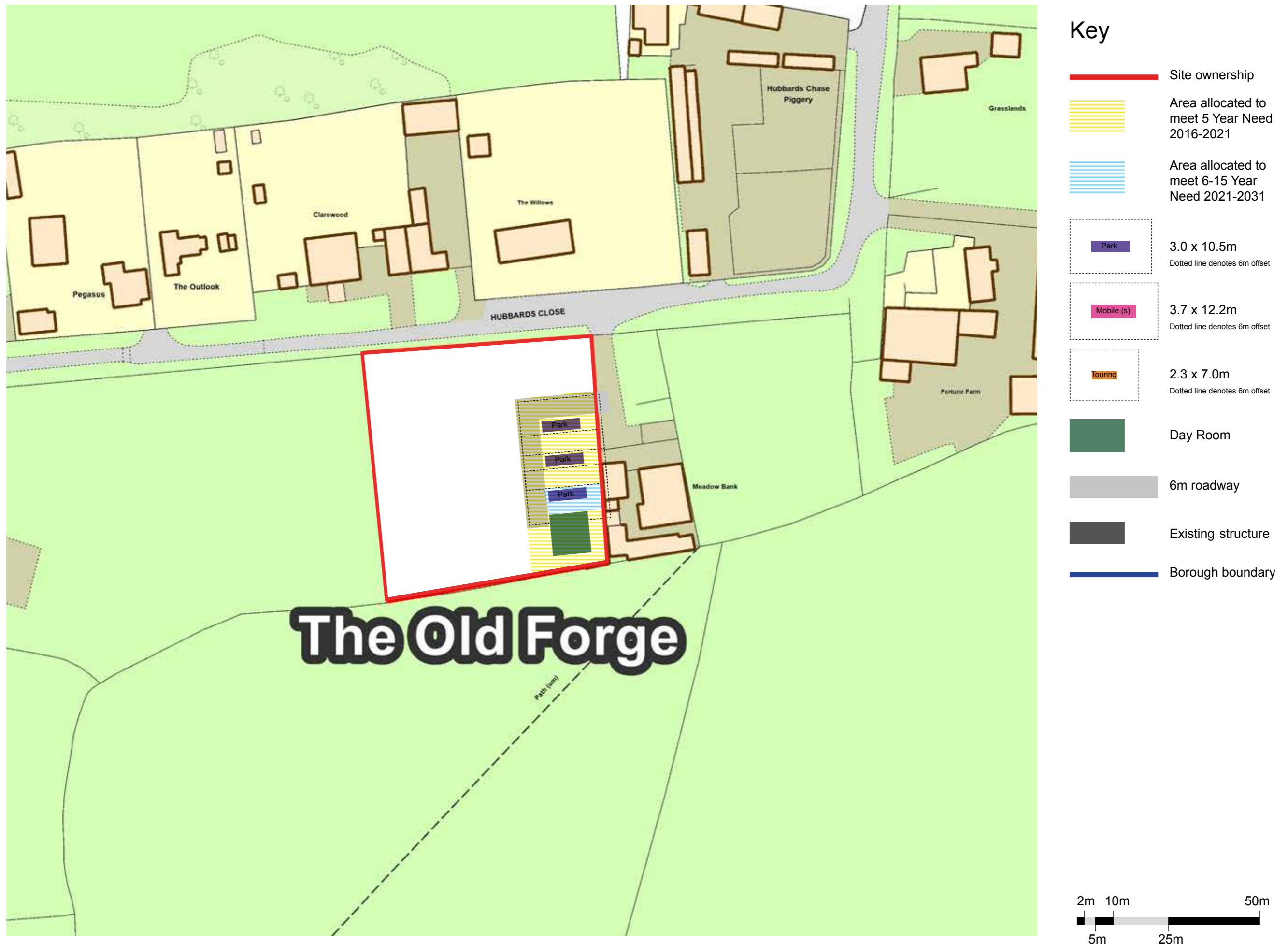
- Site ownership
- ▨ Area allocated to meet 5 Year Need 2016-2021
- ▨ Area allocated to meet 6-15 Year Need 2021-2031
- Park 3.0 x 10.5m
Dotted line denotes 6m offset
- Mobile (s) 3.7 x 12.2m
Dotted line denotes 6m offset
- Touring 2.3 x 7.0m
Dotted line denotes 6m offset
- Day Room
- 6m roadway
- Existing structure
- Borough boundary



The Grove, The Track, Prospect Road

These are indicative layouts only of the purpose of Local Plan evidence base and should not be used for planning application purposes.

1:1000 @ A3



The Old Forge, Hubbards Close

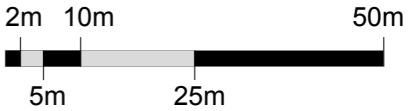
These are indicative layouts only of the purpose of Local Plan evidence base and should not be used for planning application purposes.

1:1000 @ A3



Key

- Site ownership
- Area allocated to meet 5 Year Need 2016-2021
- Area allocated to meet 6-15 Year Need 2021-2031
- Park 3.0 x 10.5m
Dotted line denotes 6m offset
- Mobile (s) 3.7 x 12.2m
Dotted line denotes 6m offset
- Touring 2.3 x 7.0m
Dotted line denotes 6m offset
- Day Room
- 6m roadway
- Existing structure
- Borough boundary



Tyas Stud Farm

These are indicative layouts only of the purpose of Local Plan evidence base and should not be used for planning application purposes.

1:1000 @ A3

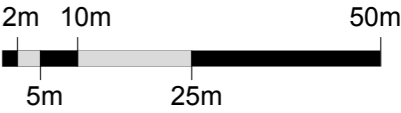


Key

- Site ownership
- Area allocated to meet 5 Year Need 2016-2021
- Area allocated to meet 6-15 Year Need 2021-2031
- Park 3.0 x 10.5m
Dotted line denotes 6m offset
- Mobile (s) 3.7 x 12.2m
Dotted line denotes 6m offset
- Touring 2.3 x 7.0m
Dotted line denotes 6m offset
- Day Room
- 6m roadway
- Existing structure
- Borough boundary

Willow Tree Lodge, Brookmans Park Drive

These are indicative layouts only of the purpose of Local Plan evidence base and should not be used for planning application purposes.



1:1000 @ A3

Gypsy & Traveller Site Allocations

Site Layouts

Page 607

This page is intentionally left blank

Havering Cabinet Meeting on August 5 2020

Item to be approved for Havering Local Plan Main Modifications Public Consultation

Pitch Deliverability Assessments (Matrixs) (February 2019)

August 2020




Examination into the Havering Local Plan 2016 - 2031

Document for Public Consultation alongside the Proposed Main Modifications

Pitch Deliverability Assessment (Matrices) (February 2019)


August 2020

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA16
Site name and address	Ashlea View, Tomkyns Lane, RM14 1TP
Site plan	
Site planning status	Unauthorised
Planning history	P1705.10 – 3 static, 1 tourer – expired 30 June 2013
GTAA 2019 pitch number	5
GTAA 2019 planning definition status	5 households met the planning definition
Additional current and future needs	6
Total pitch need 2016-2021	5 – 5 x unauthorised
Total pitch need 2021-2031	1 – 1 x new household formation
Site area	2.3ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and	No


storm water drainage	
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	Yes
Impact of site on local character and amenity	Low impact. Residential development on the site is set back from Tomkyns Lane, is screened by vegetation and has a low impact on the local character, appearance and general openness of the area.
Impact of site on amenity of local residents	Low impact. Sporadic residential development along Tomkyns Lane and no adjoining properties.
Site can provide visual and acoustic privacy	The residential area is set back from Tomkyns Lane and provides visual and acoustic privacy.
Environmental concerns	No known issues.
Constraints on design and layout of the site	The residential area should be located at the end of the driveway (as current) in order to maintain the character, openness and visual amenity of the area.
Could the site meet current and future need?	Yes
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	Yes
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes – Site owners have plenty of room to accommodate their current and future needs. If granted planning permission, they would construct a proper access road and invest money on the site.

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA14
Site name and address	Blossom Hill View, Church Road
Site plan	
Site planning status	Unauthorised
Planning history	Appeal dismissed 27 Mar 2008. Several plots.
GTAA 2019 pitch number	1
GTAA 2019 planning definition status	Household met the planning definition
Additional current and future needs	2
Total pitch need 2016-2021	1 – 1 x unauthorised
Total pitch need 2021-2031	1 – 1 x new household formation
Site area	0.05ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No


Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	No
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	Yes
Impact of site on local character and amenity	Medium Impact. The northern part of this site has a low impact as the site is not immediately visible from all public areas and is situated some distance from Church Road. The southern part of this site has a higher impact as it extends the site towards Church Road, from where it is most visible.
Impact of site on amenity of local residents	Low – medium impact. There are a number of residential properties on Benskins Lane to the east and Crown Farm Kennels to the north.
Site can provide visual and acoustic privacy	Varied - some fencing provides visual and some acoustic privacy.
Environmental concerns	No known issues.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required.
Could the site meet current and future need?	Yes, there is space for additional pitches.
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	Yes
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes. The occupants of this pitch are willing to take forward the planning application and are able to co-ordinate their resources to implement a landscaping/layout scheme to improve the visual appearance of the site and necessary improvements to the access roadway.


Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA
Site name and address	Plot 14, Church Road
Site plan	
Site planning status	Unauthorised
Planning history	None
GTAA 2019 pitch number	1
GTAA 2019 planning definition status	Household met the planning definition
Additional current and future needs	1
Total pitch need 2016-2021	1 x unauthorised
Total pitch need 2021-2031	0
Site area	0.01ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No

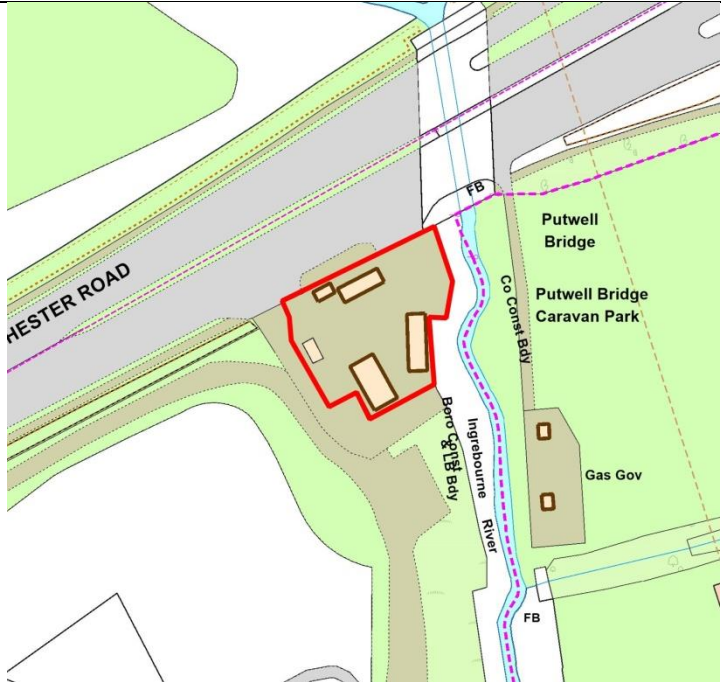
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	No
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	Yes
Impact of site on local character and amenity	Medium Impact. The northern part of this site has a low impact as the site is not immediately visible from all public areas and is situated some distance from Church Road. The southern part of this site has a higher impact as it extends the site towards Church Road, from where it is most visible.
Impact of site on amenity of local residents	Low – medium impact. There are a number of residential properties on Benskins Lane to the east and Crown Farm Kennels to the north.
Site can provide visual and acoustic privacy	Varied - some fencing provides visual and some acoustic privacy.
Environmental concerns	No known issues.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required.
Could the site meet current and future need?	Yes.
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	n/a
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes. The occupants of this pitch are willing to take forward the planning application and are able to co-ordinate their resources to implement a landscaping/layout scheme to improve the visual appearance of the site and necessary improvements to the access roadway.

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA25
Site name and address	Crow Lane (r/o 24)
Site plan	
Site planning status	Tolerated
Planning history	Lawful – 4 caravans
GTAA 2019 pitch number	4
GTAA 2019 planning definition status	Households undetermined – 4 x refusals
Additional current and future needs	1
Total pitch need 2016-2021	0
Total pitch need 2021-2031	1 x new household formation, undetermined
Site area	0.06ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	No
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	No
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes


Public transport route within 800m	Yes
Impact of site on local character and amenity	Low impact - industrial use to the north of the site.
Impact of site on amenity of local residents	Low impact - mixed residential and industrial use along Crow Lane.
Site can provide visual and acoustic privacy	Unsure – not visible from Crow Lane but visible from adjacent homes.
Environmental concerns	No known issues.
Constraints on design and layout of the site	<p>Site is currently very intensively occupied with no apparent room for additional accommodation and few options for reconfiguration.</p> 
Could the site meet current and future need?	Unlikely
Could the site only meet current need?	Yes – provided the current configuration is viable.
Can the configuration of the site be altered to meet future need?	Unlikely – no space for further accommodation. 3 showman's caravans and 2 tourers on site.
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	No contact with residents as they refused to be interviewed.

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA30
Site name and address	The Caravan Park, Putwell Bridge (Former Brook Street Service Station)
Site plan	
Site planning status	Unauthorised
Planning history	Appeal Allowed 22 Mar 2011 6 caravans (max 2 static) – expired 22 Mar 2016
GTAA 2019 pitch number	4
GTAA 2019 planning definition status	2 households met the planning definition. 2 households did not meet the planning definition.
Additional current and future needs	7 - 3 from households that met the planning definition and 4 from households that did not meet the planning definition.
Total pitch need 2016-2021	3 from households that met the planning definition – 2 x unauthorised, 1 x 5-year need. 2 from households that did not meet the planning definition – 2 x unauthorised.
Total pitch need 2021-2031	2 from households that did not meet the planning definition – 2 x new household formation.
Site area	0.04ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	Yes
Contaminated land	Yes
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity	Yes


available or accessible	
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	No
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	No
Shops within 2km	Yes
Public transport route within 800m	Yes
Impact of site on local character and amenity	Low impact, site set well away from the road and residential properties and as such, has low impact on the local character, appearance and general openness of the area.
Impact of site on amenity of local residents	Low impact owing to the distance between the location of accommodation on the site and the nearest residential properties which are some distance away.
Site can provide visual and acoustic privacy	Yes. Fencing around site provides visual privacy. Some noise from the A12 but not significant.
Environmental concerns	Potential air quality and noise issues from the A12.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required.
Could the site meet current and future need?	Yes
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	Yes, mobile homes can be repositioned, a replacement dayroom can be built, and extra tourers accommodated.
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes. In addition to the existing land the owners have recently negotiated with the adjoining land owner to change the boundaries to create access for the new cemetery. This will provide additional land to the rear of the site.

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA14
Site name and address	Plot 13, Church Road
Site plan	
Site planning status	Unauthorised
Planning history	Appeal dismissed 27 Mar 2008. Several plots.
GTAA 2019 pitch number	1
GTAA 2019 planning definition status	Household met the planning definition
Additional current and future needs	2
Total pitch need 2016-2021	1 x unauthorised
Total pitch need 2021-2031	1 x new household formation
Site area	0.01ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No


Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	No
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	Yes
Impact of site on local character and amenity	Medium Impact. The northern part of this site has a low impact as the site is not immediately visible from all public areas and is situated some distance from Church Road. The southern part of this site has a higher impact as it extends the site towards Church Road, from where it is most visible.
Impact of site on amenity of local residents	Low – medium impact. There are a number of residential properties on Benskins Lane to the east and Crown Farm Kennels to the north.
Site can provide visual and acoustic privacy	Varied - some fencing provides visual and some acoustic privacy.
Environmental concerns	No known issues.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required.
Could the site meet current and future need?	Yes. Additional land available for extra pitches.
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	n/a
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes. The occupants of this pitch are willing to take forward the planning application and are able to co-ordinate their resources to implement a landscaping/layout scheme to improve the visual appearance of the site and necessary improvements to the access roadway.

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA14
Site name and address	Cherry Blossom View, Church Road
Site plan	
Site planning status	Unauthorised
Planning history	Appeal dismissed 27 Mar 2008
GTAA 2019 pitch number	1
GTAA 2019 planning definition status	Household met the planning definition
Additional current and future needs	3
Total pitch need 2016-2021	2 – 1 x unauthorised, 1 x 5-year need
Total pitch need 2021-2031	1 x new household formation
Site area	0.03ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No


Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	No
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	Yes
Impact of site on local character and amenity	Medium Impact. The northern part of this site has a low impact as the site is not immediately visible from all public areas and is situated some distance from Church Road. The southern part of this site has a higher impact as it extends the site towards Church Road, from where it is most visible.
Impact of site on amenity of local residents	Low – medium impact. There are a number of residential properties on Benskins Lane to the east and Crown Farm Kennels to the north.
Site can provide visual and acoustic privacy	Varied - some fencing provides visual and some acoustic privacy
Environmental concerns	No known issues.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required.
Could the site meet current and future need?	Yes, there is space for additional pitches.
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	Yes
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes. The occupants of this pitch are willing to take forward the planning application and are able to co-ordinate their resources to implement a landscaping/layout scheme to improve the visual appearance of the site and necessary improvements to the access roadway.

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA14
Site name and address	Cherry Tree View, Church Road
Site plan	
Site planning status	Unauthorised
Planning history	Appeal dismissed 27 Mar 2008
GTAA 2019 pitch number	1
GTAA 2019 planning definition status	Household met the planning definition
Additional current and future needs	3
Total pitch need 2016-2021	3 – 1 x unauthorised, 1 x doubled-up, 1 x 5-year need
Total pitch need 2021-2031	0
Site area	0.04ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No


Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	No
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	Yes
Impact of site on local character and amenity	Medium Impact. The northern part of this site has a low impact as the site is not immediately visible from all public areas and is situated some distance from Church Road. The southern part of this site has a higher impact as it extends the site towards Church Road, from where it is most visible.
Impact of site on amenity of local residents	Low – medium impact. There are a number of residential properties on Benskins Lane to the east and Crown Farm Kennels to the north.
Site can provide visual and acoustic privacy	Varied - some fencing provides visual and some acoustic privacy.
Environmental concerns	No known issues.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required.
Could the site meet current and future need?	Yes, additional space available for extra pitches.
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	Yes
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes. The occupants of this pitch are willing to take forward the planning application and are able to co-ordinate their resources to implement a landscaping/layout scheme to improve the visual appearance of the site and necessary improvements to the access roadway.

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA12
Site name and address	Willow View, Church Road
Site plan	
Site planning status	Unauthorised
Planning history	P0940.09. Expired 8 October 2012
GTAA 2019 pitch number	1
GTAA 2019 planning definition status	Household met the planning definition.
Additional current and future needs	2
Total pitch need 2016-2021	1 x unauthorised
Total pitch need 2021-2031	1 x new household formation
Site area	0.02ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	No


Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	Yes
Impact of site on local character and amenity	Medium impact. The northern part of this site has a low impact as the site is not immediately visible from all public areas and is situated some distance from Church Road. The southern part of this site has a higher impact as it extends the site towards Church Road, from where it is most visible.
Impact of site on amenity of local residents	Low – medium impact. There are a number of residential properties on Benskins Lane to the east and Crown Farm Kennels to the north west.
Site can provide visual and acoustic privacy	Varied - some fencing provides visual and some acoustic privacy.
Environmental concerns	No known issues.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required.
Could the site meet current and future need?	Yes. Additional land available for extra pitches.
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	Yes.
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes. The occupants of this pitch are willing to take forward the planning application and are able to co-ordinate their resources to implement a landscaping/layout scheme to improve the visual appearance of the site and necessary improvements to the access roadway.

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA14
Site name and address	Plot 3, Church Road
Site plan	
Site planning status	Unauthorised
Planning history	Appeal dismissed 27 Mar 2008. Several plots.
GTAA 2019 pitch number	1
GTAA 2019 planning definition status	Household met the planning definition
Additional current and future needs	1
Total pitch need 2016-2021	1 x unauthorised
Total pitch need 2021-2031	0
Site area	0.02ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No


Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	No
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	Yes
Impact of site on local character and amenity	Medium Impact. The northern part of this site has a low impact as the site is not immediately visible from all public areas and is situated some distance from Church Road. The southern part of this site has a higher impact as it extends the site towards Church Road, from where it is most visible.
Impact of site on amenity of local residents	Low – medium impact. There are a number of residential properties on Benskins Lane to the east and Crown Farm Kennels to the north.
Site can provide visual and acoustic privacy	Varied - some fencing provides visual and some acoustic privacy.
Environmental concerns	No known issues.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required.
Could the site meet current and future need?	Yes
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	n/a
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes. The occupants of this pitch are willing to take forward the planning application and are able to co-ordinate their resources to implement a landscaping/layout scheme to improve the visual appearance of the site and necessary improvements to the access roadway.

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA25
Site name and address	Crow Lane (r/o 21), RM7 0EL
Site plan	
Site planning status	Tolerated
Planning history	Lawful – 2 mobile homes
GTAA 2019 pitch number	1
GTAA 2019 planning definition status	Household met the planning definition
Additional current and future needs	4
Total pitch need 2016-2021	2 x 5-year need
Total pitch need 2021-2031	2 x new household formation
Site area	0.07ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	Yes
Access to highway network	Yes


Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	Yes
Impact of site on local character and amenity	Low impact - similar accommodation to the east of the site
Impact of site on amenity of local residents	Low impact – site has been occupied for over 40 years.
Site can provide visual and acoustic privacy	Fenced and visually unobtrusive
Environmental concerns	None
Constraints on design and layout of the site	None
Could the site meet current and future need?	Yes
Could the site only meet current need?	-
Can the configuration of the site be altered to meet future need?	Yes
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA14
Site name and address	Dunromin, Church Road
Site plan	
Site planning status	Unauthorised
Planning history	None
GTAA 2019 pitch number	1
GTAA 2019 planning definition status	Household met the planning definition
Additional current and future needs	1
Total pitch need 2016-2021	1 x unauthorised
Total pitch need 2021-2031	
Site area	0.03ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No


Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	No
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	Yes
Impact of site on local character and amenity	Medium Impact. The northern part of this site has a low impact as the site is not immediately visible from all public areas and is situated some distance from Church Road. The southern part of this site has a higher impact as it extends the site towards Church Road, from where it is most visible.
Impact of site on amenity of local residents	Low – medium impact. There are a number of residential properties on Benskins Lane to the east and Crown Farm Kennels to the north.
Site can provide visual and acoustic privacy	Varied - some fencing provides visual and some acoustic privacy.
Environmental concerns	No known issues.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required.
Could the site meet current and future need?	Yes.
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	n/a
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes. The occupants of this pitch are willing to take forward the planning application and are able to co-ordinate their resources to implement a landscaping/layout scheme to improve the visual appearance of the site and necessary improvements to the access roadway.

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA19
Site name and address	Fairhill Rise, Lower Bedfords Road
Site plan	
Site planning status	Unauthorised
Planning history	Appeal allowed 10 August 2007 for 5 caravans (max 3 static), expired 10 August 2012
GTAA 2019 pitch number	4
GTAA 2019 planning definition status	1 household met planning definition, 3 households did not meet planning definition
Additional current and future needs	9
Total pitch need 2016-2021	3 for households that met the planning definition – 1 x unauthorised, 2 x 5-year need. 4 for households that did not meet the planning definition – 3 x unauthorised, 1 x 5-year need.
Total pitch need 2021-2031	2 x new household formation from households that did not meet the planning definition.
Site area	0.1ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No
Within high pressure gas pipeline	No


safeguarding zone	
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	No
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	Yes
Impact of site on local character and amenity	Low impact. Site forms a narrow wedge of land that is mostly contained by existing development to the south and east. As such, the visual impact and encroachment into the Green Belt is limited.
Impact of site on amenity of local residents	Low impact on the residents of Stanwyck Gardens owing to the distance between the location of accommodation on the site and the rear of the residential properties. Noise from site residents no different to neighbouring houses.
Site can provide visual and acoustic privacy	Yes. Fencing around the site provides visual and acoustic privacy.
Environmental concerns	No known issues.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required.
Could the site meet current and future need?	Yes – subject to potential reconfiguration of the site.
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	Yes
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Unable to discuss with site residents following a recent police raid on the site. However the outcomes of the initial site interview indicated that the owner was very keen to obtain planning consent in order to construct a dayroom.

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA18
Site name and address	Pitch 1, Gravel Pit Coppice, Benskins Lane
Site plan	
Site planning status	Unauthorised
Planning history	P0405.15 – 6 plots. Expired 18 Feb 2019
GTAA 2019 pitch number	1
GTAA 2019 planning definition status	Household met the planning definition
Additional current and future needs	2
Total pitch need 2016-2021	1 x unauthorised
Total pitch need 2021-2031	1 x new household formation
Site area	0.1ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and	No


storm water drainage	
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	No (1.4km's)
Impact of site on local character and amenity	Medium impact. Mature woodland cut down to enable development of this site and others and as such, development of the sites has had a high impact on the rural character and wooded appearance of the area and the erosion of the openness of the Green Belt.
Impact of site on amenity of local residents	Low impact. Sporadic residential development along Benskins Lane and no adjoining properties.
Site can provide visual and acoustic privacy	Each of the six sites is enclosed by fencing which affords visual and acoustic privacy.
Environmental concerns	Potential air quality and noise issues from M25.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required.
Could the site meet current and future need?	Yes
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	Yes
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA18
Site name and address	Romany Rest, Gravel Pit Coppice, Benskins Lane
Site plan	
Site planning status	Unauthorised
Planning history	P0405.15 – 6 plots. Expired 18 Feb 2019
GTAA 2019 pitch number	1
GTAA 2019 planning definition status	Household met the planning definition.
Additional current and future needs	5
Total pitch need 2016-2021	4 – 1 x unauthorised, 1 x doubled-up, 2 x 5-year
Total pitch need 2021-2031	1 x new household formation
Site area	0.1ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and	No


storm water drainage	
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	No (1.4km's)
Impact of site on local character and amenity	Medium impact. Mature woodland cut down to enable development of this site and others and as such, development of the sites has had a high impact on the rural character and wooded appearance of the area and the erosion of the openness of the Green Belt.
Impact of site on amenity of local residents	Low impact. Sporadic residential development along Benskins Lane and no adjoining properties.
Site can provide visual and acoustic privacy	Each of the six sites is enclosed by fencing which affords visual and acoustic privacy.
Environmental concerns	Potential air quality and noise issues from M25.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required.
Could the site meet current and future need?	Yes
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	n/a
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA18
Site name and address	Rosewood Cottage, Gravel Pit Coppice, Benskins Lane
Site plan	
Site planning status	Unauthorised
Planning history	P0405.15 – 6 plots. Expired 18 Feb 2019
GTAA 2019 pitch number	1
GTAA 2019 planning definition status	Household met the planning definition.
Additional current and future needs	1
Total pitch need 2016-2021	1 x unauthorised
Total pitch need 2021-2031	0
Site area	0.1ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and	No


storm water drainage	
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	No
Impact of site on local character and amenity	Medium impact. Mature woodland cut down to enable development of this site and others and as such, development of the sites has had a high impact on the rural character and wooded appearance of the area and the erosion of the openness of the Green Belt.
Impact of site on amenity of local residents	Low impact. Sporadic residential development along Benskins Lane and no adjoining properties.
Site can provide visual and acoustic privacy	Each of the six sites is enclosed by fencing which affords visual and acoustic privacy.
Environmental concerns	Potential air quality and noise issues from M25.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required.
Could the site meet current and future need?	Yes
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	n/a
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA18
Site name and address	Valley View, Gravel Pit Coppice, Benskins Lane
Site plan	
Site planning status	Unauthorised
Planning history	P0405.15 – 6 plots. Expired 18 Feb 2019.
GTAA 2019 pitch number	1
GTAA 2019 planning definition status	Household met the planning definition.
Additional current and future needs	3
Total pitch need 2016-2021	1 x unauthorised, 1 x doubled-up
Total pitch need 2021-2031	1 x new household formation
Site area	0.1ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and	No


storm water drainage	
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	No
Impact of site on local character and amenity	Medium impact. Mature woodland cut down to enable development of this site and others and as such, development of the sites has had a high impact on the rural character and wooded appearance of the area and the erosion of the openness of the Green Belt.
Impact of site on amenity of local residents	Low impact. Sporadic residential development along Benskins Lane and no adjoining properties.
Site can provide visual and acoustic privacy	Each of the six sites is enclosed by fencing which affords visual and acoustic privacy.
Environmental concerns	Potential air quality and noise issues from M25.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required.
Could the site meet current and future need?	Yes
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	Yes
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA18
Site name and address	Woodland Cottage, Gravel Pit Coppice, Benskins Lane
Site plan	
Site planning status	Unauthorised
Planning history	P0405.15 – 6 plots. Expired 18 Feb 2019
GTAA 2019 pitch number	1
GTAA 2019 planning definition status	Household met the planning definition.
Additional current and future needs	2
Total pitch need 2016-2021	1 x unauthorised, 1 x doubled-up
Total pitch need 2021-2031	0
Site area	0.1ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and	No


storm water drainage	
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	No (1.4km's)
Impact of site on local character and amenity	Medium impact. Mature woodland cut down to enable development of this site and others and as such, development of the sites has had a high impact on the rural character and wooded appearance of the area and the erosion of the openness of the Green Belt.
Impact of site on amenity of local residents	Low impact. Sporadic residential development along Benskins Lane and no adjoining properties.
Site can provide visual and acoustic privacy	Each of the six sites is enclosed by fencing which affords visual and acoustic privacy.
Environmental concerns	Potential air quality and noise issues from M25.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required.
Could the site meet current and future need?	Yes
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	Yes
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA18
Site name and address	Orchard Lodge, Gravel Pit Coppice, Benskins Lane
Site plan	
Site planning status	Unauthorised
Planning history	P0405.15 – 6 plots. Expired 18 Feb 2019
GTAA 2019 pitch number	1
GTAA 2019 planning definition status	Household met the planning definition
Additional current and future needs	5
Total pitch need 2016-2021	4 – 1 x unauthorised, 1 x doubled-up, 2 x 5-year
Total pitch need 2021-2031	1 x new household formation
Site area	0.1ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and	No



storm water drainage	
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	No
Impact of site on local character and amenity	Medium impact. Mature woodland cut down to enable development of this site and others and as such, development of the sites has had a high impact on the rural character and wooded appearance of the area and the erosion of the openness of the Green Belt.
Impact of site on amenity of local residents	Low impact. Sporadic residential development along Benskins Lane and no adjoining properties.
Site can provide visual and acoustic privacy	Each of the six sites is enclosed by fencing which affords visual and acoustic privacy.
Environmental concerns	Potential air quality and noise issues from M25.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required.
Could the site meet current and future need?	Yes
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	Yes. A mix of statics and tourers can be accommodated.
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA28
Site name and address	Haunted House Wood, 102 St. Johns Road
Site plan	
Site planning status	Private
Planning history	P1428.99 – Appeal allowed for 1 Mobile
GTAA 2019 pitch number	3
GTAA 2019 planning definition status	1 household did not meet planning definition 3 households are undetermined as there was insufficient proxy interview data to determine planning status
Additional current and future needs	2
Total pitch need 2016-2021	1 x 5-year need
Total pitch need 2021-2031	1 x new household formation
Site area	1.7ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	Yes
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes

Public transport route within 800m	Yes
Impact of site on local character and amenity	Low impact – screened from residents on St. John's Road/Kingshill Avenue.
Impact of site on amenity of local residents	Low impact – Well screened from residents on Kingshill Avenue – similar accommodation at rear of St. John's Road.
Site can provide visual and acoustic privacy	Well screened wooded site, well screened to the south and east of site.
Environmental concerns	None known.
Constraints on design and layout of the site	Space limited – possible fire safety issues. Registry plans show additional land to the rear which could be utilised.
Could the site meet current and future need?	Yes
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	Yes. Registry plans show additional land to the rear which could be utilised.
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Not discussed with owner.


Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA20
Site name and address	Hogbar Farm East, Lower Bedfords Road
Site plan	 <p>The site has now been split into Hogbar Farm East and Hogbar Farm with a new access to Hogbar Farm East.</p> 
Site planning status	Unauthorised
Planning history	P1937.11. 18 caravans (max. 13 static) – expired 30 April 2013.
GTAA 2019 pitch number	8
GTAA 2019 planning definition status	8 households met the planning definition
Additional current and future	12

needs	
Total pitch need 2016-2021	10 - 8 x unauthorised, 1 x doubled-up, 1 x 5-year need
Total pitch need 2021-2031	2 x new household formation
Site area	0.25ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	No
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	Yes
Impact of site on local character and amenity	Low impact. Site forms a narrow wedge of land that is mostly contained by existing development to the south and east. As such, the visual impact and encroachment into the Green Belt is limited.
Impact of site on amenity of local residents	Low – medium impact. The properties on Stanwyck Gardens are situated at a lower level to those on this site. However, this can be addressed through landscaping to the rear of the site. Noise from site residents no different to neighbouring houses.
Site can provide visual and acoustic privacy	Yes. Fencing around the site provides visual and acoustic privacy.
Environmental concerns	No known issues.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required.
Could the site meet current and future need?	Yes – subject to reconfiguration of the site.
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	Yes – subject to reconfiguration of the site. For example, fewer and smaller dayrooms/additional touring caravans instead of statics etc.
Are the residents in a position to take forward the planning application/deliver the site and	Unable to speak with residents due to a recent police raid.



intensification to meet planning conditions?	
--	--

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA09
Site name and address	Hogbar Farm West, Lower Bedfords Road
Site plan	
Site planning status	Unauthorised
Planning history	Appeal allowed 29 July 2015 4 caravans (max 2 static), expired 29 July 2018
GTAA 2019 pitch number	7
GTAA 2019 planning definition status	1 household met the planning definition. 6 did not meet the definition.
Additional current and future needs	10
Total pitch need 2016-2021	1 x unauthorised for households that met the planning definition. 6 x unauthorised for households that did not meet the planning definition.
Total pitch need 2021-2031	1 x new household formation for households that met the planning definition. 2 x new household formation for households that did not meet the planning definition.
Site area	0.2ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity	Yes

available or accessible	
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	No
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	Yes
Impact of site on local character and amenity	Low impact. Site forms a narrow wedge of land that is mostly contained by existing development to the south and east. As such, the visual impact and encroachment into the Green Belt is limited.
Impact of site on amenity of local residents	Low impact. Site is situated to the west of Stanwyck Gardens and does not border these residential properties.
Site can provide visual and acoustic privacy	Yes. Fencing and tree cover around the site provides visual and some acoustic privacy.
Environmental concerns	No known issues.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required. This includes boundary treatment onto Lower Bedfords Road.
Could the site meet current and future need?	Yes
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	Yes. Would be happy to build large dayroom and move mobile homes around. Children on site need place to play during bad weather.
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes

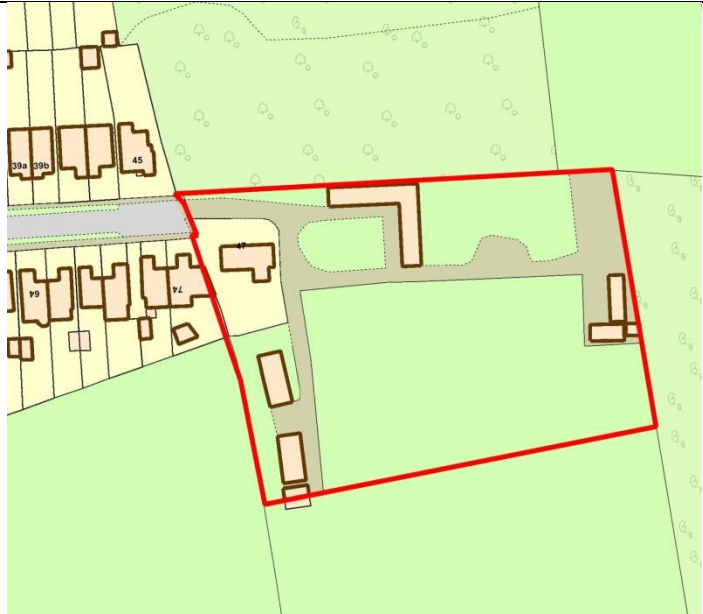
Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA
Site name and address	Hogbar Farm, Lower Bedfords Road
Site plan	 <p>The site has now been split into Hogbar Farm and Hogbar Farm East with a new access to Hogbar Farm East.</p> 
Site planning status	Unauthorised
Planning history	P1937.11. 18 caravans (max. 13 static) – expired 30 April 2013. Formerly part of Hogbar Farm East.
GTAA 2019 pitch number	11
GTAA 2019 planning definition status	6 households met planning definition. 5 households did not meet planning definition.

Additional current and future needs	21
Total pitch need 2016-2021	8 for households that met the planning definition – 6 x unauthorised, 2 x 5-year need. 8 for households that did not meet the planning definition – 5 x unauthorised, 2 x doubled-up, 1 x 5-year need.
Total pitch need 2021-2031	2 x new household formation for households that met the planning definition. 3 x new household formation for households that did not meet the planning definition.
Site area	0.2ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	No
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	Yes
Impact of site on local character and amenity	Low impact. Site forms a narrow wedge of land that is mostly contained by existing development to the south and east. As such, the visual impact and encroachment into the Green Belt is limited.
Impact of site on amenity of local residents	Low – medium impact. The properties on Stanwyck Gardens are situated at a lower level to those on this site. However, this can be addressed through landscaping to the rear of the site. Noise from site residents no different to neighbouring houses.
Site can provide visual and acoustic privacy	Yes. Fencing around the site provides visual and acoustic privacy.
Environmental concerns	No known issues.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required.
Could the site meet current and future need?	Potentially if the site layout were to be reconfigured.
Could the site only meet current	n/a


need?	
Can the configuration of the site be altered to meet future need?	Potentially if the site layout were to be reconfigured.
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Unable to discuss with the site owner due to police raid.

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA07
Site name and address	Laburnum Stables, RM14 1HX
Site plan	
Site planning status	Private (1)/Temporary (2)/Unauthorised (1)
Planning history	P1733.01 permanent permission for 1 pitch. P1266.14 temporary permission for 2 mobiles, expires 11 May 2020
GTAA 2019 pitch number	4
GTAA 2019 planning definition status	All households met the planning definition.
Additional current and future needs	13
Total pitch need 2016-2021	4 for households on the private pitch – 1 x doubled-up, 3 x 5-year need. 5 for households on the temporary pitch – 1 x temporary, 1 x doubled-up, 2 x 5-year need. 1 for households on the unauthorised pitch – 1 x unauthorised.
Total pitch need 2021-2031	2 x new household formation on the private pitch. 1 x new household formation on the temporary pitch.
Site area	4.0ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity	Yes


available or accessible	
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	Cannot confirm
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	No
Public transport route within 800m	Yes
Impact of site on local character and amenity	Well screened by hedging from public open space. Large wooded area to north of site.
Impact of site on amenity of local residents	Medium impact - Situated at the end of Laburnum Gardens. At present only the stables are visible from the road.
Site can provide visual and acoustic privacy	Yes – dense hedging and woodland to the north and west.
Environmental concerns	No known concerns.
Constraints on design and layout of the site	Proposed layout of residential area would be required to minimise effect on residents of Laburnum Gardens.
Could the site meet current and future need?	Yes
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	Yes – large site, mainly grassed paddock.
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA
Site name and address	Land East of Rosewood Cottage, Benskins Lane
Site plan	
Site planning status	Unauthorised
Planning history	Enforcement Notice 24 Jul 2017
GTAA 2019 pitch number	1
GTAA 2019 planning definition status	Household met the planning definition.
Additional current and future needs	6
Total pitch need 2016-2021	5 – 1 x unauthorised, 1 x doubled-up, 3 x 5-year need
Total pitch need 2021-2031	1 x new household formation
Site area	0.1ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	No


Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	No
Impact of site on local character and amenity	Medium impact. Mature woodland cut down to enable development of this site and others and as such, development of the sites has had a high impact on the rural character and wooded appearance of the area and the erosion of the openness of the Green Belt.
Impact of site on amenity of local residents	Low impact. Sporadic residential development along Benskins Lane.
Site can provide visual and acoustic privacy	Site could be enclosed by fencing which would afford visual and acoustic privacy.
Environmental concerns	Potential air quality and noise issues from M25.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required.
Could the site meet current and future need?	No – residents do not own the site and are the subject of an Eviction Order.
Could the site only meet current need?	No
Can the configuration of the site be altered to meet future need?	No
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	No – residents do not own the site and are the subject of an Eviction Order.

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA17
Site name and address	66-72 Lower Bedfords Road
Site plan	
Site planning status	Unauthorised
Planning history	Enforcement Notice Upheld 16 Feb 2000
GTAA 2019 pitch number	3
GTAA 2019 planning definition status	3 households did not meet the planning definition
Additional current and future needs	3
Total pitch need 2016-2021	3 – 3 x unauthorised
Total pitch need 2021-2031	0
Site area	0.06ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	No
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes


Public transport route within 800m	Yes
Impact of site on local character and amenity	Low impact. The site is currently vacant and flanked by large residential properties on both sides.
Impact of site on amenity of local residents	Low impact. Lower Bedfords Road contains a mix of residential/commercial uses.
Site can provide visual and acoustic privacy	Yes. Fencing and tree cover around the site provides visual and some acoustic privacy.
Environmental concerns	No known issues.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required. This includes boundary treatment onto Lower Bedfords Road.
Could the site meet current and future need?	Currently unoccupied.
Could the site only meet current need?	Site is capable of meeting the need for 3 households either in caravans or in bricks and mortar.
Can the configuration of the site be altered to meet future need?	Site is capable of meeting the need for 3 households either in caravans or in bricks and mortar.
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Site owners have stated they would like to build a bungalow on the land due to the family's various health conditions.

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA14
Site name and address	Meadow Rise, Church Road
Site plan	
Site planning status	Unauthorised
Planning history	P1355.14 – Expired 4 Dec 2017. P1930.17 – Not decided.
GTAA 2019 pitch number	4
GTAA 2019 planning definition status	Household met the planning definition
Additional current and future needs	5
Total pitch need 2016-2021	4 x unauthorised
Total pitch need 2021-2031	1 x new household formation
Site area	0.07ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	No
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes


Shops within 2km	Yes
Public transport route within 800m	Yes
Impact of site on local character and amenity	Medium Impact. The northern part of this site has a low impact as the site is not immediately visible from all public areas and is situated some distance from Church Road. The southern part of this site has a higher impact as it extends the site towards Church Road, from where it is most visible.
Impact of site on amenity of local residents	Low – medium impact. There are a number of residential properties on Benskins Lane to the east and Crown Farm Kennels to the north.
Site can provide visual and acoustic privacy	Varied - some fencing provides visual and some acoustic privacy.
Environmental concerns	No known issues.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required.
Could the site meet current and future need?	Yes. Additional land available for extra pitches.
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	Yes
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes. The occupants of this pitch are willing to take forward the planning application and are able to co-ordinate their resources to implement a landscaping/layout scheme to improve the visual appearance of the site and necessary improvements to the access roadway.

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA12
Site name and address	Meadow View, Church Road
Site plan	
Site planning status	Unauthorised
Planning history	P0940.09. 2 plots – expired 8 October 2012
GTAA 2019 pitch number	3
GTAA 2019 planning definition status	Households met the planning definition.
Additional current and future needs	4
Total pitch need 2016-2021	3 x unauthorised
Total pitch need 2021-2031	1 x new household formation
Site area	0.08ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	No

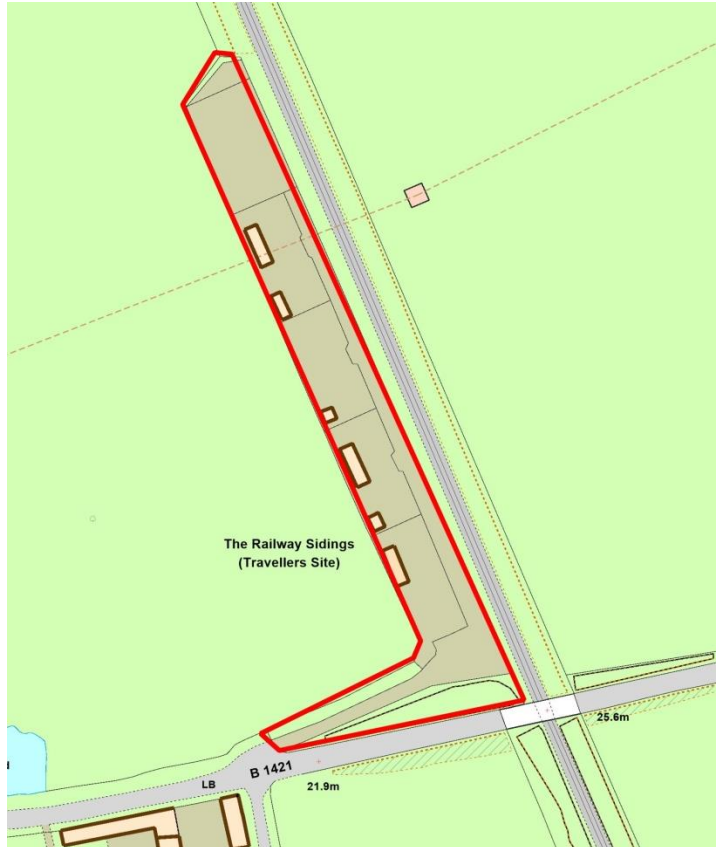
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	Yes
Impact of site on local character and amenity	Medium impact. The northern part of this site has a low impact as the site is not immediately visible from all public areas and is situated some distance from Church Road. The southern part of this site has a higher impact as it extends the site towards Church Road, from where it is most visible.
Impact of site on amenity of local residents	Low – medium impact. There are a number of residential properties on Benskins Lane to the east and Crown Farm Kennels to the north west.
Site can provide visual and acoustic privacy	Varied - some fencing provides visual and some acoustic privacy.
Environmental concerns	No known issues.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required.
Could the site meet current and future need?	Yes. Additional land is available for extra pitches.
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	Yes
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	The occupants of this pitch are willing to take forward the planning application and are able to co-ordinate their resources to implement a landscaping/layout scheme to improve the visual appearance of the site and necessary improvements to the access roadway.

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA14
Site name and address	Paddock View, Church Road
Site plan	
Site planning status	Unauthorised
Planning history	Appeal dismissed 27 Mar 2008. Several plots.
GTAA 2019 pitch number	2
GTAA 2019 planning definition status	2 households met the planning definition.
Additional current and future needs	2
Total pitch need 2016-2021	2 x unauthorised
Total pitch need 2021-2031	0
Site area	0.04ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No


Contaminated land	No
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	No
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	Yes
Impact of site on local character and amenity	Medium Impact. The northern part of this site has a low impact as the site is not immediately visible from all public areas and is situated some distance from Church Road. The southern part of this site has a higher impact as it extends the site towards Church Road, from where it is most visible.
Impact of site on amenity of local residents	Low – medium impact. There are a number of residential properties on Benskins Lane to the east and Crown Farm Kennels to the north.
Site can provide visual and acoustic privacy	Varied - some fencing provides visual and some acoustic privacy.
Environmental concerns	No known issues.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required.
Could the site meet current and future need?	Yes. Additional space available for extra pitches.
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	Yes
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes. The occupants of this pitch are willing to take forward the planning application and are able to co-ordinate their resources to implement a landscaping/layout scheme to improve the visual appearance of the site and necessary improvements to the access roadway.

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA31
Site name and address	Railway Sidings, North Ockendon
Site plan	
Site planning status	Private (2)/Temporary (3)
Planning history	P0905.17 permanent permission for 2 plots; P0950.17 temporary permission for 5 plots over whole site. Expires 4 August 2019
GTAA 2019 pitch number	5
GTAA 2019 planning definition status	3 households met planning definition. 2 households did not meet planning definition.
Additional current and future needs	18
Total pitch need 2016-2021	1 x doubled-up on private pitch met planning definition. 2 x temporary, 3 x doubled-up, 5 x 5-year need on temporary pitch met planning definition. 1 x temporary, 1 x doubled-up on temporary pitch did not meet planning definition.
Total pitch need 2021-2031	2 x new household formation on private pitch met planning definition. 2 x new household formation on temporary pitch met planning definition. 1 x new household formation on private pitch did not meet planning definition.
Site area	0.6ha

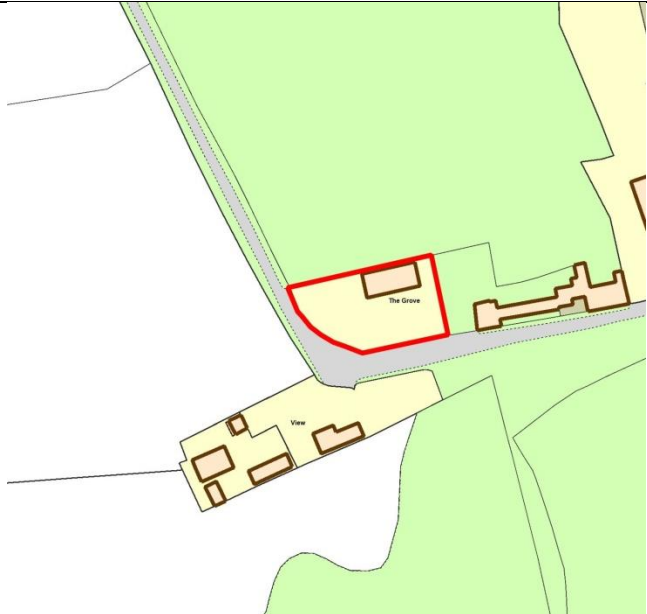
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI/SNCI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes – Private system
Provision for surface water and storm water drainage	Yes
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	No
Shops within 2km	No
Public transport route within 800m	Yes
Impact of site on local character and amenity	Minimal impact
Impact of site on amenity of local residents	Low impact
Site can provide visual and acoustic privacy	Only really visible from railway bridge well screened from railway by dense hedging. Farmer has agreed a hedge planting scheme to the western boundary.
Environmental concerns	No known issues.
Constraints on design and layout of the site	Network Rail. No encroachment onto railway embankment, low impact lighting. No discharge of water onto railway embankment.
Could the site meet current and future need?	Yes
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	Yes. Large spacious pitches can easily be sub-divided.
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes. Willing to agree an acceptable plan to meet planning conditions.

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA13
Site name and address	Springfield, off Church Road
Site plan	
Site planning status	Unauthorised
Planning history	P0997.12 – Expired 3 Sept 2014
GTAA 2019 pitch number	2
GTAA 2019 planning definition status	2 households met the planning definition
Additional current and future needs	2
Total pitch need 2016-2021	2 x unauthorised
Total pitch need 2021-2031	0
Site area	0.06ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	No
Access to highway network	Yes


Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	Yes
Impact of site on local character and amenity	Medium impact. The northern part of this site has a low impact as the site is not immediately visible from all public areas and is situated some distance from Church Road. The southern part of this site has a higher impact as it extends the site towards Church Road, from where it is most visible.
Impact of site on amenity of local residents	Low – medium impact. There are a number of residential properties on Benskins Lane to the east and Crown Farm kennels to the north west.
Site can provide visual and acoustic privacy	Varied – some fencing provides visual and some acoustic privacy.
Environmental concerns	No known issues.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required.
Could the site meet current and future need?	Yes. Additional land is available for extra pitches.
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	n/a
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes. The occupants of this pitch are willing to take forward the planning application and are able to co-ordinate their resources to implement a landscaping/layout scheme to improve the visual appearance of the site and necessary improvements to the access roadway.

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA32
Site name and address	The Grove, Prospect Road
Site plan	
Site planning status	Unauthorised
Planning history	P1580.16 - 1 static, 3 tourers, expired 30 June 2018 P1524.17 undecided – seeks 5 static, 5 tourers
GTAA 2019 pitch number	5
GTAA 2019 planning definition status	5 households met the planning definition
Additional current and future needs	7
Total pitch need 2016-2021	5 x unauthorised
Total pitch need 2021-2031	2 x new household formation
Site area	0.09ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No but within a site of Nature Conservation Impact
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	Yes
Access to highway network	Yes


Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	Yes
Impact of site on local character and amenity	Low impact – quiet secluded area only visible from the track leading from Prospect Road.
Impact of site on amenity of local residents	Low impact – good distance from the residents on Prospect Road.
Site can provide visual and acoustic privacy	Fenced all round – established hedging to the north and east of the site.
Environmental concerns	None
Constraints on design and layout of the site	5 mobile homes on the site. Space for accommodation in tourers subject to safety requirements.
Could the site meet current and future need?	Potentially but only space for additional tourers.
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	Possibly by utilising more tourers and addition of a day room/utility block.
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Not discussed with owners.

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA14
Site name and address	The Oak View, Church Road
Site plan	
Site planning status	Unauthorised
Planning history	Appeal dismissed 27 Mar 2008. Several plots.
GTAA 2019 pitch number	1
GTAA 2019 planning definition status	Household met the planning definition
Additional current and future needs	1
Total pitch need 2016-2021	1 x unauthorised
Total pitch need 2021-2031	0
Site area	0.02ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No


Contaminated land	No
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	No
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	Yes
Impact of site on local character and amenity	Medium Impact. The northern part of this site has a low impact as the site is not immediately visible from all public areas and is situated some distance from Church Road. The southern part of this site has a higher impact as it extends the site towards Church Road, from where it is most visible.
Impact of site on amenity of local residents	Low – medium impact. There are a number of residential properties on Benskins Lane to the east and Crown Farm Kennels to the north.
Site can provide visual and acoustic privacy	Varied - some fencing provides visual and some acoustic privacy.
Environmental concerns	No known issues.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required.
Could the site meet current and future need?	Yes.
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	n/a
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes. The occupants of this pitch are willing to take forward the planning application and are able to co-ordinate their resources to implement a landscaping/layout scheme to improve the visual appearance of the site and necessary improvements to the access roadway.

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA14
Site name and address	The Oak, Church Road
Site plan	
Site planning status	Unauthorised
Planning history	Appeal dismissed 27 Mar 2008. Several plots.
GTAA 2019 pitch number	1
GTAA 2019 planning definition status	Household met the planning definition
Additional current and future needs	2
Total pitch need 2016-2021	1 x unauthorised
Total pitch need 2021-2031	1 x new household formation
Site area	0.02ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No


Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	No
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	Yes
Impact of site on local character and amenity	Medium Impact. The northern part of this site has a low impact as the site is not immediately visible from all public areas and is situated some distance from Church Road. The southern part of this site has a higher impact as it extends the site towards Church Road, from where it is most visible.
Impact of site on amenity of local residents	Low – medium impact. There are a number of residential properties on Benskins Lane to the east and Crown Farm Kennels to the north.
Site can provide visual and acoustic privacy	Varied - some fencing provides visual and some acoustic privacy.
Environmental concerns	No known issues.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required.
Could the site meet current and future need?	Yes. Additional land available for extra pitches.
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	Yes
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes. The occupants of this pitch are willing to take forward the planning application and are able to co-ordinate their resources to implement a landscaping/layout scheme to improve the visual appearance of the site and necessary improvements to the access roadway.

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA01
Site name and address	The Old Forge, Hubbards Chase
Site plan	
Site planning status	Private
Planning history	P1581.90 - 2 caravans, permanent. Additional L Shaped unit is permitted as a dayroom.
GTAA 2019 pitch number	1
GTAA 2019 planning definition status	3 households met the planning definition
Additional current and future needs	3
Total pitch need 2016-2021	2 x 5-year
Total pitch need 2021-2031	1 x new household formation
Site area	0.3ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	Yes
Access to highway network	Yes


Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	Yes
Impact of site on local character and amenity	Minimal impact. Area features mix of residential/industrial uses.
Impact of site on amenity of local residents	Minimal impact. Some distance from the main residential part of Hubbards Close.
Site can provide visual and acoustic privacy	Well screened with dense hedging.
Environmental concerns	None
Constraints on design and layout of the site	None
Could the site meet current and future need?	Yes – large site.
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	Unlikely – large brick dayroom accommodation on site, although approximately half of the site is grassed/paved allowing space to accommodate more mobile homes.
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	No discussion with owner has taken place.

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA14
Site name and address	The Schoolhouse, Church Road
Site plan	
Site planning status	Unauthorised
Planning history	Appeal dismissed 27 Mar 2008. Several plots.
GTAA 2019 pitch number	1
GTAA 2019 planning definition status	1 household met the definition
Additional current and future needs	2
Total pitch need 2016-2021	1 x unauthorised
Total pitch need 2021-2031	1 x new household formation
Site area	0.02ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No


Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	No
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	Yes
Impact of site on local character and amenity	Medium Impact. The northern part of this site has a low impact as the site is not immediately visible from all public areas and is situated some distance from Church Road. The southern part of this site has a higher impact as it extends the site towards Church Road, from where it is most visible.
Impact of site on amenity of local residents	Low – medium impact. There are a number of residential properties on Benskins Lane to the east and Crown Farm Kennels to the north.
Site can provide visual and acoustic privacy	Varied - some fencing provides visual and some acoustic privacy.
Environmental concerns	No known issues.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required.
Could the site meet current and future need?	Yes. Additional land available for extra pitches.
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	Yes
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes. The occupants of this pitch are willing to take forward the planning application and are able to co-ordinate their resources to implement a landscaping/layout scheme to improve the visual appearance of the site and necessary improvements to the access roadway.

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA32
Site name and address	The View, Prospect Road
Site plan	
Site planning status	Private
Planning history	Appeal allowed 12 May 1988 5 caravans permanent
GTAA 2019 pitch number	3
GTAA 2019 planning definition status	1 household did not meet planning definition. 2 households were undetermined as there was insufficient proxy interview data to determine planning status.
Additional current and future needs	1
Total pitch need 2016-2021	0
Total pitch need 2021-2031	1 x new household formation
Site area	0.09ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	Yes


Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	Yes
Impact of site on local character and amenity	Low impact – established site well away from other homes. .
Impact of site on amenity of local residents	Low impact – good distance from residents on Prospect Road.
Site can provide visual and acoustic privacy	Yes. Fencing and established planting provides privacy surrounded by a wooded area.
Environmental concerns	No known issues.
Constraints on design and layout of the site	Details of where further accommodation on the site would be located would be required.
Could the site meet current and future need?	Yes
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	Yes
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Not discussed with owners.

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA05
Site name and address	Tyas Stud Farm, St. Marys Road
Site plan	
Site planning status	Temporary
Planning history	P0773.13. 2 pitches, max. 1 static each – expires 2 Feb 2021
GTAA 2019 pitch number	2
GTAA 2019 planning definition status	2 households met the planning definition, 1 household undetermined.
Additional current and future needs	9
Total pitch need 2016-2021	5 pitches for households that met the planning definition – 1 x temporary, 1 x doubled-up, 3 x 5-year. 1 x temporary pitch for households that were undetermined.
Total pitch need 2021-2031	2 x new household formation for households that met the planning definition. 1 x new household formation for undetermined households.
Site area	0.36ha
Site ownership	Private


DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	No
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	Yes
Impact of site on local character and amenity	Low impact. Site set well away from the road – no detrimental impact when seen from the M25, trains or footpath to the east.
Impact of site on amenity of local residents	Low impact. Latchford Farm and Wyngards Farm situated to the east of the site are the only neighbouring properties and the site does not have any detrimental impact on the amenity of these residents.
Site can provide visual and acoustic privacy	The site has visual privacy from Latchfords Farm and Wyngards Farm and the residential area is situated at the southern end of the site, some considerable distance from the railway line. Some noise from the M25 but not significant.
Environmental concerns	Potential air quality and noise issues from M25.
Constraints on design and layout of the site	Details of the proposed design and layout of the site with the residential area clearly defined would be required.
Could the site meet current and future need?	Yes – existing pitches are very large and also additional land holding to the north of the site.
Could the site only meet current need?	-
Can the configuration of the site be altered to meet future need?	Yes. There is ample room for 12 pitches. Owner is happy to accommodate up to 20 pitches to help meet need. This can be met by a mix of mobile homes, tourers and day rooms.
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes.

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA08
Site name and address	Vinegar Hill, Lower Bedfords Road
Site plan	
Site planning status	Unauthorised
Planning history	P0760.14 Temporary permission 10 caravans (max 5 static) Expired 01/08/2017
GTAA 2019 pitch number	9
GTAA 2019 planning definition status	7 households met planning definition. 2 households did not meet planning definition.
Additional current and future needs	26
Total pitch need 2016-2021	18 from households that met the planning definition – 7 x unauthorised, 5 x doubled-up, 6 x 5-year. 4 from households that did not meet the planning definition – 2 x unauthorised, 2 x 5-year.
Total pitch need 2021-2026	2 x new household formation from households that met the planning definition. 2 x new household formation from households that did not meet the planning definition.
Site area	0.51ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No

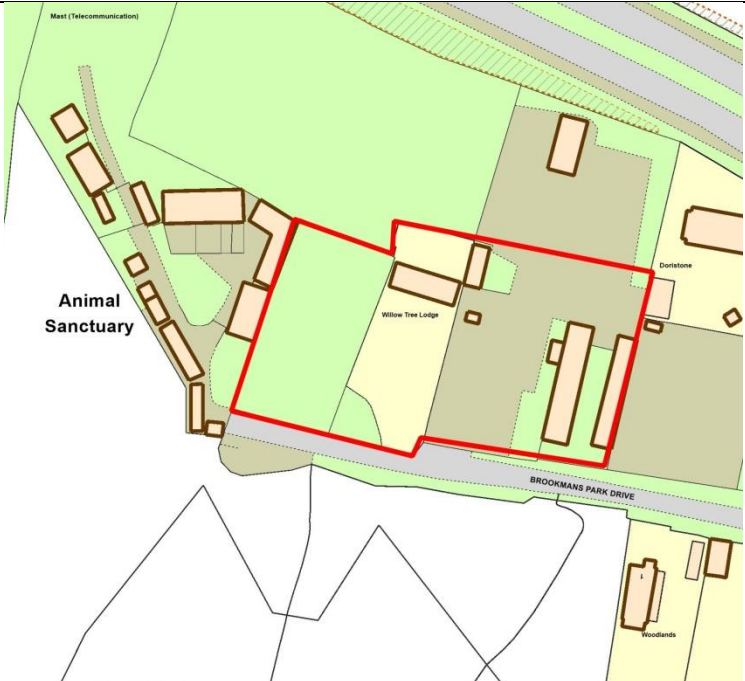
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	No
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	Yes
Impact of site on local character and amenity	Low impact. Site forms a narrow wedge of land that is mostly contained by existing development to the south and east. As such, the visual impact and encroachment into the Green Belt is limited.
Impact of site on amenity of local residents	Low impact on the residents of Stanwyck Gardens and Straight Road to the rear of the site. Noise from site residents no different to neighbouring houses.
Site can provide visual and acoustic privacy	Yes. Fencing around site provides visual and acoustic privacy.
Environmental concerns	No known issues.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required.
Could the site meet current and future need?	Possibly – subject to an amended site layout to accommodate additional caravans.
Could the site only meet current need?	n/a
Can the configuration of the site be altered to meet future need?	Yes. Whilst the site may not be big enough to accommodate the required number of formal additional pitches, there is sufficient room on the site to accommodate sufficient caravans and shared day rooms.
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Not discussed with owner.

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA33
Site name and address	1 Willoughby Drive
Site plan	 <p>Red lines round 1A Willoughby Drive</p>
Site planning status	Bricks and mortar
Planning history	
GTAA 2019 pitch number	1 bricks and mortar property
GTAA 2019 planning definition status	Household met the planning definition.
Additional current and future needs	0
Total pitch need 2016-2021	
Total pitch need 2021-2031	
Site area	0.1ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	Unknown
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	Yes
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes


Public transport route within 800m	Yes
Impact of site on local character and amenity	Low
Impact of site on amenity of local residents	Low
Site can provide visual and acoustic privacy	Bricks and mortar accommodation
Environmental concerns	Noise, dust from waste converters
Constraints on design and layout of the site	n/a
Could the site meet current and future need?	No
Could the site only meet current need?	No
Can the configuration of the site be altered to meet future need?	No
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Unknown

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA04, HA27
Site name and address	Willow Tree Lodge, Brookmans Park Road
Site plan	
Site planning status	Private
Planning history	<p>P0719.18 – 12 caravans (11 static and 1 tourer, replacement stable block) – Allowed subject to Legal Agreement</p> <p>E0007.11 – 1 plot. E0017 – 1 plot 13 Feb 2018 – Appeal Allowed/Dismissed Land to rear – 4 plots – dismissed Land to north of stables – 2 plots – allowed Land to east of Willow Tree Lodge – lawful for 2 plots Land to west of Willow Tree Lodge – 2 plots - allowed</p>
GTAA 2019 pitch number	11
GTAA 2019 planning definition status	11 households met the planning definition
Additional current and future needs	8
Total pitch need 2016-2021	6 – 4 x concealed or doubled-up households or adults, 2 x 5-year need
Total pitch need 2021-2031	2 x new household formation.
Site area	0.5ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	No
Within 250m of landfill site	No

Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	Yes
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	Yes
Impact of site on local character and amenity	Low - medium impact owing to the scale of development proposed. However, the site is visible from the A127 heading west towards Romford.
Impact of site on amenity of local residents	Low – medium impact owing to the scale of development proposed. There are a number of residential properties on Brookman's Park Drive.
Site can provide visual and acoustic privacy	Not at present as the site is open land.
Environmental concerns	Potential air quality and noise issues from the Southend Arterial Road.
Constraints on design and layout of the site	No constraints although details of proposed design and layout of the residential area would be required.
Could the site meet current and future need?	Yes
Could the site only meet current need?	-
Can the configuration of the site be altered to meet future need?	Yes
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Recent approval for 11 pitches (subject to a Legal Agreement). Owner is prepared to work with HBC to implement further pitches.

Havering Gypsy & Traveller Site Deliverability Assessment

SITE BACKGROUND	
Site reference	HA33
Site name and address	1A Willoughby Drive
Site plan	
Site planning status	Unauthorised
Planning history	Enforcement Notice 21 October 2011
GTAA 2019 pitch number	1
GTAA 2019 planning definition status	Households met the planning definition
Additional current and future needs	3
Total pitch need 2016-2021	2 – 1 x unauthorised, 1 x doubled-up
Total pitch need 2021-2031	1 – 1 x new household formation
Site area	0.05ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Green Belt	Yes
SSSI	No
Heritage Area	No
Flood zone	No
Contaminated land	Unknown
Within 250m of landfill site	No
Within high pressure gas pipeline safeguarding zone	No
Mains water and electricity available or accessible	Yes
Sanitation available or capable of being provided	Yes
Provision for surface water and storm water drainage	Yes
Access to highway network	Yes
Primary school within 2km	Yes
GP surgery within 2km	Yes
Shops within 2km	Yes
Public transport route within 800m	Yes

Impact of site on local character and amenity	Low
Impact of site on amenity of local residents	Low
Site can provide visual and acoustic privacy	No
Environmental concerns	Noise, dust from waste converters
Constraints on design and layout of the site	Subject to enforcement notice.
Could the site meet current and future need?	No
Could the site only meet current need?	No
Can the configuration of the site be altered to meet future need?	No
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Unknown

Havering Cabinet Meeting on August 5 2020

Item to be approved for Havering Local Plan Main Modifications Public Consultation

Gypsy and Traveller Accommodation and Proposals Map Changes (January 2020)

August 2020



Examination into the Havering Local Plan 2016 - 2031

Document for Public Consultation alongside the Proposed Main Modifications

Gypsy and Traveller Accommodation and Proposals Map Changes (January 2020)

August 2020

Havering Local Plan 2016-2031

Gypsy and Traveller Accommodation & Proposals Map Changes

January 2020

This document replaces the following submission documents:

- 1. Proposals Map Changes Booklet – Addendum March 2019**
- 2. Proposals Map Changes Booklet – Addendum September 2019**

Cleaner, Safer, Prouder Together

1. Introduction

This document will accompany the Proposals Map Changes Booklet – July 2017 and Addendum - March 2018, which accompanied the Havering Local Plan (2016-2031) submission and would not alter the fundamental direction and approach of the Havering Local Plan.

The reason for the subsequent document is a direct response to representations made on the Proposed Submission Version Local Plan and supporting evidence base in respect of Gypsy and Traveller Accommodation within the Borough, as a result of the Examination in Public (EiP) in October 2018 and 2019 and the second phase of consultation (legally referred to as Regulation 19 consultation).

As a result of the consultation, certain additional information emerged given rise to the need to modify the draft Local Plan (2016-2031), in respect of Policy 11 - Gypsy and Traveller Accommodation. This involved necessary amendments to the Proposals Map to ensure that it is accurately reflected in the Local Plan.

The site allocations presented in this document have been marked as an addition or an amendment to signify the updates, since the Local Plan, was submitted in March 2018. Further to this, some of the site allocations presented in this document supersede their original allocations, as previously presented in the Proposals Map Changes Booklet, dated July 2017 and Addendum, dated March 2018, as outlined in Table 1, Chapter 2

The document supersedes addendum versions dated March 2019 and September 2019

2. Summary of Amendments

In accordance with the statutory requirements of the NPPF, amendments listed in the table below include additions and revision of boundaries:

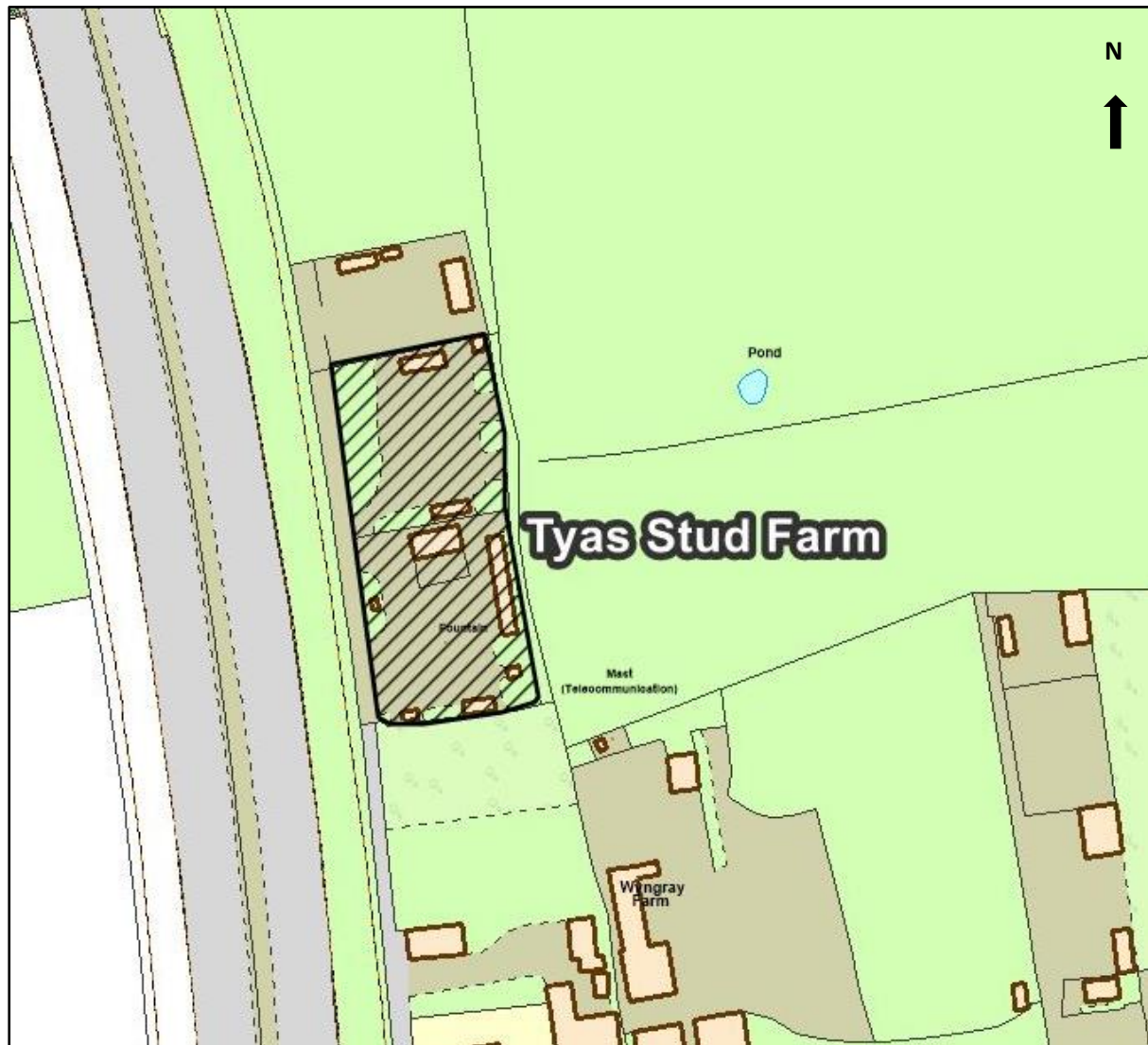
Table 1



	Site allocation	Amendment Type	Map Reference	Addition/ Amendment	Supersedes original site allocation at submission
1	Ashlea View, Tomkyns Lane	Revised boundary	Map 10	Amendment	This site allocation supersedes original allocation, as shown in Proposals Map Changes Booklet, July 2017
2	Crow Lane (r/o 21)	Additional site	Map 81	Addition	N/A
3	Haunted House Woods, 102 St Johns Road	Additional site	Map 83	Addition	N/A
4	Hogbar Farm East, Lower Bedfords Road	Revised boundary	Map 7	Amendment	This site allocation supersedes original allocation, as shown in Proposals Map Changes Booklet, July 2017
5	Hogbar Farm	Additional site	Map 85	Addition	N/A
6	Laburnham Stables, Laburnham Gardens	Additional site	Map 78	Addition	N/A
7	The Railway Sidings, Ockendon Road	Additional site	Map 79	Addition	N/A
8	Putwell Bridge (The Former Brook Street Garage Site)	Revised boundary	Map 12	Amendment	This site allocation supersedes original allocation, as shown in Proposals Map Changes Booklet, July 2017 and Proposals Map Changes Booklet, Addendum, March 2018
9	The Grove, The Track, Prospect	Additional site	Map 82	Addition	N/A

	Road				
10	The Old Forge, Hubbards Close	Additional site	Map 80	Addition	N/A
11	Tyas Stud Farm	Revised boundary	Map 4	Amendment	This site allocation supersedes original allocation, as shown in Proposals Map Changes Booklet, July 2017
12	Willow Tree Lodge, Brookmans Park Drive	Revised boundary	Map 76	Amendment	This site allocation supersedes original allocation, as shown in Proposals Map Changes Booklet, Addendum, March 2018
13	Fairoaks, St Mary's Lane	Additional site	Map 84	Addition	N/A

3. Mapping Changes and Additions


3.1 Gypsy and Traveller Site at TyasStud Farm (amended)




 Havering <small>LONDON BOROUGH</small>	London Borough of Havering, Town Hall, Main Road, Romford, RM1 3DB, Tel: 01708 434343	©Crown copyright and database rights 2017. Ordnance Survey 100024327.
Key- Map 4		
Tyas Stud Farm - Gypsy and Traveller Site		

3.2 Gypsy and Traveller Site at Hogbar Farm East (amended)





 Havering <small>LONDON BOROUGH</small>	London Borough of Havering, Town Hall, Main Road, Romford, RM1 3DB, Tel: 01708 434343	©Crown copyright and database rights 2017. Ordnance Survey 100024327.
--	---	--

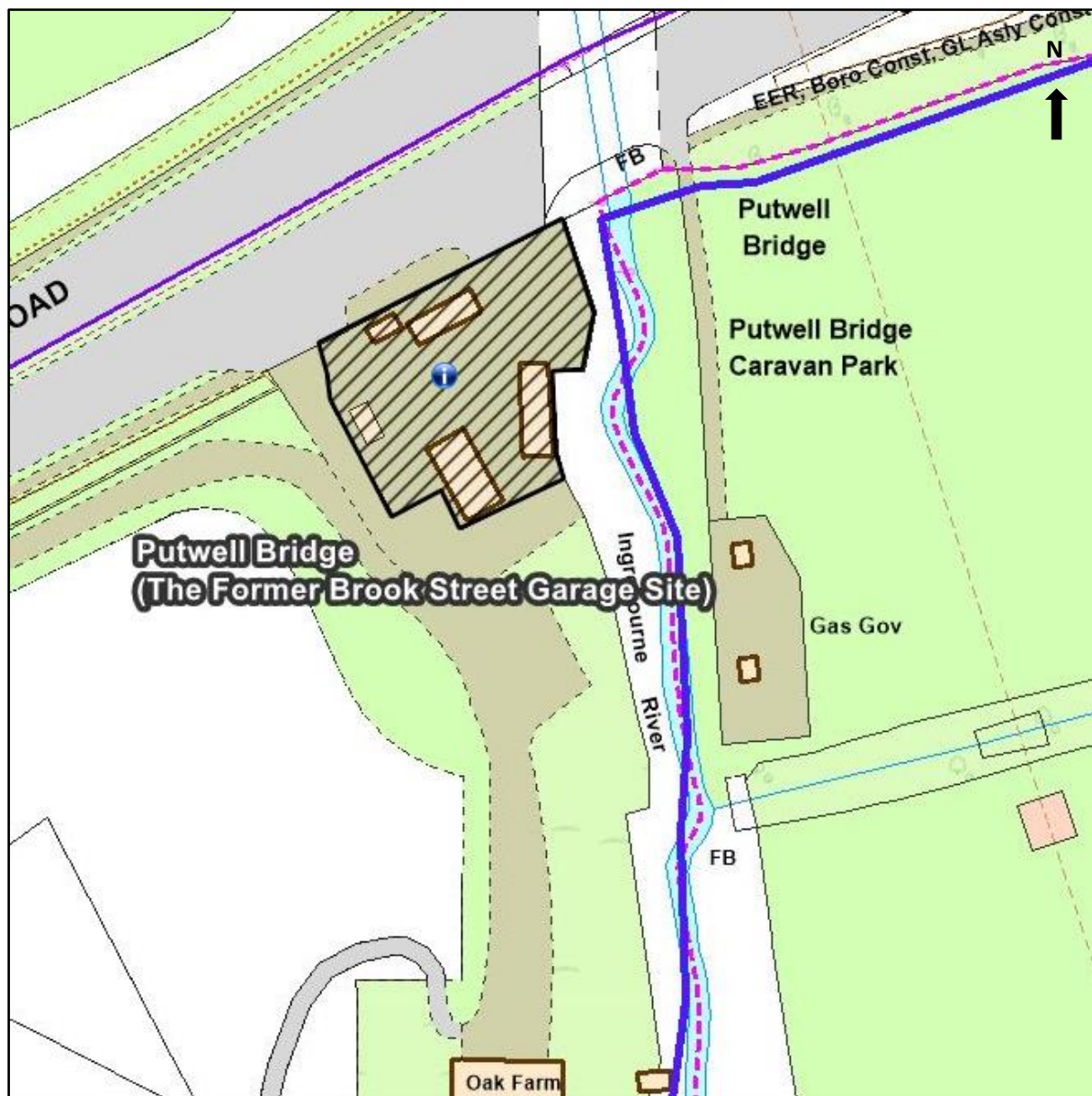
Key- Map 7	
Hogbar Farm East - Gypsy and Traveller Site	

3.3 Gypsy and Traveller Site at Ashlea View, Tomkyns Lane (amended)



 Havering <small>LONDON BOROUGH</small>	London Borough of Havering, Town Hall, Main Road, Romford, RM1 3DB, Tel: 01708 434343	©Crown copyright and database rights 2017. Ordnance Survey 100024327.
Key- Map 10		
Ashlea View, Tomkyns Lane - Gypsy and Traveller Site		

3.4 Gypsy and Traveller Site at Putwell Bridge (amended)



London Borough of Havering,
Town Hall, Main Road, Romford, RM1 3DB,
Tel: 01708 434343

©Crown copyright and database rights 2017.
Ordnance Survey 100024327.

Key- Map 12



Putwell Bridge (The Former Brook Street Garage Site) - Gypsy and Traveller Site

Borough Boundary



3.5 Gypsy and Traveller Site at Willow Tree Lodge (amended)



 Havering LONDON BOROUGH	London Borough of Havering, Town Hall, Main Road, Romford, RM1 3DB Tel: 01708 434343	© Crown Copyright and database rights 2017. Ordnance Survey 100024327
Key – Map 76		
Willow Tree Lodge, Brookmans Park Drive - Gypsy and Traveller Site		

3.6 Gypsy and Traveller Site at Laburnham Stables, Upminster (additional)



Havering
LONDON BOROUGH

London Borough of Havering,
Town Hall, Main Road, Romford, RM1 3DB
Tel: 01708 434343

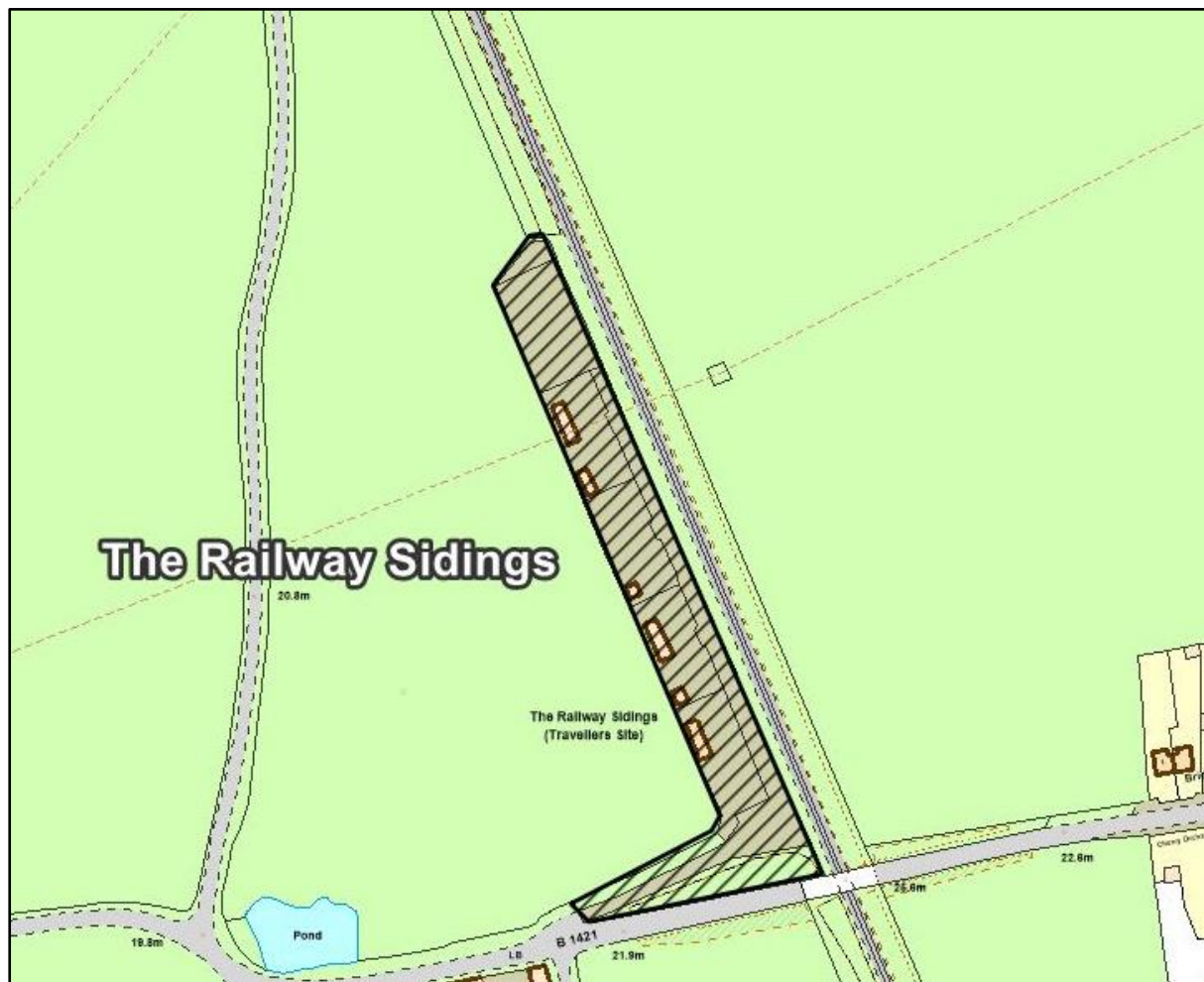
© Crown Copyright and database rights 2017.
Ordnance Survey 100024327

Key – Map 78

Laburnham Stables - Gypsy and Traveller Site



3.7 Gypsy and Traveller Site at The Railway Sidings, Upminster (additional)



London Borough of Havering,
Town Hall, Main Road, Romford, RM1 3DB
Tel: 01708 434343

© Crown Copyright and database rights 2017.
Ordnance Survey 100024327

Key – Map 79

The Railway Sidings Stables - Gypsy and Traveller Site



3.8 Gypsy and Traveller Site at The Old Forge (additional)



Havering
LONDON BOROUGH

London Borough of Havering,
Town Hall, Main Road, Romford, RM1 3DB
Tel: 01708 434343

© Crown Copyright and database rights 2017.
Ordnance Survey 100024327

Key – Map 80

The Old Forge, Hubbard's Close - Gypsy and Traveller Site



3.9 Gypsy and Traveller Site at Crow Lane (r/o no.21) (additional)



Havering
LONDON BOROUGH

London Borough of Havering,
Town Hall, Main Road, Romford, RM1 3DB
Tel: 01708 434343

© Crown Copyright and database rights 2017.
Ordnance Survey 100024327


Key – Map 81


Crow Lane (r/o no.21) - Gypsy and Traveller Site



3.10 Gypsy and Traveller site at The Grove, Prospect Road (additional)



 Havering <small>LONDON BOROUGH</small>	London Borough of Havering, Town Hall, Main Road, Romford, RM1 3DB	© Crown Copyright and database rights 2017. Ordnance Survey 100024327
--	--	--

Key – Map 82	
The Grove - Gypsy and Traveller Site	

3.11 Gypsy and Traveller Site Haunted House Woods, 102 St John's Road (additional)



Havering
LONDON BOROUGH

London Borough of Havering,
Town Hall, Main Road, Romford,
RM1 3DB

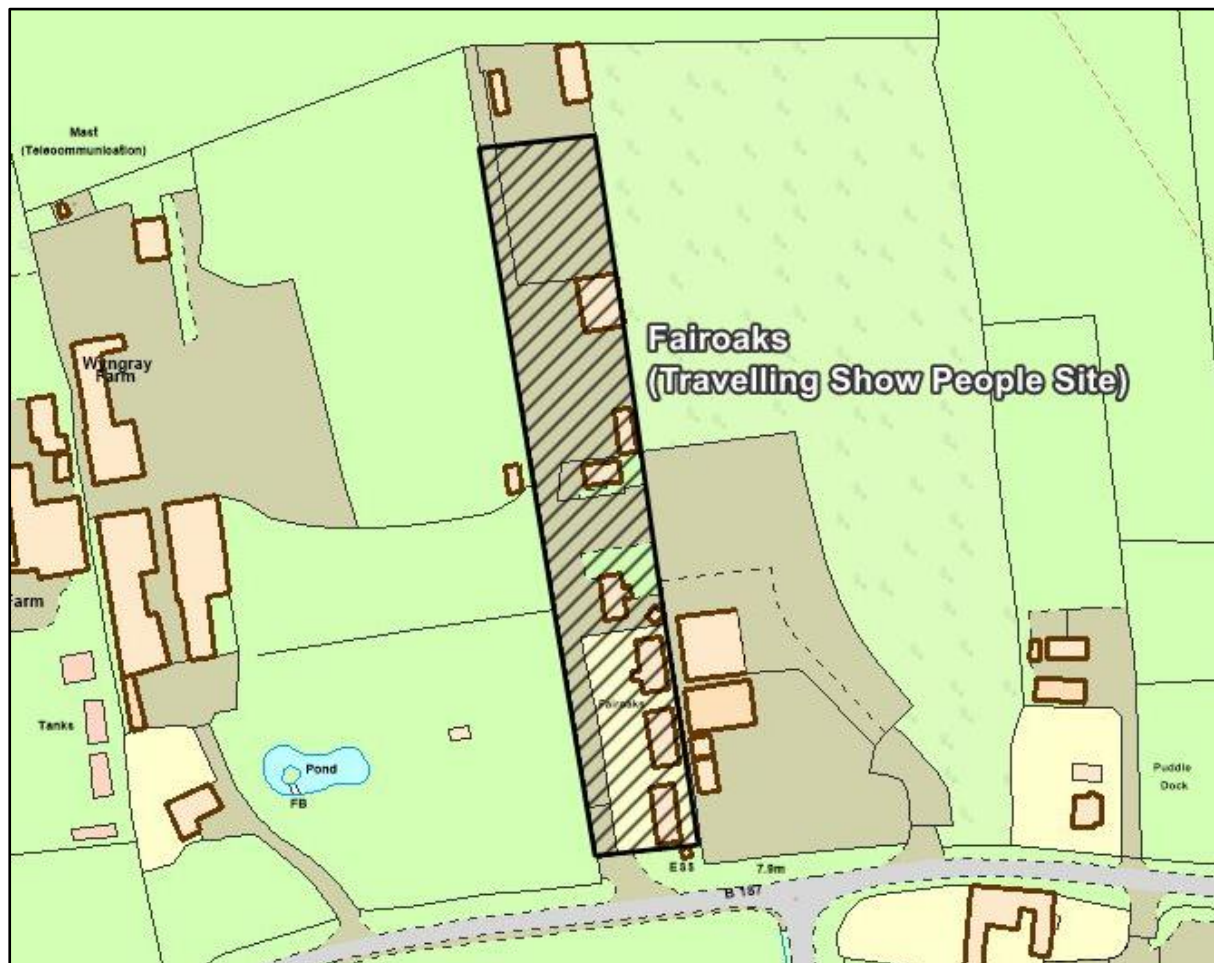
© Crown Copyright and database rights 2017.
Ordnance Survey 100024327


Key – Map 83


Haunted House Woods, St John's Road - Gypsy and Traveller Site



3.12 Gypsy and Traveller Site at Fair Oaks, St Mary's Lane, Upminster (additional)




 Havering LONDON BOROUGH	London Borough of Havering, Town Hall, Main Road, Romford, RM1 3DB	© Crown Copyright and database rights 2017. Ordnance Survey 100024327
---	--	--

Key – Map 84	
Fairoaks, St Mary's Lane – Travelling Show People Site	

3.13 Gypsy and Traveller site at Hogbar Farm (additional)



 Havering LONDON BOROUGH	London Borough of Havering, Town Hall, Main Road, Romford, RM1 3DB	© Crown Copyright and database rights 2017. Ordnance Survey 100024327
---	--	--

Key – Map 85	
Hogbar Farm – Gypsy and Traveller Site	

This page is intentionally left blank

Haverling Cabinet Meeting on August 5 2020

Item to be approved for Haverling Local Plan Main Modifications Public Consultation

**Supplementary Retail Note for the Haverling Local Plan
(December 2018)**

August 2020



Examination into the Havering Local Plan 2016 - 2031

**Document for Public Consultation alongside the
Proposed Main Modifications**

**Supplementary Retail Note for the Havering Local Plan
(December 2018)**

August 2020



now part of



Ha^{vering} Local Plan (2016-2031)

Supplementary Retail Note December 2018

On behalf of **London Borough of Havering**



Project Ref: 30904 | Rev: A | Date: December 2018

Registered Office: Buckingham Court Kingsmead Business Park, London Road, High Wycombe, Buckinghamshire, HP11 1JU
Office Address: 33 Bowling Green Lane, London, EC1R 0BU
T: +44 (0)203 824 6600 E: london@peterbrett.com

Document Control Sheet

Project Name: Havering Local Plan (2016-2031)

Project Ref: 30904

Report Title: Retail Briefing Note December 2018

Doc Ref: V2

Date: 05/12/2018

	Name	Position	Signature	Date
Prepared by:	Conor Lennon	Graduate Planner	CL	05/12/2018
Reviewed by:	Francesca Rowson	Senior Planner	FR	05/12/2018
Approved by:	Cathy Hall	Senior Associate	CH	05/12/2018
For and on behalf of Peter Brett Associates LLP				

Revision	Date	Description	Prepared	Reviewed	Approved
V1	03/12/2018	Draft report	CL	FR	CH
V2	03/12/2018	Draft report	CL	FR	CH

This report has been prepared by Peter Brett Associates LLP ('PBA') on behalf of its client to whom this report is addressed ('Client') in connection with the project described in this report and takes into account the Client's particular instructions and requirements. This report was prepared in accordance with the professional services appointment under which PBA was appointed by its Client. This report is not intended for and should not be relied on by any third party (i.e. parties other than the Client). PBA accepts no duty or responsibility (including in negligence) to any party other than the Client and disclaims all liability of any nature whatsoever to any such party in respect of this report.

© Peter Brett Associates LLP 2018

Contents

1	Introduction	1
1.2	Structure of this Report	1
1.3	Planning policy context.....	2
2	Retail impact threshold	5
2.1	Introduction.....	5
2.2	Local impact thresholds across London	5
2.3	Town centre vacancy rates	5
2.4	LB Havering impact threshold	6
2.5	Conclusion.....	9
3	Meeting convenience needs	10
3.2	RLNA 2018 Update	10
3.3	Meeting convenience needs.....	10
4	Summary and conclusions	12

Figures

No table of figures entries found.

Tables

Table 1 – LB Havering average retail and non-retail unit floorspace (sqm)	7
Table 2 LB Havering quantitative convenience floorspace needs	10
Table 3 Key housing growth locations and net additional dwellings up to 2031	11
Table 5 London metropolitan centre vacancy rates	1
Table 6 LB Havering district centre vacancy rates.....	1
Table 7 Average London district centre vacancy rates by borough	2
Table 8 LB Havering retail developments approved between 2012 and 2018	4

Appendices

Appendix A	London borough's impact thresholds
Appendix B	London borough's vacancy rates
Appendix C	LB Havering retail commitments 2012-2018
Appendix D	LB Havering growth locations

This page is intentionally blank

1 Introduction

1.1.1 The London Borough of Havering (LB Havering) commissioned PBA, now part of Stantec, (PBA) to prepare a report outlining the justification for draft Policy 13 of the emerging Havering Local Plan (2016-2031). PBA prepared the Havering Retail and Commercial Leisure Needs Assessment ('RLNA') (LBHLP.21) in 2015 and a Quantitative Update as an Addendum to the RLNA in March 2018.

1.1.2 Draft Policy 13 of the emerging Havering Local Plan (2016-2031) states:

'Applications for new main town centre uses will be subject to the sequential test as defined in the NPPF. An impact assessment will be required for retail, leisure and office developments over 200 square metres in edge or out of centre locations.'

1.1.3 Paragraph 8.2.4 of the supporting text to draft Policy 13 states that:

'With regards to the average size of retail premises in town centres district centres in Havering are made up mostly of small shops, with the average floor space being below 200 square metres. In Romford the average floor space is generally higher, although this varies between frontages. The threshold for impact assessments for edge and out of town centre development is therefore set at 200 square metres in the Local Plan.'

1.1.4 The primary purpose of this Report is to examine whether there is a sound basis for the LB Havering to set a local impact floorspace threshold for retail uses and whether the proposed 200 sqm threshold is justified¹.

1.1.5 The secondary purpose of this Report is to provide the Inspector with further information on how identified convenience needs within the borough may be accommodated across the period to 2026. In this regard, Table 3 of draft Policy 13 identifies a need for an additional 8,299 sqm net convenience (food) floorspace by 2026 and 10,851 sqm net by 2031.

1.2 Structure of this Report

1.2.1 Section 2 considers whether there is a sound basis for the LB Havering to set a local impact floorspace threshold and whether the 200 sqm local retail impact threshold is justified based on the available evidence. This section provides a review of other London borough's local impact thresholds and centre vacancy rates. Section 3 sets out a strategy to meet convenience retail development needs identified in the RLNA 2018 Update up to 2026.

1.2.2 This Report is supported by the following appendices:

- Appendix A – London borough's impact thresholds
- Appendix B – London borough's vacancy rates

¹ Note: LB Havering have agreed that the reference to leisure and office uses within this part of the policy will be removed through a modification. Therefore, the revised wording is as follows: *'Applications for new main town centre uses will be subject to the sequential test as defined in the NPPF. An impact assessment will be required for retail, ~~leisure and office developments~~ over 200 square metres in edge or out of centre locations.'*

- Appendix C – LB Havering growth locations map

1.3 Planning policy context

- 1.3.1 LB Havering's plan was submitted for examination before the 24 January 2019 deadline set out in the revised National Planning Policy Framework (2018). It is therefore being examined against the requirements of the NPPF (2012). Paragraph 23 states that planning policies '*should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period*' and specifically requires planning policies to:

'allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites;

allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre;

- 1.3.2 The NPPF requires that local plans should be drawn up over a 15-year time frame (paragraph 157) and should be informed by an evidence base which assess:
- the need for floorspace for economic development, including retail and leisure development, over the 15-year plan period; and
 - the existing and future supply of land to meet identified needs (paragraph 161).
- 1.3.3 While the NPPF suggests that local plans should identify sites to meet retail and leisure needs over a 15-year period, the Planning Practice Guidance (PPG) advises that strategies sites in town centres should be allocated over a three to five-year period subject to regular review². Considering how need may be accommodated over the first 10 years of the plan therefore reflects a robust approach and has regard to the revised NPPF (2018) which advises that planning policies should allocate a range of suitable sites to meet retail needs looking 10 years ahead (paragraph 85).
- 1.3.4 Section 3 of this Report responds to the above requirements setting out a strategy to meet convenience development needs over the plan period.
- 1.3.5 The NPPF (2012) paragraph 27 states that when assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold. If there is no locally set threshold, the default threshold is 2,500 sqm gross. The purpose of the test is to ensure that the impact of out-of-centre and edge of centre proposals on existing town centres is not significantly adverse.
- 1.3.6 The Planning Practice Guidance (PPG) provides guidance on setting a locally appropriate threshold for retail impact assessments. The section 'Ensuring the

² Paragraph: 003 Reference ID: 2b-003-20140306 Revision date: 06 03 2014

Viability of Town Centres' states in setting a locally appropriate threshold it will be important to consider the following³:

- the scale of proposals relative to town centres;
- the existing viability and vitality of town centres;
- cumulative effects of recent developments;
- whether local town centres are vulnerable;
- likely effects of development on any town centre strategy; and
- impact on any other planned investment.

1.3.7 Section 2 of this report assesses the local context in respect of the above criteria.

1.3.8 The London Plan (2016) sets the overall spatial development strategy for London and includes town centre policies which require applicants to undertake sequential and impact assessments. Policy 4.7 (Retail and Town Centre Development) outlines the Mayor's support for a strong, partnership approach to assessing need and bringing forward capacity for retail, commercial culture and leisure development for town centres. The policy states that development proposals for new or extensions to existing, edge or out-of-centre retail, leisure or office development will be subject to an assessment of impact. However, the London Plan does not set a threshold for the impact assessment. The policy also requires that in preparing their local plans boroughs should:

- identify future retail and commercial leisure floorspace needs;
- undertake regular town centre health checks;
- resist inappropriate out of centre development; and
- manage existing out of centre retail and leisure development in line with the sequential approach.

1.3.9 London Plan Policy 4.8 (Supporting a Successful and Diverse Retail Sector and Related Facilities and Services) Part A requires that boroughs support a competitive retail sector which promotes sustainable access to goods and services.

1.3.10 London Plan Policy 7.1 (Lifetime Neighbourhoods) Part B requires that development should be designed so that the mix of uses improve people's access to local shops.

1.3.11 The Mayor published the new Draft London Plan for consultation on 1 December 2017 and subsequently published the new Draft London Plan showing Minor Suggested Changes (Draft London Plan) on 13 August 2018 with adoption timetabled for late 2019.

1.3.12 Draft Policy SD8 (Town Centres: Development principles and Development Plan Documents) advocates a town-centre first approach in development plans and development proposals, advocates a sequential approach to accommodating town centre uses, seeks to firmly resisting out-of-centre development of town centre uses

³ Paragraph: 016 Reference ID: 2b-016-20140306 Revision date: 06 03 2014

and requires an impact assessment for new, or extensions to existing, edge or out-of-centre development for town centre uses that are not in accordance with the Development Plan. The policy does not however set a threshold for the impact assessment.

- 1.3.13 The Town Centres Supplementary Planning Guidance (SPG) provides further guidance on the London Plan 'town centre first approach' and impact assessment. Paragraphs 6.3.3 and 6.3.4 state that:

'In line with NPPF paragraph 26, London Plan policy 4.7Bc requires an impact assessment for applications for new, or extensions to existing, edge or out of centre development. This policy is applicable to retail, leisure and office development exceeding 2,500 sqm outside of town centres, which are not in accordance with an up-to-date local plan. An impact assessment may also be required for developments below this threshold, for example, where a borough has set a proportionate, local floorspace threshold as indicated in the NPPF.'

- 1.3.14 Section 2 of this Report sets out the evidence underpinning the proposed local retail impact threshold for LB Havering.

2 Retail impact threshold

2.1 Introduction

- 2.1.1 In this section, we examine whether there is a sound basis for the LB Havering to set a local impact floorspace threshold and whether the proposed 200 sqm local retail impact threshold is justified based on the available evidence. First, we present our review of London borough's local impact thresholds and centre vacancy rates in LB Havering and across London. This Section is supported by Appendix A which presents a comparison of London borough's impact thresholds, where they have been adopted, and Appendix B which provides centre vacancy rates for LB Havering and other London boroughs.

2.2 Local impact thresholds across London

- 2.2.1 PBA has undertaken a review of adopted London borough's local plans to identify trends in the adoption of local impact thresholds. Appendix A presents the results of this assessment. The headline findings are set out below:
- 14 out of the 25 London boroughs have adopted a local impact threshold (56%);
 - Adopted local impact thresholds range from 80 sqm up to 1,000 sqm;
 - The most common local impact threshold across London is 200 sqm; five out of 14 boroughs have adopted this threshold; and
 - Each London borough applies a 'blanket' approach whereby the threshold applies to all centres within the borough.
- 2.2.2 Based on these findings, a retail impact threshold of 200 sqm is not out of step with other London boroughs.

2.3 Town centre vacancy rates

- 2.3.1 Appendix B contains three tables which present vacancy rates for centres in LB Havering and comparable centres (by classification) across London:
- Table 5 - London metropolitan centre vacancy rates
 - Table 6 - LB Havering district centre vacancy rates
 - Table 7 - Average London district centre retail vacancy rates by borough
- 2.3.2 The vacancy data in Tables 4-7 is taken from the GLA London Town Centre Health Check report (2016) for retail units only. The GLA data has been used as it provides a consistent dataset for the comparison of London boroughs.
- 2.3.3 Romford is the only metropolitan centre in LB Havering. Table 5 shows that the vacancy rate in metropolitan centres ranges from 2% to 15% across London with Wood Green in LB Haringey having the lowest vacancy rate and Sutton in LB Sutton having the highest. Romford sits in the middle of this range with a retail vacancy rate of 7%.

- 2.3.4 Table 6 presents the retail vacancy rates for district centres in LB Havering and Table 5 shows, for each London borough, the average district centre vacancy rate. Table 6 shows that the vacancy rate in LB Havering's district centres ranges from 0% up to 11%. Table 7 shows that LB Havering has the second-lowest average district centre vacancy rate across London at 5%. Only LB Barking & Dagenham has a lower vacancy rate at 4% and it is worth noting that the unusual configuration of Rainham district centre which has a zero-vacancy rate skews the borough average for Havering.
- 2.3.5 Tables 6 and 7 show that there is significant capacity to meet future retail needs within existing centres; as of 2016 there was a total of 14,771 sqm gross vacant floorspace across LB Havering's centres.

2.4 LB Havering impact threshold

- 2.4.1 This Section presents the evidence to justify the proposed local impact threshold (200 sqm) against the PPG criteria (see Section 1) which require LPAs to consider the existing viability and vitality of town centres, the scale of proposals relative to town centres and the likely effects of development on town centres.

Health check summary

- 2.4.2 Section 3 and Appendix A of the Havering RLNA contain the most up-to-date comprehensive health check assessments of centres in LB Havering. The key findings on role and function of each centre are summarised below:
- Romford: is the principal shopping destination for residents within the borough and attracts visitors from further afield. The centre has a strong comparison and convenience offer anchored by three main shopping centres (The Liberty, the Mercury and the Brewery) alongside a wide range of commercial leisure uses;
 - Collier Row: the centre predominantly caters for the day to day needs of residents, with representation geared towards convenience goods, hot food takeaways and some services. The offering in the town centre is generally towards the lower end of the market;
 - Elm Park: the centre is anchored by three national multiple convenience retailers and predominantly caters for the day to day needs of residents with a good range of convenience stores and an extensive range of local services. However, the centre has a very limited evening leisure offer;
 - Harold Hill: the centre is also anchored by three national multiple convenience retailers and the focus of the retail offer is convenience goods with some retail services, such as banking and hairdressing;
 - Hornchurch: the retail offer contains a good diversity of comparison, convenience and service retail uses as well as an impressive commercial leisure offer which makes the centre a borough-wide leisure destination for eating and drinking and lends it a stronger 'evening economy' than might typically be expected for a district centre;
 - Rainham: the centre is anchored by a large Tesco Extra supermarket which offers many of the services which would usually be found in a 'typical' district centre. Elsewhere in the centre, the offer includes a limited range of convenience

stores, comparison stores and takeaway restaurants with most units operated by independent operators. There are a number of gaps in the retail and services offer; and

- Upminster: the retail offer is geared towards meeting day-to-day needs with a good mix of commercial, civic and residential uses which contribute to the centre's vitality. The retail offer is anchored by four national multiple convenience retailers. There is some scope for improvement in the quality of the retail offer.

- 2.4.3 This review demonstrates that the offer in most of the district centres is focused on convenience goods catering to the day-to-day needs of residents. Most of the district centres are anchored by a few national multiple convenience retailers trading 'local' store formats complemented by a range of local retail services.

LB Havering floorspace analysis

- 2.4.4 PBA has undertaken an assessment of the average size of units in the LB Havering's centres. The data used for our analysis, presented in Table 1, is taken from the GLA London Town Centre Health Check report (2017). The data includes retail units and non-retail units within centres.
- 2.4.5 Table 1 shows that the average unit size in all centres except for Rainham is significantly below the NPPF threshold of 2,500 sqm. Only two centres, Romford and Rainham, have an average unit size greater than the proposed local impact threshold (200 sqm).

Table 1 – LB Havering average retail and non-retail unit floorspace (sqm)

Centre	Classification (London Plan)	Average unit size (Retail & non retail)
Romford	Metropolitan	399
Collier Row	District	162
Elm Park	District	40
Harold Hill	District	148
Hornchurch	District	178
Rainham	District	2,523
Upminster	District	187
Borough average	-	520

- 2.4.6 As Romford is the only metropolitan centre and the primary shopping destination in LB Havering it is to be expected that it would have a greater average unit size than other centres. In this respect Rainham presents an anomaly in the data.
- 2.4.7 The average unit size of Rainham is far higher than all other centres in the borough due to the presence of a large Tesco Extra store (5,224 sqm net) within the centre. The health check for Rainham prepared as part of the Havering RLNA in 2015

identifies that aside from the Tesco Extra the majority of retail units in Rainham are small independent stores.

Potential effects of development

- 2.4.8 Considering the evidence presented in the previous sections, it is likely that most centres in LB Haverling would be vulnerable to adverse impacts arising from out of centre development proposals (retail, leisure or office) of between 200 sqm and 2,500 sqm.
- 2.4.9 Our analysis shows that the average unit size in all LB Haverling centres except for Rainham is significantly below the NPPF threshold of 2,500 sqm. The average unit size data for Rainham is somewhat misleading since aside from Tesco Extra most units are small independent stores. In addition, only two centres, Romford and Rainham, have an average unit size greater than the proposed impact threshold (200 sqm).
- 2.4.10 The centre health checks presented in the RLNA (Section 3 and Appendix A) demonstrate that the offer in most of LB Haverling's district centres is focused convenience goods. These centres are typically anchored by a few national multiple convenience retailers trading 'local' store formats. Given that these centres predominantly cater for day-to-day shopping needs, it is likely that proposals for even small out-of-centre convenience food stores would compete directly with the district centres for turnover. The health checks also identify that the leisure offer (food and drink) in these centres is generally weak and could be improved. To ensure that the impact on designated centres is not significantly adverse applicants proposing edge or out-of-centre proposals (retail, leisure or office) over 200 sqm should be required to assess the potential impacts on designated centres.
- 2.4.11 While it is acknowledged that Romford would be less vulnerable to the impacts from small proposals it is not considered practical to apply a higher threshold for Romford and a lower threshold for the district centres. Due to the nature of overlapping catchment areas it is highly unlikely that a proposal would divert trade from a single centre only. Therefore, even if a higher threshold was adopted for Romford, in most cases the lower threshold would be tested in any case. The proposed 'blanket' threshold represents best practice and is consistent with the approach taken by all other London boroughs which have an adopted local impact threshold.
- 2.4.12 To protect the vitality and viability of all centres in the retail hierarchy we recommend that the proposed 'blanket' 200 sqm threshold for LB Haverling should be adopted.

Committed retail development

- 2.4.13 This Section presents our review of retail applications approved by LB Haverling between 2012 and 2018 located outside of designated centres. This analysis indicates the pressure that existing centres face from out-of-centre development, and will help to inform an appropriate local threshold for assessing retail impact.
- 2.4.14 The data used for our analysis, presented in Table 8 at Appendix C is taken from the London Development Database (sourced on 05/12/2018). This database includes all retail schemes over 1,000 sqm as well as schemes under the 1,000sqm submitted on a voluntary basis.

- 2.4.15 Table 8 shows that since 2012 planning permission has been approved for nine retail schemes located outside of LB Havering's designated centres, equivalent to 25,781 sqm gross floorspace. We have undertaken analysis of this data to identify the proportion of schemes which meet the NPPF impact threshold for testing retail impact:
- Proportion of approved retail schemes over 2,500 sqm - 33%
 - Proportion of approved retail schemes 200 - 2,500 sqm - 56%
 - Proportion of approved retail schemes less than 200 sqm - 11%
- 2.4.16 Our analysis shows that Our analysis demonstrates that 67% of retail schemes approved between 2012 and 2018 located outside of LB Havering centres fall below the NPPF impact threshold for testing retail impact. However, had the 200 sqm local impact threshold been adopted since 2012 then 89% of retail schemes would have been required to assess impact. In the absence of a locally set threshold, a significant amount of floorspace could be delivered in edge and out of centre locations in the future without any assessment of the potential impacts on designated centres.
- 2.4.17 This analysis demonstrates the importance of identifying an appropriate lower local threshold to ensure that future retail proposals are supported by appropriate evidence on their likely impact individually and cumulatively.

2.5 Conclusion

- 2.5.1 This Section demonstrates that there is clear justification for adopting a local impact threshold in LB Havering. It is highly likely that all centres in LB Havering would be vulnerable to adverse impacts arising from edge or out of centre retail proposals of between 200 sqm and 2,500 sqm. To ensure that the impact on designed centres is not significantly adverse applicants proposing edge or out-of-centre proposals (retail, leisure or office) over 200 sqm should be required to assess the potential impacts on designated centres.
- 2.5.2 To protect the vitality and viability of all centres in the retail hierarchy we recommend that the proposed 'blanket' 200 sqm threshold for LB Havering should be adopted.

3 Meeting convenience needs

- 3.1.1 In this section, we set out a strategy to meet convenience retail development needs as identified in the RLNA 2018 Update up to 2026. This Section is supported by the map at Appendix D which identifies the key housing growth locations.

3.2 RLNA 2018 Update

- 3.2.1 Draft Policy 13 identifies a need for 8,299 sqm net additional convenience floorspace within the first 10 years of the plan period (i.e. up to 2026). Table 3.3 of the RLNA 2018 Update summarises the convenience capacity forecasts with the figures presented on a cumulative basis, the figures are re-provided in Table 2 below.

Table 2 LB Havering quantitative convenience floorspace needs

	2017	2021	2026	2029	2031
Net sqm	8,235	5,822	8,299	9,829	10,851
Gross sqm	12,669	8,957	12,767	15,121	16,694

- 3.2.2 Section 2 of the RLNA 2018 Update identifies that per capita convenience retail spending growth is static over the plan period which means that the forecast convenience needs are purely a product of population growth. Key housing growth locations, outside of Rainham and Beam Park, comprise 12 Council-owned estates shown on the map at Appendix D.

3.3 Meeting convenience needs

- 3.3.1 This Section sets out LB Havering's strategy for meeting convenience floorspace needs over the first 10 years of the plan period. Although convenience floorspace needs have been assessed up until the end of the plan period the LB Havering has not identified sites to accommodate the full scale of floorspace needs up to 2031 since they have committed to review the plan 18 months after adoption. Further, the revised NPPF only requires planning policies to allocate retail sites looking ten years ahead.
- 3.3.2 In the medium term, convenience needs will be met through the delivery of new and enhanced floorspace as part of the planned redevelopment of Rainham and Beam Park Strategic Development Area and other key housing growth locations.
- 3.3.3 Planning permission has recently been granted for Beam park including up to 1,011 sqm net convenience floorspace. This leaves the remaining 7,288 sqm net convenience floorspace to be distributed between the 12 key housing growth locations. This equates to just 607 sqm net floorspace for each estate although in practice the locations with the highest level of housing growth will need to deliver greater floorspace.
- 3.3.4 Table 3 identifies the number of net additional dwellings expected to be delivered in each strategic housing growth location across the borough by 2031. Key housing growth locations are expected to deliver 2,116 additional dwellings by 2031 in total.

Table 3 Key housing growth locations and net additional dwellings up to 2031

Housing Estate	Net additional dwellings
Waterloo (and Queen Street)	1,165
Napier and New Plymouth	96
Solar – Arena - Sunrise	135
Maygreen	89
Old Church	214
Royal Jubilee Court	71
Delta	253
Dell Court	11
Delderfield	16
Farnham Hilldene	63
Brunswick	3
Total	2,116

- 3.3.5 The 2031 figures have been presented here because although the delivery of dwellings is not expected to complete until 2031 on some sites it is likely that the delivery of retail floorspace would come forward as part of a phased approach ahead of the completion date.
- 3.3.6 This strategy of co-locating the delivery of new homes and convenience floorspace is an appropriate strategy in the medium term since forecast convenience needs are a product of population growth. As well as meeting the quantitative convenience needs of new residents, retail uses will also play an important role in achieving to place-making objectives within new developments.
- 3.3.7 This strategy also accords with the strategic aims of the London Plan (Policies 4.8 and 7.1) which requires that new development promotes sustainable access to goods and services and improves people's access to local shops by incorporating a mix of uses.

4 Summary and conclusions

- 4.1.1 The LB Havering commissioned PBA to prepare a report outlining the justification for draft Policy 13 of the emerging Havering Local Plan (2016-2031).
- 4.1.2 Section 2 of this Report has examined whether there is a sound basis for the LB Havering to set a local impact threshold, rather than the NPPF default 2,500 sqm threshold and whether the proposed 200 sqm threshold proposed in draft Policy 13 is justified. The headline findings of Section 2 are as follows:
- Across London 14 London boroughs have adopted local impact thresholds ranging from 80 sqm up to 1,000 sqm and the most common adopted local impact threshold is 200 sqm. Each London borough applies a 'blanket' approach whereby the threshold applies to all centres within the borough;
 - There is significant capacity to meet future retail needs within existing centres; the tables at Appendix B show that as of 2016 there was a total of 14,771 sqm gross vacant floorspace across LB Havering's centres. In accordance with the NPPF town centre first approach, available units in existing centres are the priority location for new retail development and other main town centre uses;
 - The town centre offer in most of the district centres is focused on convenience goods and many are anchored by just a few national multiple convenience retailers trading 'local' store formats complemented by local retail services. The leisure offer (food and drink) in these centres is generally weak and could be improved;
 - Although most of the district centres are currently functioning well they are vulnerable to the impact of out-of-centre convenience proposals because their turnover is heavily reliant on a small number of convenience stores. As such it is likely that proposals for even small out of centre convenience food stores by national multiple retailers would have an impact on the vitality and viability of these centres;
 - The average unit size in all LB Havering centres except for Rainham is significantly below the NPPF threshold of 2,500 sqm. In addition, only two centres, Romford and Rainham, have an average unit size greater than the proposed impact threshold (200 sqm); and
 - In the absence of a lower local threshold, a significant amount of floorspace could be delivered in edge and out of centre locations in the future without any assessment of the potential impacts on designated centres. Our analysis demonstrates that 67% of retail schemes approved between 2012 and 2018 located outside of LB Havering centres fall below the NPPF impact threshold for testing retail impact. This is a concern considering that most of LB Havering's centres are likely to be vulnerable to the impacts of retail proposals well below the NPPF impact threshold.
- 4.1.3 This evidence demonstrates that there is clear justification for adopting a local impact threshold in LB Havering and based on the above findings we recommend that the proposed 'blanket' 200 sqm gross threshold should be adopted.

- 4.1.4 Section 3 of this Report sets out a strategy to meet convenience retail development needs as identified in the RLNA 2018 Update within LB Havering up to 2026.
- 4.1.5 In the medium-term, convenience needs will be met through the delivery of new and enhanced retail floorspace in Rainham and Beam Park Strategic Development Area and key housing growth locations which together will accommodate the majority of new homes across the Borough to 2031.
- 4.1.6 This strategy of co-locating the delivery of new homes and convenience floorspace is appropriate in the medium term since forecast convenience needs are a product of population growth as explained in the RLNA 2018 Update. This strategy accords with the strategic aims of the London Plan (Policies 4.8 and 7.1) which seeks to promote sustainable access to goods and services and improves people's access to local shops within new developments. Finally, as well as meeting the quantitative convenience needs of new residents, retail uses will also play an important role in achieving to place-making objectives within new developments.

Appendix A London borough's impact thresholds

Table 4 Summary of London borough's impact thresholds

Local Authority	Policy document name and adoption date	Retail impact threshold	Relates to	Stage	Evidence base
Bexley	Bexley Core Strategy 2012 - Policy	500sqm	Convenience stores, Comparison	Adopted	Retail Capacity Study Update 2013
Brent	Brent Core Strategy 2010 - Policy DMP2	500sqm	Retail	Adopted	Retail Impact Assessment Threshold 2014
Tower Hamlets	New Local Plan 2018	200sqm	Retail	Submitted to SoS	Retail Impact Threshold Study 2018
Hackney	Draft Local Plan 2018 (same threshold in adopted plan July 2015) - Policy 28	200sqm	Retail	Public Consultation (Reg18)	Town Centre and Retail Study 2017
Islington	Development Management Policies 2013	80sqm	Retail	Adopted	Retail & Leisure Study 2017
Kensington & Chelsea	Consolidated Local Plan 2015 - Policy CF1	400sqm	Retail	Adopted, Local Plan review 2018 no bearing on this policy	Retail and Leisure Needs Study 2008
Lewisham	Development Management Local Plan	1,000sqm	Retail	Adopted	Lewisham Retail Capacity Study 2009
Merton	New Local Plan 2020	n/a	n/a	Stage 2 Consultation	n/a
	Sites & Policies Plan & Policies 2014 - Policy DM R2	180sqm	Convenience retail	Adopted	Retail and Town Centre Capacity Study 2011
Wandsworth	Development Management Policies 2016 - Policy DMTS 2	200sqm	Retail & Leisure but excluding convenience	Adopted	Retail Needs and Town Centre Assessment 2012
Waltham Forest	Development Management Policies 2013 - DM26	200sqm	Retail	Adopted	Town Centres and Retailing Study 2016
Hillingdon	Local Plan Part 2 Development Management Policies 2018 - Policy DMT C1	200-1000sqm	200sqm for Retail and 1000sqm for Main Town Centre Uses	Submitted to SoS May 2018	Retail Study Update 2012
Hounslow	Hounslow Local Plan 2015 - Policy TC3	500-2,500sqm	500sqm for Retail and 2,500 for other Main Town Centre Uses	Adopted	Retail Needs Study Update (2013)
Barnet	Development Management DPD 2012	500sqm	Retail	Adopted	Town Centre Floorspace Needs Assessment 2017
Harrow	Harrow Local Plan 2013	1,000sqm	Retail	Proposed	Economic Development Needs Assessment 2017

Appendix B London borough's vacancy rates

Table 5 London metropolitan centre vacancy rates

Centre	Borough	Vacant retail floorspace (%)	Vacant retail floorspace (sqm)
Bromley	Bromley	5%	5,950
Croydon	Croydon	10%	20,150
Ealing	Ealing	4%	3,750
Shepherds Bush	Hammersmith and Fulham	4%	5,660
Wood Green	Haringey	2%	1,890
Harrow	Harrow	7%	5,860
Romford	Havering	7%	11,381
Uxbridge	Hillingdon	7%	6,060
Hounslow	Hounslow	9%	6,910
Kingston	Kingston upon Thames	3%	4,420
Stratford	Newham	7%	11,380
Ilford	Redbridge	14%	13,780
Sutton	Sutton	15%	17,280

Source: Table 1, Appendix 4 - Technical Appendix, London Plan Town Centre Health Check 2017

Table 6 LB Havering district centre vacancy rates

Centre	Classification	Vacant retail floorspace (%)	Vacant retail floorspace sqm)
Collier Row	District	11%	830
Elm Park	District	0%	0
Harold Hill	District	8%	530
Hornchurch	District	6%	1,120
Rainham	District	0%	0
Upminster	District	4%	910
Average	-	5%	-
Total	-	-	3,390

Source: Table 1, Appendix 4 - Technical Appendix, London Plan Town Centre Health Check 2017

Table 7 Average London district centre vacancy rates by borough

Borough	District centre average vacant retail floorspace (%)
Barking & Dagenham	4%
Enfield	5%
Greenwich	5%
Havering	5%
Harrow	6%
Hackney	6%
Harrow	6%
Hillingdon	6%
Kensington & Chelsea	6%
Wandsworth	6%
Brent	7%
Lewisham	7%
Merton	7%
Richmond	7%
Waltham Forest	7%
Bromley	8%
Camden	8%
Sutton	8%
Westminster	8%
Redbridge	8%
Barnet	9%
Haringey	9%
Kingston	9%
Southwark	9%
Tower Hamlets	9%
Croydon	10%
Newham	10%

Borough	District centre average vacant retail floorspace (%)
Ealing	12%
Hounslow	13%
Lambeth	14%
Islington	15%

Source: Table 1, Appendix 4 - Technical Appendix, London Plan Town Centre Health Check 2017

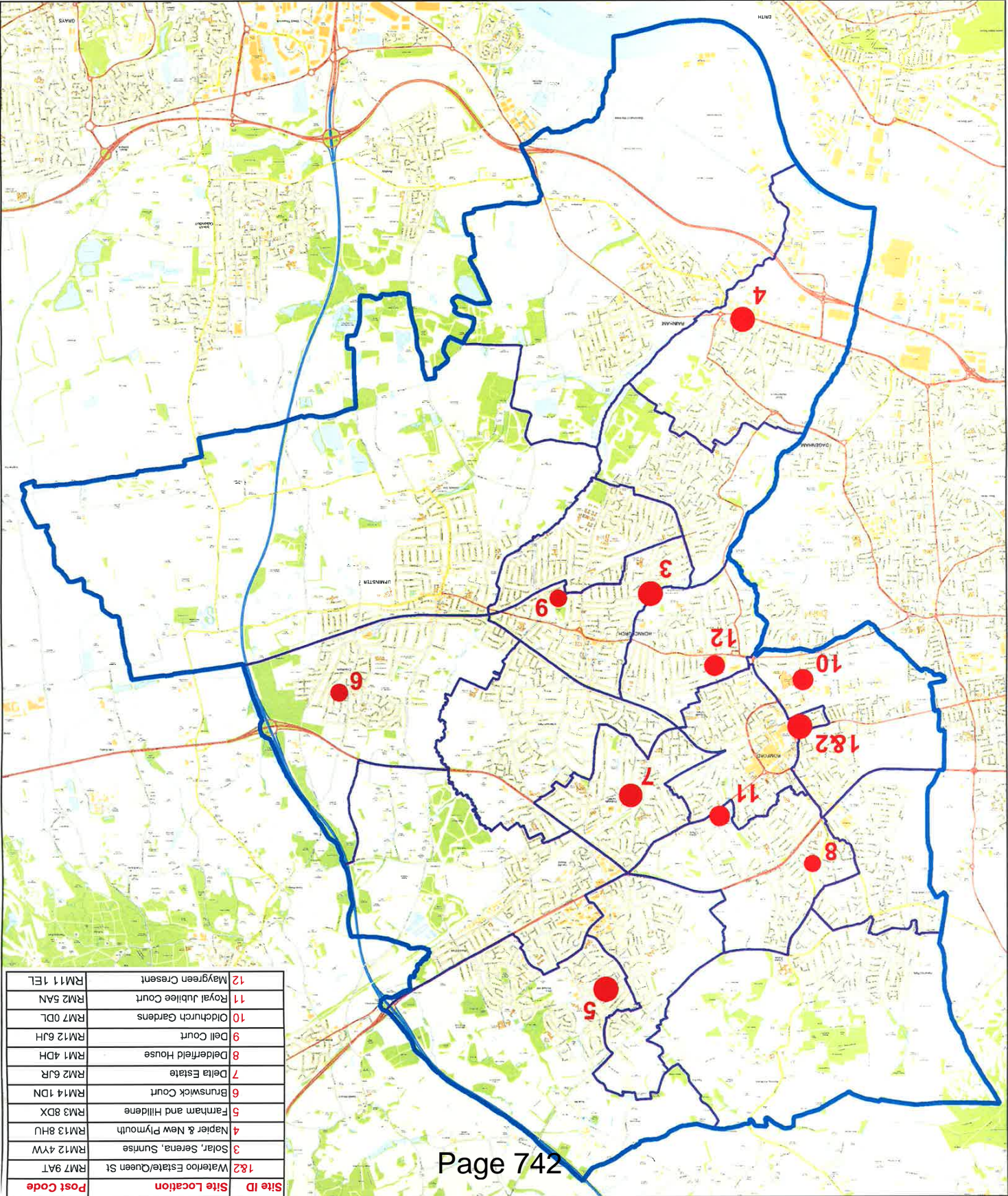
Appendix C LB Havering retail commitments 2012-2018

Table 8 LB Havering retail developments approved between 2012 and 2018

Site address	Location	Proposed A1 floorspace sqm
Site at Romford Ice Rink, Rom Valley Way, RM17 0AE	Out of centre	9,825
93-97, Collier Row Road, RM5 2AU	Edge of centre	6,000
93-97, Collier Row Road, RM5 3NX	Edge of centre	6,000
131-133, Gooshays Drive, RM3 8AE	Out of centre	1,661
Unit 6a Gallows Corner Retail Park, Colchester Road, RM3 0AD	Out of Centre	1,060
Former Petrol Station Adj 2a, Suttons Lane, RM12 6RJ	Edge of centre	418
78-80, Straight Road, RM3 8AA	Edge of centre	412
270, Hornchurch Road, RM11 1PZ	Out of centre	275
Essex House, 1, Harold Court Road, RM3 0YU	Out of Centre	130

Source: London Development Database (05/12/2018)

Appendix D LB Havering growth locations



Site ID	Site Location	Post Code
1&2	Waterloo Estate/Queen St	RM7 9AT
3	Solar, Serena, Sunrise	RM12 4YW
4	Napier & New Plymouth	RM13 8HU
5	Farnham and Hilldene	RM3 8DX
6	Brunswick Court	RM14 1DN
7	Delta Estate	RM2 6JR
8	Deidrefield House	RM1 4DH
9	Dell Court	RM12 6JH
10	Oldchurch Gardens	RM7 0DL
11	Royal Jubilee Court	RM2 5AN
12	Maygreen Crescent	RM11 1EL

Site Locations for The 12 Estates Within London Borough of Havering
Drawn by C.O



Scale: 1:50000
Date: 10 October 2018
0 1000 2000 3000 metres

Havering
LONDON BOROUGH
London Borough of Havering
Town Hall, Main Road
Romford, RM1 3BD
Tel: 01708 434343

© Crown copyright and database rights 2018
Ordnance Survey 100024327



Havering Cabinet Meeting on August 5 2020

**Item to be approved for Havering Local Plan
Main Modifications Public Consultation**

**Schedule of Minor Modifications to the Submission
Havering Local Plan**

August 2020



Examination into the Havering Local Plan 2016 – 2031

**Document published for information* alongside the
Proposed Main Modifications**

**Schedule of Minor Modifications to the Submission
Havering Local Plan**

August 2020

*** this document is published for information and is not part of the suite of documents on which comments can be submitted**

Proposed Additional Modifications to Havering Local Plan 2016-31- January 6th 2020 Version

Whilst not forming part of this consultation, we are proposing a number of additional modifications (e.g. typographical errors, clarifications and factual updates) to improve the clarity of the Local Plan.

None of these changes, however, will materially affect the policies of the Local Plan all changes have been made to the Proposed Submission Version of the Plan which was dated March 2018.

For both text in the policy and the supporting explanatory text, the proposed Main Modifications are expressed in the conventional form of ~~strike through~~ for deletions and underlining for proposed additions of text or numbering changes.

Proposed Minor Modification (PM) Number	Section /paragraph of Local Plan	Proposed Modification
1.Overview		
PM1	Section 1.2 Commenting on the Local Plan	<p>How to make comments on the Local Plan</p> <p>The Local Plan, all supporting documents and details of how to submit comments can be at www.Havering.gov.uk</p> <p>Hard copies are also available for inspection at all public libraries in Havering.</p> <p>At this stage in the plan making process, comments should made in the prescribed format need to address with the Local Plan has been made in accordance with the legislated requirements and if the Local Plan is sound – that is:</p> <p>Is the Local Plan positively prepared? Is it based on a strategy to meet the borough’s housing employment and infrastructure requirements?</p>

		<p>If the Local Plan justified? Are the policies founded on a robust and credible evidence base? Do they represent the most appropriate strategy when considered against reasonable alternatives?</p> <p>Is the Local Plan effective? Are the proposed policies deliverable and flexible? Can the council demonstrate how they will be monitored?</p> <p>Is the Local Plan consistent with national policy?</p> <p>You can submit your comments:</p> <ul style="list-style-type: none"> • online at HTTP://havering-consult.objective.co.uk/portal/planning_policy/lp/lp • By email to: development_planning@havering.gov.uk • in writing to Development Planning, London Borough of Havering, Town Hall, Main Road, Romford RM1 3BD <p>All comments should be submitted by 5 PM on Friday, 29 September 2017.</p> <p>Next steps</p> <p>The representations received in response to the consultation will be submitted with the final submission version of the Local Plan, along with supporting documents, the Secretary of State for Communities and Local Government. The Secretary of State will appoint a Planning Inspector to carry out an independent Examination in Public.</p> <p>Following the examination, the Inspector will publish a report. If the report finds the Havering Local Plan to be found “sound” the Council may formally adopt the Local Plan. Once adopted, it will supersede policies currently contained in the Core Strategy and Development Control Policies Development Plan Document and the Romford Area Action Plan 2008</p>
2. Vision for Havering		
PM2		<p>Vision for Havering</p> <p>2.1 Achieving Havering’s corporate Vision</p>

		<p>2.1.1 The Local Plan has an important role in contributing to the delivery of the Council's new dynamic vision which recognises that Havering is London's next big opportunity. <u>vision</u>. Since February 2015, our vision has been to create a clean, safe and proud borough. Whilst these are key values to the people of Havering, our borough has so much more to offer, not just to our own residents but also to the whole of London.</p> <p>2.1.2 The Council's new vision 'Havering – Making a Greater London' is about Embracing the best of what Havering has to offer and how the borough can play an active role in the success of the whole of London, The new vision is focused around four cross-cutting priorities: Communities, Places, Opportunities and Connections:</p> <ul style="list-style-type: none"> • Communities - We want to help our residents to make positive lifestyle choices and ensure a good start for every child to reach their full potential. We will support families and communities to look after themselves and each other, with a particular emphasis on our most vulnerable residents. • Places - We will work to achieve a clean, safe environment for all. This will be secured through working with residents to improve our award-winning parks and continuing to invest in our housing stock, ensuring decent, safe and high standard properties. Our residents will have access to vibrant culture and leisure facilities, as well as thriving town centres. • Opportunities - We will provide first-class business opportunities by supporting the commercial development of companies within the borough, as well as being a hub for start-ups and expanding businesses. We will ensure
--	--	--

		<p>sustainable economic growth that generates local wealth and opportunities, as well as securing investment in high-quality skills and careers.</p> <ul style="list-style-type: none"> • Connections - We want to capitalise on our location with fast and accessible transport links both within the borough and to central London, as well as making the most of national and international connections. Likewise, we will continue to make Havering a digitally-enabled borough that is connected to residents and businesses. Enhancing our connections will strengthen the borough's offer as a Greater London hub for business.
PM3	Paragraph 2.2.1	<p>2.2Havering in 15 years from now</p> <p>2.2.1 It is an exciting time for Havering; the population is growing and becoming more diverse and the borough is an increasingly attractive part of London in which to live, develop and invest. We want to position Havering as one of London's most successful and attractive outer London boroughs. The vision for the Local Plan builds on the Council's overarching vision of 'Havering: Making a Greater London' and provides a snapshot of what Havering will aspire to be like in 15 years from now.</p>
	Paragraph 2.2.7	<p>The employment area to the south of Rainham and Beam Park will have retained its role as a strategically important industrial area and will have benefited from transformational new developments and an intensification of employment uses <u>in a safe and secure environment</u>.</p>
	Paragraph 2.2.17	<p>2.2.17 Havering's Green Belt, green and open spaces, <u>biodiversity</u> and heritage assets will continue to be valued and enhanced, recognising their contribution to Havering's character <u>and future resilience</u>, the appeal of the borough as a place to live, work and visit and the health and well-being and overall quality of life for residents. Havering's existing green spaces will continue to offer an array of</p>

		recreation and leisure opportunities and, by 2031, will be more attractive and usable, as well as more accessible to residents.
	Paragraph 2.2.19	2.2.19 Over the lifetime of the Plan the Council will seek to maintain an appropriate aggregate landbank needed to support construction whilst ensuring that the individual and cumulative impacts of extraction are minimised, and that sites are restored at the earliest opportunity to a high standard <u>to contribute to the borough's environmental and social well-being.</u>
3. Strategic Objectives		
	Objective xiv.	Proactively conserve, enhance, and ensure greater understanding of Havering's <u>designated and non-designated</u> heritage assets, their settings and wider historic environment <u>subject to viability</u>
	Objective xv	Increase the <u>quantity</u> , quality and accessibility of Havering's public open spaces and maintain and enhance biodiversity and geodiversity;
5. Borough wide Strategy for growth		
	Paragraph 5.1.1	Paragraph 5.1.1 Havering's population is expected to grow to over 293,000 (1) over the next 15 years. The Strategy underpinning the Local Plan seeks to ensure that there is the necessary growth in homes, jobs and critical infrastructure to support and sustain new and existing communities whilst also preserving <u>conserving</u> and enhancing the borough's most valuable assets and maintaining its long established and strongly supported character and appearance as an outer London sub-urban borough.
	Paragraph 5.1.11	The spatial strategy has been carefully prepared to reflect several important topics. Firstly, it takes account of the strategic context provided by the National Planning Policy Framework and the London Plan. It aims to translate the policy approaches applicable to Havering into planning policies that are both relevant and necessary. Secondly, it is the land-use planning tool whereby the Council will seek to translate the ambition of its overarching vision - 'Havering - Making a Greater London' <u>to deliver into the</u> places and communities that will endure well into the remainder of this century. Thirdly, at a time when the delivery of new homes is seen as critical to London's wellbeing, it acknowledges the opportunity resulting from Havering having two key growth areas with Housing Zone status. The strategy is informed by the

		spatial portrait and key issues as set out in Annex 4 and is intended to deliver the vision and objectives as set out in Chapters 2 and 3. The strategy also takes account of environmental constraints, the finite availability of land for development and the need for the Council to balance different competing land uses and priorities in determining the most appropriate uses of land and forms of development.
	Paragraph 5.1.5	Romford is identified as a metropolitan centre in the London Plan and is the largest town centre in the borough. Romford has scope for development across a number of well located and well connected sites. The Local Plan recognises its potential for significant regeneration and intensification. Romford is already a key transport hub in Havering with more than 25 bus routes using the town centre. From 2019, it will benefit from improved rail services as a result of the arrival of Elizabeth line services through Crossrail. Its potential has been recognised by its designation as a Mayoral Housing Zone and the Local Plan will provide the means to assist in accelerating the delivery of new homes on a number of sites in and around the town centre. <u>A minimum of 6000 new homes will be delivered in the Romford Strategic Development Area.</u> This plan also envisages business growth and an expanded leisure and cultural role for Romford. The next London Plan will re-affirm the role of Romford by designating it as an Opportunity Area in recognition of its potential to address an important part of Havering's growth potential.
	Paragraph 5.1.11	Havering is one of London's greenest boroughs with extensive open spaces and more than half of the borough designated as Metropolitan Green Belt as identified on the Proposals Map. The spatial strategy of the Local Plan is to optimise the use of brownfield land <u>with suitable brownfield sites being developed first for meeting the demand for new homes and business growth and to provide continued protection for Havering's Green Belt and its most valuable open spaces and its ecological assets.</u> The Thames Chase Community Forest will be enhanced in line <u>with the Thames Chase Plan. A Brownfield Land Register has been prepared which lists the brownfield sites that have the potential to be used for future housing in the borough.</u>

	Key Features of the Spatial Strategy	<p>Key features of the spatial strategy</p> <p><i>Housing Growth</i></p> <ul style="list-style-type: none"> • Delivery of at least 17,550 high quality homes over the 15 year Plan period; • Delivery of over 5,300 <u>6000</u> new homes in the Romford Strategic Development Area; • Transformation of Rainham and Beam Park Strategic Development Area providing a new, well connected residential community of at least 3,000 homes served by Beam Park Station; • Residential intensification of the borough's district centres, with proposed development compatible with their character, function and scale; • Intensification and renewal of existing Council housing estates providing an improved housing stock and at least 700 additional homes across the borough, outside of the Strategic Development Areas. <p><i>Economic Growth</i></p> <ul style="list-style-type: none"> • Regeneration of Romford Town Centre, providing a more diverse and higher quality retail, leisure, cultural and employment offer; • Directing an appropriate scale of retail, culture, service industries and office development to the boroughs network of town centres comprising of: Romford Metropolitan Centre, district centres at Collier Row, Elm Park, Harold Hill, Hornchurch, Rainham and Upminster and 75 local centres including a new local centre at Beam Park.
--	--------------------------------------	--

		<ul style="list-style-type: none"> • Protection of the borough's Strategic Industrial Locations (SIL) (Rainham Employment Area, Harold Hill Industrial Area, King George Close Estate and Freightmaster Estate) for continued industrial use; • Protection of the borough's Locally Significant Industrial Sites (LSIS) (Harold Wood, Hillman Close, the Seedbed Centre, Lyon Road and Crow Lane) for continued industrial and employment use; • Intensification of the borough's designated industrial areas to optimise the use of the land and support transformational new developments which will maximise the economic benefits for the borough. <p><i>Transport Infrastructure</i></p> <ul style="list-style-type: none"> • Improved public transport access to central London via Crossrail services at Romford, Gidea Park and Harold Wood and a new railway station at Beam Park on the Essex Thameside Line; • Remodelling of Gallows Corner roundabout to increase safety, improve air quality and smooth motor vehicle traffic flows; • • Improved north-south links within the borough, connecting Rainham and Beam Park, Romford and Harold Hill; • Remodelling of sections of the Romford Ring Road; • Increased capacity at Junction 28 of the M25; • Improvements to the A127 through the A127 Growth Corridor project; • Working with Highways England <u>and other partners</u> to minimise the adverse impact on Havering and its <u>local</u> residents <u>and the environment</u> of the Government's preferred option for a Lower Thames Crossing.
--	--	---

		<p><i>Social Infrastructure</i></p> <ul style="list-style-type: none"> • Delivery of an early years and schools expansion programme, which may include new provision, to increase the number of early years and school places for new and existing residents; • New early years and school provision in the growth areas of Romford and Rainham and Beam Park; • New health facilities at the former St George's Hospital Site, Romford Town Centre, Rainham and Beam Park and in the north-west of the borough; • Improvements to the borough's existing leisure facilities (<u>as set out in Policy 18</u>) and new facilities in Romford Town Centre and Rainham and Beam Park. <p><i>Haverling's most valued assets</i></p> <ul style="list-style-type: none"> • Protecting and enhancing the Green Belt and Haverling's open spaces and <u>ecological assets</u>; • Preserving<u>Conserving</u> and enhancing the Haverling's rich heritage and historic environments.
6.Strategic Development Areas		
Romford	Paragraph 6.1.3	The arrival of Crossrail in 2018/19 <u>2020/21</u> alongside the relative affordability of this area are key drivers of growth.
	Paragraph 6.1.12	Market Place is one of Romford's greatest assets and has potential to provide a key civic <u>public</u> -space within the town centre.
	Add at the end of Paragraph 6.1.17	<u>In addition, the Council will seek enhancements to the biodiversity value and water quality of the river in line with the requirements of Policy 31.</u>

	Paragraph 6.1.22	<p>Education provision is particularly challenging in Romford. Existing schools within the area are already at full capacity, and whilst the Council's school expansion programme will assist in meeting future demand, this will not offer sufficient capacity over the Local Plan period. In order to meet the need for primary school places in the Romford area over the next five years an additional 3FE will be needed. 1FE is likely to be delivered through expansion of an existing school. A new 2FE school will be needed. <u>a 3 form of entry primary school (630 places) has been approved on the Bridge Close development site and the new school should be sufficient to meet demand for the additional primary places needed over the next five years. This will be addressed via the updated Local Plan that will identify specific sites for future schools. If further sites come forward for housing development then we will need to assess whether further education provision will be needed.</u> There is a further 6FE requirement for primary school places beyond the first five years. This will need to be delivered through new schools. A 6/8FE secondary school is required in the second phase of the Plan period (5-10 years). The Council will seek to identify sites suitable for additional education provision through the Romford Masterplan and Site Specific Allocations Local Plan.</p>
	Paragraph 6.1.24	<p>Due to the particular challenges in Romford and in advance of the delivery of the updated Local Plan, the Council will require all development proposals that generate a primary school child yield equivalent to one additional form of entry to provide adequate space on site for the provision of a school or robustly demonstrate how this need will be accommodated through other developments.</p>
	Paragraph 6.1.25	<p><u>The reference to a minimum 700 units for primary and 3,000 units for secondary triggering the need for part of the development site to be set aside to provide a publicly funded school, are only average figures. The specific tenure and unit size breakdown for each development will be used to calculate the child yield using the publicly available GLA population calculator.</u></p>
	Insert a new paragraph between paragraphs 6.1.25 and 6.1.26	<p><u>Havering's Indoor Sport and Leisure Facilities Strategy 2016-31 supports the provision of the new Romford Sapphire Ice and leisure Centre which has now opened. The centre offers a 25 m pool and 15 m learner pool, an ice rink, gym and studio space and is home to the Everyone Active Raiders Ice Hockey Team.</u></p>

	Figure 3 Romford Strategic Development Area	Update the Strategic Development Area boundary to reflect the revised proposed boundary set out in Proposals Map Booklet Addendum 2018.
Rainham	Paragraph 6.2.5	There are a number of development opportunities within public and private ownership. The GLA are an important landowner in the area and are bringing forward the Beam Park site for residential and mixed use development with <u>Persimmon Countryside Properties PLC</u>
	Paragraph 6.2.9	The Employment Land Review recommended the retention of the Rainham Steel office building. The site is of a good quality and is compatible with the housing development that will take place in the area. However, in the long term if Rainham Steel were to relocate from this location, the Council would not wish to retain the site for industrial use due to its prominent location and close proximity to the new residential development. The Council will seek a residential redevelopment in this scenario.
	Insert new paragraph between 6.2.11 and 6.2.12	<u>The central area in Rainham Village is designated as a Conservation Area and comprises a number of listed buildings including the grade I listed Church of St Helen & St Giles and the grade II* listed Rainham Hall.</u>
	Insert a new additional paragraph between paragraphs 6.2.18 and 6.2.19	<u>A feasibility study has been carried out in 2019 on a new leisure centre for the south of the borough as identified within the Havering Indoor Sport and Leisure Facilities Strategy 2016-31. A new leisure centre is proposed at Rainham Recreation Ground, and subject to a Cabinet decision in January 2020, is expected to open to the public in September 2021.</u>
	Figure 4 Rainham and Beam Park Strategic Development Area	Show River Beam on Figure 4
7. Successful Places to Live		

	Table 2 Housing Mix	Table 3 Borough Wide Housing Mix
8. Thriving Communities		
	Policy 12 Healthy Communities	The Council will seek to maximise the potential health gains from development proposals and ensure that any negative impacts are mitigated. All major development proposals must be supported by a Health Impact Assessment (HIA) to demonstrate that full consideration has been given to health and wellbeing <u>and the principles of active design.</u>
	Insert new paragraph after 8.1.4	<u>When undertaking Health Impact Assessments, full consideration should be given to the principles of Active Design as set out in Sport England and Public Health England's Active Design Guidance. Active design is about designing and adapting where we live to encourage activity in our everyday lives.</u>
	Policy 13 Town Centre Development	<p>The Council will seek to enhance the vitality and vibrancy of Havering's town centres, maintaining their important role for local communities.</p> <p>Applications for new main town centre uses will be subject to the sequential test as defined in the NPPF. An impact assessment will be required for retail, leisure and office developments over 200 square metres in edge or out of centre locations. Preference will be given for edge of centre and out of town centre developments to be located on existing out of centre sites designated on the Proposals Map and / or in accessible locations that are well connected to town centres.</p> <p>The Council will support development proposals within town centres that:</p> <p>i. Are appropriate to the scale and function of the town centre's position within the Town Centre Network (see Map 1 'Havering Town Centre <u>Hierarchy</u>'); </p> <p><u>The Council will not support proposals for single use retail developments which do not optimise the development potential of the site.</u> within, on the edge or outside of town centres</p>

	Paragraph 8.2.3	Although overall performing well, the other district and metropolitan centres are subject to the over proliferation of non-retail uses and have a number of vacancies in prominent locations. The vitality and vitality of these town centres could therefore also be adversely impacted by out of centre development.
	Paragraph 8.2.4	<p>Another consideration is the impact on planned assessment in town centres. Significant investment has been planned in the Romford and Rainham and Beam Park SDAs. The former includes Romford Metropolitan Centre and the latter includes Rainham District Centre and the new Beam Park Local Centre. To make sure that <u>out of centre</u> proposals out of town centres do not <u>adversely</u> affect the vitality and viability of existing town centres, and make sure future investments are optimised, the setting of a significantly lower locally specific threshold for impact assessments than that specified in the NPPF is justified.</p> <p>With regards to the average size of retail premises in town centres, district centres in Havering are made up mostly of small shops, with the average floor space being below 200 sq m. In Romford the average floor space is generally higher, although this varies between frontages. The threshold for impact assessments for edge and out of town centre development is therefore set at 200 sq m in the Local Plan.</p>
	Paragraph 8.2.5	<p>However, in promoting diversification of development and uses, the Council is concerned to ensure that the retail function of town centres is not undermined. In promoting diversity, acceptable upper floor uses would include residential, office and leisure uses. <u>Subject to the Council being satisfied that an appropriate residential environment will be provided,</u> rResidential development at the ground floor level in town centres <u>may be encouraged in locations beyond the designated frontages such as the periphery of centres will not be supported</u>. In terms of shop front design, laminated glass and internal security grills are preferred above external shutters.</p>

	Paragraph 8.2.6	The Council has designated primary and secondary frontages within its metropolitan centre and six district centres. These are shown on the Proposals Map with a schedule of properties within these frontages listed in Annex 6. <u>These designated frontages borough's metropolitan and district centres are considered to be the borough's primary shopping areas within the borough's metropolitan and district centres.</u>
	Paragraph 8.2.7	Within primary frontages, the Council will seek to increase the amount of retail floorspace, resist the loss of shops and prevent the clustering of certain uses where this would harm the town centre's primary shopping function, character and appearance. Use Class A1 should be the principal and most dominant land use as this contains the most important shopping facilities, those which attract the greatest number of customers and those which contribute most to the vitality and viability of the respective centres
	Paragraph 8.2.8	In secondary frontages and local centres, the Council will seek to maintain a majority <u>significant proportion</u> of retail uses. However, a wider mix of uses will be promoted, especially those non-retail uses that provide services which complement shopping facilities. Such uses <u>should</u> provide active frontages, support street activity and generate a similar level of pedestrian movement to a retail use, and are open during the day (retail hours).
	Paragraph 8.2.9	The over concentration of particular uses can impact negatively on the amenity of adjacent uses and adversely affect the vitality and viability of the town centre.
	Policy 15 Culture and Creativity Insert new paragraph between	<u>Havering is identified by the Mayor of London's in the Thames Estuary Production Corridor, which seeks to develop facilities for artistic and creative production from Eastern London to Southend. The Thames Estuary Production Corridor vision document already identifies Rainham's Centre for Engineering and Manufacturing Excellence as contributing to the production corridor of creative industries.</u>

	paragraphs 8.4.2 and 8.4.3.	
	Policy 16 – Social Infrastructure	c. Make use of an innovative delivery of social infrastructure;
	Policy 16 – Social Infrastructure	f. Explore the possibility to co-locate, <u>in multi-use buildings</u> with complimentary services; and
	Policy 16 – Social Infrastructure	g. Are provided in multi-use , flexible, adaptable and healthy buildings.
	Policy 16 – Social Infrastructure	Stakeholders <u>Applicants</u> will be encouraged to consider funding arrangements for <u>reasonable</u> on-going maintenance costs.
	Policy 16 – Social Infrastructure	The suitability of redundant social infrastructure premises for accommodating other forms of social infrastructure for which there is a defined need in the locality should be assessed before alternative developments will be considered by the Council. <u>The assessment should take account of site constraints and consider the feasibility and viability of retaining the site for alternative social infrastructure provision.</u>
	Policy 16 – Social Infrastructure	The following paragraph was included at the end of the Social Infrastructure policy, however it should have been the first paragraph of the support text: Social infrastructure covers a variety of health, community, cultural, sports and leisure facilities. It encompasses burial spaces, places of worship, health and education facilities, social care facilities, nurseries, theatres, sports pitches, swimming pools, and many other uses that provide a social function.
	Paragraph 8.5.6	The Council will, however, not permit proposals which would result in a loss of social infrastructure in an area of defined need for that type of social infrastructure without a convincing demonstration by the developer that an equivalent <u>replacement provision</u> re-provision (in terms of size, usefulness, attractiveness, safety and quality) has been made. <u>If the disposal of assets is part of an agreed programme of social infrastructure consolidation, the loss of social infrastructure in</u>

		<u>areas of defined need may be acceptable. The Council will also give consideration to the viability of retaining existing social infrastructure provision.</u>
	Paragraph 8.5.7	The future demand for burial space in the borough has been identified through the Council's Infrastructure Delivery Plan. Sufficient supply of multi-faith/interdenominational plots has been identified for the full Local Plan period. With regards to demands for burials meeting specific Muslim requirements arising from the wider North East London, including Havering, sufficient capacity has been identified until around 2028 <u>2024</u> . The Council <u>will support burial provision when the local need for such facilities can be demonstrated, based on up-to-date evidence.</u> only support applications for burial space which meet an unmet need.
	Policy 17 Education	Proposals with innovative and flexible design solutions and the shared use of open space and sports facilities will be considered favourably where it enables the delivery of a new school in an area of identified need <u>and where the existing sports facility can accommodate additional play without compromising quality and accessibility for existing users.</u>
	Policy 17 Education	Proposals for educational uses in the Green Belt, including the expansion of existing schools may be considered as very special circumstances where it can be robustly demonstrated that there are no suitable alternative sites within the appropriate education planning area and there is a demonstrable need <u>or demand</u> for additional school places
	Policy 18 Open space, sports and recreation	ix. Support improvements to the borough's sports and recreation facilities <u>in line with the recommendations in the Indoor Sport and Leisure Facilities and Outdoor Playing Pitch Strategies 2016</u> including: a. The replacement of Hornchurch Leisure Centre; <u>The new centre is currently being constructed and is scheduled to open in September 2020.</u> b. The refurbishment of Chafford Sports complex; <u>Provision of a new leisure centre in the south of the borough;</u> c. Expansion of Central Park leisure Centre; e. d. Enhanced facilities and a wider range of uses of Bretons Outdoor Recreation Centre;

		<p>e. New provision within the Rainham and Beam Park Strategic Development Area; and</p> <p>f. The provision of new 3G Artificial Grass Pitches (AGPs) and improvements to existing ones within the borough.</p>
	Paragraph 8.7.2	<p>In applying Policy 18, open space will encompass parks and gardens, natural and semi natural green spaces, amenity space, children's play areas, allotments and cemeteries, churchyards and other burial grounds <u>as defined in Havering's Open Space Assessment and Standards Paper (2016)</u>. In addition, <u>waterways are also included as open space recognising their sport, recreation and amenity value, consistent with the definition of open space in the NPPF</u>. <u>Leisure and sSports and recreation</u> facilities encompass indoor sports halls, swimming pools, fitness centres, outdoor sports pitches, <u>playing fields</u> tennis courts and bowling greens.</p>
	Paragraph 8.7.8	<p>It is essential that Havering has modern and fit for purpose indoor sports facilities and the Council is actively seeking to upgrade the current provision. Havering's Indoor Sport and Leisure Facilities Assessment and Strategy (2016) found that investment is needed in both community and school sports facilities. Provision <u>-has been-</u> <u>be</u> significantly enhanced by the new Romford Leisure Centre, <u>and will be further enhanced with the</u> replacement of Hornchurch Leisure Centre, <u>a new leisure centre to serve the south of the borough</u> and improved facilities at Bretons Outdoor Recreation Centre.</p>
10. Connections		
	Policy 23 Transport Connections	<p>i. Maximising the <u>development opportunities supported by Crossrail as well as the benefits from Crossrail</u> for local businesses and residents.</p>
	Table 3 Havering Transport Schemes A127 Corridor Aspirations	<p>Working collaboratively with TfL, Essex County Council, Basildon, Southend, Brentwood and Thurrock District Councils examining the A127 Corridor from Gallows Corner in Havering out to Southend. This work will look at the aspirations that various authorities have for improvements along this key route <u>to support growth across South Essex and LB Havering</u>. This work will inform the <u>production of a promotional document that can be used to highlight the importance of the Corridor and to support bids for external funding</u>. <u>With the long term aim of producing a "lobbying" document for external funding</u></p>

	Table 3 Havering Transport Schemes “ – additional scheme to be included	Transport Scheme : <u>Lower Thames Crossing</u> . <u>Scheme Description: Proposed tunnel crossing of the River Thames east of London. The purpose of the new crossing is to provide relief to journey times and congestion that is currently experienced on the Dartford Crossing whilst also addressing future capacity needs. The scheme extends from its connection with the M25 between Junctions 29 and 30 within the southern part of the Borough eastwards into Thurrock BC. This scheme is being promoted by Highways England and is to be determined by the Secretary of State for Transport as a Nationally Significant Infrastructure Project.</u> <u>Delivery Timescales : 5 – 10 years</u> <u>Key Partners : Highways England</u>
	Policy 25 Digital Connections Paragraph 10.3.1 add to end of paragraph	<u>The aim is to improve connectivity whether that’s through mobile, wireless or broadband infrastructure.</u>
11. High Quality Places		
	Policy 26 Urban Design	i. Are informed by, respect and complement the distinctive qualities, identity, and <u>character and geographical features</u> of the site and local area;
	Policy 26 Urban Design	<u>The Council will require</u> development proposals of a strategic nature to will be subject to an Urban Design Review Panel .
	Paragraph 11.1.8 add to end of paragraph	<u>When designing new residential and mixed use developments consideration should be given to how frequent deliveries will be accommodated.</u>
	Paragraph 11.1.16	The Council supports the use of Urban Design Review Panels <u>The National Planning Policy Framework states that Local Planning Authorities should have local design review arrangements in place to provide assessment and support to ensure high standards of design. The Council had established a Design Review Panel comprised of independent specialists and Council representatives and will expect development proposals of a strategic nature to be subject to such as-review. For the purpose of this policy</u> development proposal of a strategic nature are those that

		<p>have potential to significantly impact or alter the character of an area <u>including those that comprise of tall buildings and those referable to the Mayor. If an applicant is in doubt about whether a design review is required this should be discussed with the councils planning department at pre-application stage. This will include large development schemes within the Romford and Rainham and Beam Park Development Area.</u></p>
	Policy 27 Paragraph 11.2.7	<p>Landscaping schemes should demonstrate a commitment to promoting biodiversity, <u>having regard to the Havering Nature Conservation and Biodiversity Strategy (2014).</u></p>
	Policy 28 - Heritage Assets Paragraph 11.3.5	<p>11.3.5 The borough's Conservation Areas each have their own special character and architectural and historic interest that contributes to their significance, which needs to be respected by new development within them, and within their setting. For example, the special interests and significance of the Gidea Park Conservation Area, with its individually architect designed 'Arts and Crafts' style Competition and Exhibition houses, are very different to that of Romford Conservation Area, which are based on its historic significance rather than a defined architectural character. Havering's Conservation Areas all have Conservation Area Appraisals and Management Proposals which identify the special interest of each area. <u>There are certain parts of the borough which, whilst not conservation areas, have special and unique characters which add to the landscape and landscape quality of Havering. Developments in these areas should aim to preserve the spacious character of the Emerson Park and Hall Lane and Upminster residential areas to maintain the special character of these areas. Due to criteria dealing with applications in the Emerson Park and Hall Lane Special Policy Areas are contained in separate SPD's.</u></p> <p>Split into two paragraphs:</p>

		<p>11.3.5 <u>11.3.6</u> Proposals for new and replacement buildings and features within a Conservation Area or its setting, will be expected to be of a high quality design. that responds to the important characteristics of the Conservation Area, and which will preserve, enhance or reveal its character and appearance, and significance. For this reason, the Council will not normally accept applications for outline planning permission within Conservation Areas or their setting, and demolition will only be considered where the building, or other element, fails to make a positive contribution to the character or appearance, and significance of the Conservation Area.</p> <p>11.3.6 <u>11.3.7</u> Where the exercise of permitted development rights would erode the character or appearance of a Conservation Area, or other heritage asset, the Council will seek to sustain their significance, including the contribution to significance provided by their setting, through the use of Article 4 directions.</p>
	Paragraph 11.3.7	<p>11.3.7 <u>11.3.8</u> Not all of Havering's heritage assets are designated. There are also many non-designated heritage assets that contribute to the character and distinctiveness of the borough's historic environment including historic parks and gardens of local interest and locally important historic buildings. In order to ensure that these elements of the historic environment are conserved in a manner appropriate to their significance, the Council will work with local communities to promote the identification and maintenance of a list of non-designated heritage assets when these meet its agreed criteria. <u>The proposed Local List Criteria will be subject to Public Consultation.</u> Development proposals affecting non-designated heritage assets will be dealt with in accordance with the NPPF.</p> <p>11.3.8 <u>11.3.9</u></p> <p>To enable the Council to determine a the potential impact of a development proposal on the historic environment, it will require applications affecting a heritage asset, or its setting, to be accompanied by either a Design and Access Statement</p>

		<p>that includes both an assessment of the assets significance and impact statement, or a separate Heritage Statement. Proposals that affect a site which includes, or has the potential to include, heritage assets with archaeological interest, will need to be accompanied by an archaeological desk-based assessment, and may also require field evaluation in order to determine its significance.</p> <p>11.3.9 <u>11.3.10</u> All proposals affecting heritage assets should be informed by consultation with the Historic Environment Record and assessed using appropriate expertise. The level of assessment needed should be proportionate to the significance of the asset affected and the impact of the proposal. To ensure opportunities for people to access and learn from the borough's historic environment, where the loss of the whole, or a part of a heritage asset's significance is necessary and clearly justified, the Council will require the developer to record and advance public understanding of the significance of the heritage asset by making the results publicly accessible.</p>
	Insert new paragraph after paragraph 11.3.10	<p><u>11.3.11 Archaeological Priority Areas (APAs) are areas where there is significant known archaeological interest or potential for new discoveries. APAs are used to help highlight where development might affect heritage assets. The Greater London Archaeological Advisory Service are undertaking a review of the APAs across London. Havering's APA review is currently scheduled for 2019.</u></p>
12. Green Places		
	Policy 29 Green Infrastructure Paragraph 12.1.1	<p>Green infrastructure is a network of green spaces and natural features that provide multiple benefits for the environment, economy and community. The benefits of green infrastructure include enhancing biodiversity, alleviating flood risk, providing opportunities for recreation, physical activity and education. defined as a network of green spaces - and features such as street trees and green roofs - that is planned,</p>

		<p><u>designed and managed to provide a range of benefits, including: recreation and amenity, healthy living, reducing flooding, improving air quality, cooling the urban environment, encouraging walking and cycling, and enhancing biodiversity and ecological resilience(1).</u></p> <p><u>(1) All London Green Grid Supplementary Planning Guidance, Mayor of London 2012</u></p>
	Policy 30 Nature Conservation Paragraph 12.2.6	London Wildlife <u>Sites</u> Board ...
	Map 2 Havering Wildlife Corridors	Include the Thames Corridor as a wildlife Corridor.
	Policy 31 Rivers and river corridors	To protect and enhance the biodiversity and amenity value of river corridors while accommodating future adaptations to flood defences, the Council will require development to be set back by 8 metres from main rivers, ordinary watercourses and other flood assets, and 16 metres from tidal rivers or defence structures from tidal rivers or defence structures, <u>including tie rods and anchors.</u>
	Policy 31 Rivers and river corridors	ii. Contributes towards the enhancement and extension of a riverside path to enable local communities to enjoy the riverside <u>providing that appropriate lifesaving equipment such as grab chains, access ladders and life buoys are provided along the river edge</u>
	Paragraph 12.3.2	<p>All the Rivers in Havering (Beam, Ravensbourne, Rom, <u>Mardyke, Ingrebourne...</u></p> <p>Add to the end of 12.3.2: <u>For the implantation of this policy, any development within 20m of a main river is considered in close proximity.</u></p>
	Paragraph 12.3.3	<p>The Thames River Basin Management Plan <u>2015-2021 (*)...</u></p> <p>Footnote: * https://www.gov.uk/government/collections/river-basin-management-plans-2015</p>

	Policy 32 Flood Management Insert new paragraph after paragraph 12.4.8	<u>12.4.9 In some cases, the discharge or infiltration of surface water may require a permit under the Environmental Permitting Regulations. Developers are therefore advised to review available guidance (1) and seek advice from the Environment Agency at an early stage.</u> <u>(1) https://www.gov.uk/topic/environmental-management/environmental-permits</u>
	Insert new paragraph after paragraph 12.4.8 9	<u>12.4.10 The Council recognises that flood management measures can support biodiversity, and thereby contribute to the objectives of Policy 30. Developers are expected to seek to integrate such measures into the wider green infrastructure network in line with Policy 29.</u>
	Policy 33 Air Quality Paragraph .5.2 add to end of paragraph	<u>The Havering Council Air Quality Action Plan 2018- 2023 is being implemented.</u>
	Policy 34 Managing Pollution Paragraph 12.6.4 add to end of paragraph	<u>Applicants are also encouraged to consider guidance from the Bat Conservation Trust to minimise the impact of artificial lighting on wildlife (footnote: Bat Conservation Trust, 2014. Artificial lighting and wildlife; Interim Guidance: Recommendations to help minimise the impact artificial lighting. See: www.bats.org.uk/pages/bats_and_lighting.html)</u>
	Paragraph 12.6.5	<u>The Environment Agency should be consulted when the proposed development poses a potential risk to controlled waters due to land contamination <u>having regard to the Environment Agency's groundwater protection principles (footnote: https://www.gov.uk/government/collections/groundwater-protection)</u>. Regard should be given to the Source Protection Zone along the border with Barking & Dagenham, which needs to be protected during development around discharges or pathways to groundwater. The Council's leaflet ...</u>
	Policy 35 Paragraph 12.7.3 Add to end of paragraph	<u>For developments including flatted properties, it will be expected that the required waste management plan adheres with the advice and template provided by the London Waste & Recycling Board (1).</u> <u>(footnote:http://www.lwarb.gov.uk/what-we-do/resource-london/successes-to-date/efficiencies-programme-outputs/ The Council will bring forward further detailed guidance in due course.</u>

	Policy 36-Low carbon design, decentralised energy, and renewable energy. Paragraph 12.8.1	Renewable energy supplies and achieving energy efficiency are crucial to meeting the Council's ambition of reducing carbon emissions, and generating cleaner power locally. Specific requirements relating to minimising carbon dioxide emissions, <u>water efficiency</u> , sustainable design and construction and decentralised energy are set out within the London Plan and will be applied by the Council.
14. Delivery and Implementation		
	Paragraph 14.0.5	The Council knows that its role and that of other public bodies as land owners is important through direct investment in the provision of land for new homes and infrastructure. To this end, the Council has established its own housing company and , an ambitious estates regeneration programme <u>and has entered into three joint venture partnerships.</u> and <u>The council is also</u> working proactively with other public sector bodies and private developers to bring forward sites in public and private ownership to increase the supply of housing in the borough.
A. Annexes		
	Paragraph A.3.32	Havering has a diverse range of important heritage <u>assets.</u> sites and areas. There are currently 6 Grade I and , 15 Grade II* <u>and over 100 Grade II</u> listed buildings located within Havering, as well as 11 designated conservation areas at including; Corbets Tey, Cranham, Gidea Park, Havering-atte-Bower, Langtons, North Ockendon, RAF Hornchurch, Rainham, Romford, St Andrews and St Leonards <u>and one listed garden – Upminster Court Gardens.</u>

Havering Cabinet Meeting on August 5 2020

**Composite revised Havering Local Plan document
(including Proposed Main Modifications and ‘Minor’
changes)**

August 2020



Examination into the Havering Local Plan 2016 – 2031

**Document published for information* alongside the
Proposed Main Modifications**

**‘Composite’ revised submission Havering Local
Plan document (including Proposed Main
Modifications and ‘Minor’ changes)**

**This document will be completed after the Cabinet
meeting**

August 2020

*** this document is published for information and is not part of the suite of
documents on which comments can be submitted**

Havering Cabinet Meeting on August 5 2020

Item to be approved for Havering Local Plan Main Modifications Public Consultation

**Amended Statement of Community Involvement (Covid 19
update)**

August 2020



Examination into the Havering Local Plan 2016 - 2031

**Document published for information* alongside the
Proposed Main Modifications**

**Amended Statement of Community Involvement (Covid 19
update)**

August 2020

***this document is published for information and is not part of the suite of
documents on which comments can be submitted**



STATEMENT OF COMMUNITY INVOLVEMENT
February 2015

Temporary Changes August 2020

CONTENTS

1. Introduction	3
1.1 What is the Statement of Community Involvement?	3
1.2 Why do we need a new Statement of Community Involvement?	3
1.3 Links to other Havering Policies	4
2. Havering's Stakeholders and Local Community	5
2.1 Havering's Community	5
2.2 Statutory Consultation Bodies	6
3. Community Involvement in Plan Making	8
3.1 Introduction to Planning Policy Documents	8
3.2 Community Involvement in the Local Plan	12
3.3 Community Involvement in Supplementary Planning Documents	17
3.4 Community Involvement in setting a Community Infrastructure Levy Charging Schedule	19
3.5 Havering's Planning Consultation Database	22
4. Community Involvement in Planning Decisions	24
5. Monitoring and review	32
6. Appendices:	33
A. Guiding Principles of Consultation	33
B. Applications where consultation is not compulsory	34
C. Glossary	35

COVID-19 UPDATE AUGUST 2020:

In response to Government advice relating to the Covid-19 Pandemic the Council has made temporary changes to the SCI. Further details are set out below and for clarity all amendments are written and underlined in red.

Section 5.1.1 of this document states that a review of the SCI should be undertaken when there are 'Changes in legislation with direct influence on the function of the Statement of Community Involvement'.

In May 2020 the Government published its Planning Update: Written Statement (HCWS235) setting out clear expectations for how the planning system should be operating during the Covid-19 emergency.

Updates to the National Planning Policy Guidance (NPPG) encourage local planning authorities to undertake an immediate review of their SCIs and update the policies where necessary so that plan-making can continue during this time using means which are reasonably practicable including online engagement methods. (NPPG Paragraphs: 077 and 078)

For this reason, the Council is making changes to policies in this document that reference availability of hard copies of documents in libraries and the Romford Public Advice Service Centre (PASC), as well as making consultation documents available in alternative forms. These policies need to be amended to ensure the safety of residents and to follow government guidance, while still being able to move forward in planning processes. The Council is committed to providing meaningful opportunities to the community to engage in the plan making process during these challenging and unprecedented times.

It should be noted that these amendments are only temporary while restrictions relating to COVID-19 are in place. The Council is planning to undertake a full review of the SCI in due course.

1. INTRODUCTION

1.1 What is the Statement of Community Involvement?

1.1.1. Havering is committed to securing effective involvement of the community and other stakeholders in the future development of the Borough. The purpose of the Statement of Community Involvement (SCI) is to set out the preferred options and legal requirements for involving the community and other stakeholders in:

- The preparation of planning policies including a new Havering Local Plan which will set out the long term strategic planning priorities, objectives and opportunities for development and clear policies on what will or will not be permitted and where.
- The determination of planning applications through the decision making process.

1.1.2. Planning policies and decisions help shape the places and spaces where people live, work, are educated, visit and invest in and it is therefore essential that Havering's stakeholders including residents have an opportunity to take part in the process.

1.2 Why do we need a new Statement of Community Involvement?

1.2.1 Havering's first Statement of Community Involvement was adopted in 2006 to support the preparation of the Local Development Framework (LDF) 2008.

1.2.2 The Council is now reviewing its LDF and will be preparing a new Local Plan for the Borough. The new SCI will support this process and set out how the community and other stakeholders will be consulted and how they can influence the Plan as it develops.

1.2.3 A new SCI is needed so that it can take account of the following:

- Changes to planning legislation including the replacement of Local Development Frameworks with Local Plans.
- Publication of the National Planning Policy Framework (NPPF) in 2012 which encourages consultation before a planning application is submitted and early and meaningful collaboration and engagement when preparing Local Plans and other policy documents.

- Increasing budget pressures and the need to consult effectively and in the most efficient way.
- The increasing use of online communication methods and social media.

1.3 Links to other Havering Policies

- 1.3.1 Havering's 'Living Ambition' Strategy and its associated Corporate Plan set out the Council's commitment to actively consult and engage with residents, service users and local communities in pursuit of its long-term vision to achieve a better quality of life for residents.
- 1.3.2. The Council has also developed a consultation policy and toolkit for use within the Council which sets out Havering's commitment to be open and accessible and to consult widely with residents, service users, and local communities on policy issues that affect them and on the services the Council provides. As part of this work the Council has developed seven Guiding Principles of Consultation, these are reflected in the draft Statement of Community Involvement.

Guiding Principles of Consultation

- Integrity
- Accessibility
- Visibility
- Disclosure
- Transparency
- Fair Interpretation
- Publication

Further detail on each of these principles is set out in Appendix A.

- 1.3.3 Havering Compact 2008 sets out guidelines for consultation, information sharing and participation in order to enable the voluntary and community sector in Havering to make an effective contribution to the development and implementation of policy.

2. HAVERING'S STAKEHOLDERS AND LOCAL COMMUNITY

2.1 *Havering's community*

2.1.1 Havering's community is made up of many different groups including residents, workers, visitors, service providers, businesses and community groups all of whom can have a wide range of differing views, aspirations and priorities.

2.1.2 An assessment of Havering's community profile has identified a number of characteristics that may need to be taken into account when considering how to consult and engage effectively. These are identified below:

- There is a growing older population (over 65's)
- There is a growing younger population (under 18's)
- There is an increasingly diverse population with an increase in ethnic minorities
- There are a number of languages spoken in Havering as well as English
- There are a significant number of residents who have a long term health problem or disability
- There are some pockets of deprivation in the Borough

2.2 *Statutory consultation bodies*

2.2.1 The Local Planning Regulations 2012 require the Council to consult and notify a number of 'specific consultation bodies' when preparing Local Plans. The Council may also consult any of the 'general consultation bodies' and residents or other such persons carrying out business in the area, that the Council considers is appropriate.

2.2.2 The specific consultation bodies who are required to be consulted are:

- The Mayor of London
- Transport for London
- Relevant authority any part of whose area is in or adjoining the Borough of Havering:
- The Environment Agency
- the Historic Buildings and Monuments Commission for England (known as English Heritage or Historic England from 1st April 2015)
- the Marine Management Organisation
- Natural England
- Network Rail Infrastructure Limited
- the Highways Agency

- the Civil Aviation Authority
- Local Enterprise Partnership(s)

1.2.3 The general consultation bodies (optional consultees) are:

- Any voluntary bodies some or all of whose activities benefit any part of the local planning authority's area
- Any bodies which represent the interests of different racial, ethnic or national groups in the local planning authority's area
- Any bodies which represent the interests of different religious groups in the local planning authority's area
- Any bodies which represent the interests of disabled persons in the local planning authority's area
- Any bodies which represent the interests of persons carrying on business in the local planning authority's area

3. COMMUNITY INVOLVEMENT IN PLAN MAKING

3.1 *Introduction to planning policy documents*

- 3.1.1 There are a number of planning policy documents that the Council is either required to or may wish to produce. The different types of documents are set out below.

The Local Plan

- 3.1.2 The Council is required to produce a Local Plan for the Borough. Local Plans set out the long-term strategic planning priorities, objectives and opportunities for development and clear policies on what will or will not be permitted and where. Decisions on planning applications are taken in accordance with the policies set out in Local Plans.
- 3.1.3 Local Plans can comprise of more than one document, for example this could include separate Local Plan documents setting out policies relating to a specific area of the borough or a specific topic area, such as waste.
- 3.1.4 The Local Plan has to be consistent with national planning policy (the NPPF) and in general conformity with the London Plan which is produced by the Mayor of London.
- 3.1.5 Local Plans are subject to a minimum of two stages of public consultation. They are then submitted for consideration by an Independent Planning Inspector. For further details on the process of preparing a Local Plan refer to table 3.1.
- 3.1.6 Until a new Local Plan is adopted, development in Havering will continue to follow the policies in the Local Development Framework (LDF) 2008, the London Plan (2011) and subsequent alterations, and the National Planning Policy Framework.

Neighbourhood Plans

- 3.1.7 The Localism Act 2011 introduced new powers enabling local communities to come together to prepare Neighbourhood Plans. Neighbourhood Plans set out policies in relation to the development and use of land for a designated Neighbourhood Area. In Havering a Neighbourhood Plan would need to be produced by a designated community group, known as a Neighbourhood Forum. The Plans are approved through referendum after being checked for legal compliance by an independent examiner.

3.1.8 There are currently no Neighbourhood Forums or Neighbourhood Plans in Havering.

Supplementary Planning Documents

3.1.9 Supplementary Planning Documents (SPD) provide further detail and guidance on the implementation of policies set out in a Local Plan but they cannot set new policies. SPDs are subject to public consultation prior to being adopted. For further details on the process of preparing an SPD refer to table 3.3.

Sustainability Appraisal

3.1.10 A Sustainability Appraisal is a statutory document the purpose of which is to ensure that the promotion of sustainable development is integrated in the plan making process. It is a key tool used to appraise the environmental, economic and social effects of plans, strategies and policies. The Sustainability Appraisal process includes two stages of public consultation, firstly on the defining the scope of the Appraisal and then on the draft document. For further details on the process of preparing a Sustainability Appraisal for the Local Plan, refer to table 3.2.

Local Development Scheme

3.1.11 Local planning authorities are required to prepare and maintain a Local Development Scheme (LDS). The purpose of the LDS is to set out the plans and policy documents that will be prepared by the Council and a timetable for their delivery.

3.1.12 The Local Development Scheme is not subject to public consultation.

Authority Monitoring Report

3.1.13 The Localism Act 2011 requires local authorities to prepare and publish an Authority Monitoring Report (AMR) containing information on the implementation of the Local Development Scheme (LDS) and the extent to which the policies set out in the Local Development Framework (LDF)/ Local Plan.

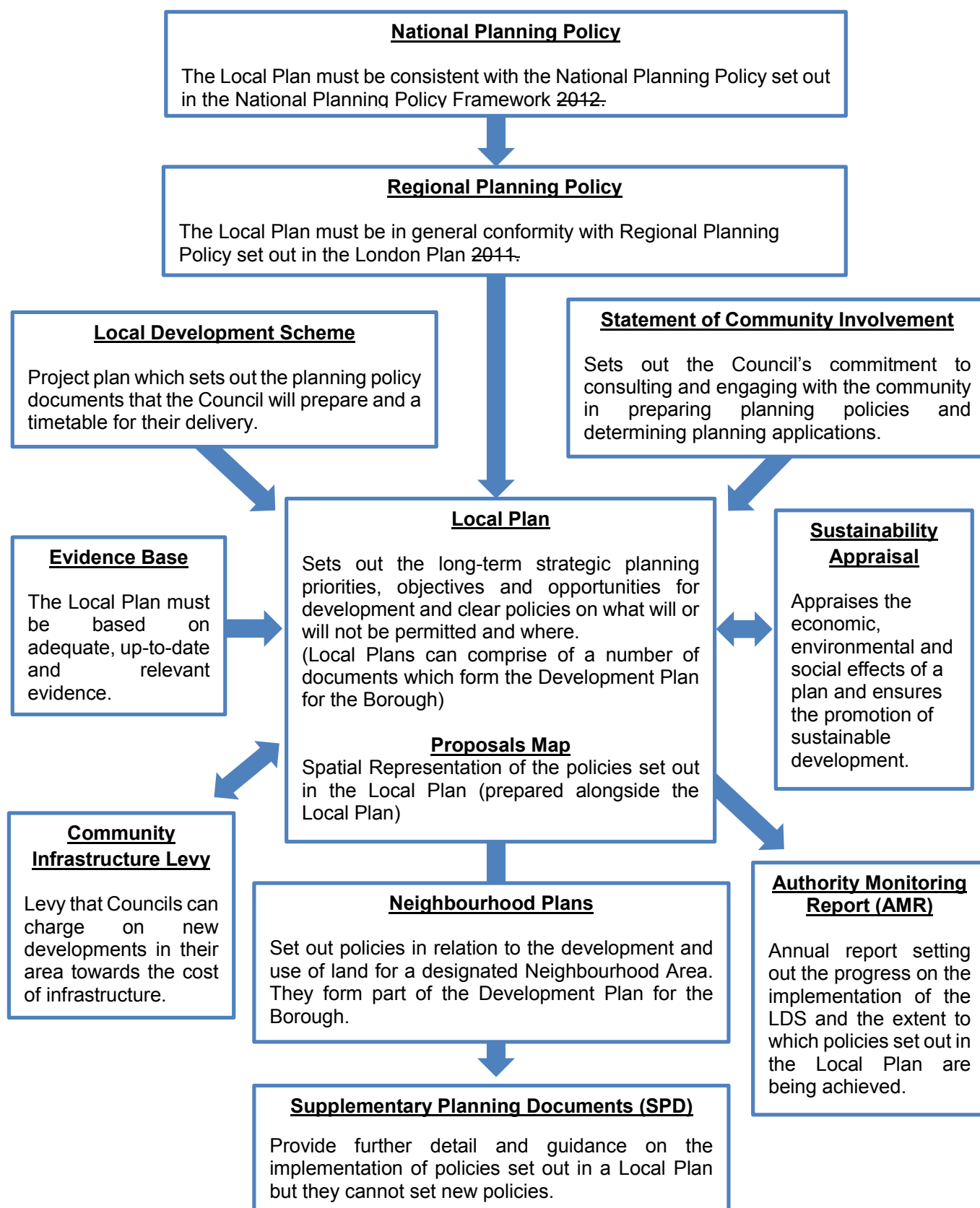
3.1.14 The Authority Monitoring Report is not subject to public consultation.

Community Infrastructure Levy

- 3.1.15 Community Infrastructure Levy (CIL) is a levy that local authorities can choose to charge on new developments in their area towards the cost of infrastructure.
- 3.1.16 The charging authority (The Council) sets out its levy rates in a charging schedule. The Charging Schedule is subject to two stages of public consultation before it can be submitted and examined in public by an independent planning inspector. Further details on the process of introducing a Community Infrastructure Levy are set out in table 3.4.

The diagram overleaf shows the key planning policy documents.

Diagram 1: Key Planning Policy Documents



3.2 Community Involvement in the Local Plan

The following table sets out how the Council will engage with the community at each stage of the Local Plan process.

3.2.1 It should be noted that in times where government imposes restrictions on movements and gatherings, and advises people to social distance, consultations and public examination meetings will be held on online platforms. During these times documents won't be available in hard copies at libraries, at the Romford Public Advice Service Centre, or in hard copy alternative form. Hard copies will still be available on request. The Council will do as much as possible in these times to utilise other forms of communication to keep residents informed and involved. All other community involvement commitments will still be carried out.

Table 3.1 Community involvement in the Local Plan Process

Stage	Community involvement commitments (What we will do)		Additional options
Preparation and Initial Consultation At this stage an initial consultation document/questionnaire will be prepared and it will be subject to public consultation	<ul style="list-style-type: none"> - Consult for a minimum of 6 weeks; - Consult statutory consultees - specific and appropriate general consultation bodies including HAVCO (Havering Association of Voluntary and Community Organisations); - Publicise and make consultation documents available on the Council's website; - Make consultation documents available in all libraries and the Romford Public Advice Service Centre (PASC); (refer to section 3.2.1) - Notify registered contacts (refer to section 3.5) by email or in writing if no email address is provided - Issue a statutory public notice in the Romford Recorder - Notify all elected Members; 		<ul style="list-style-type: none"> - Longer consultation period if the consultation falls at certain times such as Christmas or Easter; - Publicise in the Council's quarterly 'Living in Havering' magazine if the timing allows; - Publicise via Council's social media platforms (Twitter, Facebook, Instagram, and YouTube channel); - Provision of a questionnaire, if this will assist the consultation.

	<ul style="list-style-type: none"> - Make consultation documents available in alternative formats on request (refer to section 3.6 and section 3.2.1) 	
<p>Publication</p> <p>At this stage the Local Plan is published in what is considered its finalised form</p>	<ul style="list-style-type: none"> - Consult for a minimum of 6 weeks; - Consult statutory consultees - specific and general consultation bodies including HAVCO. - Publicise and make consultation documents available on the Council's website; - Make consultation documents available in all libraries and the Romford Public Advice Service Centre (PASC); (refer to section 3.2.1) - Notify registered contacts (refer to section 3.5) by email or in writing if no email address is provided - Issue a statutory public notice in the Romford Recorder - Notify all elected Members; - Make consultation documents available in alternative formats on request (refer to section 3.6 and section 3.2.1) 	<ul style="list-style-type: none"> - Longer consultation period if the consultation falls at certain times such as Christmas or Easter; - Publicise in the Council's quarterly 'Living in Havering' magazine if the timing allows; - Publicise via Council's social media platforms (Twitter, Facebook, Instagram, and YouTube channel); - Provision of a questionnaire, if this will assist the consultation.

<p>Submission to the Secretary of State</p> <p>At this stage, the Plan, the Sustainability Appraisal, any information documents that are appropriate, and a report of the consultation process and results, are forwarded to the Secretary of State for consideration.</p> <p>There is no consultation at this time.</p>	<ul style="list-style-type: none"> - Make submission documents available on the Council's website; - Notify statutory consultees including specific and general consultation bodies. - Make submission documents available in all libraries and the Romford Public Advice Service Centre (PASC); (refer to section 3.2.1) - Issue a statutory public notice in the Romford Recorder - Notify registered contacts (refer to section 3.5) including those who previously commented on the Plan by email or in writing if no email address is provided. - Make consultation documents available in alternative formats on request (refer to section 3.6 and section 3.2.1) 	
<p>Public Examination</p> <p>At this stage the Local Plan is 'examined' by the Planning Inspectorate on whether it is 'sound' and has met all of the legal requirements.</p> <p>A programme officer is appointed who is responsible for organising and running the Examination on behalf of the Inspector.</p>	<ul style="list-style-type: none"> - Publish the date, time and location of the Examination on the Council's website - Issue a statutory public notice in the Romford Recorder - Notify those who previously commented on the Plan by email or in writing if no email address is provided. - Make all examination documentation available on the Council's website <p><i>The notifications above will provide details on how to register to speak at the Examination in Public. Only those who have made written representations at publication stage may speak at the Examination</i></p>	

Further consultation		
The Inspector may suggest changes to the Local Plan and further consultation may be required at this stage and any representations will be considered by the Inspector and not the local planning authority. If further consultation is required it will be carried out in accordance with the commitments for the initial consultation and publication stages.		
Adoption At this stage the Council adopts the final version of the Local Plan.	<ul style="list-style-type: none"> - Publish the Local Plan alongside an adoption statement and other supporting documents on the Council's website; - Notify registered contacts (refer to section 3.5) by email or in writing if no email address is provided - Notify statutory consultees including specific and general consultation bodies. - Issue a statutory public notice in the Romford Recorder - Place a copy of the adopted Local Plan in all libraries and the Romford Public Advice Service Centre (PASC); <u>(refer to section 3.2.1)</u> - Make consultation documents available in alternative formats on request (refer to section 3.6 <u>and section 3.2.1</u>) 	<ul style="list-style-type: none"> - Publicise in the Council's quarterly 'Living in Havering' magazine if the timing allows; - Publicise via Council's social media platforms (Twitter, Facebook, Instagram, and YouTube channel);

As set out in paragraph 3.1.10 the Local Plan must be accompanied by a Sustainability Appraisal, which is prepared in parallel to the Local Plan Process. The SA is subject to public consultation as detailed in table 3.2 below

Table 3.2 Community Involvement in Sustainability Appraisals

Stage	Community Involvement Commitments (What we will do)	Additional options
<p>Stage A: Setting the context, establishing baseline and deciding on scope.</p> <p>At this stage a Draft Scoping Report is prepared and is subject to public consultation.</p> <p>Public consultation on the Scoping Report will occur prior to the initial consultation on the Local Plan.</p> <p>Comments received during the consultation period will be considered and a final version of the Scoping report will be prepared and published.</p>	<ul style="list-style-type: none"> - Consult for a minimum of 5 weeks; - Consult statutory consultees by email or letter: <ul style="list-style-type: none"> - Environment Agency - Natural England - English Heritage (Historic England from 1st April 2015) - Publicise and make consultation documents available on the Council's website; - Make consultation documents available in all libraries and the Romford Public Advice Service Centre (PASC); <u>(refer to section 3.2.1)</u> - Notify registered contacts (refer to section 3.5) by email or in writing if no email address is provided - Issue a statutory public notice in the Romford Recorder - Make consultation documents available in alternative formats on request (refer to section 3.6 <u>and section 3.2.1)</u> 	<ul style="list-style-type: none"> - Longer consultation period if the consultation falls at certain times such as Christmas or Easter;
<p>Stage B: Developing and refining options and assessing affects</p>	<p>There is no public consultation at this stage</p>	

This stage occurs in parallel with preparing the submission version of the Local Plan.	
Stage C Preparing the SA report	There is no public consultation at this stage
Stage D Consulting on the SA Report Public consultation on the SA report will take place alongside consultation on the Submission version of the Local plan.	<div data-bbox="1034 1485 1179 1944" data-label="Text"> <p>- Longer consultation period if the consultation falls at certain times such as Christmas or Easter;</p> </div> <div data-bbox="639 808 1179 1464" data-label="List-Group"> <ul style="list-style-type: none"> - Consult for a minimum of 5 weeks; - Publicise and make consultation documents available on the Council's website; - Make consultation documents available in all libraries and the Romford Public Advice Service Centre (PASC); <u>(refer to section 3.2.1)</u> - Notify registered contacts (refer to section 3.5) by email or in writing if no email address is provided - Issue a statutory public notice in the Romford Recorder - Make consultation documents available in alternative formats on request (refer to section 3.6 <u>and section 3.2.1</u>) </div>
Stage E Monitoring the significant effects of implementing the DPD	<p>There is no public consultation at this stage</p>

3.3 Community Involvement in Supplementary Planning Documents

The following table sets out how the Council will engage with the community when preparing Supplementary Planning Documents

Table 3.3 Community Involvement in the SPD process

Stage	Community Involvement Commitments (What we will do)	Additional options
Preparation At this stage a draft version of the SPD is prepared	No specific requirements.	Informal engagement with relevant stakeholders to agree the level of detail and identify key issues.
Public Consultation At this stage the draft SPD is published for consultation.	<ul style="list-style-type: none"> - Consult for a period of 6 weeks; (statutory minimum is 4 weeks) - Consult statutory consultees - specific and appropriate general consultation bodies including HAVCO. - Publicise and make consultation documents available on the Council's website; - Make consultation documents available in all libraries in areas that are affected by the SPD and the Romford Public Advice Service Centre (PASC); (refer to section 3.2.1) - Notify registered contacts (refer to section 3.5) by email or in writing if no email address is provided - Issue a statutory public notice in the Romford Recorder - Notify Ward Members in areas affected by the SPD; 	<ul style="list-style-type: none"> - Longer consultation period if the consultation falls at certain times such as Christmas or Easter; - Publicise in the Council's quarterly 'Living in Havering' magazine if the timing allows; - Publicise via Council's social media platforms (Twitter, Facebook, Instagram, and YouTube channel); - Provision of a questionnaire, if this will assist the consultation.

	<ul style="list-style-type: none"> - Make consultation documents available in alternative formats on request (refer to section 3.6 and section 3.2.1) 	
Following public consultation, the representations received will be considered and amendments will be made to the Supplementary Planning Document.		
Adoption At this stage, the Council adopts the final version of the SPD.	<ul style="list-style-type: none"> - Publish the SPD alongside an adoption statement and other supporting documents on the Council's website; - Notify those who previously commented on the SPD by email or in writing if no email address is provided. - Issue a statutory public notice in the Romford Recorder - Place a copy of the adopted SPD in all libraries in areas that are affected by SPD and the Romford Public Advice Service Centre (PASC); (refer to section 3.2.1) - Issue a statutory notice (press release) in the Romford Recorder - Make consultation documents available in alternative formats on request (refer to section 3.6 and section 3.2.1) 	<ul style="list-style-type: none"> - Publicise in the Council's quarterly 'Living in Havering' magazine if the timing allows; - Publicise via Council's social media platforms (Twitter, Facebook, Instagram, and YouTube channel);

3.4 Community Involvement in setting a Community Infrastructure Levy charging schedule

The following table sets out how the Council will engage with the community in preparing its Community Infrastructure Levy:

Table 3.4 Community Involvement in the Community Infrastructure Levy process

Stage	Community Involvement Commitments (What we will do)		Additional options
Preliminary Draft Charging Schedule (PDCS) The PDCS sets out the initial proposals for the levy and is subject to public consultation	<ul style="list-style-type: none"> - Consult for a period of 6 weeks - Publicise and make consultation documents available on the Council's website; - Make consultation documents available in all libraries and the Romford Public Advice Service Centre (PASC); (refer to section 3.2.1) - Notify registered contacts (refer to section 3.5) by email or in writing if no email address is provided - Issue a statutory public notice in the Romford Recorder - Make consultation documents available in alternative formats on request (refer to section 3.6 and section 3.2.1) 		<ul style="list-style-type: none"> - Longer consultation period if the consultation falls at certain times such as Christmas or Easter; - Publicise in the Council's quarterly 'Living in Havering' magazine if the timing allows; - Publicise via Council's social media platforms (Twitter, Facebook, Instagram, and YouTube channel); - Provision of a questionnaire, if this will assist the consultation.
Following consultation on the Preliminary Draft Charging Schedule, the representations must be considered taken into account when preparing the Draft Charging Schedule.			
Draft Charging Schedule Publication At this stage the Draft Charging Schedule is published for consultation	<ul style="list-style-type: none"> - Consult for a period of 6 weeks (statutory minimum is 4 weeks) - Publicise and make consultation documents available on the Council's website; 		<ul style="list-style-type: none"> - Longer consultation period if the consultation falls at certain times such as Christmas or Easter;

in what is considered to be its final form	<ul style="list-style-type: none"> - Make consultation documents available in all libraries and the Romford Public Advice Service Centre (PASC); <u>(refer to section 3.2.1)</u> - Notify registered contacts (refer to section 3.5) by email or in writing if no email address is provided - Issue a public notice (press release) in the Romford Recorder - Make consultation documents available in alternative formats on request (refer to section 3.6 <u>and section 3.2.1</u>) 	<ul style="list-style-type: none"> - Publicise in the Council's quarterly 'Living in Havering' magazine if the timing allows; - Publicise via Council's social media platforms (Twitter, Facebook, Instagram, and YouTube channel); - Provision of a questionnaire, if this will assist the consultation.
<p>Submission to Secretary of State</p> <p>At this stage, the Charging Schedule, Statement of consultation and any supporting documents are submitted to the Secretary of State for consideration.</p> <p>There is no public consultation at this time.</p>	<ul style="list-style-type: none"> - Make submission documents available on the Council's website; - Make submission documents available in all libraries and the Romford Public Advice Service Centre (PASC); <u>(refer to section 3.2.1)</u> - Issue a statutory public notice in the Romford Recorder - Notify registered contacts (refer to section 3.5) including those who previously commented on the Plan by email or in writing if no email address is provided. - Make consultation documents available in alternative formats on request (refer to section 3.6 <u>and section 3.2.1</u>) 	
<p>Public Examination</p> <p>The CIL Charging Schedule is subject to examination by an independent Planning Inspector.</p>	<ul style="list-style-type: none"> - Publish the date, time and location of the Examination on the Council's website - Issue a statutory public notice in the Romford Recorder - Notify those who previously commented on the Plan by email or in writing if no email address is provided. 	<ul style="list-style-type: none"> - Publicise in the Council's quarterly 'Living in Havering' magazine if the timing allows; - Publicise via Council's social media platforms (Twitter, Facebook, Instagram, and YouTube channel);

<p>A programme officer is appointed who is responsible for organising and running the Examination on behalf of the Inspector.</p>	<ul style="list-style-type: none"> - Make all examination documentation available on the Council's website <p><i>The notifications above will provide details on how to register to speak at the Examination in Public. Only those who have made written representations on the Draft Charging Schedule may speak at the Examination</i></p>	
<p>Adoption</p> <p>At this stage, the Council adopts the final version of the CIL Charging Schedule.</p>	<ul style="list-style-type: none"> - Publish the CIL Charging Schedule alongside an adoption statement and other supporting documents on the Council's website; - Notify registered contacts (refer to section 3.5) by email or in writing if no email address is provided - Issue a statutory public notice in the Romford Recorder - Place a copy of the adopted CIL Charging Schedule in all libraries and the Romford Public Advice Service Centre (PASC); <u>(refer to section 3.2.1)</u> - Make the CIL Charging Schedule available in alternative formats on request (refer to section 3.6 <u>and section 3.2.1</u>) 	<ul style="list-style-type: none"> - Publicise in the Council's quarterly 'Living in Havering' magazine if the timing allows; - Publicise via Council's social media platforms (Twitter, Facebook, Instagram, and YouTube channel);

3.5 *Havering's Planning Consultation Database*

- 3.5.1 The Council's maintains a Consultation Database of local individuals and businesses who have expressed an interest in being consulted on the preparation of Havering's Local Plan and other planning policy documents. When consulting on planning policy documents we will email or write to every registered contact as set out in tables 3.1 to 3.3.
- 3.5.2 If you would like to be added to this Consultation Database, please contact: developmentplanning@haverling.gov.uk or complete our [Online Form](#).
- 3.5.3 All data is held in accordance with the Data Protection Act 1998.

3.6 *Availability of Documents in Alternative Formats*

- 3.6.1 The Council offers alternative formats (such as Large Print or Easy Read) and translation and interpreting services for disabled service users and those who do not speak or read English ([refer to paragraph 3.2.1](#))
- 3.6.2 Please contact developmentplanning@haverling.gov.uk for further information.

3.7 *The Duty to Cooperate*

- 3.7.1 The Duty to Cooperate was introduced by the Localism Act 2011. It places a legal duty on local planning authorities, to engage constructively, actively and on an on-going basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. The Duty to Cooperate is a legal test that requires cooperation between local planning authorities and other public bodies to maximise the effectiveness of policies for strategic matters in Local Plans.
- 3.7.2 The Duty to Cooperate requires Havering to work with neighbouring local authorities on strategic issues and developments that may have cross-boundary implications. This may result in:
- Working together with local authorities to develop common views on policy topics
 - Setting out joint approaches to plan making
 - Engage actively and on an on-going basis

- 3.7.3 Havering welcomes cooperation and on-going engagement with all neighbouring authorities both in London and Essex and other public bodies and appreciates the value and efficiency that can be achieved through joint working and sharing of information and best practices.
- 3.7.4 The way in which the Council meets its Duty to Cooperate will vary and will depending on the type and scope of the planning document involved and the strategic issues and cross boundary implications.

4. COMMUNITY INVOLVEMENT IN PLANNING DECISIONS

4.1 *The Planning Application Process*

COVID 19 INFORMATION:

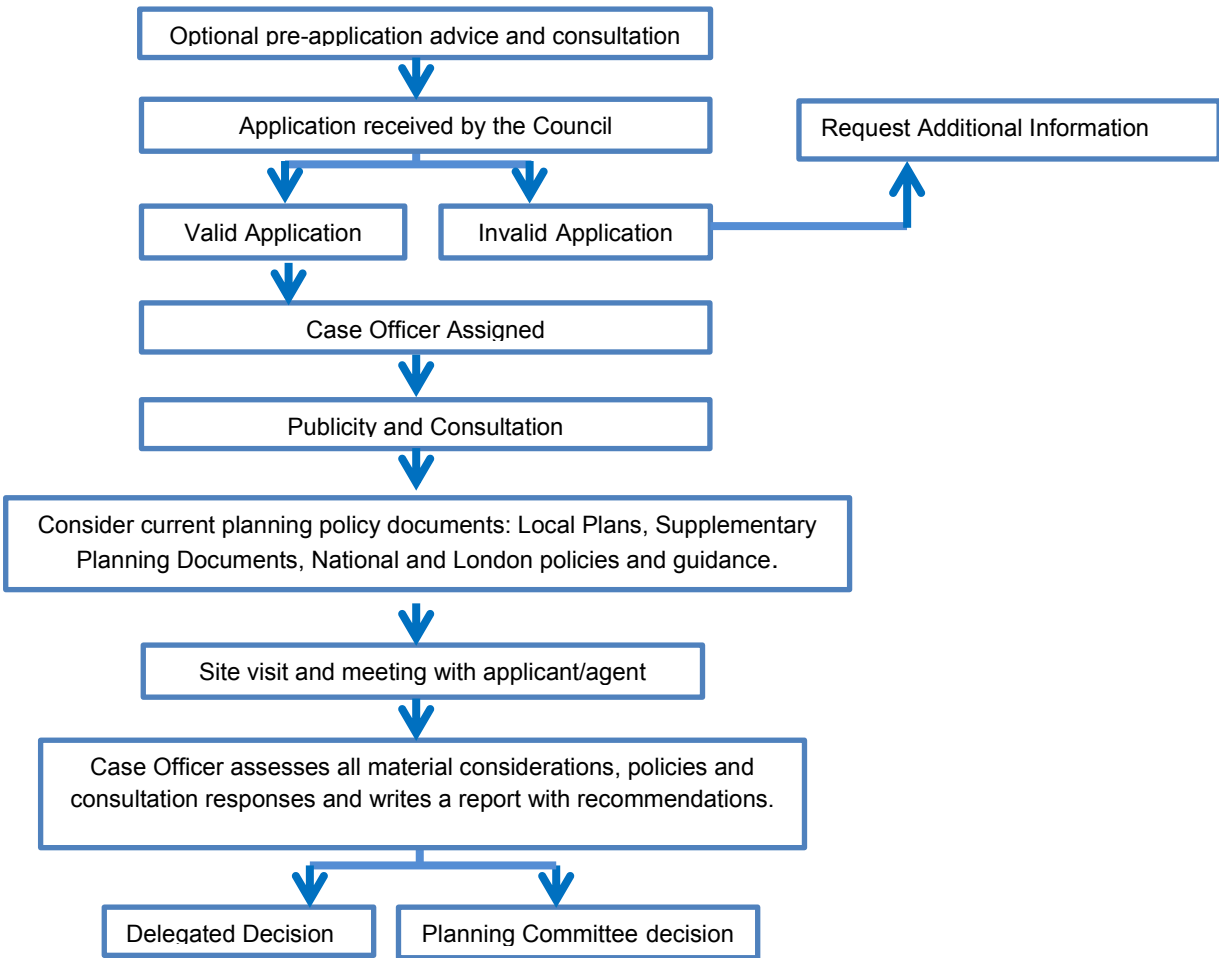
Please refer to the Council's website for the latest updates to community involvement in planning decisions. This includes information on Town Hall, PASC and Mercury House closures, publication and availability of documents, site notices and site visits.

https://www.havering.gov.uk/info/20191/coronavirus_covid_19/582/service_disruption#COVID19planning

- 4.1.1 The Council determines around 1,700 planning applications each year, ranging from householder extensions to major new residential, retail or office developments. As part of the process of determining these applications, it is important that the community and other stakeholders have the opportunity to get involved in order to help shape the areas where they live, work, visit and invest.
- 4.1.2 Planning legislation sets out the minimum requirements for publicising and consulting the community and stakeholders on planning applications. This section explains how the Council will meet these requirements and seek to encourage awareness of and involvement in the planning application and decision-making process.

The diagram below describes the planning application process.

Diagram 2: The Planning Application Process



4.2 Community Involvement at the Pre-application Stage

- 4.2.1 In line with the National Planning Policy Framework 2012 and National Planning Practice Guidance 2014 the Council strongly encourages prospective applicants to engage and consult with neighbours and other stakeholders who might be affected by their proposal, prior to submitting the application to the Council.
- 4.2.2 Involvement of stakeholders and the wider Havering community at the pre-application stage can help early identification of potential issues, ease the subsequent planning process and lead to an improved development.
- 4.2.3 Pre-application consultation does not replace the statutory period of notification and consultation. Refer to section 4.3 for further information
- 4.2.4 The Council does not set prescribed standards for pre-application consultation. The applicant should be able to justify that the methods used are reasonable in relation to the scale and potential impacts of the development and that the consultation reaches those who will be affected by the proposal.
- 4.2.5 Where pre-application consultation is carried out, applicants should prepare a report summarising the type of consultation carried out, the key issues raised and how the scheme has been amended (if at all) to addresses these issues. This should be submitted as part of the planning application.

4.3 Community Involvement at the application stage

- 4.3.1 Once a planning application has been received and validated there is a process of publicity and consultation that is undertaken to ensure that stakeholders and the community have the opportunity to have their say on the development proposed.
- 4.3.2 Certain types of application are not subject to public notification. These are set out in Appendix B.

Neighbour Notification and Site Notices

- 4.3.3 The Council has a statutory duty to notify any adjoining occupier. Letters are also sent to any other neighbouring occupiers that the Council considers to be affected by the proposal.
- 4.3.4 All letters are addressed to 'The Occupier' as we do not hold details of ownership.

4.3.5 When it is not possible to identify all adjoining properties, a site notice is displayed as close as possible to the proposed development site.

4.3.6 In certain circumstances the Council is required to display a site notice (for example applications in a Conservation Area, works to a listed building, major applications, and 'departures' from the development plan. In such circumstances a newspaper advertisement also appears in the local press, currently the Romford Recorder.

Other notification procedures

4.3.7 A weekly list of all planning applications is published on the Council's website at: <https://www.havering.gov.uk/Pages/Services/Planning-applications-received.aspx> it can also be viewed at the Public Advice and Service Centre.

How can planning applications be viewed?

4.3.8 All received applications are made available on Havering's website and updated on a weekly basis. To search for and view planning applications, visit the following page on the Council's website: <https://www.havering.gov.uk/Pages/Services/Land-and-property-area-search-service.aspx>

4.3.9 Applications can also be seen at the Planning Reception located in the Romford Public Advice and Service Centre (PASC), currently between the hours of 9am to 11am, Monday to Friday.

Consultation with Statutory Bodies

4.3.10 Some applications may require that specific consultation bodies be involved in the decision making process. This will depend of the scale of the application and what its scope is.

4.3.11 Large scale developments that may be of strategic importance, or located in strategic locations such as Opportunity Areas can be referred to the Greater London Authority who have powers to direct refusal or determine the application themselves. Such developments may also merit the engagement of neighbouring Local Authorities.

4.3.12 The Council will screen all applications and identify when and where specific consultation bodies should be consulted on a planning application. Following these notifications, there is a period of at least 21 days on all applications for any interested consultee to submit their comments.

Further Notification and Consultation

4.3.13 Sometimes a planning application's content is amended by the applicant following consultation or negotiation. If the changes are significant, there will be a further round of notification and consultation, but usually shorter than the initial one. If the changes are not significant, or in the Council's opinion overcome the concerns raised by neighbours or consultees, further notification or consultation will not generally be considered necessary.

How to submit comments

4.3.14 Anyone is entitled to submit comments on a current planning application regardless of whether or not they were personally notified.

4.3.15 Comments may be submitted by email, post or online via the Council's website using the online planning searches facility. For comments to be taken into account they must be made in writing and include the name and address of the person making the comments. The Council is unable to take into account comments made over the telephone.

What comments on a planning application can be considered?

4.3.16 Comments can be made in support of, or to object to a planning application. A material consideration is a matter that should be taken into account in deciding a planning application or on an appeal against a planning decision. Material considerations can include (but are not limited to):

- Overlooking/loss of privacy
- Loss of light or overshadowing
- Parking
- Highway safety
- Traffic
- Noise
- Effect on listed building and conservation area
- Layout and density of building
- Design, appearance and materials
- Government policy
- Disabled persons' access
- Proposals in the Development Plan
- Previous planning decisions (including appeal decisions)
- Nature conservation

- 4.3.17 Issues such as loss of view, infringement of private property rights or covenants or negative effect on the value of properties are not usually material considerations.

Speaking at committee

- 4.3.18 The Regulatory Services Committee usually consider applications for large scale development, or controversial proposals. Planning officers present reports and recommendations to the Elected Members who sit on the Committee. It is these Elected Members who decide whether to grant or refuse planning permission for these applications.
- 4.3.19 The only members of the public allowed to speak at the meeting are those who have objected to the application and registered to speak with the Council beforehand.
- 4.3.20 All objectors to an application will receive a letter a few days before the Committee meeting to let them know the proposal to which they are objecting is to be considered. Only one objector can usually speak and this would be the first person to register. The registered objector can speak against the proposal for up to two minutes.
- 4.3.21 The applicant is given the opportunity to reply. Full details of the speaking arrangements are in the letter the Council sends to notify objectors about the Committee or are otherwise available from the Council.
- 4.3.22 Agenda and minutes from all Regulatory Service Committee meetings are available [online on the Havering Website](#). Agendas for future meetings are published about six days in advance and printed copies will be available on the day.

Notification of a decision

- 4.3.23 Once a decision is made on a planning application the decision notice is made available [on the Council's website through the planning searches page](#).
- 4.3.24 The Council will send an email or letter to anyone who commented on the application during the consultation period to notify them of the decision.

4.4 Community Involvement at the Appeal Stage

- 4.4.1 Where planning permission is refused or granted subject to conditions, the applicant has a right of appeal against the refusal or conditions. Appeals are made to the Planning Inspectorate, an executive agency of the Government.

- 4.4.2 When appeals are made, those who were notified of the application and any other objectors will be notified by the Council. Where the proposal is for householder or small scale commercial development, the Council will send copies of objections received to the Planning Inspectorate. There is no opportunity for further representations to be made. For other proposals, the Council will include within the notification details of how to make further representations to the Planning Inspectorate.

4.5 *Developments that require Prior Approval*

- 4.5.1 Certain development does not need planning permission, but does need an application for prior approval from the Council – examples include mobile phone masts, larger residential extensions and certain changes of use of buildings. The Council can only refuse such applications on limited grounds and must do so within a specified time (usually 56 days). Adjoining occupiers would be notified of applications and comments received, if relevant, would be taken into account.
- 4.5.2 Applications will not be reported to the Regulatory Services Committee so there is no opportunity for objectors to be heard through speaking at committee.

4.6 *Additional Information for applicants*

- 4.6.1 It is the responsibility of the applicant to make sure that any development or changes to a building or site that they wish to make is lawful. Advice should be sought from the Council prior to the commencement of any work. In most cases, a planning application will be needed and a period of consultation will be required before a decision can be made.
- 4.6.2 The Council offers a pre-application service for prospective applicants, further information including fees can be found [on the Council's website](#).
- 4.6.3 For large-scale developments, a Design Review Panel may be recommended to ensure that the quality of the proposal mirrors current best practices. A review Panel is an independent group of Urban Designers, Architects, Landscape Architects and other professionals that give advice to the developer, as well as to the council, regarding a specific application.
- 4.6.4 An applicant will receive notifications at specific stages of the process:
- Notification of receipt of the application
 - Notification of validation of application (a validation checklist can be found [online on the Council's website](#))

- The Decision Notice, within two working days of a decision being taken. We post the decision notice to the applicant or agent, not both, by second class mail. If you wish to view your decision the same day it is made and download your decision notice too, you can do this online from our online planning search section.

4.6.5 Further details on all aspects of the application process can be found [online on the Council's website.](#)

Table 4.1 Consultation procedures for Planning Applications

Application Type	Consultation methods	Who will be contacted specifically	Period of Consultation	Period of determination	Decision Body
Householder Applications	E-mail/letters	Neighbours (common border, and opposite if development is at the front of the property);	21 days	8 weeks	Delegated Officer Decision
Applications for Prior Approval (where consultation is required)	E-mail/letters	Neighbours (common border, and opposite if development is at the front of the property);	21 days	56 days	Delegated Officer Decision
Advertisement Applications	Non required	None required	N/A	8 weeks	Delegated Officer Decision
Listed Building Consent or Works in Conservation Area	Site notice, press notice	None required	21 days	8 weeks	Delegated Officer Decision or Regulatory Services Committee, on a case by case basis
Minor Development	E-mail/letter	Neighbours (common border and opposite if development is at the front of the property)	21 days	8 weeks	Delegated Officer Decision or Regulatory Services Committee, on a case by case basis
Major Applications	E-mail/letters, site notice, press notice	Neighbours (common border and adjacent); any Statutory Consultees affected	21 days	13 weeks	Regulatory Services Committee, if approval recommended
Departure Applications or affected by Site Constraints	E-mail/letters, site notice, press notice	Neighbours (common border and adjacent); any Statutory Consultees affected	21 days	8 or 13 weeks	Regulatory Services Committee, if approval recommended

5. MONITORING AND REVIEW

5.1 *Statement of Community Involvement review*

5.1.1 The following considerations are useful in assessing whether a revision of the Statement of Community Involvement is needed:

- Changes in legislation with direct influence on the function of the Statement of Community Involvement or its prescribed consultees.
- The current population trends are altered, in terms of age groups, ethnicities.
- There are significant changes in communication technologies available for Council's that are also popular with specific and significant segments of our population.

6. APPENDICES

Appendix A: Guiding Principles of Consultation

Guiding Principle	Before and During Consultation
Integrity	<ul style="list-style-type: none">- We will identify the need to consult- We will listen to the views of the public to inform and influence our decision-making.- We will make clear the purpose of the consultation
Accessibility	<ul style="list-style-type: none">- We will make consultations accessible by choosing the most appropriate method for the intended audience, including those harder to reach.
Visibility	<ul style="list-style-type: none">- We will publicise consultations to the relevant audience and encourage participation.
Disclosure	<ul style="list-style-type: none">- We will disclose any information which could materially influence the nature and extent of participants' responses.
Transparency	<ul style="list-style-type: none">- We will ensure we have the expressed or implied consent of participants before we publish the results.- We will comply with the Data Protection Act 1998 to protect the privacy of individuals.
Fair Interpretation	<ul style="list-style-type: none">- We will be objective when assessing information and views gathered through consultation.
Publication	<ul style="list-style-type: none">- We will publish the results of consultations, other than in exceptional cases, in an accessible format and in a reasonable time after the consultation closes.- Where we do not intend to publish the results, we will disclose this at the start of the consultation.

Appendix B: Applications where consultation is not compulsory

In a few cases, formal consultation on planning applications is not required. These are set out in law and include

- Advertisements and signs – There is no statutory consultation needed for advertisements or signs. They do not need a planning application if they are smaller than 0.3 square meters, are not illuminated, and are safely positioned.
- Non-material alterations, unless it relates to a heritage building or its site – these are developments that do not physically alter the shape, size or material aspects of a building or land and they don't normally require planning permission (for example, interior works, boilers and heating works, repairs and maintenance works).
- Applications for Prior Approval (covered by the Town and Country Planning Development Order 1995 with its further alterations) and that are considered to not affect any of the adjacent properties.
- Application for Certificate of Lawfulness – provides the possibility of obtaining a statutory document confirming that the use, operation or activity named in it is lawful for planning control purposes on the dates specified in the document. (<https://www.gov.uk/government/publications/lawful-development-certificates-a-users-guide>)
- Non-material amendments to planning applications.
- Discharge of Planning Conditions

Appendix C: Glossary

Authority Monitoring Report: sets out the progress on the implementation of the Local Development Scheme (LDS) and reports on the extent to which the policies set out in Local Development Documents are being achieved

Community Infrastructure Levy: A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area.

Conservation Area: Areas of special architectural and/or historic interest, the character of appearance of which it is desirable to preserve or enhance

Duty to Cooperate: created by the Localism Act 2011 it places a duty on local authorities to 'engage constructively, actively and on an on-going basis' with certain specified bodies to maximise the effectiveness of Local Plan preparation relating to strategic cross boundary issues

Evidence Base: Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area

Examination in Public: A hearing chaired by an Independent Inspector to assess the soundness of development plan documents.

General Consultation Bodies: organisations defined by The Town and Country Planning (Local Planning) (England) Regulations 2012 that are required to be consulted at key stages of plan production. They include bodies which represent the interests of different racial, ethnic, religious or national groups, disabled persons and business in the LPA's area

Local Development Framework: Statutory plans produced by each borough that comprise a portfolio of development plan documents including a core strategy, proposals and a series of area action plans. (LDFs have now been replaced with Local Plans)

Local Development Scheme: sets out the plans and policy documents that will be prepared and a timetable for their delivery

Local Plan: The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current core strategies or other planning policies, which under the regulations would be considered to be development plan documents, form part of the Local Plan. The term includes old policies which have been saved under the 2004 Act.

Major Applications: A major development is one of 10 dwellings or more or 1,000sqm and above.

Material Considerations: A matter that should be taken into account in deciding a planning application or on an appeal against a planning decision.

Neighbourhood Plan A plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).

Opportunity Areas: An area designated by the London Plan which has the potential to accommodate large scale development to provide substantial numbers of new employment and housing.

Prior Approval: A procedure where permission is deemed granted if the local planning authority does not respond to the developer's application within a certain time. Often relating to telecommunication or agricultural developments

Proposals Map: A map that shows the boundaries of all policy areas as set out in Development Plan Documents.

Specific Consultation Bodies: organisations defined by The Town and Country Planning (Local Planning) (England) Regulations 2012 that are required to be consulted at key stages of plan production. They include neighbouring and parish councils, key service providers, Government departments and non-government organisations

Supplementary Planning Documents: Documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.

Sustainability Appraisal: Required by the Planning and Compulsory Purchase Act 2004. Sustainability Appraisal is based on the principles of Strategic Environmental Assessment but is wider in focus and covers other key considerations of sustainability that also concern social and economic issues.

Havering Cabinet Meeting on August 5 2020

Item to be approved for Havering Local Plan Main Modifications Public Consultation

**Equalities Impact Assessment for the amended Statement
of Community Involvement**

August 2020



Examination into the Havering Local Plan 2016 – 2031

**Document published for information* alongside the
Proposed Main Modifications**

**Equalities Impact Assessment for the amended
Statement of Community Involvement**

August 2020

*** this document is published for information and is not part of the suite of documents on which comments can be submitted**

Equalities Impact Assessment for the London Borough of Havering's Statement of Community Involvement 2020 update

August 2020

1. Introduction

1.1 This document is the Equality Impact Assessment (EqIA) for the London Borough of Havering's Statement of Community Involvement (SCI) 2020 update. The purpose of this EqIA is to ensure that all residents have equal access to public consultations. It identifies the likely impact of the temporary changes made to the SCI on the ability of the borough's diverse community to be involved in consultation. The EqIA can anticipate and recommend ways to avoid any discriminatory or negative consequences for a particular group. This EqIA relates to the temporary changes to the SCI and is not an EqIA of the complete SCI from 2015.

1.2 The duty to carry out an EqIA of new policy is set out in the Equality Act 2010. The Act protects people from discrimination on the basis of certain characteristics, which are known as protected characteristics. The protected characteristics are:

- **Age** – a person of a particular age group
- **Disability** – a person who has a physical or mental impairment
- **Race** – includes colour, nationality, ethnic or national origins
- **Sex** – being a man or a woman
- **Gender reassignment** - a person who is proposing to undergo, is undergoing or has undergone a process (or part of a process) of reassigning the person's sex by changing physiological or other attributes of sex.
- **Marriage and Civil Partnership** – a person who is married, isn't married, or in a civil partnership
- **Pregnancy and maternity** – includes discrimination towards women who are pregnant, given birth, or breastfeeding
- **Religion or beliefs** – includes religion, lack of religion or philosophical beliefs
- **Sexual orientation** – a person's sexual orientation towards a person of the same sex, of the opposite sex or persons of either sex

1.3 The Duty requires public bodies to have due regard for the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people when carrying out their activities.

2. The Statement of Community Involvement

2.1 The purpose of the Statement of Community Involvement (SCI) is to set out the preferred options and legal requirements for involving the community and other stakeholders in, 1) The preparation of planning policies including a new Havering Local Plan which will set out the long term strategic planning priorities, objectives and opportunities for development and clear policies on what will or will not be permitted and where, and 2) The determination of planning applications through the decision making process.

2.2 Havering's last SCI was adopted in 2015. However, due to the circumstance arising from the covid-19 pandemic, national planning guidance has updated regulations and recommendations to respond accordingly to the restrictions we find ourselves facing. Updates to the National Planning Policy Guidance (NPPG) encourage local planning authorities to undertake an immediate review of their SCIs and update the policies where necessary so that plan-making can continue during this time (NPPG Paragraph: 077 and 078). Because of this, Havering has made some changes to the 2015 SCI to ensure that consultation of the main modifications of the Local Plan can move forward.

2.3 Havering's Local Plan is currently being prepared to go out to consultation on the Main Modifications identified by the inspector. The updated SCI is needed so that the Council can effectively provide meaningful opportunities to the community to engage in the plan making process during these challenging and unprecedented times. It is also essential to continue consultation as government sees Local Plans as a key 'tool' in securing economic recovery.

3. Legislation and council strategies

3.1 The Equalities Act 2010 replaces previous anti-discrimination law with a single Act, making the law easier to understand and strengthening protection in some situations. It legally protects people from discrimination in the workplace and in wider society. The public sector Equality Duty 2011 requires that public bodies (like Havering Council) have to consider all individuals when carrying out their day-to-day work – in shaping policy, in delivering services and in relation to their own employees.

3.2 “One Havering” Community Cohesion Strategy 2018-2022 is Havering’s first community cohesion strategy. It lays out the changes and challenges the borough is facing and how the council can use these challenges as an opportunity to promote inclusive place-shaping, including supporting newer and older communities to live well and interact with each other. The main objective of the strategy is;

‘To nurture and promote a cohesive, healthy and optimistic Borough underpinned by mainstreamed inclusive British values, where everyone experiences dignity and equal life chances, and where neighbours, colleagues and different community groups interact, respect and value each other’.*

* Regardless of age, colour, class, disability, education, ethnicity/race, sex, health status, marital status, nationality, political perspective, religion, transgender identity, sexuality, or socio-economic status.’

4. Table 1 shows the EqIA screening process. It lays out the current data we know about the protected groups in Havering, how the group may be effected by the updated SCI, and what actions will be taken to mitigate further potential negative impacts.

Table 1. EqlA Screening

Protected Characteristic	What we know as a council about this group	Impact of the SCI on this group (+/-)	Explanation	Actions to be taken to mitigate potential negative impacts
Age	<p>The total population of Havering is 259,552. Havering has the oldest population in London with a median age of 39. 18% of residents are aged 65 or older, which is much higher than the London average of 12%. 13,499 people in Havering over the age of 65 live alone.</p> <p>From 2012 to 2017, Havering experienced the largest net inflow of children across all London boroughs. 4,343 children settled in the borough from another part of the United Kingdom during this six year period. The current percentage of children, age 0-15, is very similar to the London average (20.3% in Havering, 20.6% in London).</p> <p>It is projected that the largest increases in population will occur in children (0-17 years) and older people age groups (65 years and above) up to 2033.</p>	+	<p>Older people tend to prefer reading hard copies of documents due to lack of skills or access to computers. Usually, this is offset by having hard copies available in libraries and at the town hall. The covid-19 changes to the SCI means that hard copies won't be available in libraries, the Romford public advice service centre, or in the town hall. However, hard copies will still be available on request, so if someone feels that the other methods the Council uses are not appropriate for their needs, they still have that option.</p> <p>The Council will be able to make use of letters to draw attention to consultations that are going on, as well as keeping the method of notifying through the Romford Recorder and the Living in Havering Magazine. Social media will also be made use of, which many older persons have become more accustomed to during this time of lockdown.</p> <p>Young persons are usually less engaged with consultations in general. However, increased use of social media during consultation due to the lockdown precautions has the potential to increase younger participation due to higher social media use of the younger population.</p>	<p>As mentioned in the updated NPPG, on-line engagement methods should be used "to their full potential". Havering will make use of these methods.</p> <p>Letters and emails to people signed up to the Havering consultation database will still be distributed, as set out in the SCI</p> <p>The consultation period will also be extended to 8 weeks instead of the statutory 6 weeks to ensure people are given more time to respond. This will allow people to come to grips with new methods the council will use for the consultation, get any queries answered, and ensure reasonable timeframe for hard copy delivery.</p>

Disability	<p>About 19% of working age people living in Havering disclosed that they have a disability or long term illness. This is similar to the London average of 20%.</p> <p><u>Visual impairment</u> 449 per 100,000 people are registered blind in havering. This is very close to the London average (446 per 100,000). Older people are more at risk from total or partial sight loss.</p> <p><u>Learning disability</u> Around 970 adults in havering have a moderate or severe learning disability. 1,900 additional people have autistic spectrum disordered.</p>	+	<p>Increased use of online methods of communication will benefit those with physical disabilities who may have previously found it hard to attend in-person consultation events. Examination meetings and similar will now be held on online platform, making it easier for those to access from the comfort of their homes.</p> <p>Those with visual impairment may need extra support in accessing online events.</p>	<p>The Council has alternative forms of documents available on request, which could be utilised by those with disabilities. This should be advertised on social media to ensure this knowledge is known.</p> <p>The consultation period will also be extended to 8 weeks instead of the statutory 6 week to ensure people are given more time to respond. This will allow people to come to grips with new methods the council will use for the consultation and get any queries answered.</p>
Ethnicity/Race	<p>Havering is one of the most ethnically homogenous places in London, with 83% (census 2011) of its residents recorded as White British, higher than both the London average (45%) and England average (80%).</p> <p>Romany Gypsies and Irish travellers are identified as a racial group under the Equalities Act 2010. In the 2011 census, Havering had 160 people identifying as white Gypsy or Irish Traveller. The Gypsy and Traveller Accommodation Assessment (GTAA) report (July 2019) identifies future</p>	+	<p>Havering's consultation database includes contacts for ethnic minority community hubs. These contacts will all be made aware of the consultation, as laid out in the SCI.</p> <p>Extensive work has been done to create a relationship with Gypsies and travellers to engage them in consultations. Opinion Research Services (ORS), who have carried out previous consultation with the Gypsy and Traveller community, will again be involved in the process, making the community aware of</p>	<p>New contacts can be added to Havering's consultation database at any time.</p> <p>A variety of consultation methods will hopefully improve the likelihood of engagement in different ethnic groups.</p> <p>Alternative versions of the document can be utilised, e.g.</p>

	need as 220 pitches for Gypsies and Travellers and 5 plots for Travelling Showpeople for the Plan period 2016-2031.		consultation methods and the changes to the Local Plan that effects them.	translations or easy-to-read versions.
Gender/Sex	Males make up 48.1% of the population, while females are 51.9%. The life expectancy at age 65 years in Havering is 18.5 years for males and 21.6 years for females.	Neutral	N/A	Continue to provide an inclusive and open to all approach to public engagement.
Gender Reassignment	There is currently no data on gender reassignment in the borough. There is no robust data on the UK trans population, however the government equalities office (2018) estimates that there is 200,000-500,000 trans people in the UK.	Neutral	Due to lack of data, how the updated SCI could effect this group can't be assessed.	Continue to provide an inclusive and open to all approach to public engagement.
Marriage and civil partnership	48.5% of Havering residents are married, which is higher than the London average (39.8%) and England average (46.6%). 0.1% of havering residents are in a same sex civil partnership.	Neutral	N/A	Continue to provide an inclusive and open to all approach to public engagement.
Pregnancy and Maternity	There has been an increase in the general fertility rate from 58 (per 1,000 women aged 15-44) in 2004 to 68 in 2017. This equates to an additional 10 births per 1,000 women aged 15-44 within the period.	+	Online tools will be utilised to their fullest, providing easy access to public consultations. This can benefit expecting or new mothers, who many have limitations due to their physical state and/or parental responsibilities. Examination meetings and similar will now be held on online platform, making it easier for people to access from the comfort of their homes.	Consider timings of any online meetings to take into account parental responsibilities. Provide access to recordings of meetings if people can't attend on the day.

Religion or Beliefs	<p>65.6% of Havering residents are Christian. This is much higher than the London average (48.4%) and the England average (59.4%). Hindu is the second highest religion in Havering (1.2%).</p> <p>22.6% of Havering residents have no religion.</p>	+	Havering's consultation database includes contact information of various religious community groups in Havering. These will all be contacted about the consultation, as laid out in the SCI.	New contacts can be added to Havering's consultation database at any time.
Sexual Orientation	<p>There is currently no data on sexual orientation in the borough. According to the ONS (2018) 2.2% of the UK population identified as lesbian, gay or bisexual (LGB). People in London were most likely to identify as LGB (2.8%), with people in the North East the least likely (1.8%). We can use these statistics to make some assumptions about levels of LGB people living in Havering.</p>	Neutral	Due to lack of data, how the updated SCI could effect this group can't be assessed.	Continue to provide an inclusive and open to all approach to public engagement.



CABINET

Subject Heading:

**Remodelling of oneSource Services:
New arrangements for the Finance
function across Havering, Newham and
Bexley**

Cabinet Member:

Cllr Ramsey

SLT Lead:

Jane West

Report Author and contact details:

**Simon Pollock, Executive Director
oneSource,
simon.pollock@oneSource.co.uk**

Policy context:

Financial summary:

The financial implications of the decision
are detailed in Appendix 1 in the exempt
part of this report.

Is this a Key Decision?

***This is a key decision on the grounds:
(a) Expenditure or saving (including
anticipated income) of £500,000 or more***

When should this matter be reviewed?

Reviewing OSC:

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

Communities making Havering
Places making Havering
Opportunities making Havering
Connections making Havering

☐
☐
☐
☐

Place an X in the [] as appropriate

Confidential Appendix This report has a confidential appendix which is not for publication as it includes exempt information falling within paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972, as amended.

It is in the exempt part of the agenda because it refers to:

Information relating to the financial or business affairs of the Council and its partner councils.

and, in all the circumstances, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

SUMMARY

This report seeks Cabinet's approval for the remodelling of oneSource services and related matters. The recommendations arise from a provisional agreement between Havering, Newham and Bexley Councils reached by the oneSource Joint Committee on 26th June 2020, which now requires the formal agreement of each Council to be implemented.

In the lead up to the Joint Committee meeting, detailed discussions and meetings took place with the partner boroughs a number of which were formal meetings comprising the political leadership of the partner boroughs.

All due diligence has been applied to the process and assessing the impact of this decision.

RECOMMENDATIONS

1. Subject to 2 below and for the reasons set out in this report and its appendices, Cabinet, is recommended to agree the variation of the oneSource agreement between the Council and the London Boroughs of Newham and Bexley on the following terms:
 - a. London Borough of Bexley's full withdrawal from oneSource from 31st July 2020, waiving the requirement to give 15 months' notice;
 - b. London Borough of Newham's withdrawal of its delegation to the oneSource Joint Committee of all Finance Services provided by oneSource except for the Finance services provided currently by the Transactional Team, Treasury and Pensions and the Oracle Systems Support Team (the latter initially for one year only);

- c. The financial compensation payable by the exiting boroughs to Havering as detailed in Table 1 of the oneSource report considered at oneSource Joint Committee on 26 June 2020 (see Appendix 1);
 - d. To vary the oneSource Agreement generally and the remodelling of oneSource services specifically to the extent that the affected services and the relevant delegations are executive functions of the Council;
 - e. To the London Borough of Bexley's withdrawal from the membership of the oneSource Joint committee with effect from 31 July 2020;
- 2. Cabinet is recommended to agree that the decisions in 1 above are subject to the approval by Bexley and Newham of all of the terms of the agreement reached at the oneSource Joint Committee on 26 June 2020 and the formation of a contract between the three boroughs to give effect to the agreement.
 - 3. Cabinet is recommended to delegate the implementation of the agreement reached at the oneSource Joint Committee on 26 June 2020 to the Executive Director of oneSource;
 - 4. Cabinet is asked to note that the other Councils may continue to share some of the proposed withdrawn services for a transitional period beyond 31 July 2020 whilst permanent arrangements are put in place within the sovereign boroughs.

REPORT DETAIL

The Council is aware that the services provided by oneSource are delegated from the three partner boroughs to the oneSource Joint Committee. The oneSource Joint Committee has then agreed a Scheme of Delegation for the delivery of those services by officers, under the management of the Executive Director, oneSource.

All Finance services had been delegated by all three Councils and are operated as an integrated service, with only the section 151 officer function retained by the boroughs. It was always the intention that the delegation of functions to oneSource would be dynamic and change over time. This was one of the advantages of the Joint Committee structure.

Detailed discussions have taken place between the partner boroughs regarding the remodelling of the services that sit within the oneSource model. Following these discussions and diligent assessment of the impact of any changes a report was produced for the oneSource Joint Committee for consideration.

Finance and Transactional Services

All three authorities have recently reviewed the services delegated to oneSource and in addition oneSource has conducted its own review. As a result of these reviews a number of changes have been proposed and agreed in principle by all parties.

A report (attached at Appendix 1) was considered by the OneSource Joint Committee on the 26th June 2020

The report proposed that oneSource returns the delivery of Newham finance functions (except the Transactional Team, the Oracle Systems Support Team plus the Treasury and Pensions Team) back to the Council under the s.151 officer and that all services in Bexley should also return to the sovereign borough.

The oneSource Joint Committee agreed to the LB Newham and LB Bexley requests to make the following changes to the shared arrangement:-

- Bexley wish to withdraw all delegated services from oneSource
- Newham wish to withdraw from all Finance Services except for the Finance services provided currently by the Transactional Team, Treasury and Pensions and the Oracle Systems Support Team (the latter initially for one year only).

These changes will create additional costs for Havering which will lose some of the economies of scale that have been achieved by sharing services. Under the Partnership Agreement between the three boroughs, the two boroughs requesting the withdrawal of services must compensate Havering for the additional costs this change creates.

The oneSource Joint Committee agreed the following:

- To agree Bexley's full withdrawal from oneSource from 31st July 2020, waiving the requirement to give 15 months notice.
- To agree Newham's withdrawal from all Finance Services except for the Finance services provided currently by the Transactional Team, Treasury and Pensions and the Oracle Systems Support Team (the latter initially for one year only).
- To agree the financial compensation payable by the exiting boroughs.
- To vary the terms of the oneSource agreement to withdraw the Bexley's membership of the oneSource Joint committee with effect from 31st July 2020
- To agree a joint press release.

In line with the delegation arrangements in place in each borough the decisions of the oneSource Joint Committee are subject to approval by each and all of the authorities in respect of the delegation of powers to the Joint Committee and the other terms of the agreement. The recommendations set out in this report deal with the matters that Cabinet is requested to agree and note.

Members of the oneSource Joint Committee noted that if ratified further work needs to be undertaken to complete these changes to the partnership and

therefore agreed that officers continue this work in the spirit of any agreement reached by the oneSource Joint committee and Cabinet. To this end officers from the three boroughs will work together to implement any ratified changes with a view to achieving an implementation date of the end of July 2020.

REASONS AND OPTIONS

Reasons for the decision:

The Joint Committee arrangement is backed by an agreement under section 101 of the Local Authority Act 1972 between the three authorities, the oneSource Joint Agreement. This agreement provides for the variation of the agreement, which may include the addition or withdrawal of services. The agreement provides for the agreement of compensatory payments arising from any variation of the agreement.

Other options considered:

The proposals followed a long period of negotiation. The oneSource agreement between the Councils set out the process for the variation and withdrawal from oneSource to be followed in the event mutual agreement was not reached.

IMPLICATIONS AND RISKS

Financial implications and risks:

The financial implications are set out in Appendix 1 of this report.

Legal implications and risks:

This report seeks the Cabinet's approval to an agreement between the Council and its oneSource partner authorities, Newham and Bexley, to vary the services provided on a shared basis and the contractual agreement between the councils to undertake sharing.

The three Councils entered into a contractual agreement in April 2016 to share services (varied in March 2018) including terms for its variation and withdrawal

from oneSource. The proposals in this report seek to vary the oneSource agreement by mutual agreement of the three boroughs and thereby waive the contractual provisions on variation and withdrawal.

The Council has various powers to enter into the variation and to continue the shared services agreement with Newham (including but not limited to s.1 of the Localism Act 2011, section 9EB of the Local Government Act 2000 (as amended) and section 101(5) of the Local Government Act 1972). The terms of the agreement are reasonable and it is noted that (a) the agreement is dependent on approval by all three boroughs and (b) will be subject to a contractual agreement between the boroughs.

The oneSource Joint Agreement will require variation to provide for the withdrawal of Bexley and the variation of services for Newham. This may include some transitional provision of shared services and the Councils may use their powers under s.113 of the LGA 1972 to second staff to deliver functions for each other or reach a similar agreement under s.1 of the Localism Act 2011.

It is noted that if the agreement is not reached, the terms of the oneSource Agreement remain in force, including the terms with regard to variation and withdrawal from the agreement.

Human Resources implications and risks:

A number of organisational changes will need to be made to staffing structures. The necessary corporate HR policies and procedures will be followed when implementing these changes. A number of staff will be moved back to their employer borough by way of a 'lift and shift' arrangement, and some staff will be subject to TUPE arrangements.

Equalities implications and risks:

As any impact will be on staff, and HR procedures will be followed the view is that any equality implications will be neutral.

Health and Wellbeing implications and Risks

None

BACKGROUND PAPERS

Document is Restricted

This page is intentionally left blank



CABINET	5th August 2020
Subject Heading:	Havering and Wates Regeneration Covid-19 Options Paper
Cabinet Member:	Councillor Damian Council and Portfolio Holder for Regeneration.
SLT Lead:	Neil Stubbings - Director of Regeneration
Report Author and contact details:	Martin Fahy - Finance Martin.Fahy@havering.gov.uk
Policy context:	Havering Housing Strategy 2014-2017 National Planning Policy Framework 2012 Draft London Plan 2017 Emerging Havering Local Plan 2017 HRA Business Plan 2017-2047 Romford Housing Zone - Overarching Borough Agreement with the GLA Havering Local Development Framework and Romford Area Action Plan 2008 Romford Development Framework 2015-
Financial summary:	This report presents a number of options to bring forward the development of Napier New Plymouth. The detailed financial arrangements for each site are contained within the exempt agenda report.
Is this a Key Decision?	This is a key decision

When should this matter be reviewed? Spring 2020

Reviewing OSC: Towns and Communities OSC

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

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

SUMMARY

- 1.1 In June 2016 and October 2016, Cabinet received reports which proposed to increase the number of affordable homes on housing sites owned by the Council. As a result of the information provided to Cabinet, 12 sites vested in the HRA were identified for regeneration and Havering and Wates Joint Venture appointed to bring forward these proposals. However, the outbreak of COVID-19 has created an unprecedented situation in which the Joint Venture must consider its ability to deliver the Schemes and ensure exposure is limited.
- 1.2 In October 2019 the planning application for the redevelopment one of the 12 sites, Napier and New Plymouth House was submitted by the Havering and Wates Joint Venture and approved by the Council's Strategic Planning Committee. The approved scheme proposes to deliver 197 new homes, 64% of which will be affordable, delivering 126 affordable residential units, including 87 as part of the 'right to return' re-provision for previous Council Tenants.
- 1.3 With the serious outbreak of the COVID-19 virus since the turn of the year, the Government has taken action to reduce its spread and the associated level of excess mortality has resulted in lock-down and a reduction in macro-economic activity.
- 1.4 The extended lockdown linked to the COVID-19 outbreak has resulted in a severe economic downturn, impacting on various sectors, household incomes and jobs. This has created a significant element of uncertainty in the housing market. Across the housing sector, it has been highlighted that assumptions on house-prices may need to be revisited and remain uncertain in the short term. RICS, in response to the COVID-19 outbreak had asked valuers to consider all circumstances where a material uncertainty declaration is appropriate. The uncertainty has been reflected in the share prices of the leading developers in the sector, which have seen a

significant fall in value since the outbreak. The resulting loss of confidence has impacted on housing development and calls into question some of the assumptions underpinning the approved Havering & Wates Regeneration Business Plan.

- 1.5 The uncertainty will have a material effect on sites which are scheduled to come forward for development within the next 12 months, including Napier New Plymouth (NNP), where construction was scheduled to commence at the end of April 2020. The uncertainty in house prices has eroded confidence in the projected level of sale receipts on NNP, underpinning the approved Business Plan. In response, both the Council and Wates Construction Limited (WCL) have agreed it would not be possible to proceed to construction in accordance with the Business Plan until after either the housing market returns to pre-COVID19 levels or the Council along with its JV Partner Wates Construction Limited resolves the deterioration in viability linked to COVID19.
- 1.6 This report assesses the various options available to the Council to unlock the development of the Napier New Plymouth estate.

RECOMMENDATIONS

That Cabinet:

1. **Approves** the recommendation option 4 set out in this Report to progress the development of Napier New Plymouth as a 100 per cent Council scheme, at a total development cost of £57.370 million, and delegates the final decision on the tenure of the additional 71 units to the Director of Regeneration in consultation with the Director of Housing.
2. **Notes** that the Leader of the Council, after consultation with the s151 Officer will be responsible for the approval of the revised business case for Napier New Plymouth and related viability assessment.
3. **Authorises** the Director of Regeneration to take all steps necessary to negotiate and enter into variations of any of the joint venture documentation and the planning permission and associated planning obligation to the extent required to enable the implementation of Option 4.

REPORT DETAIL

2.1 Background

- 2.2 The recovery phase has begun with an easing of the restrictions by the UK but the UK economy will contract in 2020, adversely impacting on jobs and household incomes in the UK and the world economy. The UK along with most countries will need to consider intervention, underpinned by an increased level of national debt to both maintain existing jobs and support growth in the future.
- 2.3 There will be a period of uncertainty across a range of sectors including housing and construction as we go forward. The short and long term impacts of COVID-19 outbreak on the Havering and Wates Joint Venture (Havering and Wates Regeneration LLP (the JV/HWR)) are still unfolding, however a softening of the revenues on the 12 Estates is a significant risk, with an independent open market valuation obtained by the Council running some 20% below the approved Business Plan projections. Given the level of uncertainty and risk, both the Council and WCL cannot endorse the assumptions, which underpin the current Business Plan, approved 12th February 2020 by Cabinet. Viability is a Condition Precedent required to vest the first site Napier New Plymouth (NNP) to the joint venture and crystallise the Council land value.
- 2.4 It will not be possible to vest NNP into HWR until the adverse impact on viability linked to COVID-19 outbreak is resolved. As a result, construction, which had been scheduled to start with the vesting of NNP (end of April 2020) has been delayed.
- 2.5 Given a potential softening of revenues in the short to medium term, it is likely that to continue with the development as currently proposed by the approved Business Plan would result in the forward funding commitment for NNP increasing. It may be possible that some of this may be offset by a reduction in build costs, given a potential collapse in demand.
- 2.6 In response to the COVID-19 outbreak, HWR must review contract terms, putting in place mitigation measures. Where possible, in such unprecedented times, the JV may need to be pragmatic in order to find short term solutions to safeguard the viability of the project, including measures to best retain resources, materials and general capabilities during and after the pandemic period.
- 2.7 It is anticipated that any adverse impact linked to the COVID-19 outbreak would be short term, and is unlikely to impact on sites which are earmarked for completion beyond the next two years. It is therefore proposed to continue with the proposals for Waterloo and Queen Street and Solar Serena Sunrise estates in line with the approved Business Plan, pending a review at the next Business Plan refresh, scheduled for November 2020.

- 2.8 Discussions are ongoing with the GLA to ascertain what support they can provide to bring forward stalled developments. The formation of a housing recovery task force which will bring together key stakeholders to assess the measures needed to keep development moving forward. The GLA have noted the long term the fundamental strength of London's economy and its property market would remain.
- 2.9 Applications for gap funding and other financial support from the GLA are over-subscribed, and it is therefore unlikely the Council will receive any additional funding from the GLA in the short term. The scope of discussions has been limited to information gathering, to support a GLA application for additional funding from Central Government. Any additional funding from the GLA in the short term would be limited to additional affordable housing grant, linked to an increase in affordable housing on existing schemes.
- 2.10 The options available to the Council and WCL to bring forward the development of NNP are summarised below: -

Option 1 - Pause on activities

- 3.1 Without an immediate solution to address the deterioration in viability and the effect on the approved Business Plan, both JV partners could consider placing the development of NNP on hold. The pause would have to remain in place until either: -
- Confidence returns to the housing market, with sales values recovering to at least pre-COVID19 levels.
 - The Council or GLA provides additional gap funding.
- 3.2 Placing a pause on activities would expose the Council to cost escalations on NNP, with an extension of the Pre-Construction Services Agreement (PCSA) contract made between the HWR and WCL currently running at £80k per month. This contract is scheduled to terminate in advance of the commencement of the building contract. It will also be necessary to continue to secure the site at the cost of £25k per month. Other monthly payments include the Development Management fee £43k per month, Professional Fees £18k per month and financing £30k per month.
- 3.3 Therefore, the cost of delays to HWR (of which the Council funds 50%) is running at £178k per month on the NNP site. This is further compounded by the loss of rent and other income as the completion of the units is pushed further back.
- 3.4 For an extended pause, ongoing holding costs would need to be reviewed by HWR. There is scope to reduce some costs, including not committing to an extension of the PCSA and suspending all design and consultant activities. A pause would require the JV to stand down its service and works providers, with a resumption of activity adding delays and costs to the programme. If there was an extended pause the parties would also need to consider whether they needed to

or should agree an extension to the Programme in relation to the development of NNP.

- 3.5 It should also be noted that if there were to be an extensive pause, the procurement law risk implications of the cumulative costs would need to be reviewed. Currently, a brief pause appears low risk, due to the value involved, however a more extensive pause may require further procurement law consideration.

4.1 Option 2 - Underwriting Sales Risk

- 4.2 The development manager has put forward an option which would see the Council underwrite the sales risk linked to COVID-19 outbreak. Given the market uncertainty, it is difficult to pre-determine. However, the two scenarios below have been assessed: -

- 10% reduction in sale revenues, £2.4M
- 20% reduction in sale revenues, £4.8M

- 4.3 With the Council underwriting any sales risk and viability resolved, both JV partners could agree to take forward the development of NNP following the parameters laid out in the approved Business Plan.

- 4.4 Under this scenario, the Council would need to set aside up to an additional £4.800 million of capital funding to cover any shortfall in revenues as compared to the Business Plan. Any shortfall payment from the Council would be made once the sales programme has completed.

- 4.5 While this could unlock the development, this option undermines the principle of sharing risk, and would in effect remove most of the risk to WCL as a joint venture partner.

- 4.6 Also, the Council would need to put in place additional HRA capital approvals, which would need to be approved by Cabinet and Full Council. This option would also raise both state aid and procurement issues. This option removes the JV partner sales risk and changes the economic balance of the contract in favour of WCL. This increases the risk that this change would be seen as an unlawful material change to the contract, which, had it been detailed in the procurement documentation at the time of OJEU advertisement in the market, may have attracted different bidders. This option has, therefore, been discounted.

5.1 Option 3 - Early Works Agreement

- 5.2 A third option would be to bring forward some elements of the building contract within the scope of the Early Development Agreement (EDA). The EDA would facilitate the commencement of works on the NNP site in advance of the vesting of the site in the JV. The Development Manager (DM) has earmarked up to £6.615 million of construction works for six months, which could be brought into the scope of the EDA.

- 5.3 The costs of the works would be directly charged to HWR and would, therefore require both members to advance funds. However, without a resolution to viability it would not be possible for WCL to advance funding to support the construction works. As a result, it would not be possible to progress the EDA, without intervention from LBH.
- 5.4 As the Development Agreement is not unconditional yet (due to the lack of viability) there is no obligation on either partner to advance B Partner Loans. The partners would therefore need to agree to vary the Members Agreement to enable C Partner Loans to be advanced where the parties agreed to it. Under such a proposal, the Council would advance £6.615 million to bring forward the works under the EDA, covering 100% of the cost. The C Partner Loans take priority in the event of a liquidation / winding up of HWR.
- 5.5 A coupon of 15% is attached to the C Partner Loans, which the Council would benefit from. However, there are insufficient profits now to settle this liability without additional forward funding. It would, therefore, be necessary to adjust the development margin payable to WCL down to reflect the additional risk assumed by the Council and avoid increasing the level of Forward Funding. It would also be necessary to secure agreement from WCL to vary the Members Agreement before advancing C Partner Lending.
- 5.6 The works package would need to be compliant with the need to maintain social distancing and health requirements.
- 5.7 The advantage of this option would be to minimise delays to the commencement of construction activities on NNP, which would have the benefit of reducing abortive and holding costs. The PCSA would be terminated, saving £80k per month and other holding costs minimised through the avoidance of delays.
- 5.8 This option does not however resolve the underlying viability issue on NNP. A Business Plan refresh would be necessary to assess the current funding gap linked to the COVID-19 outbreak. Progressing with the Early Works would be at risk. Therefore, this option could only be advanced if the Council, as JV partner is prepared to introduce further forward funding to address the likely viability gap. In addition, if this option were to be considered further, the Council would need to carry out an analysis of whether this option would constitute a material change for procurement law purposes; if it had been detailed in the procurement documentation at the time of the OJEU advertisement could it have attracted different bidders. If it did constitute a material change the Council would also need to consider whether it could fall under the specific criteria for any relevant procurement law exemption, (for example, could it be argued that it is not a substantial change within the meaning of Regulation 72 (1)(e) of the Public Contracts Regulations 2015 (as amended)).

6.1 Option 4 - Council acquire all Units

- 6.2 Given the current uncertainty in the housing market, the Council could agree to acquire the additional 71 open market units but change the tenure. This option would eliminate the JV sales risk as the Council would commit to acquiring all the housing on the development.
- 6.3 This option increases the quantity of housing in the Borough at a time when the demand for affordable housing linked to COVID-19 outbreak is likely to increase. With the Council's support, the joint venture can continue with the programme dedicated to providing good quality affordable family housing with enhanced design to meet the need of local residents.
- 6.4 Should the Council proceed with option 4, the Council would be responsible for 100% of the development cost of NNP of £57.370 million, with the Council securing a reduction of £4.382 million from the total development cost as agreed at the approved business plan. This would be internally funded by HWR from compensating cost savings coming from the sales and marketing budget, financing and the development margin, 50 per cent of which would have been payable to the Council and is instead passed on through a reduction in the cost of development.
- 6.5 This option has the advantage of unlocking the development, committing the Council to a total development cost of £57.370 million. It would be necessary to increase the amount set aside to cover the residual development cost from £36.558 million under the approved Business Plan to £57.370 million, an increase of £20.812 million.
- 6.6 This option would require variation of the Development Agreement between the Council and the JV to address the introduction of this new affordable tenure, the mechanism by which the Council will pay for these units and to recognise that the JV will not receive its Development Margin. The JV Partners would be required to approved the changes to the revised business case for NNP, as set out in the attached Phase Viability Plan (PVP).
- 6.7 Any change to the tenure of the scheme would require an amendment to the section 106 agreement by a Deed of Variation. It would be a commercial decision for the Council to decide if it can proceed to enter into contract with HWR in advance of formal approval for the changes in tenure.

Proposed Timeline to Start on Site on NNP

Milestone	Dates	Notes
Decisions to be taken on Appropriation by Director of Regeneration	August	Delegated to the Director of Regeneration
Confirm tenure changes	August	Delegated to the Director of Regeneration

JV Approval of Phase Viability Plan	August	Will require approval from both JV Partners
Amendment to Planning Approval / s106 - Submission	August	To cover both changes to tenure and minor amendments to design
Enter into contract with HWR	End August / Early September	Dependent on confirmation from planning
Start on site	September (mid to end)	One to two weeks after contract approval.

- 6.8 The Council would have the discretion to determine the tenure of the 71 affordable units from the following: -
- 6.9 Option 4a, Shared Ownership (71 units). The Council would be exposed to some sales risk but this would be mitigated by a disposal of a part interest, which must be at 25% of market value. Grant would be made available by the GLA at £28,000 per unit under the 16-21 programme to bring forward the development. Again this would maintain the mixed tenure approach. This maintains the principle of a mixed tenure development.
- 6.10 The Council could benefit from potential upside on sales as the market recovers from the end of the lockdown but with some flexibility to hedge against sales risk in the short term. The Council would retain some element of sales risk linked to the disposal of the initial interest.
- 6.11 Option 4b, Shared Ownership (36 units) with open market sale (35 units). The Council would retain the option to sell up to 35 units on the open market, with the remaining 31 provisioned for shared ownership. This would have the potential benefit of bringing forward the recovery of its investment. The delivery of the open market units would be incidental to the main objective, which is the delivery of affordable housing. Any cross subsidy would be used to reduce the overall cost of the development. This would maintain the principle of a mixed tenure development.
- 6.12 The Council would need to set aside a provision for CIL and sales and marketing fees for the open market units, estimated at £25,000 per unit. The Council could benefit from potential upside on sales as the market recovers from the end of the lockdown. With the current depressed valuations, it would be difficult to justify a policy of open market disposals, as they are unlikely to recover cost. However, should revenues return to pre-COVID-19 when construction is completed, the disposals could yield an overall net return to Council.
- 6.13 Option 4c, London Affordable Rent (71 units). Letting the units at London affordable rents, would improve the overall scheme viability if combined with a claim for RTB 1-4-1 funding. This option would see the Council move away from the mixed tenure approach.

6.14 The addition of the 71 London Affordable Rent units would improve the current projected scheme payback to the HRA.

6.15 The table below summarises the key impact of the various options below: -

TABLE 1 – Summary of Napier New Plymouth Options

	Option 1 - Pause	Option 2 – Underwriting Sales Risk	Option 3 – Early Works	Option 4 – 100% Council
Affordable Housing units	126	126	126	197 *
Development Cost Movement	Increased (holding costs)	Neutral	Neutral (subject to delays)	Reduced
Resolves JV viability	No	Yes	No	Yes
Forward Funding Impact	Increase	Increased	Neutral (subject to delays)	Neutral
Start on site	On pause	Late 2020	Aug 2020	Aug 2020
Payback to the HRA	Extended	Extended	Neutral	Reduced
Council Cost	Increased, linked to length of delay	Up to £4.900M	Neutral but viability not resolved	£20.812M + £25k per unit sales / CIL costs for open market disposals

* The Council would retain the option to market some of the units for open market sale.

6.16 Further financial details are captured in the exempt agenda report.

REASONS AND OPTIONS

7.1 Reasons for the decision:

7.2 The adoption of option 4 by the JV is a consent matter. Without the Council's approval, as a Member of the LLP, the revised Business Case for NNP could not be adopted and the current approved Business Plan would be maintained. The Council is in contract with WCL as a commercial partner for the delivery of the regeneration of sites within work package one and to share the associated costs. These commitments will need to be upheld.

- 7.3 In order to set aside the necessary funding for NNP, it will be necessary to approve the revised business case underpinning the change to a 100 per cent Council scheme. Not approving the revised Business Case will delay the delivery of the Napier New Plymouth development, which may have a negative impact on the Council's ability to deliver on targets including affordable housing delivery and achieving targets agreed with the GLA in the Overarching Borough Intervention Agreements.
- 7.4 Not adopting option 4 may also give rise to negative market sentiment with a consequential impact on the wider development market that this scheme would otherwise seek to stimulate.

IMPLICATIONS AND RISKS

8.1 Financial implications and risks:

- 8.2 Detailed financial information (paras 8.1 to 12.11) are contained within the exempt appendices

Financial risks:

- 8.3 The impact of COVID19 will require a refresh of the Business Plan. With viability uncertain, both JV Partners have agreed not to advance funding to support construction on NNP. The impact of the COVID-19 outbreak and the resulting lockdown had effectively put the housing market on hold. With the relaxation of the restrictions, it is hoped that the demand should return to pre-COVID-19 levels. However, the lockdown is likely to have an impact in the short to medium term on demand for new housing, linked to increasing levels of unemployment and job insecurity.
- 8.4 It is anticipated that sales revenues will reduce in the short term, due to a reduction in household income and increasing job insecurity. A reduction in construction costs could offset the impact but the net impact cannot be quantified at this stage. COVID-19 will likely harm viability in the short term. NNP as the first site to go forward could see further erosion of viability, increasing the forward-funding requirement from the Council.
- 8.5 Under options 1 and 3, there is a risk that both partners would not agree the Business Plan refresh, with progress suspended on all sites. Both partners would have invested funds which they cannot recover unless the development is unlocked. The Council will have to consider if it is willing to progress the build contract and sales programme on NNP at risk or bring the joint venture to a close, crystallising the abortive costs on the programme.

- 8.6 Option 2 and 4 exposes the Council to additional financial commitment and risk but option 4 delivers an additional 71 affordable units to the Council, which would generate an enhanced rental return to service the associated borrowing.
- 8.7 Under option 3, the advancement of C Partner Loans is at risk, with the repayment contingent on the agreement of a revised Business Plan, with potentially an increased level of forward-funding committed by the Council.
- 8.8 The move to 100% Council scheme under option 4 changes the risk profile of the development, as effectively this moves away from an affordable housing fixed price agreement to a build contract. A contingency of 5% including a developer's contingency has been set aside to manage risk. This site has been extensively surveyed and the level of contingency has been validated to be sufficient under the worst-case scenario by IKON, the employer's agent for the development.
- 8.9 The various tenure sub-options under Option 4, have different risk profiles, with Option 4c, London Affordable Rent assessed to present the lowest financial risk to the Council given would not expose the Council to sales risk.
- 8.10 Sub-options 4a and 4b provide an element of sales risk to the Council but would maintain the principle of mixed tenure. There is a significant element of uncertainty linked to open market values at this time, with valuations depressed in response to COVID-19. However, it is possible that values could recover to pre-COVID-19 levels once the units are completed. Disposals at pre COVID-19 values would deliver a modest gain to the Council and would accordingly reduce the level of overhanging debt and risk. The government have extended support for the Help to Buy scheme to 2023, which would increase demand for outright sale.
- 8.11 Shared ownership presents an element of sales risk, but it is reduced by the requirement for a disposal of a part interest (minimum 25%). This government extension of Help to Buy to 2023, could dampen interest as qualifying households are likely to favour acquiring an outright interest (with government support) as opposed to a part interest. The Council would receive a rent based on 2.75% of the market value of residual interest held by the Council. This exceeds the current marginal rate of PWLB housing borrowing, 1.51% (30-year maturity loan), and therefore would provide a net return against Council investment. The tenants have the right to increase their interest in the property (staircasing), which would yield further capital receipts to the Council, but also lower the rents linked to the property.

Legal implications and risks:

9.0 This report follows a number of previous reports to Cabinet and most recently in February 2020.

The Cabinet is being asked to approve the development of Napier New Plymouth as a scheme to be funded by and owned by the Council and either:

- a 100 per cent affordable scheme with the exact affordable product to be determined in due course. [; or
- a mixed tenure scheme of at least 126 affordable units with the remainder being either affordable, shared ownership or private market sale (or a combination of tenures), to be determined by the Director of Regeneration in consultation with the Director of Housing.

The Leader will approve the revised business plan in due course

The Council has entered into the joint venture LLP with Wates pursuant to a number of powers including the Housing Act 1985, the Housing and Regeneration Act 2008, the Local Government Act 1972 and the general power of competence in section 1 Localism Act 2011. The general power of competence will enable the Council to make the necessary changes to the scheme as described.

- 9.1 The Council is contractually committed to progress the project in accordance with the agreements that have been entered into with Wates and the JV LLP, unless variations are agreed by the parties. In order to implement Option 4, the Development Agreement will need to be varied to allow for the acquisition of and the payment for units other than Low Cost affordable units by the Council and to acknowledge that the NNP scheme is viable without the JV receiving a Development Margin.
- 9.2 This report seeks approval for the 71 units which were previously intended to be open market units acquired by the JV to be funded by and retained by the Council. The report sets out the financial and other implications of proceeding with the scheme in the manner recommended.
- 9.3 The additional financing is capable of being met from the Councils existing budgets as set out in the MTFS 2020/21.
- 9.4 The Council will pay the JV the build contract sum. This is a lump sum of £52.277 million. The Council has received advice from Ikon that the costs payable pursuant to the build contract are a market price on the basis of the specification, the acquisition will therefore be compliant with the state aid rules.
- 9.5 The Council has the power to make market sales of housing developed out of the HRA where it is part of a housing decision taken for the purposes of meeting housing need under Part 2 Housing Act 1985. This can include cross-subsidy models where there are elements of market sale in a scheme to make the provision of sub-market housing, which is needed to meet housing need, viable.
- 9.6 Further legal implications are contained in appendix 1.

10. Human Resources implications and risks:

- 10.1 There are no Human Resources implications arising from this report.

11. Equalities implications and risks:

11.1 The Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010 requires the Council, when exercising its functions, to have due regard to:

- (i) The need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (ii) The need to advance equality of opportunity between persons who share protected characteristics and those who do not, and;
- (iii) Foster good relations between those who have protected characteristics and those who do not.

Note: 'Protected characteristics' are age, disability, gender reassignment, marriage and civil partnerships, pregnancy and maternity, race, religion or belief, sex/gender, sexual orientation.

11.2 The Council is committed to all of the above in the provision, procurement and commissioning of its services, and the employment of its workforce. In addition, the Council is also committed to improving the quality of life and wellbeing for all Havering residents in respect of socio-economics and health determinants.

11.3 update to the existing EqHIA will be carried out linking to a final decision on tenure as proposed under Option 4.

BACKGROUND PAPERS

NONE

Appendices

- Appendix 1 – Exempt Appendix
- Appendix 2 – Draft Phase Viability Plan (Napier New Plymouth) - EXEMPT

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

Document is Restricted

This page is intentionally left blank