



# CABINET

<b>7.30 pm</b>	<b>Wednesday 10 November 2021</b>	<b>Council Chamber - Town Hall / Hybrid Meeting</b>
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Members 8: Quorum 3

Councillor Damian White (Leader of the Council), Chairman

**Cabinet Member responsibility:**

Councillor Dilip Patel	Deputy Cabinet Memembr for Business Recovery
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:**  
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**Webcast**

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**which is not in camera range.**

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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.

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## **AGENDA**

### **1 ANNOUNCEMENTS**

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

### **2 APOLOGIES FOR ABSENCE**

(if any) - receive

### **3 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.

### **4 MINUTES**

To approve as a correct record the minutes of the meeting held on 20 October, 2021, and to authorise the Chairman to sign them.

### **5 ADOPTION OF THE HAVERING LOCAL PLAN (Pages 1 - 200)**

### **6 HAVERING CLIMATE CHANGE ACTION PLAN (Pages 201 - 296)**

### **7 INTRODUCTION OF ALL DAY VISITOR PERMIT/VOUCHER (Pages 297 - 302)**

### **8 LOCAL GOVERNMENT ASSOCIATION (LGA), INDEPENDENT RACE, EQUALITY, ACCESSIBILITY, DIVERSITY AND INCLUSION, (READI), COMMISSIONED REVIEW MAY 2021: APPROVAL OF ACTION PLAN. (Pages 303 - 330)**





## CABINET

<b>Subject Heading:</b>	Adoption of the Havering Local Plan
<b>Cabinet Member:</b>	Councillor Damian White
<b>SLT Lead:</b>	Barry Francis, Director of Neighbourhoods
<b>Report Author and contact details:</b>	Lauren Miller, Development Planning Team Leader
<b>Policy context:</b>	<ul style="list-style-type: none"><li>- National Planning Policy Framework 2021</li><li>- London Plan 2021</li><li>- Havering Local Development Framework 2008</li><li>- Havering Community Infrastructure Levy 2019</li><li>- Havering Local Plan Submission version (2018)</li><li>- Havering Local Plan Main Modifications (2020)</li><li>- Havering Local Plan Further Main Modifications (2021)</li></ul>
<b>Financial summary:</b>	There are no financial implications arising from the adoption of the Local Plan.
<b>Is this a Key Decision?</b>	Yes - Significant effect on two or more Wards
<b>When should this matter be reviewed?</b>	October 2023
<b>Reviewing OSC</b>	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 Havering Local Plan sets out a vision, strategic priorities and a spatial planning policy framework for development in the Borough. It positively plans for the future development and infrastructure requirements to meet the needs of Havering's communities and will be used to determine all planning applications submitted to the Council.

The Havering Local Plan has been through an extensive preparation process, including evidence base collection, public consultation and independent examination. In July 2017, full Council approved the publication and subsequent submission of the Local Plan to the Secretary of State for Examination in Public.

Following Examination hearings in 2018 and 2019, at the request of the Inspector consultation on a number of proposed Main Modifications commenced in August 2020. Consultation on Further Main Modifications took place in 2021.

The Inspector's Final Report was received on the 14<sup>th</sup> October 2021. The report concludes that the Local Plan is sound and legally compliant, subject to the main modifications being made.

It is now necessary to adopt the Havering Local Plan to ensure the Council has a robust and up-to-date spatial planning policy framework. This report seeks Cabinet endorsement for the adoption of the Local Plan and recommends its adoption to full Council.

## **RECOMMENDATIONS**

This report recommends that Cabinet:

1. Note the content of the Inspector's Report into the soundness of the Havering Local Plan (refer to annex 1)
2. Endorse and make the following recommendations to full Council:

That full Council:

- (i) Agree to adopt the Local Plan 2016-2031 including:
  - a. the main modifications to the Submission Local Plan that are set out in the appendix to the Inspector's report (refer to annex 2)
  - b. The minor modifications as set out in annex 3.

- (ii) Agree to revoke the Council's current adopted Core Strategy and Development Control Policies Development Plan Document 2008 and the Romford Area Action Plan 2008 (excluding Site Specific Allocations) from the 29<sup>th</sup> December 2021 (following the statutory six week legal challenge period from Local Plan adoption).
- 3. Authorise the Assistant Director of Planning to prepare and publish an Adoption Statement and Sustainability Appraisal Report in accordance with S26 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 4. Authorise the Assistant Director of Planning to make typographical amendments to the plan prior to its publication to improve cross-referencing (e.g. paragraph numbering, page re-numbering) and typographical errors.
- 5. Authorise the Assistant Director of Planning to prepare and publish an updated Policies Map, reflecting the proposed changes previously consulted on.
- 6. Revoke the following Supplementary Planning Documents:
  - i. Sustainable Design and Construction 2009
  - ii. Shopfront Design 2013
  - iii. Residential Design 2010
  - iv. Protection of Trees During Development 2009
  - v. Protecting and Enhancing the Boroughs Biodiversity 2009
  - vi. Landscaping 2011
  - vii. Designing Safer Places 2010
- 7. Approve the publication of an updated Local Development Scheme (as set out in Annex 4)
- 8. Approve the publication of an updated Statement of Community Involvement (as set out in Annex 5).

<b>REPORT DETAIL</b>
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## **1. Background**

- 1.1 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.

- 1.2 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.
- 1.3 The Havering Local Plan has been through an extensive preparation process, including evidence base collection, public consultation and independent examination as summarised below.

#### Consultation

- 1.4 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. This comprised:
  - statutory consultation in Spring 2015 (regulation 18)
  - non-statutory consultation on a 'Direction of Travel' document in Autumn 2016
  - statutory consultation in summer 2017 (regulation 19)

#### Submission

- 1.5 In July 2017, full Council approved the publication and subsequent submission of the Local Plan to the Secretary of State for Examination in Public. Following statutory consultation under Regulation 19, Havering submitted its Local Plan for formal Examination by an independent Planning Inspector in March 2018.

#### Examination

- 1.6 In October 2018, the first part of the Havering Local Plan Examination in Public took place over 6 days of examination hearings. Following this the Inspector requested additional information across a number of topics.
- 1.7 Specific consultation on gypsy and traveller matters took place in Spring 2019 at the request of the Local Plan Inspector following the initial Examination hearings.
- 1.8 A further 2 days of Examination hearings took place in May 2019. These focussed on housing, Gypsy and Travellers and parking.

#### Consultation on Main Modifications

- 1.9 Following the hearings the Inspector concluded that a number of main modifications were required to enable the Plan to be found sound.

- 1.10 The main modifications covered a number of topics but the most significant changes related to car parking standards, housing and gypsy and traveller matters. These matters are all discussed in detail in the August 2020 report to Cabinet which sought approval to consult on the main modifications. An all Member briefing took place on the 3<sup>rd</sup> March 2020.
- 1.11 Consultation on the Main Modifications and updates to evidence base took place in August 2020.
- 1.12 Alongside the main modifications the Council published a schedule of minor modifications (refer to Annex 3). These comprised small corrections, factual updates and 'consequential' adjustments linked to the Proposed Main Modifications.

**Consultation on Further Main Modifications**

- 1.13 In March 2021 a new London Plan was published. Local Plans are required to be in general conformity with the London Plan. Following submissions from both the Council and the GLA, the Inspector concluded that further main modifications were required to bring the Local Plan into general conformity with the London Plan. These related to housing targets, car parking standards and affordable housing.
- 1.14 The proposed Further Main Modifications were published for consultation in July 2021. An all Member briefing was held in advance of the consultation on 9<sup>th</sup> June 2021.

**2. The Inspector's Final Report**

- 2.1 The Inspector issued her final report on 14<sup>th</sup> October 2021 (refer to Annex 1). The report concludes that the Havering Local Plan provides an appropriate basis for the planning of the borough and is 'sound', provided that a number of main modifications are made to it. The main modifications all relate to matters that were discussed at the examination hearings and have been subject to public consultation as set out above.
- 2.2 In summary, the main modifications set out:
- The need for an immediate update of the Plan and an explanation of the relationship to the London Plan 2021
  - The policies that are superseded by the Local Plan
  - Amendments to the objectives and various policies to include the need to support great use of the River Thames for freight and passenger transport in line with the London Plan and national policy
  - Various amendments to policies to ensure general conformity with the London Plan 2021, including those relating to the housing requirement, affordable housing targets and parking standards;

- The benchmark figure for older person's housing and identify the need from the most up to date needs report
- Amendments to policy 11 relating to Gypsies, Travellers and Travelling Show people accommodation to reflect updated needs assessment, identify additional sites to meet the need and remove those sites from the Green Belt
- Amendments to Policy 11 relating to Gypsies, Travellers and Travelling Showpeople accommodation to reflect updated needs assessment, identify additional sites to meet the need and remove those sites from the Green Belt.

2.3 The Inspector's report is binding on the Council. The Inspector's main modifications are required to make the plan sound and the Local Plan cannot legally be adopted unless these changes are made.

2.4 This Cabinet report seeks Cabinet approval to recommend to full Council the adoption of the Local Plan including the main modifications to the Submission Local Plan (refer to annex 2) and the additional minor modifications (refer to annex 3).

### **3. Policies Map**

3.1 The Council is required to maintain an adopted policies map which illustrates geographically the application of the policies in the adopted Local Plan. The Council was required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan.

3.2 The Council's current adopted map is the Proposals Map 2008 which relates to the Havering Local Development Framework.

3.3 Throughout the preparation of the Local Plan the Council has consulted on the changes that will need to be made to this map. These are set out in:

- i. Proposals Map Changes Booklet July 2017
- ii. Proposals Map Changes Booklet Addendum March 2018
- iii. Proposals Map Changes Booklet Addendum December 2019

3.4 This Cabinet report seeks authorisation for the Assistant Director of Planning to finalise the preparation and publication of the final Policies map.

### **4. Local Plan Adoption - Next Steps**

4.1 Subject to the Council adopting the Local Plan officers will consolidate the main modifications (refer to annex 2) and minor modifications (refer to annex 3) into a final version of the Local Plan.

4.2 The adopted Local Plan will then be published on the Council's web site and made available in the borough's libraries and Town Hall. The Local Plan will carry full weight in the determination of planning applications and will become

part of the borough's development plan alongside the London Plan and Joint East London Waste Plan.

- 4.3 The Council will need to prepare an Adoption Statement to accompany the Local Plan in accordance with regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Adoption Statement sets out:
- a. date which the Local Plan was adopted;
  - b. modifications following the submission version (February 2018);
  - c. notice that any person aggrieved by the process can make an application to the High Court within 6 weeks from the date of adoption.
- 4.4 The Council is also required to finalised and publish the Sustainability Appraisal ("SA"). The SA Adoption Statement is the final step in the SA process, which involves preparing a 'statement' at the time of the plan's adoption. The SA Adoption Statement addresses the requirement to prepare a post-adoption 'statement' under Part 4 of the SEA Regulations.
- 4.5 In conjunction with the SEA Regulations, the SA Adoption Statement should include the following.
- An overview of the process which has been undertaken for the SA to date;
  - How the SA has informed and influenced the development of the Local Plan (including through the consideration of reasonable alternatives);
  - The consultation that has been undertaken as part of the SA process; and
  - Proposed monitoring processes.
- 4.6 This Cabinet reports seeks authorisation for the Assistant Director of Planning to finalise the Adoption Statement and Sustainability Appraisal.
- 4.7 Following adoption of the Local Plan there will be a statutory six week legal challenge period. The six weeks will commence from the date of adoption of the New Local Plan which will be the date of the meeting of full Council at which a resolution to adopt in passed.

#### **Residential Car Parking Standards**

- 4.8 Residential car parking standards have been an ongoing topic of discussion throughout the examination and the Council has robustly and continuously challenged the application of London Plan parking standards.
- 4.9 The Inspector's decision to require further restrictions to the residential parking standards, despite the evidence put forward throughout the examination is unsatisfactory and does not reflect the Council's objectives.
- 4.10 Officers have carefully considered whether the Inspectors' conclusions regarding parking are legally challengeable by the Council itself.

4.11 However, for the reasons set out below, it is not recommended that the Council put forward a legal challenge:

- The Planning Inspector exercised planning judgement in coming to her decision and 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; and
- There is a need to adopt the Havering Local Plan as soon as possible in order that it's wider planning, regeneration objectives can be delivered, and a challenge would delay adoption.

## **5. Existing Planning Documents**

5.1 The Havering Local Plan will replace the Council's Core Strategy and Development Control Policies Development Plan Document ("DPD") as well as the policies in the Romford Area Action Plan. These documents are available to view on the [Council's website](#).

5.2 As the Local Plan does not include Site Specific Allocations, the Inspector has requested that the current Site Specific Allocations Development Plan Document and the Site Allocations within the Romford Area Action Plan are retained.

5.3 The Council has previously prepared a number of Supplementary Planning Documents which support the current Core Strategy and Development Management DPD. These Supplementary Planning Document ("SPDs") provide additional guidance on the implementation of particular policies.

5.4 In order to ensure that the Council has up to date guidance that link to policies within the Local Plan, it is recommended that a number of SPDs are revoked alongside the Core Strategy. These SPDs and the reason for recommending revocation are set out below. They are all available to view on the [Council's website](#).

- Sustainable Design and Construction SPD 2009 – This SPD has been superseded by more up to date National policy and is therefore no longer up to date.
- Shopfront Design SPD 2013 – This guidance is now outdated as a result of the Government's permitted development rights.
- Residential Design SPD 2010 – This SPD has been superseded by updated policy and is therefore no longer up to date
- Protection of Trees During Development SPD 2009 this SPD has been superseded by updated standards and policy and is therefore no longer up to date.



- Protecting and Enhancing the Boroughs Biodiversity SPD 2009 – the guidance in this SPD has been superseded by updated Policy and is therefore no longer up to date. Factual information about the Borough’s biodiversity assets will be retained on the Council’s website but will not form part of an SPD.
- Landscaping SPD 2011 - SPD has been superseded by updated policy and is therefore no longer up to date
- Designing Safer Places SPD 2010 – This SPD is now covered within Local Plan policy and by the Secured by Design standards as detailed on the Secured by Design website. It does not need to be repeated in SPD as it will be achieved through the application of the Local Plan policies.

5.5 As detailed above, the revocation of these Supplementary Planning Documents does not undermine the Council’s position on these matters because the current position is dealt with by more up to date policy and guidance.

5.6 The remaining SPDs will be retained and reviewed, as set out in the proposed Local Development Scheme (refer to annex 4).

## **6. Local Development Scheme**

6.1 Local planning authorities are required to prepare and maintain a Local Development Scheme (LDS) under Section 15 of the Planning and Compulsory Purchase Act 2004, as amended by the Localism Act 2011 and the Housing and Planning Act 2016.

6.2 The LDS is the programme for the production of the Council's strategic planning policy documents. The current LDS (2019-21) is now out of date and requires updating. The Local Plan Inspector has also requested an updated LDS be prepared to formalise the Council’s commitment to an immediate update of the Local Plan.

6.3 The updated LDS (2022-2024) sets out:

- The current planning policy documents that the Council has already prepared
- The planning policy documents that Havering intend to produce;
- The subject matter and geographical area of each of the proposed documents;
- The timetable for the preparation of the documents over the next three years.

- 6.4 This report seeks Cabinet approval to adopt the updated LDS as set out in Annex 4.

## **7. Statement of Community Involvement**

- 7.1 Section 18 of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to produce a Statement of Community Involvement (“SCI”), which should explain how they will engage local communities and other interested parties in producing their Local Plan and determining planning applications.
- 7.2 The Council’s current SCI was adopted in 2015. In response to the Covid19 Pandemic the Government issued updated guidance on making temporary changes to SCIs with the aim of maintaining the momentum on plan making. Authorities were strongly encouraged ‘to use on-line engagement methods to their full potential. Cabinet agreed to make temporary changes to the SCI in August 2020 to enable consultation on the Local Plan Main Modifications to progress.
- 7.3 In preparation for the immediate update of the Local Plan, an update which is specifically sought by Inspector, an updated SCI has been prepared. This reports seeks Cabinet approval to publish the SCI 2021 as set out in Annex 5,

## **REASONS AND OPTIONS**

### **Reasons for the decision:**

Following the preparation, submission and examination of the Havering Local Plan the Council has now received the Inspector’s final report. The report concludes that the Local Plan is sound, subject to the inclusion of a number of main modifications.

To come into force the Local Plan has to be adopted by resolution of Full Council.

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

Having an up to date Plan will also enable the Council to:

- i. bring forward other linked pieces of work such as Masterplans and other supplementary planning documents
- ii. support other planning and regeneration programmes

- iii. assist the Council in the infrastructure planning necessary to support change and growth in Havering

**Other options considered:**

The option of not adopting the Havering Local Plan was rejected because:

- a) It is a statutory requirement for boroughs to have up to date Local Plans.
- b) 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.

<b>IMPLICATIONS AND RISKS</b>
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**Financial implications and risks:**

There are no financial implications relating to the adoption of the Havering Local Plan.

The outstanding examination costs and the costs associated with the preparation of the final Policies Map will not exceed £0.030m and this spend has been accounted for within the 2021/22 Local Plan Cost Centre (A26731).

To fund to the immediate update of the Local Plan and preparation of other policy documents as set out in the Local Development Scheme there is an annual base budget of £0.166m within the Local Plan Cost Centre.

There is also £0.434 of earmarked reserves available of which £0.212m will be spent in 2021/22, leaving £0.222m in 2022/23.

Plan making spend should not therefore not exceed £0.388m in 2022/23 and £0.166m in each financial year thereafter.

The monies available will fund the production and commissioning costs associated with plan making. They do not include the officer salary costs which are separately budgeted and funded via the Development Planning Cost Centre (refer to Human Resources Implications and risks).

**Legal implications and risks:**

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.

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

The Inspector's final report contains her assessment of the Havering Local Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is compliant with the legal requirements and whether it is sound. The National Planning Policy Framework makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.

The adoption of a new Local Plan will require a resolution by full Council.

Following adoption of the Local Plan there will be a statutory six week legal challenge period. Under section 113 of the Planning and Compulsory Purchase Act, an application can be made within six weeks of adoption to the High Court to quash a Local Plan (either in whole or part). The six weeks will commence from the date of adoption which will be the full Council meeting on 17<sup>th</sup> November 2021. During the challenge period the Council can still afford full weight to the policies in the Local Plan.

As a precaution, the existing Development Plan Documents will not be revoked until the 6 week challenge period has passed.

Local planning authorities are required to prepare and maintain a Local Development Scheme (LDS) under Section 15 of the Planning and Compulsory Purchase Act 2004, as amended by the Localism Act 2011 and the Housing and Planning Act 2016.

#### **Human Resources implications and risks:**

There are no human resource implications associated with the adoption of the Local Plan.

The programme for the immediate update of the Local Plan as set out in the Local Development Scheme will be undertaken using existing staffing within the Council's

planning services. There may be a need to commission external consultants which specialist expertise to prepare some of the supporting evidence base work. Where this is necessary, it will be commissioned in accordance with the Council's procurement rules.

**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, disability, gender reassignment, marriage and civil partnerships, pregnancy and maternity, race, religion or belief, sex/gender, sexual orientation.

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 EQIA 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 for public examination.

**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 as part of the planning application process to ensure that positive impacts are enhanced and mitigations put in place against any identified negative impact on health and well being of local residents.

The health and wellbeing implications of the proposed Main Modifications have also been assessed through an updated Health Impact Assessment.

Adoption of the local plan therefore ensures that alongside the creation of new homes, jobs and improved infrastructure, which will impact positively on local population, health and well being considerations will be embedded in new development to ensure Havering is a much healthier place to live and work.

<b>BACKGROUND PAPERS</b>
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None

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# **Report to London Borough of Havering Council**

**by Susan Heywood BSc(Hons) MCD MRTPI**

an Inspector appointed by the Secretary of State

Date: 14 October 2021

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Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

## **Report on the Examination of the Havering Local Plan**

The Plan was submitted for examination on 27 March 2018

The examination hearings were held from 9 – 18 October 2018 and 29 – 30 May 2019

File Ref: PINS/B5480/429/9

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## Abbreviations used in this report

dpa	dwellings per annum
ELR	Employment Land Review 2015 (LBHLP.20)
ELWP	East London Waste Plan
FMM	Further Main Modifications
GLA	Greater London Authority
GTAA	Gypsy and Traveller Accommodation Assessment
HPS	Housing Position Statement
HRA	Habitats Regulations Assessment
LDS	Local Development Scheme
LP2021	London Plan 2021
LSIS	Locally Significant Industrial Sites
MM	Main Modifications
NPPF	National Planning Policy Framework
ONEL	Outer North East London
PPG	Planning Policy Guidance
PPTS	Planning Policy for Traveller Sites
PTAL	Public Transport Accessibility Level
SA	Sustainability Appraisal
SDA	Strategic Development Area
SHMA	Strategic Housing Market Assessment
SIL	Strategic Industrial Location
SINC	Site of Importance for Nature Conservation
SPG	Supplementary Planning Guidance
TfL	Transport for London
UCO	Use Classes Order

## Non-Technical Summary

This report concludes that the Havering Local Plan provides an appropriate basis for the planning of the borough, provided that a number of main modifications are made to it. The London Borough of Havering Council has specifically requested that I recommend any main modifications necessary to enable the Plan to be adopted.

The main modifications all concern matters that were discussed at the examination hearings. Following the hearings, the Council prepared schedules of the proposed modifications and carried out sustainability appraisal and habitats regulations assessment of them. The main modifications were subject to public consultation over an eight-week period. An additional seven-week consultation took place on further main modifications needed to ensure the Plan is in general conformity with the London Plan 2021 and on an updated sustainability appraisal and habitats regulations assessment. In some cases, I have amended detailed wording of the modifications to take account of representations made in response to the consultations. I have recommended their inclusion in the Plan after considering the sustainability appraisal and habitats regulations assessments and all the representations made in response to consultation on them.

The Main Modifications and Further Main Modifications can be summarised as follows:

- Set out the need for an immediate update of the Plan and explaining the relationship of the Plan to the London Plan 2021, to ensure the Plan is positively prepared and effective;
- Identify the policies which are superseded by the Plan to ensure the Plan is legally compliant;
- Amend the objectives and various policies to include the need to support greater use of the River Thames for freight and passenger transport in line with the London Plan and national policy relating to sustainable travel;
- Various modifications to amend policies to ensure general conformity with the London Plan 2021, including those relating to the housing requirement, affordable housing targets and parking standards;
- Set out the benchmark figure for older person's housing and identify the need from the most up to date needs report, in order to ensure that the Plan is positively prepared, justified and effective;
- Amend Policy 11 relating to Gypsies, Travellers and Travelling Showpeople accommodation to reflect updated needs assessment, identify additional sites to meet the need and remove those sites from the Green Belt, all to ensure the Plan is positively prepared, justified, effective and consistent with national policy;
- Amend policies 19, 20, 21 and 22 to clarify the criteria, to reflect evidence of the amount of land which can be released from employment use and to reduce the affordable workspace requirement, in order to ensure the policies are justified, effective, consistent with national policy and in general conformity with the London Plan;
- Inclusion of a monitoring framework to ensure the Plan is effective;
- A number of other modifications to ensure that the plan is positively prepared, justified, effective and consistent with national policy.

## Introduction

1. This report contains my assessment of the Havering Local Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is compliant with the legal requirements and whether it is sound. The National Planning Policy Framework (NPPF) 2012 (paragraph 182) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. A revised NPPF was published in July 2021. Paragraph 220 states that the policies in the original NPPF published in March 2012 will apply for the purpose of examining plans, where those plans were submitted on or before 24 January 2019. The Havering Local Plan was submitted in March 2018. Therefore, unless stated otherwise, references in this report are to the 2012 NPPF.
3. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound Plan. The Havering Local Plan, submitted in March 2018 is the basis for my examination. It is the same document as was published for consultation in August 2017.

## Main Modifications

4. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications (MMs) necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2** etc.
5. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out sustainability appraisal (SA) and habitats regulations assessment (HRA) of them. The MM schedule was subject to public consultation for eight weeks. An additional seven week consultation took place on further main modifications (FMMs) needed to ensure the Plan is in general conformity with the London Plan 2021 and on an updated SA and HRA. These further MMs are identified in the form **FMM1** etc in the report. Some of these FMMs supersede previous MMs. All MMs and FMMs are set out in full in the consolidated Appendix.
6. I have taken account of the consultation responses in coming to my conclusions in this report and in this light I have made some amendments to the detailed wording of the MMs and FMMs where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal/habitats regulations assessment that has been undertaken. Where necessary I have highlighted these amendments in the report.

## Policies Map

7. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council are required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as Proposals Map Changes Booklet July 2017 (document LBHLP.2.1) and Addendum March 2018 (document LBHLP.2.2).
8. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the published MMs / FMMs to the Plan's policies require further corresponding changes to be made to the policies map.
9. These further changes to the policies map were published for consultation alongside the MMs and are contained within the Proposals Map Changes Booklet Addendum December 2019 (document MMC02). The latter document supersedes some of the gypsy site allocations in the earlier documents.
10. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted proposals map to include all the changes proposed in Proposals Map Changes Booklet July 2017 (document LBHLP.2.1), Addendum March 2018 (document LBHLP.2.2)<sup>1</sup> and the further changes included in the Proposals Map Changes Booklet Addendum December 2019 (document MMC02) published alongside the MMs. This will become the policies map for the Havering Local Plan 2016-2031.

## Context of the Plan

11. Havering is an Outer London borough and the Plan must therefore be in general conformity with the London Plan. The Local Plan was prepared, and much of the Examination was undertaken, under the former London Plan 2016. The London Plan 2021 (LP2021) was published on 2 March 2021.
12. Further MMs have been put forward to ensure general conformity with the LP2021. However, given that the LP2021 was adopted at a late stage in the examination, it has not been possible for the evidence base documents for this Plan to be updated. This would have resulted in considerable delay in the examination and adoption of the Plan.
13. The Plan includes a commitment to an immediate update<sup>2</sup> and it is considered pragmatic to allow this Plan to proceed to adoption on this basis. This is in

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<sup>1</sup> Apart from those superseded and replaced by the changes in the Proposals Map Changes Booklet Addendum December 2019 (document MMC02)

<sup>2</sup> The NPPF 2021 paragraph 33 sets out that Plans should be reviewed to assess whether they need updating at least once every 5 years and should then be updated as necessary. The commitment in the Plan is to undertake an immediate update rather than simply reviewing the policies to assess whether they need updating.

line with the Government's deadline for all authorities to have an up-to-date plan in place by December 2023. The relative certainty that will be provided by finalising the Plan will be beneficial in terms of encouraging sustainable development.

14. In order to ensure that the Plan is effective therefore, a FMM (**FMM1**) is necessary to explain the relationship of the Plan to the LP2021. It also sets out the need for an immediate update of the Plan, in accordance with specified timescales, in order to ensure that the Plan has full regard to the LP2021 and latest Government guidance. I have made a minor alteration to this FMM to reference the 2021 NPPF which was published after the consultation on the FMMs began.
15. The current adopted Local Development Framework 2008 includes the Core Strategy and Development Control Policies document, the Site Specific Allocations document and the Romford Area Action Plan. Once adopted the Havering Local Plan will supersede the Core Strategy and Development Control Policies document. The Local Plan indicates broad locations for housing, employment, retail, leisure, transport, community services and other types of development. It also allocates sites for Gypsy and Traveller pitches, a matter which is addressed in detail below.
16. When the Plan was submitted, it was the Council's intention to prepare a future Site Specific Allocations Local Plan to identify individual sites for specific uses. It is currently the Council's intention to incorporate site allocations into the immediate update of this Plan. In the interim period, the existing allocations in the Romford Area Action Plan and Site Specific Allocations document remain extant.

## Public Sector Equality Duty

17. The Council carried out an Equalities Impact Assessment to inform the preparation of the Plan (LBHLP.6). I have had due regard to the three aims expressed in section 149(1) of the Equality Act 2010 and in particular considered how the Plan's policies and proposals are likely to affect people from groups with "protected characteristics"<sup>3</sup>. This has involved my consideration of several matters during the examination including those relating to different types of housing need, including for people with disabilities, older people and travellers; achieving thriving communities; promoting economic development; supporting sustainable transport connections and achieving high quality places and green places. My findings in relation to those matters are set out in subsequent sections of this report.

## Assessment of Duty to Co-operate

18. Section 20(5)(c) of the 2004 Act (the Planning and Compulsory Purchase Act 2004) requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation. The Council set out the actions that they have undertaken in this regard in a Duty to Co-

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<sup>3</sup> Age; disability; gender reassignment; marriage and civil partnerships; pregnancy and maternity; race; religion or belief; sex; and sexual orientation (section 149 of the Equality Act 2010).

operate Statement (LBHLP.4). This describes the activities that it has undertaken with other bodies in order to maximise the effectiveness of the Plan's preparation.

19. Co-operation has taken place with the Greater London Authority (GLA) and a number of London boroughs including the adjoining boroughs of Redbridge, Barking and Dagenham and Bexley. Havering also adjoins Epping Forest District Council to the north, Brentwood Borough Council to the east and Thurrock Council to the south-east. The Council have co-operated with these authorities and with Essex County Council. Co-operation has taken place in relation to a range of matters, including the homes and jobs required for the borough, the approach to the Green Belt and the infrastructure required to support the level of growth. A Statement of Common Ground with these and other authorities has been submitted in support of the Plan.
20. Essex County Council and the authorities of Basildon, Thurrock and Rochford object to the Plan due to concerns relating to Havering's unmet housing need, although they have confirmed that these objections relate to soundness matters rather than any failure of the duty to co-operate. Matters relating to housing need and supply are considered later in this report.
21. The Duty to Co-operate Statement sets out the GLA's view that individual London boroughs are not expected to identify where any unmet need is to be met either inside or outside of London. Whilst this was produced under the 2016 London Plan, it also reflects the London Plan 2021 which sets out that the Mayor will work with partners in the Wider South East to find solutions to shared strategic issues, including barriers to housing delivery. The London Plan does nevertheless promote the importance of engagement on locally specific cross-border matters between individual London boroughs and authorities beyond London.
22. The Council have worked in partnership with other relevant bodies in order to address other specific strategic matters. An example includes engagement with neighbouring local authorities, Transport for London (TfL) and Highways England in relation to the transport implications of the Plan. The Council have also been involved in the A127 Growth Corridor working group led by Essex County Council to assess the impact of cross-borough growth on this highway corridor.
23. Co-operation has also taken place with bodies such as Natural England, the Environment Agency, Historic England, the Local Enterprise Partnership and Local Nature Partnerships with regard to specific Local Plan issues.
24. No objections have been raised in respect of any failure to meet the duty to co-operate by any of the bodies prescribed in relevant legislation for the purposes of section 33A(1)(c) of the Act. While concerns of detail remain, notably in respect of the Local Plan's approach towards meeting housing needs and the proposed parking standards in the Plan, these relate to matters of soundness rather than any failure under the duty to co-operate. I return to these matters later in this report.
25. I am satisfied that where necessary the Council have engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

## Assessment of Other Aspects of Legal Compliance

### Consultation

26. Initial consultation on 'A New Local Plan for Havering' was undertaken in March 2015 in accordance with Regulation 18 (of the Town and Country Planning (Local Planning)(England) Regulations 2012), a 'Direction of Travel' document was consulted upon in November 2016 and consultation on the submission version of the Plan was consulted upon between August and September 2017, in accordance with Regulation 19. Consultation has subsequently taken place on the proposed MMs and FMMs. Consultation on the Plan and the MMs/FMMs was carried out in compliance with the Council's Statement of Community Involvement and the Regulations.

### Sustainability Appraisal

27. The Plan was subject to a SA during its preparation and to inform the proposed MMs and FMMs. No statutory consultation bodies have raised any significant concerns about the SA process.
28. A number of options, or reasonable alternatives, for the spatial strategy in the Plan were assessed in the Sustainability Appraisal for the Havering Local Plan 2017 (LBHLP.8). The options considered alternative levels of growth and the spatial distribution of that growth. The alternative options included increased densities in specified areas to meet a higher housing target and two alternative options which considered limited Green Belt release, one of which would have facilitated more family and older person's housing by developing at lower densities.
29. The SA has not considered an option which seeks to meet housing need through large scale release of Green Belt land. However, the Council are only required to consider reasonable alternatives which are capable of meeting the objectives of the Plan to such an extent as that option is viable. One of the Plan's objectives is to protect and enhance Havering's Green Belt. I consider it reasonable for the SA not to have considered this option given the objectives of the Plan and the requirement to be in general conformity with the London Plan which also seeks to protect the Green Belt. This is consistent with the judgement in *R. (on the application of Friends of the Earth England, Wales and Northern Ireland Ltd) v Welsh Ministers [2015] EWHC 776 (admin)*.
30. The 2017 SA report did not make clear the assessment of the preferred option (option 1) against many of the SA themes, which reflect the range of effects being considered through the SA process. It was not therefore clear that the preferred option had been assessed against the reasonable alternatives and judged to be the most appropriate option to help achieve the environmental, economic and social objectives set out in the SA themes. A SA Report Addendum (LBHLP.56) was produced in December 2018 to address these concerns.
31. Together, the SA and SA Addendum set out the likely significant effects of each of the options, or reasonable alternatives. Each of the options is assessed against the SA themes and planning judgement has been used to determine the likely significant effects of each of the options and whether they

meet the objectives of the Plan. The Plan's objectives include increasing the supply of housing by a minimum of 17,550 dwellings over the Plan period and protecting and enhancing the Green Belt. Whilst some of the options considered against the SA themes included exceeding the London Plan target the SA concluded that these options would not achieve the objective of protecting and enhancing the Green Belt.

32. The SA process led the Council to determine that the most appropriate strategy having regard to the relevant objectives of the Plan was option 1 which seeks to meet the London Plan housing target, reflects current densities of development and which does not involve release of Green Belt land.
33. The SA was updated following the need for the FMMs (the SA Report Further Addendum June 2021)(FMMC02). The minimum housing figure which the Plan seeks to meet has been increased following the increase in the LP2021 housing target. However, the SA Further Addendum concludes that as neither the spatial distribution nor the supply over the first 10 years of the Plan period has changed, this FMM does not significantly affect the findings of the SA or SA Addendum. The majority of the remaining FMMs do not significantly affect the findings of the SA / SA Addendum. FMM24 (which relates to car parking and is discussed in detail below) has been the subject of further appraisal through the SA Further Addendum and found to be not likely to have a significant effect alone nor to significantly affect the findings of the SA / SA Addendum.
34. No statutory bodies have raised significant concerns about the SA process. Whilst there were a number of criticisms made by other representors, it is not unusual for there to be disputes about some of the findings of the SA. I am satisfied that the SA process, once clarified by the SA Addendum 2018 and SA Further Addendum 2021, has been carried out satisfactorily and that there is nothing which undermines the SA findings. The SA process has assessed the extent to which the emerging Plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. Overall, I am satisfied that the SA process was proportionate, objective and the judgements reached were reasonable. The SA is compliant with legal requirements and relevant national guidance.

## **Conformity with the London Plan**

35. Section 24(1)(b) of the Planning and Compulsory Purchase Act 2004 requires all development plan documents to be in general conformity with the London Plan. The GLA have confirmed that, subject to the FMMs, the Plan is in general conformity with the LP2021.

## **Other Legal Compliance matters**

36. The Plan has been prepared in accordance with the Council's Local Development Scheme (LDS). The Council have confirmed that the LDS will be updated to reflect the timescales for the immediate update of the Local Plan.
37. The Habitats Regulations Assessment (HRA) June 2017 sets out that development in the Plan will not have a likely significant effect on any internationally designated site either alone or in combination. As such, an



Appropriate Assessment is not necessary. The MMs and FMMs were subject to further HRA. Both concluded that there would be no likely significant effects on European sites (now part of the national site network) from the MMs or FMMs.

38. The Development Plan, taken as a whole, includes policies to address the strategic priorities for the development and use of land in the local planning authority's area.
39. The Development Plan, taken as a whole, includes policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. In this respect the Plan includes policies relating to flood management, low carbon design, decentralised and renewable energy. Accordingly, the Development Plan, taken as a whole, achieves the statutory objective of S19(1A) of the Planning and Compulsory Purchase Act 2004<sup>4</sup>.
40. Regulation 8(5) of The Town and Country Planning (Local Planning) (England) Regulations 2012 (the 2012 Regulations) require that where a plan contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy. As submitted, the Plan does not identify which documents forming part of the Council's development plan would be superseded and which parts remain extant. A main modification (**MM1**) is needed to clarify this in order to ensure that the Plan is legally compliant. I have made a minor alteration to the wording of MM1 to clarify that the proposals map 2008 will be superseded by the policies map for this Local Plan. This will bring the terminology in line with the current Regulations. Subject to this modification, the Plan complies with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

## **Assessment of Soundness**

### **Main Issues**

41. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, I have identified 8 main issues upon which the soundness of this Plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors. Nor does it refer to every policy, policy criterion or allocation in the Plan.

### **Issue 1 – Is the Plan's spatial strategy and approach to the Green Belt appropriate and justified? Is it in general compliance with the London Plan and consistent with national policy?**

42. The Plan adopts a spatial strategy which seeks to meet the growth requirements for the borough in accordance with the London Plan. It also seeks to retain the suburban character of the borough and to protect the

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<sup>4</sup> As amended by the Planning Act 2008.

Green Belt. The Plan identifies the main town centre of Romford together with Rainham and Beam Park as Strategic Development Areas (SDAs). This is in line with the London Plan which identifies these areas as Opportunity Areas. These areas, together with the Council's housing estate renewal programme, will be the focus for growth in the Plan. Other options for different spatial strategies, including development in the Green Belt, were considered in the SA as set out above but were discounted as not meeting the aims of the Plan to protect the Green Belt and the character of the borough.

43. The Council carried out a Green Belt Study including a land parcel assessment in 2016 (LBHLP.26 and 26.1). This concluded that all of the Green Belt in Havering has value when considered against the purposes of the Green Belt. The majority of land parcels were assessed as making a fundamental or high contribution to the Green Belt, with only one parcel making a low contribution. This parcel contains recreational land, which is a beneficial use in terms of the NPPF paragraph 81, and a cemetery.
44. A further Sites Green Belt Assessment was carried out in 2018 (LBHLP.27, 27.1 and 27.2). This assessed a number of sites which had been put forward for potential Green Belt release against the Green Belt purposes and against a set of sustainability criteria. Whilst some sites were identified as having a low or moderate rating assessment of harm for release of the whole site (Table 5.1 LBHLP.27), none of the assessed sites have been released from the Green Belt. The Council set out (Matter 5 Green Belt hearing statement) that a low or moderate assessment of harm does not amount to exceptional circumstances for the release of Green Belt sites.
45. The NPPF states that the Government attaches great importance to Green Belts. Once established, Green Belt boundaries should only be altered in exceptional circumstances. The LP2021 states that the Mayor strongly supports the continued protection of London's Green Belt and the GLA have confirmed the Mayor's support for Havering's approach to the Green Belt (document LBHLP.14 and GLA letter dated 18 March 2021). The strategy of protecting the Green Belt complies with the NPPF and is in general conformity with the LP2021.
46. Main Modifications to the Plan have resulted in the allocation of existing Gypsy and Traveller sites and the removal of these sites from the Green Belt, a matter considered in detail later in this report.
47. The 2008 Core Strategy identified four Major Developed Sites in the Green Belt. The NPPF does not refer to Major Developed Sites in the Green Belt and the Plan does not specifically identify any such sites. However, the Housing Position Statement 2019: Technical Update (HPS 2019) (Document CHPDO25) identifies two previously developed sites within the Green Belt which have potential for housing development<sup>5</sup>. The Rowley Cardrome site was also identified in the Core Strategy but is not specifically identified in the HPS 2019 as contributing to the Council's housing land supply. Nevertheless, none of these sites are released from the Green Belt. Any development proposed on the sites would need to be justified having regard to the NPPF, local policy and

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<sup>5</sup> St George's Hospital and Quarles Campus

any other material considerations. The approach of the Plan to these sites is sound.

48. Other than the limited exceptions for Gypsy and Traveller site allocations, the Plan proposes no release of Green Belt land for general housing or employment purposes. I deal below in detail with the Council's housing land supply position. In summary, although it appears unlikely that a 5-year supply can be demonstrated in the Plan, the evidence demonstrates that there is likely to be sufficient housing supply to meet the requirement for the first 10 years of the Plan period.
49. The aim of Green Belt policy in the NPPF is to keep land permanently open and the essential characteristics of Green Belts are their openness and permanence. The lack of a 5-year housing land supply is a situation that can change over a relatively short period of time and the Council have committed to an immediate review of this Plan in order to reassess the options for increasing the housing land supply in the borough. Having regard to the support in the LP2021 and in Government policy for the protection of the Green Belt and the fact that the Plan can demonstrate a 10-year housing supply, I am not satisfied that the current lack of a 5 year housing land supply provides the exceptional circumstances necessary to alter the boundaries of the Green Belt as part of this Plan.
50. Aside from the protection of the Green Belt, the Plan also sets out the other aims and objectives it seeks to tackle the key issues facing the area. A modification (**MM2**) is proposed to add to the objectives the need to support greater use of the River Thames for freight and passenger transport. This modification is necessary in order to encourage greater use of sustainable transport options in line with paragraphs 29 and 35 of the NPPF and to ensure compliance with the London Plan. This objective follows through into modifications to specific policies (identified separately below) to support this overarching objective.
51. Policy 1 sets out the number of homes to be provided in the Romford SDA over the Plan period. A modification is proposed to update the housing figures to reflect updated evidence in the Housing Position Statement 2019 (MMC07, MMC08, MMC09.01-04, MMC10) (**MM3**). This is necessary to ensure the policy is positively prepared, justified and effective.
52. The policy also sets out the support for commercial development, to enhance connectivity, to ensure the delivery of infrastructure and promote good design and heritage conservation within the SDAs. **MM3** modifies the criterion which sets out the requirements for additional primary school provision over the Plan period in order to reflect updated information regarding school provision. This part of the modification is necessary to ensure that the policy is justified and effective. I have made a further change to the wording to reflect the fact that future site allocations are likely to be dealt with through the immediate update of this Plan. The modification also explains the requirement in the policy which seeks 'generous' floor to ceiling heights. This is required to ensure the policy is effective. I have made a further minor change to the wording of this part of the modification to allow flexibility in the application of this criterion.

53. In order to ensure clarity and effectiveness and so as not to unnecessarily burden smaller developments, **MM3** makes further modifications to Policy 1 and its justification to clarify that only major developments will be required to secure improvements to connectivity; to clarify the role of the Romford Masterplan and to emphasise the importance of mixed-use developments within the SDA.
54. The modification also alters and explains the requirements for tall buildings and removes a restriction on such buildings north of the railway line. The submitted policy restricts tall buildings within the conservation area but the modification to the justification paragraphs clarifies the considerations to be taken into account for such buildings elsewhere within the SDA. The modifications included in **MM3** are necessary to ensure that the policy is positively prepared, justified, clear and therefore effective.
55. Policy 2 relates to development within the Rainham and Beam Park SDA. It contains similar criteria to Policy 1 to guide development within the SDA. As submitted the wording of requirements for floor to ceiling heights and the need for a mix of uses is unclear. A modification is therefore necessary (**MM5**). Similar to Policy 1, I have made a further minor change to introduce some flexibility in the application of the floor to ceiling height criterion. The modification also introduces a criterion to ensure that development has regard to listed buildings and their settings. The modification is necessary to ensure that the policy is effective, justified and consistent with national policy.
56. Subject to the main modifications outlined above I conclude that the Plan's spatial strategy and approach to the Green Belt is appropriate, justified, in general compliance with the London Plan and consistent with national policy.

## **Issue 2 – Is the Local Plan's overall approach to the provision of new housing soundly based, having particular regard to the housing requirement and the desirability of there being a 5-year supply of deliverable housing land?**

### **Housing Requirement**

57. Havering forms part of the London-wide housing market area. The Havering Local Plan was prepared, and much of the Examination was undertaken, at the time when the London Plan 2016 was the published plan. The London Plan 2016 set a minimum target of 11,701 new homes for Havering over the ten-year period 2015 – 2025. This equates to an average annual housing target of 1,170 dwellings per annum (dpa) or 17,550 dwellings over the 15-year Plan period. This target is set out in Policy 3 of the submission version of the Local Plan and in the table within the Plan which sets out the 'Key features of the spatial strategy'<sup>6</sup>.
58. In March 2021, at a late stage in the Examination, the LP2021 was published and the 10-year housing target for Havering was increased to 12,850 homes between 2019/20 and 2028/29. In order to ensure that the Plan is in general

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<sup>6</sup> Chapter 5 of the Plan

conformity with the LP2021, modifications are required to the table within Chapter 5 and to Policy 3 and its justification, to reflect the adopted London Plan housing requirement. This is achieved through **FMM3** and **FMM6** respectively.

59. The 10-year target for Havering within FMM6 is 12,505 new homes. This reflects the fact that the Havering Local Plan straddles the two London Plan periods. The annual requirement for the period 2016/17 to 2018/19 is 1,170 dpa (in line with the 2016 London Plan) and for the period 2019/20 to 2025/26 the annual requirement is 1,285 dpa (in accordance with the LP2021).
60. In line with the 2016 London Plan, the Outer North East London (ONEL) Strategic Housing Market Assessment (SHMA) was undertaken jointly with the London Boroughs of Redbridge, Barking and Dagenham and Newham. The ONEL SHMA Update for Havering (November 2016) identifies a need for 30,052 dwellings within Havering over the period 2011-2033 or 1,366 homes per year. I have considered whether this should be the housing requirement in the Plan. However, the LP2021 makes clear that London should be considered as a single housing market area<sup>7</sup> and that boroughs are not required to carry out their own housing needs assessment. The approach of the Plan as modified to seek to meet the LP2021 housing target is therefore sound.

### Housing trajectory

61. The Plan is supported by the Housing Position Statement which was updated during the Examination by the 2019 Technical Update (HPS 2019) (document MMC07). The HPS 2019 is now in itself somewhat dated and the position of sites within the housing trajectory may have altered. However, the Council have been unable to provide a further update to that document within a reasonable timeframe. Even if this were to have been provided, any new information submitted would need to be subject to consultation and may necessitate further hearing sessions. Overall, this would result in considerable further delay in the Examination and ultimately would further delay adoption of the Plan.
62. The HPS 2019 sets out that the Council will adopt a stepped approach to housing delivery, with increased housing delivery in years 5-10 compensating for under-delivery in the first 5 years. This is in line with the LP2021 which acknowledges<sup>8</sup> that boroughs may set out stepped housing delivery targets over a 10-year period where appropriate. Furthermore, national policy does not prevent a phased approach to the delivery of housing across a plan period.
63. The Plan sets out that construction on a significant proportion of new housing development will be on large sites within the Strategic Development Areas. It states that development in these areas is likely to be towards the end of the 5-year period and into the 10-year period. The Plan therefore aims to deliver its land supply over a 10-year period. However, the Plan as submitted does not make clear the stepped annual target the Council are seeking to deliver over the 10-year period. **FMM6** contains a modification to Policy 3 and its

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<sup>7</sup> Para 4.1.2

<sup>8</sup> Para 4.1.10

explanatory text to explain the stepped approach to delivery. This is necessary to ensure that the Plan is positively prepared, justified and effective. **FMM6** sets out the phased delivery of the housing requirement as outlined in the following table. The figures in this FMM have been adjusted to take account of the higher housing requirement in the LP2021:

Years 1-5	2016/17 to 2020/21	700 dpa target
Years 6-9	2021/22 to 2024/26	1,801 dpa target
Year 11-15	2026/27 to 2030/31	1,285 dpa target

64. Under the phased targets the rate at which housing will be delivered across the Plan period will vary in each 5-year period. The 700 dpa target for years 1-5 of the Plan is significantly lower than the 1,170 dpa in the 2016 London Plan which was the published Plan during those years. However, completion figures for the previous 7-year period from 2012-2017 averaged 715 units. The lower target over the first 5 years of the Plan aligns with average annual net completions during the previous 7 years and with anticipated completions over the remaining period to 2020/21.
65. The figure for the first 5 years also reflects the fact that a significant proportion of the Council's housing land supply comes from large sites within the Romford and Rainham and Beam Park SDAs and from the Council's estates regeneration sites. These have long lead in times as a result of land assembly and infrastructure requirements. For the estates regeneration sites there is the need to engage with and move existing residents and the early years of redevelopment will include a number of demolitions, thus having a negative effect on housing supply. Consequently, anticipated net completions are predicted to be lower in the first years of the Plan period than later. There is predicted to be a significant increase in anticipated completions between 2020/21 and 2025/26, with particular 'spikes' in 2022/23 and 2023/24.
66. Furthermore, the first 5-year period up to 2020/21 has now elapsed. The annual target on adoption of the Plan will increase to 1,801 dpa. This target exceeds the 1,285 dpa annual target in the LP2021 in order to account for under-delivery in the early years of the Plan.
67. In the context of pre-plan period delivery averaging 715 dpa and the evidence relating to land supply, I am satisfied that 700 new dwellings per year for the first 5 years of the Plan period (to 2020/21), rising to 1,801 dwellings per year for years 6-10 would appropriately reflect the realities of delivery in the SDAs and the estates regeneration programme.

## Housing land supply

68. The components that make up the housing supply are set out in the HPS 2019 and accompanying trajectories. The evidence does not identify sufficient land supply to cover the 15-year Plan period. Overall supply is likely to be 16,438 homes against a modified target of 18,930 homes over the Plan period (a total shortfall of 2,492 homes by 2031). The HPS 2019 demonstrates that there will be a supply of 13,095 homes to cover the 10-year period 2016/17 to

2025/26 against the target of 12,505 homes set out in Policy 3 as modified. The evidence therefore demonstrates a sufficient supply of sites to meet the target for the first 10 years of the Plan.

69. The NPPF at paragraph 47 does not require that a plan identifies specific sites to meet the housing requirement for the full plan period. It states that land should be identified for years 11-15 "where possible". The London Plan also sets its targets for boroughs over a 10-year period. This aspect of the Council's housing land supply position is therefore in accordance with the NPPF and the London Plan.
70. The HPS 2019 provides evidence regarding build-out rates, lead-in times and lapse rates locally and capacity studies are provided for some of the identified sites. The proposals for Crossrail to include a station at Romford is likely to be one of the key drivers for growth in the Romford SDA and gives credence to the Council's estimate of the number of dwellings likely to be developed in the SDA over the first 10 years of the Plan period.
71. Similarly, the Rainham and Beam Park SDA is linked to the delivery of a new railway station at Beam Park. It is also identified as one of the GLA's Housing Zones. Housing Zones attract a range of planning and financial measures to support house building within these areas.
72. The Council have presented detailed evidence regarding the timing and phasing of its estates regeneration sites. It is clear that the Council have had regard to the potential for needing to exercise their Compulsory Purchase powers and have factored this timescale into their assumptions. I am satisfied that the Council's evidence in terms of the number of dwellings likely to come forward in these areas is robust.
73. Criticism has been made that the Council have been ambitious in its expected completions, average build-out rates and lead-in times for some sites. However, the HPS 2019 incorporates the latest available information regarding the suitability, availability, achievability and deliverability of each of the sites based on planning application information, discussions with landowners and developers and the constraints affecting some sites. A discount rate of 10%, 20% and up to 35% has been applied to sites where there is a degree of uncertainty over its delivery. On other sites capacities have been reduced to accord with the Council's capacity studies. Whilst there are different views regarding the discount rates applied, it is likely that some of these sites will come forward at the higher, non-discounted, rates whilst others may not come forward within the timescale envisaged. Ultimately, this is likely to balance out.
74. A small number of sites gained planning permission some years ago and queries have been raised as to whether the sites are deliverable. However, the sites have planning permission<sup>9</sup> and there is no evidence of any insurmountable constraints to their development. In accordance with the NPPF<sup>10</sup>, sites with planning permission should be considered deliverable until

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<sup>9</sup> At the time of the HPS2019

<sup>10</sup> Footnote 11, NPPF 2012

permission expires, unless there is clear evidence that schemes will not be implemented within five years.

75. Some of the supply relates to prior approvals and whilst it is possible that not all of these will come forward, it is equally possible that other prior approvals not currently in the trajectory will materialise. This is even more likely having regard to recent changes to the Use Classes Order (UCO). A small sites and vacant units allowance of 1,500 dpa has been included over the first 10 years of the Plan period. This is justified by the evidence in the HPS 2019 which sets out the annual average for small sites and vacant units returning to use. NPPF at paragraph 48 confirms that authorities may make an allowance for windfall sites in the 5-year supply if there is compelling evidence. There is nothing in the NPPF which precludes this allowance being made over the Plan period.
76. It is argued by some that the Council have been overly optimistic for some sites, but there is also evidence that they have been conservative in their estimation for others. There is also some evidence that other sites may come forward which have not been included in the supply due to uncertainty over their delivery.
77. **FMF6** updates the figures for homes to be provided in the Romford SDA, the Council's housing estate renewal areas, other major sites and on small sites, including vacant units returning to use. It also modifies the supporting text to set out the supply from all sources for the Plan period. These parts of the modification are required to reflect the evidence in the HPS 2019 in order to ensure that the policy is justified.
78. To support housing delivery **FMF6** also inserts criteria into Policy 3 to indicate the Council's support for the re-use of brownfield sites and for residential development around stations, subject to design review. I have added a further change to include mixed-use development around stations where appropriate to ensure that best use can be made of land which is accessible by sustainable modes of transport, in line with the NPPF. These aspects of the modification and further change ensure that the policy complies with the London Plan and national policy.
79. I conclude that the overall housing supply position is reasonable when conservative and optimistic estimates from the various sources are balanced and should ensure a sufficient supply over the first 10-year period to meet the modified housing target in the Plan. An immediate update of the Plan is proposed, as explained below. This will provide the opportunity to update the housing supply position.

### 5-year supply

80. The Plan does not seek to allocate specific housing sites as this was to be done in the Site Specific Allocations Local Plan but is now intended to be included in the immediate update to this Plan. Nevertheless, the HPS 2019 provides information on the various sources of supply of housing land.
81. Due to the persistent under delivery of housing in the past, the Council have justifiably included within its 5-year supply calculations a buffer of 20% to provide a realistic prospect of achieving the planned supply and to ensure



choice and competition in the market for land. This buffer has been added to the shortfall. Using the 'Sedgefield' approach to addressing past shortfall, where the under-delivery in earlier years is made up in the first 5 years of the Plan period, the HPS 2019 identifies a 5.34 years' supply of housing on adoption of the Plan.

82. However, the 5-year supply figures in the HPS are based on a then anticipated adoption date of 2019 and on the 2016 London Plan requirement which was lower than the 5-year requirement moving forward from adoption in 2021/22. As set out above, I do not have an updated housing trajectory. Based on the housing supply identified in the 2019 trajectory (MMC10) the Council confirm<sup>11</sup> that they will not have a 5-year supply of sites on adoption later in 2021.
83. Whilst other sites which are argued to have potential for housing were put forward during the Examination, a number of these are in the Green Belt. In any event, it would not be possible for me to recommend inclusion of additional sites in the housing trajectory without further consideration by the Council of all alternative sites which may meet the need. This would be likely to involve further consultation on an updated trajectory and discussion at further hearing sessions. This process would lead to significant additional delay in the adoption of the Plan.
84. As a result of the housing land supply situation, **FMM6** includes the commitment that the Council will undertake an update of the Plan beginning immediately after adoption. This is necessary to ensure that the Council take into account the latest information relating to any shortfall in delivery and any updates to the housing supply position in seeking to meet the updated housing requirement in the LP2021.
85. Ordinarily, the demonstration of a 5-year supply of deliverable housing land is a prerequisite of a sound plan in terms of the need to deliver a wide choice of homes. However, in the circumstances of this Plan, where the housing requirement has increased at a late stage in the examination, I ultimately conclude that the Plan, as proposed to be modified, is sound in this regard subject to an immediate review.
86. This is a pragmatic approach which is consistent with the findings of the Dacorum judgement<sup>12</sup>. It aims to ensure that an adopted plan is put in place in the interim period before the update is adopted and the 5-year housing land supply situation is established. Ultimately, there is no evidence to suggest that if the Plan was not to be adopted now, more housing would be delivered in the next 5 years and, indeed, the continuing lack of certainty resulting from this would potentially mean that fewer dwellings would be constructed. The consequences if the Council cannot demonstrate a 5-year supply will be that the presumption in favour of sustainable development, as set out in paragraph 11 of the NPPF 2021, will be applicable in decision-making on development proposals. In itself, this should help to boost housing supply.

## Conclusion on Issue 2

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<sup>11</sup> In document 'Five-year land supply at adoption in 2021'

<sup>12</sup> Grand Union Investments Ltd. V Dacorum Borough Council [2014] EWHC 1894 (Admin)

87. For the above reasons, and subject to the modifications included in **FMM6**, I conclude that the Plan's overall approach to the provision of new housing is soundly based, having particular regard to the housing requirement and the desirability of there being a 5-year supply of deliverable housing land.

### **Issue 3 – Does the Plan address the needs for all types of housing, including affordable housing and the needs of different groups in the community?**

#### **Affordable housing and the housing mix**

88. The SHMA 2016: Update for Havering identifies a need for 10,520 affordable homes from 2011-33 or 478 affordable homes per year. In order to help meet that need, Policy 4 sets out that developments of more than 10 dwellings or more than 1,000 square metres site area should provide at least 35% affordable housing. This needs to be modified to 10 or more dwellings to ensure general conformity with the LP2021 (**FMM7**). To ensure that the policy is effective, **FMM7** also includes a modification to update the reference to the Mayor's Affordable Housing Supplementary Planning Guidance (SPG) to reflect the fact that it is now adopted SPG.
89. The policy was prepared at the time when the London Plan 2016 stated that boroughs should set their own overall targets for affordable housing taking account of overall housing targets and the need to ensure a total of 17,000 affordable homes in London were provided over the London Plan period.
90. The LP2021 includes a strategic affordable housing target of 50% of new homes across London to be affordable. The London Plan sets out that the strategic target is to be achieved, amongst other measures, by the threshold approach which requires major developments to provide a minimum of 35% affordable housing, 50% for public sector land and on land in certain specified industrial areas. Provided that a scheme accords with the minimum requirements without public subsidy no viability information needs to be submitted.
91. Whilst Policy 4 does not make reference to the overall strategic target, it does not conflict with that target and the target would still apply to development proposals in Havering through the application of the LP2021 policies. The 35% target and threshold approach set out in Policy 4 is in general conformity with the London Plan but the policy does not contain the higher 50% target for public sector land or industrial land. **FMM7** therefore includes the 50% target for such land and this is necessary to ensure general conformity with the LP2021.
92. The Viability Assessment (LBHLP.24) demonstrates that affordable housing of up to 50% would be viable for lower density scheme typologies. However, higher density typologies will only support between 25% and 35% affordable housing. Policy 4 allows for development proposals which do not meet the 35% or 50% thresholds to submit a detailed viability assessment in support of the development. The Viability Assessment concludes that the flexible approach in the policy will ensure that most developments will be likely to be viable over the Plan period. Thus, whilst affordable housing needs are unlikely

to be met in full, the policy sets out a proportionate approach, which is justified by the viability evidence and is in general conformity with the LP2021.

93. Policy H5 of the LP2021 makes clear that affordable housing should be based on gross rather than net residential development. **FMM7** includes this clarification to Policy 4. This is necessary in order to ensure that the policy is effective and in general conformity with the LP2021.
94. Policy 5 sets out the housing mix requirements based on housing need identified in the ONEL SHMA. To ensure that the policy is effective, a modification is required (**MM8**) to allow the requirements to be applied flexibly having regard to individual site circumstances and to clarify that the requirements do not apply to proposals for retirement, sheltered or extra care housing.
95. With the modifications set out above, the Plan's approach to affordable housing and the housing mix is sound.

### **Specialist, including older persons', accommodation**

96. Policy 6 sets out the Plan's support for the provision of specialist accommodation which meets a number of criteria. Such accommodation is defined as that which is specifically designed and built to meet the needs of the elderly, disabled, young or vulnerable adults. This is line with national policy and the LP2021.
97. In relation to older persons' housing the LP2021 identifies indicative benchmarks which should inform local level assessments of specialist housing need. For Havering, the benchmark is 185 units per year. A modification is required to the justification for Policy 6 to reflect this approach (**MM9**). I have altered the wording of MM9 to delete reference to the 2016 London Plan.
98. The Council's local needs report Review of 2018 Review of Specialist Older Persons' Housing August 2020 (MMC06) identifies a need for 255 owner occupied / intermediate housing units per year for the 10 years from 2018 to 2028, or a total of 2,552 units over that 10-year period. **MM9** sets out this figure and includes a commitment to review the local needs report every 3 years to maintain an up-to-date understanding of need. This is necessary to ensure that the Plan is positively prepared, justified and effective. Whilst the frequency of review has been questioned, there is nothing in national or London Plan policy which requires a more frequent review and without such a commitment, the only requirement would be for the Council to review the Plan every 5 years to assess whether policies need updating<sup>13</sup>. It is also notable that the annual benchmark set out in the LP2021 has not increased from the 185 units per year set out in the 2016 London Plan.
99. In terms of supply, the evidence<sup>14</sup> identifies a deficit in sheltered / retirement housing for people wanting to purchase or lease but a surplus of affordable sheltered housing schemes. Whilst the Plan does not identify specific sites for such accommodation it was envisaged, at the time of preparation and

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<sup>13</sup> NPPF 2021 paragraph 33

<sup>14</sup> Further response from London Borough of Havering to Inspector January 2019 (CPHD0006)

submission of the Plan, that this would be the role of the Site Specific Allocations Local Plan. As set out earlier, the Council are currently intending to prepare a full Local Plan as an immediate update of this Plan. The London Plan policy requirement for boroughs to work with specialist providers to identify sites will be a matter for consideration at that stage. With the modification set out above, and the requirement for an immediate update of the Plan, the Plan's approach to specialist accommodation, including older persons' housing need, is sound.

## **Gypsies, Travellers and Travelling Showpeople**

### Background and Policy 11 of the Plan

100. Policy 11 of the submission version of the Plan indicates that 7 existing privately owned sites are allocated to provide a maximum of 33 pitches for Gypsy and Traveller accommodation. This was based on the London Borough of Havering Gypsy and Traveller Accommodation Assessment (GTAA) February 2017. A subsequent update of the GTAA in March 2018 resulted in an increase in the number of households who had been interviewed. On submission of the Plan therefore the Council proposed modifications to Policy 11 to increase the number of sites allocated to 11 providing a total of 70 pitches.
101. When assessed against national policy in Planning Policy for Traveller Sites (PPTS), the GTAA 2018 had a number of shortcomings which resulted in an underestimation of the need. It did not reflect an up-to-date assessment of existing gypsy sites, there was a low response rate to the survey undertaken to inform the GTAA at just 40% and in interpreting the GTAA into policy, need arising from 'proxy' interviews (those where Travellers from one household had answered on another household's behalf) had not been included.
102. The Council considered that they did not have sufficient information on the households who had not responded to the survey in person to determine whether or not they fell within the planning definition of a Gypsy or Traveller, set out in Annex 1 of PPTS. These households were determined to be 'unknown' households. Policy 11 of the submission Plan does not therefore seek to meet the need for those not meeting the planning definition of a Traveller, including the 'unknown' households.
103. Section 124 of the Housing and Planning Act 2016 sets out the duty of Councils 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*". PPTS requires planning authorities to identify and update annually, a supply of specific deliverable sites to provide 5 years' worth of sites against their locally set targets.
104. The Plan does not allocate sufficient sites to provide for a 5-year supply. Neither does it identify the supply or broad locations for the remaining years of the Plan based on a robust assessment of need in accordance with PPTS. In addition, not all potentially available sites had been assessed for allocation. Instead, the sites were allocated on the basis that the existing residents fell into the planning definition of a Gypsy or Traveller. Given the lack of a robust assessment of the need and planning status of existing residents in the first place, this is not a sound approach.

105. The sites which have been allocated in Policy 11 remain in the Green Belt. PPTS makes clear that Traveller sites are inappropriate development in the Green Belt. The application of national policy to these allocated sites would therefore make it difficult for planning permission to be granted, thus jeopardising the deliverability of the allocated sites to meet the need.
106. In addition, the GTAA 2018 concludes that there is no current or future need for plots for Travelling Showpeople and as such Policy 11 does not seek to meet a need or allocate any sites. However, the GTAA notes that overcrowding on the existing yard was identified by an existing resident of the site, as was a need to provide future plots for teenage children.
107. Finally, some of the criteria set out in Policy 11 for assessing Gypsy and Traveller planning applications are onerous and not in accordance with PPTS.
108. For the above reasons, the GTAA 2018 does not constitute a robust assessment of need and the approach to Gypsies and Travellers in Policy 11 of the Plan is not in accordance with PPTS. The approach is not positively prepared, justified or effective and is therefore unsound.

#### Updated GTAA 2019

109. The Council subsequently commissioned the GTAA Update Report July 2019. A further survey of the existing Gypsy and Traveller community was undertaken to inform the updated GTAA taking the response rate to the survey up to 96% which results in a much more robust assessment of the need. More accurate assessments have been made of the need arising on existing sites, the number of households meeting the planning definition, those who are undetermined<sup>15</sup> and those who do not meet the definition. The number of undetermined households has significantly fallen (from 102 'unknown' to 6 'undetermined'). The majority of the previously 'unknown' households have either fallen within those meeting the planning definition or those who do not.
110. The updated GTAA identifies a need to 2031 for:
- 174 pitches for households that meet the planning definition;
  - 43 pitches for households who do not meet the planning definition;
  - 3 pitches for undetermined households;
  - 5 plots for Travelling Showpeople who meet the planning definition.
111. In total a need for 220 pitches and 5 Travelling Showpeople's plots has been identified in the updated GTAA 2019. The GTAA breaks down the need for Gypsy and Traveller pitches into the first 5 years of the Plan (171 pitches), years 6-10 (23 pitches) and years 11-15 (26 pitches). I am satisfied that the GTAA 2019 provides a robust assessment of need for the purposes of the Local Plan.

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<sup>15</sup> the term 'unknown' in the 2018 GTAA has been replaced by 'undetermined' to reflect the fact that the Council know that the households are living on existing sites but have not been able to contact them to determine their planning status, despite repeated attempts.

### Proposed Modifications to Policy 11

112. The Council have put forward main modifications to Policy 11 (**MM12**) to reflect the updated GTAA 2019. The policy as modified sets out the need over the Plan period and identifies the allocated sites for Gypsies and Travellers and Travelling Showpeople. The need which is to be met on these allocated sites is for those who meet the PPTS definition, those who do not meet the definition and those who are undetermined. The modification results in a greater proportion of the need over the Plan period being accommodated on allocated sites.
113. The allocated sites for years 1-5 of the Plan (2016-2021) are set out in new Appendix X (included in MM12) and are shown on the Proposals Map Changes Booklet 2017, Addendum 2018 and Addendum August 2020. Sites are allocated for 162 pitches and 5 plots for Travelling Showpeople against a 5 year need for 171 pitches, although this must be seen in the context of comments I make below in relation to the size of some of the allocated sites to accommodate this number of pitches. In accordance with PPTS, the modification includes the identification of specific developable sites to accommodate the need for years 6-10 of the Plan (23 pitches).
114. The majority of existing sites on which Gypsies and Travellers currently reside have been allocated for Gypsy and Traveller pitches under modification MM12. However, some existing households reside on pitches where there are land ownership disputes. These sites have not been allocated as the uncertainties could prevent delivery of permanent pitches on these sites. MM12 sets out that the remaining need for 7 pitches in the first 5-year period is to be accommodated through the consideration of planning applications on the sites identified for accommodating growth in years 6-15 of the Plan. I acknowledge that this may not be effective at meeting the need for those families currently residing on the sites with land ownership difficulties as it is not clear that the identified sites, which are in separate ownership, would be available to those families in need. If this proves not to be possible, a criteria-based policy would provide the basis for any planning applications which come forward on unallocated sites if the families are unable to stay on the sites they currently occupy.
115. In terms of need later in the Plan period, PPTS states that "where possible" developable sites or broad locations for growth should be set out for years 11-15. The Council have not been able to identify land within the urban area for future growth and the urban area is tightly constrained by the Green Belt. Accordingly, no sites or broad areas have been identified to meet the need for years 11-15 of the Plan. The modified policy states that sites that come forward to meet the need in these years will be assessed against the modified policy criteria and national policy. The modification sets out reasonable criteria, which accord with PPTS, for the assessment of future planning applications. The justification to the policy explains the commitment elsewhere in the Plan (set out in **FM6**) to undertake a review and to update

the Plan immediately after adoption. This will provide the opportunity to review how accommodation needs later in the Plan period will be addressed.

116. There are no national standards for design and layouts of Gypsy and Traveller sites. The Council have had regard to good practice guidance<sup>16</sup> in determining the number of pitches each allocated site could accommodate. In some instances, the number of pitches would exceed that recommended in the good practice guide. This reflects the particular circumstances of the need, identified in the GTAA, for 40 pitches for teenage children in need of a pitch of their own in the next 5 years. Some households in these circumstances have expressed a preference to stay together on their existing sites and use smaller accommodation units and day rooms rather than splitting up their families to occupy larger units elsewhere.
117. MM12 includes an explanation of this approach in the modified policy. However, in order to further clarify that the allocated sites will not necessarily accommodate the specified number of full pitches (a pitch is defined in the Glossary of the Plan as accommodating a household and generally including a large static trailer, touring caravan, amenity building, parking and turning space), I have made a further change to the wording of MM12 to make this clear.
118. In the longer term, teenage children who may occupy the smaller accommodation units on some sites will be likely to form their own households and will be in need of a full pitch themselves. The immediate update of the Plan will provide the opportunity to address any future overcrowding and need for pitches for newly formed households. This is recognised in the justification to the policy in MM12. The immediate update of the Plan will also be required to be in general conformity with Policy H14 of the LP2021 which makes clear that boroughs that have undertaken a needs assessment since 2008 should update it as part of their Plan review process.

#### Site allocations - do exceptional circumstances exist?

119. MM12 and the updated policies map removes the allocated sites from the Green Belt and these are inset within it. This will ensure that applicants for planning permission for Gypsy and Traveller pitches on these sites will not need to demonstrate that very special circumstances exist in order for permission to be granted. This ensures that the allocated sites are likely to be deliverable.
120. PPTS states that local planning authorities can make exceptional, limited alteration to Green Belt boundaries to meet a specific identified need for a Traveller site. Exceptional circumstances must exist for any such alterations to Green Belt boundaries, both to accord with PPTS and NPPF.
121. There have been previous attempts in Havering to plan for the needs of the Gypsy and Traveller community. The Gypsy and Traveller Sites Development Plan Document was submitted for examination in 2012. That Plan was withdrawn following fundamental concerns expressed by the examining Inspector at that time. Since then, the need for pitches has increased and

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<sup>16</sup> Designing Gypsy and Traveller Good Practice Guide 2008 and Designing Gypsy and Traveller Sites Welsh Government Guidance 2015

there remains a significant level of unmet need in the borough for pitches / plots to accommodate the existing population of Gypsies, Travellers and Travelling Showpeople.

122. There is no public site provision in Havering. 21 pitches are currently located on sites with permanent permission, 7 pitches have only temporary permission and the vast majority of existing pitches (102 pitches) are sited on unauthorised sites, a small proportion of which are tolerated (5 pitches).
123. There is much competition for land in the urban areas due to the tightly drawn Green Belt boundaries in the borough. The only sites that have come forward as having potential for development for Gypsy and Traveller pitches are those owned and / or occupied by existing Gypsies and Travellers. The majority of these sites are in the Green Belt. It is clear from the length of time during which the allocation of sites has been unresolved in the borough, that there are currently no alternatives to the allocation of Green Belt land to meet the need. The Council acknowledge this and it is set out in the justification to the policy in MM12.
124. Regard must be had to the Public Sector Equality Duty, contained in Section 149 of the Equality Act 2010. In addition, one of the aims of PPTS is to ensure fair and equal treatment for Travellers. The allocation of sites to meet the need will reduce the disadvantages that Gypsies and Travellers in the borough currently suffer through the lack of allocated sites to meet their accommodation needs. This would achieve the social role of sustainable development set out in paragraph 7 of the NPPF.
125. I am satisfied that removal of these sites will not cause significant harm to the Green Belt. Even had that been the case, given the very significant level of need, the social benefits of meeting that need as far as possible, the lack of alternatives and the length of time that this issue has remained unresolved, I consider that exceptional circumstances exist in this case to make exceptional, limited alterations to the Green Belt boundaries in order to inset the allocated sites within the Green Belt.

#### Conclusion in relation to Gypsy, Traveller and Travelling Showpeople's Need

126. There remain some limitations in the Plan's approach in that it does not identify a supply of pitches to meet the entirety of the identified need in the first 5-year period and in the allocation of sites which are smaller than good practice would suggest. However, I recognise that Havering has significant constraints to the provision of Gypsy and Traveller pitches. There is competition for land in urban areas and there is currently no evidence that pitches could be found in these areas. Much of the rural areas are constrained by Green Belt.
127. The Plan is to be updated immediately on adoption and this will provide the opportunity to further consider the need and the availability of suitable sites. Given the allocation of a significant number of Gypsy and Traveller pitches in Policy 11 as modified, it is important that this Plan is adopted to ensure that the Council move closer to complying with Government policy in PPTS and its duty under the Housing Act. It will also give greater certainty to those currently residing on the allocated sites, to the Council and other local residents.



128. For the reasons set out above, the submission version of the Plan is unsound in its treatment of Gypsy, Traveller and Travelling Showpeople accommodation. Main modification **MM12** is therefore necessary to ensure that the Plan is positively prepared, justified, effective and accords with national policy.

### **Other housing policies**

129. Policy 7 sets out requirements for residential design and amenity. **MM10** removes references in the policy and supporting text to London Plan policies regarding 'Lifetime Homes' and 'Lifetime Neighbourhoods' which are no longer relevant. The modification includes encouragement for development to provide green infrastructure and notes its environmental benefits. This modification is necessary in order to reflect London Plan policy and NPPF. **MM10** also clarifies the requirement for dual aspect accommodation to be maximised, this is necessary to ensure the policy is effective and accords with standards in the London Housing SPG.

130. Policy 10 sets out criteria for garden and backland development. **MM11** introduces a criterion to ensure that such development does not result in significant adverse impacts on green infrastructure and biodiversity. This is required in order to ensure that the Plan is effective, consistent with national policy and in general conformity with the London Plan.

### **Conclusion on Issue 3**

131. Subject to main modifications set out above, I conclude that the approach of the Plan to addressing the needs for all types of housing, including affordable housing and the needs of different groups in the community is sound.

### **Issue 4: whether policies in Chapter 8 - Thriving Communities are justified, effective, in general compliance with the London Plan and consistent with national policy?**

132. Chapter 8 of the Plan includes policies relating to healthy communities (Policy 12), town centre development (Policy 13), eating and drinking (Policy 14), culture and creativity (Policy 15), social infrastructure (Policy 16), education (Policy 17) and open space, sports and recreation (Policy 18).

133. Policy 12 seeks to support development which contributes to healthy communities. Criterion iii of the policy seeks to manage uses that can have a negative health impact with specific reference to betting shops and fast-food take-aways. The general principles of the policy reflect London Plan policy although the latter does not specifically refer to betting shops. However, the evidence base for the Plan does not contain information which supports the blanket management of these specific uses. The policy is modified (**MM13**) so that the wording refers to managing the overconcentration of uses, rather than singling out specific uses. **MM13** also clarifies that only developers of major development proposals are required to consider wider health strategies. This will ensure that developers of smaller proposals are not burdened by unnecessary policy requirements. **MM13** is necessary to ensure that the policy is justified, effective and in general conformity with the London Plan.

134. Policy 13 sets out the Plan's approach to town centre development. The Plan is supported by the Havering Retail and Commercial Leisure Needs Assessment 2015 (LBHLP.21) and an Update 2018 (LBHLP21.4). These documents set out the quantitative need for comparison and convenience retail and leisure floorspace over the Plan period. The Update identifies a need for 8,179 square metres gross additional comparison retail floorspace from 2026, increasing to 20,722 square metres gross by 2031. Additional convenience retail floorspace of 8,299 square metres gross is required by 2026, increasing to 10,851 square metres gross by 2031.
135. Policy 13 sets out the sequential approach to site selection in accordance with the NPPF and supports appropriate development within town centres. Policy 1 supports a mix of uses, including retail and leisure, in Romford town centre. Policy 2 sets out the requirement for a new local centre adjoining Beam Park Station to deliver up to 4,000 square metres of retail and commercial floorspace. Whilst specific sites are not allocated in this Plan, they will be allocated if necessary in the Plan update which will take account of up-to-date needs assessments. The approach of the Plan to town centres accords with paragraph 23 of the NPPF.
136. A modification is necessary to Policy 13 (**MM14**) to refer to the 2018 Update and incorporate the updated need figures. The modification also clarifies, in accordance with the evidence base, that the need for further comparison floorspace will not arise until after the Plan has been updated. The modification is required to ensure that the Plan is justified and effective.
137. In September 2020 the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 came into force. This revoked many of the former use classes including A1 (shops), A2 (financial and professional services), class A4 (drinking establishments) and class A5 (hot food takeaway) and created a new 'commercial, business and service' use class (Class E).
138. Whilst Policy 13 sets criteria relating to the proportion of these former use classes in town centres, none of the policies in the Plan prevent the new Regulations taking effect. National policy in relation to town centres remains unchanged in the NPPF 2021, and whilst implementation of some of the policies in the Plan will be affected, the implications of these changes will need time to be considered.
139. These changes in circumstances came late in a process that has already taken a number of years to prepare. The Government believes that the planning system has a vital role to play in enabling the delivery of housing and economic growth that will support the UK's economic recovery. It therefore wants local planning authorities and the Planning Inspectorate to drive the planning process forward. Once adopted, the Plan will undergo an immediate update. That is the most appropriate way of dealing with the new Regulations.
140. Policy 15 relates to culture and creativity. It seeks to safeguard and encourage cultural, creative, sporting and entertainment activities and facilities. This is in accordance with NPPF. However, the policy criteria are onerous and unjustified in requiring major mixed-use developments to provide

arts and cultural facilities including by seeking financial contributions from developments to enhance existing facilities. These criteria are removed by **MM15** which is necessary to ensure that the Plan is justified and effective.

141. Policy 17 seeks to ensure existing education provision is safeguarded and sets out criteria for new education facilities. Other policies including Policy 1, relating to the Romford SDA, Policy 2, relating to the Rainham and Beam Park SDA, and Policy 16, Social Infrastructure, highlight the importance of developers providing education facilities to meet the requirements of the development where necessary. This is also set out in the Delivery and Implementation chapter of the Plan. A modification is necessary to Policy 17 to remove the need for drop-off and pick-up facilities for nurseries to be provided on-site. As long as these can be provided safely, there is no need for such facilities to be on-site. This modification (**MM16**) is necessary to ensure that the Plan is justified, effective and consistent with national policy.

142. Policy 18 relates to open space, sports and recreation. It is supported by a number of evidence base documents including the Open Space Study Standards Paper (LBHLP.37) and the Open Space Assessment Report (LBHLP.36). The policy seeks to protect existing provision and support improvement. The Plan does not seek to designate any new areas of open space but brings forward those allocated in the previous Core Strategy and identified on the Proposals Map. It may be the case that other sites in the borough could potentially be suitable for designation as open space. However, that does not mean that the Plan as submitted is not sound.

#### **Conclusion on issue 4**

143. Subject to the main modifications identified above, the policies within Chapter 8 - Thriving Communities are positively prepared, justified, effective, in general compliance with the London Plan and consistent with national policy.

#### **Issue 5: Are the policies relating to employment sites and economic development justified, effective, consistent with national policy and in general conformity with the London Plan?**

144. The Plan identifies Strategic Industrial Locations (SIL) in accordance with the LP2021 and Locally Significant Industrial Sites (LSIS) which support a range of local employment uses. Policy 19 is clear that such areas will be protected. The policy contains a number of criteria to direct and support office development and flexible business space. To ensure that the policy is effective, a modification (**MM17**) is required to qualify the requirement for residential proposals within Romford Town Centre to incorporate flexible business space to relate to the need for such space and individual site characteristics. The modification includes additional criteria to encourage greater use of the River Thames for freight and improve wharf infrastructure, and to support the growth of logistics activities in the borough. Both elements would be necessary to ensure general conformity with the London Plan.

145. The evidence regarding demand and supply of employment sites is included in the 2015 Employment Land Review (ELR) (LBHLP.20) and Addendum 2018 (LBHLP.20.1). The ELR concluded that of the 375 hectares of industrial land in the borough a total of 350 hectares was needed to meet demand over the Plan period. The ELR recommends the release of 24 hectares of employment land over the period. **MM17** includes a modification to the latter figure to ensure it reflects the ELR conclusions and is therefore justified and effective. The modification also clarifies that the need for employment land is to be kept under review in order to balance the protection of employment land with other land use objectives, including the need for housing. This ensures that the policy is effective and consistent with national policy.
146. Policy 20 sets criteria for the loss of industrial land. A number of modifications to the policy, and consequential modifications to the explanatory text, are necessary to ensure clarity regarding the application of the policy and relevant criteria to ensure the policy is effective. These modifications are incorporated into **MM18**. The modification includes a change to the title of the policy to reflect its application to LSIS and non-designated industrial land; changes to the policy to make clear that the provision of LSIS and non-designated industrial land will be kept under review; that wider land use objectives will be taken into account in considering release; to ensure the re-provision of non-designated industrial land in certain circumstances and to remove a criterion relating to conflicting uses.
147. The ELR also identifies a net additional demand for between 10,657 square metres and 17,132 square metres of office floorspace over the Plan period and that the most suitable location to accommodate this is Romford Town Centre. The Plan does not allocate specific sites to meet this need. However, Policy 1 encourages office development as part of mixed-use schemes and requires affordable office accommodation within or funded by new commercial and mixed-use developments. Policy 21 also seeks affordable workspace from major commercial and mixed-use developments. The Plan update can allocate specific sites to meet the need if necessary, having regard to updated needs assessment. The approach of the Plan accords with paragraph 21 of the NPPF.
148. A modification is necessary to clarify that the policy seeks to support local micro and small businesses and that affordable workspace will be sought in town centres, SIL and LSIS. The modification reduces the level of floorspace to be provided from 20% to 10% to reflect viability evidence; defines affordable workspace; provides flexibility for site circumstances and viability and clarifies the circumstances in which financial contributions in lieu of provision on site will be accepted. These are incorporated in **MM19** which also includes consequential modifications to the explanatory text. The modification is necessary to ensure that the policy is justified and effective.
149. Policy 22 seeks to encourage major development proposals to support employment, skills development and training opportunities for local people. A modification to the explanatory text is necessary (**MM20**) to define the meaning of 'local' within the policy. This is necessary to ensure that the policy is effective.
150. Whilst there are differences between the Plan policies and the employment policies in LP2021, the approach of the Plan does not prevent the application

of policies in LP2021. The policies, as modified, are therefore in general conformity with LP2021.

#### Changes to allocated employment sites

151. The policies map changes (set out in the Proposals Map Changes Booklet) removes Crow Lane Site 3 from the wider LSIS designation but retains the Royal Mail site as LSIS. It has been argued that the Royal Mail site should also be released as this is likely to cease being operational from 2022. The ELR concluded that this site could be retained as a Secondary Employment Area (renamed LSIS in this Plan) although I understand that at that time the Royal Mail had not confirmed any intention to vacate the site. Whilst things have clearly moved on in relation to this site since the ELR and Addendum were produced, the retention of this site within the LSIS does not make the Plan unsound. Policy 20 sets criteria for the loss of industrial land under which any proposal to change the use of the land could be considered. The immediate update of the Plan also gives the opportunity to further review the site having regard to the Royal Mail's current intentions.
152. A change to the policies map is also proposed by the Council to include the Freightmaster Estate as SIL. It has been argued that a composting facility on adjoining land should be included in this designation. The SIL boundary is defined in the London Plan and the designation as proposed in the Plan would allow the continued operation of the existing waste management operation within the SIL. The approach of the Plan to exclude the composting facility is sound and is in general conformity with the London Plan.

#### **Conclusion on issue 5**

153. Subject to the modifications identified, the policies relating to employment sites and economic development are justified, effective, consistent with national policy and in general conformity with the London Plan.

#### **Issue 6: are policies relating to transport connections justified, effective, consistent with national policy and in general conformity with the London Plan?**

154. Policy 23 sets out a number of ways in which the Council will work with partners and developers to improve transport infrastructure and connectivity in the borough. A modification (**MM21**) is necessary to include exploring opportunities to utilise the River Thames for freight and passenger transport. This is in line with earlier modifications (**MM2**, **MM17**) and ensures general conformity with the LP2021.
155. Policy T6 of LP2021 seeks to restrict car parking in line with levels of existing and future public transport accessibility and connectivity. The policy sets maximum residential car parking standards for areas with Public Transport Accessibility Levels (PTAL) 2-3 and PTAL 0-1 (the least accessible areas). In

places that are well-connected by public transport development is expected to be car-free or 'car-lite' (providing the minimum necessary parking).

156. LP2021 Policy T6 recognises that Outer London boroughs may adopt minimum residential standards, but these must be within the LP2021 maximum standards and should only apply to the least well-connected areas (PTAL 0-1). Within Outer London Opportunity Areas a maximum standard of up to 0.5 spaces per dwelling applies.
157. Policy 24 of the Havering Local Plan seeks to set minimum parking standards for residential development in all areas of the borough regardless of PTAL. The minimum standards for 3+ bedrooms in areas of PTAL 0-2 are also higher than the maximum standards in LP2021. Consequently, the policy is not in general conformity with the LP2021 and this view is supported by TfL and the GLA.
158. Prior to the publication of the LP2021, the Council proposed a modification to bring the policy in line with the 2016 London Plan. This would have required minimum parking standards in areas of PTAL 0-1 and limited areas of PTAL 2 which are 800 metres or more away from existing or planned rail and underground stations. However, the LP2021's parking standards are more restrictive than those in the 2016 London Plan, restricting minimum parking standards only to the areas with poorest connectivity levels (PTAL 0-1).
159. There is evidence which indicates that car ownership levels are high in the borough. The Council have also expressed concerns regarding north-south public transport connectivity which is not as good as connectivity into and out of central London. However, Policy 23 sets out a number of measures which aim to address this latter issue. Furthermore, the Plan notes that the borough suffers from issues of congestion and air pollution. The SA notes that the main source of air pollution is road traffic vehicle emissions (Part 8.6.1 LBHP.8). The expectation of minimum parking provision in areas with good public transport accessibility is incompatible with the objectives set out in the Plan to improve the health and wellbeing of the population, to support sustainable transport options and to improve and manage air quality. It could also undermine efforts to provide higher density residential development to increase housing delivery as more land would be needed for car parking.
160. A modification is therefore required to ensure that Policy 24 is in general conformity with the LP2021. This is set out in **FMM22** which supersedes the earlier proposed modification. The modification retains minimum parking standards, but these only relate to areas of PTAL 0-1. In addition, the minimum standards are within the maximum standards set out in LP2021 and they do not apply to the Opportunity Areas where LP2021 maximum standards will apply. This modification is necessary to ensure that the Plan is justified, effective and in general conformity with the LP2021. The GLA have confirmed that the modifications contained in FMM22 would ensure that the Plan is sound.

## Conclusion on issue 6

161. Subject to the modifications identified, the policies relating to transport connections are justified, effective, consistent with national policy and in general conformity with the London Plan.

## **Issue 7: are the Plan's policies relating to high quality places and green places justified, effective and consistent with national policy?**

162. The Plan contains a number of policies relating to the built and natural environment. A modification is required to Policy 28, which relates to heritage assets, to ensure that the wording is consistent with national policy in relation to the conservation and enhancement of the historic environment. This is achieved by **MM23**.
163. Policy 30 seeks to protect the natural environment. A modification is necessary (**MM24**) in order to ensure consistency with national policy including reference to the principles in NPPF of avoidance, mitigation and compensation of significant harm. I have made a further change to the modification to correct the reference to Sites of Special Scientific Interest.
164. The Sites of Importance for Nature Conservation (SINC) are listed in an Annex to the Plan and supported by evidence in the Havering SINC Review 2017 (LBHLP.28). It may be the case that other sites in the borough could potentially be suitable for designation as SINC. However, I am satisfied that the Plan as submitted is sound in this regard.
165. Policy 31 seeks to enhance the river environment by requiring developments in close proximity to a river to investigate and secure opportunities to restore and enhance rivers and their corridors in line with the Thames River Basin Management Plan. A modification is necessary (**MM25**) to clarify that this relates to major developments so as not to unnecessarily burden smaller developments. This will ensure that the policy is effective.
166. Policy 36 relates to low carbon design, decentralised energy and renewable energy. The Havering Local Plan Wind Resource Evidence Base (LBHLP.23) identifies suitable areas for wind turbine development and these sites are to be shown on the policies map. The policy contains a number of criteria which wind energy development on such sites will need to satisfy before planning permission would be granted. Modifications are required to the policy to make clear that the Council will follow the approach in national policy in determining applications, to clarify that there should be no unacceptable adverse impact on residential amenity or on highway safety. **MM26** incorporates these modifications and is necessary to ensure that the policy is effective and consistent with national policy.

## **Conclusion on issue 7**

167. Subject to the above modifications the Plan's policies relating to high quality places and green places are justified, effective and consistent with national policy.

### **Issue 8: is the Plan's approach to minerals, waste and monitoring justified, effective and in general compliance with the London Plan?**

168. LP2021 requires development plans to make provision for the maintenance of a landbank for aggregates of 7 years' supply. Havering is one of the few areas in London where resources of workable land-won sand and gravel exists. LP2021 apportions 1.75 million tonnes to Havering. NPPF requires minerals planning authorities to make provision for landbanks of at least 7 years' supply for sand and gravel. In order to ensure that the Plan is consistent with national policy and in general conformity with the LP2021, a modification (**MM27**) is required to make clear that at least a 7-year landbank will be retained and to set out the LP2021 apportionment. **MM27** includes alterations to the wording to ensure that the criteria are applied flexibly and as necessary in order to ensure that the policy is effective, and to include the requirement to consider use of the River Thames for transportation, in order to ensure general conformity with the LP2021.
169. The Plan does not include policies for dealing with the strategic waste apportionment as this is dealt with through the East London Waste Plan (ELWP). The Plan makes this clear at paragraph 12.7.2. In their response to the request for an opinion on general conformity with LP2021, the GLA have raised concerns with this approach. The Mayor points out that, as the ELWP only sets targets up to 2021, there is no plan which sets targets for the management of waste over the Plan period.
170. There is nothing to prevent the Council dealing with certain matters in a separate Development Plan Document (DPD) and the fact that the ELWP is in need of updating is not an issue of soundness or legal compliance for this Plan. Requiring this matter to be progressed through modifications to the current Plan would require significant further evidence and would result in further lengthy delay. I understand that the Council are working with adjoining authorities with the view to updating the ELWP. If this is not progressed within a reasonable time frame there remains the possibility for the matter to be dealt with in the immediate update of this Plan. The approach of the Plan in not dealing with strategic waste matters is not unsound and the GLA have confirmed that the Plan is in general conformity with the LP2021.
171. Turning to monitoring of the Plan, in order to ensure that the Plan is effective a modification is required (**FMM29**) to introduce a series of monitoring indicators against which the success of the policies in the Plan can be measured. This will ensure that the Plan, in the interim period prior to the adoption of the Plan update, can remain responsive and action can be taken if it becomes clear that the policies in the Plan are not achieving the aims of



sustainable development. **FMM29** sets out the policies to be monitored and the indicators to be used in the form of a table.

### **Conclusion on issue 8**

172. Subject to the main modifications set out above the Plan's approach to minerals, waste and monitoring is justified, effective and in general compliance with the London Plan.

## **Overall Conclusion and Recommendation**

173. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.

174. The Council have requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that the duty to cooperate has been met and that with the recommended Main Modifications and Further Main Modifications set out in the Appendix the Havering Local Plan satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.

*S Heywood*

Inspector

This report is accompanied by an Appendix containing the Main Modifications and Further Main Modifications.

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## Appendix – Main Modifications

The modifications below are expressed either in the conventional form of ~~striketrough~~ for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Main Modification
FMM1		New paragraphs 1.1.6 and 1.1.7	<p>Insert new paragraphs between existing paragraphs 1.1.5 and 1.1.6</p> <p><u>1.1.6 The Havering Local Plan was prepared in the context of the London Plan 2016. At a late stage in the Examination process the London Plan 2021 was published. The Local Plan was found to be in general conformity with the new London Plan. All references to the London Plan in this document refer to the London Plan 2021 unless otherwise stated.</u></p> <p><u>1.1.7 The Council recognise the importance of an immediate update of the Local Plan in the context of the new London Plan and the National Planning Policy Framework 2021 which have both been published since the Local Plan was submitted for Examination. The immediate update of the Local Plan will also take account of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 that came into force on 1 September 2020. The timetable for the update of the Local Plan is set out below and will be reflected in the Council’s Local Development Scheme.</u></p> <ul style="list-style-type: none"> <li><u>Preparation of evidence base – throughout 2021 and 2022</u></li> <li><u>Regulation 18 consultation – summer 2022</u></li> <li><u>Regulation 19 consultation – spring 2023</u></li> <li><u>Submission to the Secretary of State – late summer 2023</u></li> </ul>
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><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>

Ref	Page	Policy/ Paragraph	Main Modification
			<ul style="list-style-type: none"> <li>• <u>Core Strategy (2008)</u></li> <li>• <u>Development Control Policies (2008)</u></li> <li>• <u>Proposals Map (2008) - will be superseded by a new Policies 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></li> <li>• <u>Sustainable Design and Construction (2009)</u></li> <li>• <u>Planning Obligations (2013) will be superseded by the introduction of Havering CIL (2019)</u></li> </ul> <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>
MM2	10	Strategic Objectives Para 3.2.1	<p><b>Section 3 : Strategic Objectives</b></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>
FMM2		3.2 Objectives Paragraph 3.2.1	<p>3.2.1 To achieve these overarching aims and to tackle Havering's key issues (identified in Annex 3), the following strategic objectives have been identified for the Local Plan:</p> <ul style="list-style-type: none"> <li>i. Create high quality, safe neighbourhoods with cohesive and inclusive communities, where Havering residents want to live and settle;</li> <li>ii. Increase the supply of high quality housing in Havering by a minimum of <del>17,550</del> <u>18,930</u> dwellings over the Plan period;</li> </ul>
FMM3		5.1 Spatial Strategy	<p>Key Features of the Spatial Strategy</p> <p><b><i>Housing Growth</i></b></p> <ul style="list-style-type: none"> <li>• Delivery of at least <del>17,550</del> <u>18,930</u> high quality homes over the 15 year Plan period;</li> </ul>
MM3	16	Policy 1	Section 6 : Strategic Development Areas : 6.1 Romford Strategic Development Area

Ref	Page	Policy/ Paragraph	Main Modification
			<p>Update and amend the first paragraph of the policy as follows:</p> <p><b>Residential Development</b></p> <p>Over the plan period the Council will support the delivery of over <u>6,000</u> <del>5,300</del><sup>(2)</sup> 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.</p> <p>Insert text and renumber the policy criteria from ix. onwards (including ix.) as follows:</p> <p><b>Connectivity</b></p> <p>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:</p> <p><del>x. ix</del> Continue to work with partners to secure significant improvements to Romford station;</p> <p><del>xi. x</del> Support the delivery of Crossrail services to Romford and improvements to the public realm in the vicinity of the station;</p> <p><del>xii. xi</del> 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;</p> <p><del>xiii. xii</del> Actively pursue opportunities with TfL and other partners to tunnel the western section of the ring road;</p> <p><del>xiv. xiii</del> Work with TfL to improve accessibility into Romford Town Centre for active travel users;</p> <p><del>xv. xiv</del> 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;</p> <p><del>xvi. xv</del> 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;</p> <p><del>xvii. xvi</del> 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.</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><del>xviii.</del> <u>xvii</u> Require developers of <u>major sites</u> to improve active travel links between Romford Station, Waterloo Road and Bridge Close;</p> <p><del>xix.</del> <u>xviii</u> Support development proposals that better integrates The Brewery with South Street;</p> <p><del>xx.</del> <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</p> <p><del>xxi.</del> <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> <p>Renumber the policy criteria and insert text as follows:</p> <p><b>Social infrastructure</b></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><del>xviii.</del> <u>xxi</u> Romford Leisure Centre</p> <p><del>xix.</del> <u>xxii</u> New and enhanced public open spaces</p> <p><del>xx.</del> <u>xxiii</u> A new health hub, including the sexual health services relocated from Queens Hospital;</p> <p><del>xxi—xxiv.</del> <u>xxiv.</u> Additional school places in line with the Council's Commissioning Plan and Schools Expansion Programme over the Plan period;</p> <p><del>xxii—xxv.</del> <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><del>xxiii.</del> <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</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>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>Renumber the policy criteria and insert text as follows:</p> <p><b>Design and Heritage</b></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><del>xxii.</del> <u>xxvii.</u> 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><del>xxiii.</del> <u>xxviii.</u> 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. <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 normally 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.</u></p> <p><del>xxiv.</del> <u>xxix.</u> 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>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><del>xxv. xxx.</del> Make a positive contribution towards public realm improvements in the Market Place;</p> <p><del>xxvi. xxxi.</del> Demonstrate how the proposed scheme responds to wider development opportunities, movement and environmental enhancements in the town centre;</p> <p><del>xxvii. xxxii.</del> <u>On major development sites</u> open up access to the River Rom and positively incorporate the river into the development scheme(s);</p> <p><del>xxviii. xxxiii.</del> Optimise the design and location of development including the incorporation of resilience measures to address potential flood risk, where appropriate; and</p> <p><del>xxix. xxxiv.</del> 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 <del>and north of the railway line along south street</del> are inappropriate. <del>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.</del></p> <p><sup>2</sup> at least <del>4,750</del> <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 Romford area <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.</u> <del>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.</del> There is a further 6FE need for primary school places beyond the first five</p>



Ref	Page	Policy/ Paragraph	Main Modification
			<p>years. This will need to be delivered through new schools. This <u>will be addressed via the Site Specific Allocation Plan or in the immediate update of this 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.</u></p> <p>Add new paragraph 6.1.30</p> <p><u>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.</u></p> <p><u>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.</u></p>
MM4			MM number not used

Ref	Page	Policy/ Paragraph	Main Modification
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><b>Commercial Development</b></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 normally be required to incorporate generous floor to ceiling heights of <del>3.75</del> <u>3.5m to 4m</u> at ground floors of buildings in Beam Park Centre, and <del>3m at ground floors of buildings</del> 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><b>Design and Heritage</b></p> <p>To ensure the successful transformation of the area, the Council will support development proposals which:</p> <ul style="list-style-type: none"> <li>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;</li> <li>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;</li> <li>xvii. Better link the existing settlements of South Hornchurch and Orchard Village with Rainham Village,</li> </ul>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>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>
FMM6	27	Policy 3 – Housing Supply	<p><b>Policy 3 – Housing Supply</b></p> <p>Ensuring an adequate supply of high quality housing in Havering is essential in ensuring that the borough is a place where people want to live and where residents are able to stay and prosper. The Council will take a pro-active approach to increasing the amount housing within the borough and will encourage the effective and efficient use of land by reusing previously developed land.</p> <p><u>Over the full 15 year Plan period, at least 17,550 new homes will be built in Havering. In line with the London Plan housing target for Havering, at least 12,505* 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>

Ref	Page	Policy/ Paragraph	Main Modification
			<ul style="list-style-type: none"> <li>i. <del>5,300</del> <u>5,000</u> homes on major sites in the Romford Strategic Development Area;</li> <li>ii. 3,000 homes on major sites in the Rainham and Beam Park Strategic Development Area;</li> <li>iii. <del>700</del> <u>300</u> homes through the intensification and renewal of existing Council housing estates outside the Strategic Development Areas;</li> <li>iv. <del>400 homes on two large previously developed sites within the Green Belt; and</del> <u>1,500 homes on other major sites outside of the Strategic Development Areas and Council housing estates; and</u></li> <li>v. <del>2,790 homes on small sites across borough.</del> <u>1500 homes on small sites across the borough and through vacant units returning to use.</u></li> </ul> <p>The delivery of new homes will also be achieved by:</p> <ul style="list-style-type: none"> <li>i. Promoting mixed use development in town centres and designated out of town centre locations;</li> <li>ii. Prioritising all non-designated land for housing when it becomes available;</li> <li>iii. <u>Supporting the re-use of brownfield sites when they become available;</u></li> <li>iv. <u>Supporting residential and mixed use 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></li> <li>v. Supporting appropriate development of infill, under-utilised and vacant sites in the borough's sub-urban areas;</li> <li>vi. resisting the net loss of residential development;</li> <li>vii. xii. Supporting initiatives to bring back empty residential properties into use;</li> <li>viii. Supporting self-build initiatives; and</li> <li>ix. Seeking to optimise residential output and densities consistent with the density matrix set out in the London Plan</li> <li>x. <u>Delivery will be phased over the 15 year plan period as follows:</u></li> </ul> <p><u>*The 10 year target of 12,505 comprises of an annual target of 1,170 units per annum for the first three years of the Local Plan period (2016/17-2018/19) in accordance with the previous London Plan and an annual target of 1,285 units per annum for the following 7 years (2019/20 - 2025/26) in accordance with the London Plan 2021.</u></p>

Ref	Page	Policy/ Paragraph	Main Modification																								
			<p><b><u>Table 1: Phased Targets</u></b></p> <table> <tr> <th></th><th><u>Phase 1:</u></th><th><u>Phase 2:</u></th><th><u>Phase 3:</u></th></tr> <tr> <td><u>Targets for net additional homes</u></td><td><u>2016/17-2020/21</u></td><td><u>2021/22- 2025/26</u></td><td><u>2026/27-2030/31</u></td></tr> <tr> <td><u>Minimum dwellings per annum</u></td><td><u>700</u></td><td><u>1801</u></td><td><u>1,285*</u></td></tr> <tr> <td><u>Total</u></td><td><u>3,500</u></td><td><u>9005</u></td><td><u>6,425</u></td></tr> <tr> <td><u>10 Year Total</u></td><td colspan="3"><u>12,505</u></td></tr> <tr> <td><u>15 Year Total</u></td><td colspan="3"><u>18,930*</u></td></tr> </table> <p><i><u>*This assumes that the London Plan Housing Target will be rolled forward for the remainder of the Plan period. The Havering Local Plan will undergo an immediate update which will provide the opportunity to review housing delivery including for the later Plan periods</u></i></p> <p><u>Support text</u></p> <p>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.</p> <p>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 Phase 1: Phase 2: Phase 3: Targets for net additional homes 2016/17 2020/21 2021/22 2025/26 2026/27 2030/31 Minimum dwellings per annum 700 1801 1,285* Total 3,500 9005 6,425 10 Year Total 12,505 15 Year Total 18,930*6 minimum of 490,000 new homes in London between</p>		<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- 2025/26</u>	<u>2026/27-2030/31</u>	<u>Minimum dwellings per annum</u>	<u>700</u>	<u>1801</u>	<u>1,285*</u>	<u>Total</u>	<u>3,500</u>	<u>9005</u>	<u>6,425</u>	<u>10 Year Total</u>	<u>12,505</u>			<u>15 Year Total</u>	<u>18,930*</u>		
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			<p><del>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. The London Plan 2021 sets a ten year housing target for Havering of 12,850 new homes between 2019/20 and 2028/29 or 1,285 per annum. The previous London Plan set Havering an annual housing target of 1,170 per annum. The Local Plan period bridges the two London Plans. The annual targets reflected in this Plan are set out in table x below</del></p> <table border="1"> <tr> <td><u>Year</u></td><td><u>2016/17 - 2018/19</u></td><td><u>2019/20 - 2028/29</u></td><td><u>2029/30 - 2030/31</u></td></tr> <tr> <td><u>London Plan Annual Target</u></td><td><u>1,170</u></td><td><u>1,285</u></td><td><u>1,285*</u></td></tr> </table> <p><del>*roll forward to London Plan 2021 targets</del></p> <p><del>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.</del></p> <p><del>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.</del></p> <p><del>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</del></p>	<u>Year</u>	<u>2016/17 - 2018/19</u>	<u>2019/20 - 2028/29</u>	<u>2029/30 - 2030/31</u>	<u>London Plan Annual Target</u>	<u>1,170</u>	<u>1,285</u>	<u>1,285*</u>
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<u>London Plan Annual Target</u>	<u>1,170</u>	<u>1,285</u>	<u>1,285*</u>								

Ref	Page	Policy/ Paragraph	Main Modification
			<p>subsequent update has been prepared for Havering taking into account updated GLA household projections<sup>(3)</sup>. 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.</p> <p>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.</p> <p>7.1.7 Over the first 10 years of the Plan period (2016-2026), the Council has identified capacity to deliver at least <u>13,095</u> <del>11,947</del> new homes <del>in addition to bringing 260 existing vacant units back into use</del> (see Table 2). This exceeds the minimum 10 year target set out in the London Plan but falls <u>slightly</u> 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.</p> <p><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.</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>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.</u></p> <p>7.1.8<u>10</u> 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.</p> <p>7.1.9<u>11</u> 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.</p> <p><u>7.1.12 Over the period 2004/05 to 2016/17 Havering has met or exceeded 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 as set out in the Council's Housing Position Statement 2019 have included a 20% buffer.</u></p>



Ref	Page	Policy/ Paragraph	Main Modification
			<p><del>7.1.10</del><u>15</u> 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.</p> <p><del>7.1.11</del><u>16</u> 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 <del>an action plan</del> <u>Housing Implementation Strategy</u> addressing the initiatives underway to increase housing supply.</p> <p><del>7.1.17</del> <u>The Housing Position Statement identifies specific deliverable and developable sites for the first 10 years of the Plan. The Housing Position Statement is based on the housing targets from the London Plan 2016. 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. The update will take into account the latest information relating to the London Plan 2021 target, any shortfall in delivery and updated supply. This update will begin immediately after adoption of the Local Plan.</u></p> <p><del>7.1.12</del><u>18</u> 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.</p> <p><del>7.1.13</del><u>19</u> 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</p>

Ref	Page	Policy/ Paragraph	Main Modification										
			<p>the development strategy chosen by the Council is the most sustainable approach.</p> <p><del>7.1.14</del><u>20</u> 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><del>7.1.15</del><u>21</u> 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> <p><b>Table <del>1-3</del></b>: Housing Supply 2016-2026</p> <table><tr><th>Source of Supply</th><th>Net additional Homes 0-5 years</th><th>Net additional Homes <del>5-6-</del> 10 years</th><th>Total year supply 10</th><th>Total year supply 15</th></tr><tr><td><del>Large</del> <b>Major sites within the Romford Strategic Development Area*1</b></td><td>1,725 <del>124</del></td><td><del>3,409</del> <u>5,117</u></td><td><del>4,770</del> <u>5,241</u></td><td>6,642</td></tr></table>	Source of Supply	Net additional Homes 0-5 years	Net additional Homes <del>5-6-</del> 10 years	Total year supply 10	Total year supply 15	<del>Large</del> <b>Major sites within the Romford Strategic Development Area*1</b>	1,725 <del>124</del>	<del>3,409</del> <u>5,117</u>	<del>4,770</del> <u>5,241</u>	6,642
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<sup>1</sup> \*Includes sites with planning permission

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			<del>Large</del> <b>Major</b> sites within the Rainham and Beam Park Strategic Developm ent Area*	<del>951</del> <u>590</u>	<del>2,071</del> <u>2,515</u>	<del>3,022</del> <u>3,105</u>	3,105
			<b>LBH</b> Estate Regenera tion Schemes (outside the Strategic Developm ent Areas)	<del>-55</del> <u>-34</u>	<del>370</del> <u>410</u>	<del>315</del> <u>376</u>	1,288
			<del>Large</del> <b>Other</b> <del>major</del> sites outside the Strategic Developm ent Areas*	<del>1,758</del> <u>1,117</u>	<del>192</del> <u>503</u>	<del>1,950</del> <u>1,620</u>	1,620
			<b>Small sites</b>	<del>930</del> <u>540</u>	<del>930</del> <u>900</u>	<del>1,860</del> <u>1,440</u>	2,340
			<b>Vacant units returning to use</b>	<del>130</del> <u>78</u>	130	<del>260</del> <u>208</u>	338
			<b>Total</b>	<del>5,075</del> <u>2,415</u>	<del>7,102</del> <u>9,575</u>	<del>12,177</del> <u>11,990</u>	<u>15,333</u>
			Source: Table 6.1 Key sources of housing supply- Housing Position Statement Technical Update October 2019				
FMM7	29	Policy 4 – Affordable Housing	Policy 4 - Affordable housing  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 <del>more than</del>				

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			<p><del>10 dwellings</del> <u>10 or more dwellings</u> 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 (<u>gross</u>). <u>Residential development on public sector land where there is no portfolio agreement with the Mayor or on industrial sites where the scheme would result in a net loss of industrial capacity will be required to provide 50% affordable housing.</u></p> <p>Proposals which do not meet the 35% <u>or 50%</u> thresholds <u>set out above</u>, or require public subsidy to do so, will be required to submit a detailed viability assessment. The Council will also apply a review mechanism in order to ensure that the maximum affordable housing contributions is secured if viability improves over time.</p> <p>Proposals that meet or exceed the 35% <u>or 50%</u> thresholds without public subsidy are not required to submit viability information. Such applications will be subject to an early review mechanism, but this will only be triggered if an agreed level of progress is not made within two years of permission being granted.</p> <p>The Council will strongly resist proposals brought forward that do not meet the requirements of affordable housing in circumstances where the viability of the scheme has been compromised by unreasonably high acquisition or design costs.</p> <p>Development proposals will be required to deliver a tenure mix of 70% social/affordable rent and 30% intermediate provision.</p> <p>The Council's priority is for affordable housing to be provided on-site. Where it can be robustly demonstrated to the Council's satisfaction that this is not possible, or appropriate, it may be acceptable to make off-site provision. In these circumstances the developer will be required to identify and secure a donor site. Only when it can be demonstrated to the Council's satisfaction that a site cannot be identified will a cash in lieu payment to the Council be considered.</p> <p>Proposed modifications to explanatory text:</p> <p>7.2.1 The Council is committed to securing the highest level of affordable housing contribution as the rise in average house prices in comparison to average income</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>levels has made market housing unaffordable for many Havering residents.</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 <del>Draft</del> Affordable Housing and Viability Supplementary Planning Guidance (2017<u>6</u>)</p> <p>7.2.3 The Council has undertaken a Local Plan Viability Assessment to help inform the borough's affordable housing target. The Assessment found that in most cases, schemes can accommodate between 25% and 50% affordable housing with higher density flatted developments only likely to be able to achieve between 25% and 35% in the highest value locations.</p> <p>7.2.4 Development proposals that meet or exceed the 35% <del>or 50%</del> thresholds without public subsidy, provide affordable housing on site, meet the specified tenure mix and all other requirements and obligations are not required to submit viability information. However, these applications will be subject to an early review mechanism which will be triggered if an agreed level of progress is not made within two years of permission being granted. The level of progress will be agreed with the applicant on a site by site basis.</p> <p><u>New paragraph 7.2.5 The 50% threshold on Industrial Sites applies to Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial sites appropriate for residential development where the scheme would result in a net loss of industrial capacity.</u></p> <p><u>New paragraph 7.2.6 Public sector land is land that is owned or in use by a public sector organisation, or company or organisation in public ownership, or land that has been released from public ownership and on which housing development is proposed.</u></p> <p>7.2.5<u>7</u> The Council supports a transparent approach to viability in line with the Mayor's <del>Draft</del>-Affordable Housing and Viability Supplementary Planning Guidance (2017<u>6</u>). Applicants will be required to pay for an independent viability assessment by a third party where requested by</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>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>7.2.68 Developers should engage at a very early stage with Registered Providers of affordable housing to discuss the delivery of the affordable element of the proposal. A Registered Provider should be identified before making a planning application. The affordable offer and any grant funding should be factored into any financial viability assessment.</p> <p>7.2.79 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 <del>more than 10 residential</del> <u>10 or more residential dwellings</u> and, therefore, contribute to affordable housing provision.</p> <p>7.2.810 The Outer North East London SHMA identified two categories of need; those who can afford affordable housing for rent with housing benefit support and those who can afford affordable housing without housing benefit support and therefore require intermediate housing. In summary, the SHMA concludes that the vast majority of households in Havering can only afford social housing if they receive housing benefit. In light of these findings, the Council will seek a 70:30 tenure split between affordable rented and intermediate products.</p> <p>7.2.911 There are a range of affordable and intermediate housing products on offer including Social Rent, London Affordable Rent, Affordable Rent, London Living Rent, Shared Ownership and Starter Homes. Havering's approach is to encourage a mix of affordable housing tenures. The Council will set out the preferred split between specific affordable products within Havering's emerging Housing Strategy.</p> <p>7.2.1012 In line with national and regional planning policy, affordable housing should, in the first instance, be delivered on-site. Off-site provision may be considered in exceptional circumstances as set out in the Mayor of London's Housing Supplementary Planning Guidance (2016). Where commuted sum payments are proposed by the applicant without the Council's</p>

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			<p>agreement, for example, because there have been no pre-application discussions, the onus will be on the applicant to robustly justify to the Council why off-site provision or a commuted payment should be accepted.</p> <p><del>7.2.11</del><u>13</u> In all circumstances where provision other than on-site is being considered, applicants will be required to draw on robust evidence to provide a statement that demonstrates;</p> <ul style="list-style-type: none"> <li>• why affordable housing cannot be provided on-site, or</li> <li>• in those cases where on-site provision is possible but does not result in the best housing outcome, how and why identified housing needs would be more effectively met off-site compared to on-site.</li> </ul> <p><del>7.2.12</del><u>14</u> Details of the Council's financial model for calculating the value of a commuted sum will be provided in a Supplementary Planning Document.</p>
MM8	31	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 <u>3 unless</u> <del>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.</del></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> <del>; particularly in achieving the provision of 3 bedroom units.</del></p>
MM9	32	Policy 6	<p>Section 7 : Successful Places to live : 7.4 Specialist accommodation</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<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"> <li>i. There is an identified need within the borough;</li> <li>ii. The site has access to essential services and shops by walking and cycling;</li> <li>iii. The site is well served by public transport;</li> <li>iv. The proposal contributes to a mixed, balanced and inclusive community;</li> <li>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;</li> <li>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;</li> <li>vii. Consideration has been given to <del>all possible</del> future needs and the development can be easily adapted to meet the needs of future occupants;</li> <li>viii. 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;</li> <li>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</li> <li>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.</li> <li>xi. meet other identified prioritised local need; or</li> </ul>



Ref	Page	Policy/ Paragraph	Main Modification
			<p>xii. The existing accommodation will be adequately re-provided to an equivalent or better standard on-site or elsewhere within the borough.</p> <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 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. 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>7.4.56 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"> <li>• 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.</li> <li>• There is a current and projected deficit in sheltered/ retirement housing for lease and sale within Havering.</li> <li>• 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</li> </ul> <p>Delete paragraph 7.4.6 as follows:</p> <p><del>These finding are in line with the indicative annual benchmark for the provision of additional specialist older</del></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><del>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.</del></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>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.</p> <p>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.</p> <p>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</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>underway to identify the demand for supported housing as part of the Council's housing development programme work.</p> <p><del>7.4.10</del><u>11</u> 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.</p> <p><del>7.4.11</del><u>12</u> 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.</p> <p><del>7.4.12</del><u>13</u> 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.</p> <p><del>7.4.13</del><u>14</u> 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>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>iv. Meet the National Space Standards and the London Plan requirement for floor to ceiling heights;</p> <p>v. <del>Adhere to the London Plan policies in regards to 'Lifetime Homes Standards' and 'Lifetime Neighbourhoods';</del></p> <p>v. Are sited and designed to maximise daylight and sunlight;</p> <p>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 and</u> 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> <del>Provide</del> 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><del>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.</del></p> <p>7.5.4<del>3</del> 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</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>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>7.5.5 <u>High quality green infrastructure and A</u>amenity 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	38	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"> <li>i. Ensure good access and, where possible, retain existing through routes;</li> <li>ii. Retain and provide adequate amenity space for existing and new dwellings;</li> <li>iii. Do not have a significant adverse impact on the amenity of existing and new occupants;</li> <li>iv. Do not prejudice the future development of neighbouring sites; <del>and</del></li> <li>v. <u>Do not result in significant adverse impacts on green infrastructure and biodiversity that cannot be effectively mitigated and;</u></li> <li>vi. <del>v.</del> <u>vi.</u> 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</li> </ul>

Ref	Page	Policy/ Paragraph	Main Modification
			arrangement of properties in the surrounding area.
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><del>Gypsy and Traveller accommodation</del></p> <p><del>The Council will meet the identified current and future accommodation needs of Gypsies and Travellers and Travelling Showpeople in Havering by:</del></p> <ul style="list-style-type: none"> <li><del>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</del></li> <li><del>ii. Retaining and protecting the existing Travelling Showpeople plot at Fair Oaks, St Marys Lane.</del></li> </ul> <p><del>Proposals brought forward for permanent Gypsy and Traveller pitches on the sites identified on the Proposals Map will be required to demonstrate:</del></p> <ul style="list-style-type: none"> <li><del>iii. A suitable layout of the site;</del></li> <li><del>iv. That the site has essential services such as water, power, sewerage, drainage and waste disposal;</del></li> <li><del>v. High quality boundary treatment and landscaping of the site; and</del></li> <li><del>vi. The removal of ancillary equipment and structures not part of the residential accommodation.</del></li> </ul> <p><del>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:</del></p> <ul style="list-style-type: none"> <li><del>vii. The site has safe and convenient access to the highway and public transport services;</del></li> <li><del>viii. There is provision within the site for parking, turning and servicing;</del></li> </ul>

Ref	Page	Policy/ Paragraph	Main Modification
			<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 (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).</p> <p>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.</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 GTAA through the allocation and intensification of sites within the Green Belt.</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<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"> <li>• Tyas Stud Farm rear of Latchford Farm— maximum of 5 pitches</li> <li>• Vinegar Hill— maximum of 4 pitches</li> <li>• Hogbar Farm West— maximum of 3 pitches</li> <li>• Ashlea View, Tomkyns Lane— maximum of 2 pitches</li> <li>• Benskins Lane— maximum of 10 pitches</li> <li>• Fairhill Rise— maximum of 2 pitches</li> <li>• Hogbar Farm East— maximum of 7 pitches</li> <li>• Lower Bedfords Road— maximum 1 pitche</li> <li>• The Caravan Park, Putwell Bridge— maximum of 2 pitches</li> </ul> <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 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.</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>



Ref	Page	Policy/ Paragraph	Main Modification
			<p><del>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.</del></p> <p>Insert new policy as follows:</p> <p>Policy 11 Gypsy and Traveller accommodation</p> <p><u>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.</u></p> <p><b><u>(1) Identifying and addressing accommodation needs</u></b></p> <p><b><u>a) Overall accommodation needs for Gypsy and Traveller and Travelling Showpeople households</u></b></p> <p><u>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:</u></p> <ul style="list-style-type: none"> <li><u>174 pitches for Gypsy and Traveller households who meet the planning definition</u></li> <li><u>43 pitches for Gypsy and Traveller households who do not meet the definition</u></li> <li><u>3 pitches for undetermined households</u></li> <li><u>5 plots for Travelling Showpeople who meet the planning definition</u></li> </ul> <p><b><u>b) Accommodation needs for Gypsy and Traveller and Travelling Showpeople households for 2016-2021</u></b></p> <p><u>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:</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<ul style="list-style-type: none"> <li>• <u>136 pitches for Gypsy and Traveller households who meet the planning definition</u></li> <li>• <u>33 pitches for Gypsy and Traveller households who do not meet the definition</u></li> <li>• <u>2 pitches from undetermined Gypsy and Traveller households</u></li> <li>• <u>5 plots for Travelling Showpeople</u></li> </ul> <p><u>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.</u></p> <p><u>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.</u></p> <p><u>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.</u></p> <p><b><u>c) Accommodation needs for Gypsy and Traveller and Travelling Showpeople households for after 2021</u></b></p> <p><u>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).</u></p> <p><u>The Council expects the accommodation needs of Gypsy and Traveller households arising in the period 2021 - 2026 to be met at the following locations:</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<ul style="list-style-type: none"> <li>• <u>Ashlea View, Tomkyns Lane</u></li> <li>• <u>Church Road</u></li> <li>• <u>Haunted House Wood</u></li> <li>• <u>Laburnham Stables</u></li> <li>• <u>The Old Forge, Hubbards Chase</u></li> <li>• <u>Tyas Stud Farm</u></li> <li>• <u>Willow Tree Lodge</u></li> </ul> <p><u>No further need in Havering after 2021 has been identified as necessary for accommodation for Travelling Showpeople households.</u></p> <p><b><u>d) Accommodation needs for Gypsy and Traveller and Travelling Showpeople households after 2026</u></b></p> <p><u>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.</u></p> <p><u>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.</u></p> <p><b><u>(2) Development criteria for sites for Gypsy and Traveller and Travelling Showpeople</u></b></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> <ul style="list-style-type: none"> <li>i. <u>The site has a suitable site layout which demonstrates that the site is able to</u></li> </ul>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>accommodate the number of pitches and plots sought;</u></p> <ul style="list-style-type: none"> <li>ii. <u>The site has essential services such as water, power, sewerage, drainage and waste disposal or is capable of being provided with these;</u></li> <li>iii. <u>The site is provided with high quality boundary treatment and landscaping in accordance with Policy 27 of this Plan;</u></li> <li>iv. <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></li> <li>v. <u>The site does not place an undue pressure on local infrastructure (such as healthcare, schools and shops);</u></li> <li>vi. <u>The proposal would not result in unacceptable adverse impacts on the amenity of other site occupants and the occupiers of neighbouring sites;</u></li> <li>vii. <u>The proposal would not result in unacceptable adverse impacts on the visual amenity of the local area;</u></li> <li>viii. <u>Sites at risk of flooding should be subject to the sequential and exception tests.</u></li> </ul> <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>

Ref	Page	Policy/ Paragraph	Main Modification																														
			<p><b><u>Table 4</u></b></p> <p><u>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></p> <table><tr><th><u>Years</u></th><th><u>0-5</u></th><th><u>6-10</u></th><th><u>11-15</u></th><th></th></tr><tr><th></th><th><u>2016-21</u></th><th><u>2021-26</u></th><th><u>2026-31</u></th><th><u>Total</u></th></tr><tr><td><u>Households who meet the planning definition</u></td><td><u>136</u></td><td><u>18</u></td><td><u>20</u></td><td><u>174</u></td></tr><tr><td><u>Households whose Gypsy and Traveller status was undetermined</u></td><td><u>2</u></td><td><u>0</u></td><td><u>1</u></td><td><u>3</u></td></tr><tr><td><u>Households who do not meet the planning definition</u></td><td><u>33</u></td><td><u>5</u></td><td><u>5</u></td><td><u>43</u></td></tr><tr><td><u>TOTAL</u></td><td><u>171</u></td><td><u>23</u></td><td><u>26</u></td><td><u>220</u></td></tr></table> <p><u>Note: numbers in the table refer to the number of pitches to be provided</u></p> <p><u>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.</u></p> <p><u>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</u></p>	<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>	<u>Households who meet the planning definition</u>	<u>136</u>	<u>18</u>	<u>20</u>	<u>174</u>	<u>Households whose Gypsy and Traveller status was undetermined</u>	<u>2</u>	<u>0</u>	<u>1</u>	<u>3</u>	<u>Households who do not meet the planning definition</u>	<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>
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			<p><u>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.</u></p> <p><u>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.</u></p> <p><u>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</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>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.</u></p> <p><u>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.</u></p> <p><u>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.</u></p> <p><u>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.</u></p> <p><u>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.</u></p> <p><u>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</u></p>

Ref	Page	Policy/ Paragraph	Main Modification										
			<p>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><b><u>(a) Need for pitches for Gypsy and Traveller households who met the planning definition in Planning Policy for Traveller Sites (2015)</u></b></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> <p><b><u>Table 5</u></b></p> <p>Additional need in the number of pitches to be provided in Havering for households who meet the planning definition</p> <table><tr><th><u>Years</u></th><th><u>0-5</u> <u>2016-21</u></th><th><u>6-10</u> <u>2021-26</u></th><th><u>11-15</u> <u>2026-31</u></th><th><u>Total</u></th></tr><tr><td><u>Households who met the planning definition</u></td><td><u>136</u></td><td><u>18</u></td><td><u>20</u></td><td><u>174</u></td></tr></table> <p>Note: numbers in the table refer to the number of pitches to be provided</p> <p>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.</p> <p>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.</p> <p>7.9.14 It is not currently possible to meet the current need for 7 pitches for households on 2 unauthorised sites</p>	<u>Years</u>	<u>0-5</u> <u>2016-21</u>	<u>6-10</u> <u>2021-26</u>	<u>11-15</u> <u>2026-31</u>	<u>Total</u>	<u>Households who met the planning definition</u>	<u>136</u>	<u>18</u>	<u>20</u>	<u>174</u>
<u>Years</u>	<u>0-5</u> <u>2016-21</u>	<u>6-10</u> <u>2021-26</u>	<u>11-15</u> <u>2026-31</u>	<u>Total</u>									
<u>Households who met the planning definition</u>	<u>136</u>	<u>18</u>	<u>20</u>	<u>174</u>									



Ref	Page	Policy/ Paragraph	Main Modification										
			<p><u>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)</u></p> <p><u>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 although, as set out in paragraph 7.9.4, not all of these will be a full pitch as defined in the Glossary to the plan.</u></p> <p><b><u>(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)</u></b></p> <p><u>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.</u></p> <p><b><u>Table 6</u></b></p> <p><u>Additional need in the number of pitches to be provided in Havering for households who do not meet the planning definition</u></p> <table><tr><th><u>Years</u></th><th><u>0-5 2016- 21</u></th><th><u>6-10 2021- 26</u></th><th><u>11-15 2026- 31</u></th><th><u>Total</u></th></tr><tr><td><u>Households who did not meet the planning definition</u></td><td><u>33</u></td><td><u>5</u></td><td><u>5</u></td><td><u>43</u></td></tr></table> <p><u>Note: the numbers in table refer to the number of pitches to be provided</u></p>	<u>Years</u>	<u>0-5 2016- 21</u>	<u>6-10 2021- 26</u>	<u>11-15 2026- 31</u>	<u>Total</u>	<u>Households who did not meet the planning definition</u>	<u>33</u>	<u>5</u>	<u>5</u>	<u>43</u>
<u>Years</u>	<u>0-5 2016- 21</u>	<u>6-10 2021- 26</u>	<u>11-15 2026- 31</u>	<u>Total</u>									
<u>Households who did not meet the planning definition</u>	<u>33</u>	<u>5</u>	<u>5</u>	<u>43</u>									

Ref	Page	Policy/ Paragraph	Main Modification													
			<p><u>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.</u></p> <p><u>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.</u></p> <p><b><u>(c) Need for pitches from 'undetermined' households</u></b></p> <p><u>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.</u></p> <p><b><u>Table 7</u></b></p> <p><u>Additional need in the number of pitches to be provided in Havering for undetermined households</u></p> <table><tr><th rowspan="2"><u>Years</u></th><th><u>0-5</u></th><th><u>6-10</u></th><th><u>11-15</u></th><th rowspan="2"><u>Total</u></th></tr><tr><th><u>2016-21</u></th><th><u>2021-26</u></th><th><u>2026-31</u></th></tr><tr><td><u>Households whose Gypsy and Traveller status was undetermined</u></td><td><u>2</u></td><td><u>0</u></td><td><u>1</u></td><td><u>3</u></td></tr></table> <p><u>Note: the number in table refer to the number of pitches to be provided</u></p> <p><b><u>(d) Future accommodation needs in Havering for Gypsy and Traveller households</u></b></p> <p><u>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</u></p>	<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 whose Gypsy and Traveller status was undetermined</u>	<u>2</u>	<u>0</u>	<u>1</u>	<u>3</u>
<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 whose Gypsy and Traveller status was undetermined</u>	<u>2</u>	<u>0</u>	<u>1</u>	<u>3</u>												

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>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.</u></p> <p><u>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.</u></p> <p><u>7.9.22 Following detailed work (see paragraph 7.9.4 above), the existing Gypsy and Traveller sites at:</u></p> <ul style="list-style-type: none"> <li><u>• Ashlea View, Tomkyns Lane</u></li> <li><u>• Church Road</u></li> <li><u>• Haunted House Wood</u></li> <li><u>• Laburnham Stables</u></li> <li><u>• The Old Forge, Hubbards Chase</u></li> <li><u>• Tyas Stud Farm</u></li> <li><u>• Willow Tree Lodge</u></li> </ul> <p><u>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.</u></p>

Ref	Page	Policy/ Paragraph	Main Modification				
			<p><u>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.</u></p> <p><b><u>(e) Travelling Showpeople in Havering</u></b></p> <p><u>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.</u></p> <p><b><u>(f) Transit sites in Havering</u></b></p> <p><u>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.</u></p> <p><b><u>Appendix X</u></b></p> <p><b><u>Sites in Havering identified in Policy 11 and allocated in this Local Plan for Gypsy and Traveller accommodation</u></b></p> <table> <tr> <th><u>Site</u></th><th><u>5-Year Need (Meet</u></th><th><u>5-Year Need (Do not meet</u></th><th><u>Total Year Need</u></th></tr> </table>	<u>Site</u>	<u>5-Year Need (Meet</u>	<u>5-Year Need (Do not meet</u>	<u>Total Year Need</u>
<u>Site</u>	<u>5-Year Need (Meet</u>	<u>5-Year Need (Do not meet</u>	<u>Total Year Need</u>				

Ref	Page	Policy/ Paragraph	Main Modification				
				planning definition) (number of pitches)	planning definition) (number of pitches)	(number of pitches)	
			<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>	

Ref	Page	Policy/ Paragraph	Main Modification				
			<u>Gravel Pit</u>	<u>14</u>	<u>0</u>	<u>14</u>	
			<u>Coppice, Benskins Lane</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>	
			<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>	
			<p><u>Note: the numbers in the table refer to numbers of pitches to be provided</u></p> <p><u>Sites in Havering identified in Policy 11 and allocated in this Local Plan for Travelling Showpeople plots</u></p>				
			<u>Years</u>	<u>0-5</u>	<u>6-10</u>	<u>11-15</u>	<u>Total</u>
				<u>2016-2021</u>	<u>2021-2026</u>	<u>2026-2031</u>	<u>(number of plots)</u>

Ref	Page	Policy/ Paragraph	Main Modification					
				(number of plots)	(number of plots)	(number of plots)		
			Fairoaks, St Mary's Lane, Upminster	<u>5</u>	<u>0</u>	<u>0</u>	<u>5</u>	
			<u>TOTAL</u>	<u>5</u>	<u>0</u>	<u>0</u>	<u>5</u>	
			<u>Note: the numbers in the table refer to numbers of plots to be provided</u>					
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> <ul style="list-style-type: none"> <li>i. Directing new development to well-connected locations to enable active travel (refer to Policy 3);</li> <li>ii. Promoting well designed and safe places (refer to Policy 26);</li> <li>iii. Promoting the diversification of uses within town centres and managing <u>the overconcentration of uses</u> that can have a negative health impacts <del>such as betting shops and fast food takeaways</del> (refer to Policy 13);</li> <li>iv. Supporting the delivery of essential community services (refer to Policies 16 and 17);</li> <li>v. Providing and protecting open space, leisure and recreation facilities (refer to Policy 18);</li> <li>vi. Supporting measures to promote walking and cycling (refer to Policy 23);</li> <li>vii. Supporting the provision of multifunctional green infrastructure (refer to Policy 29);</li> <li>viii. Seeking environmental improvements, minimising exposure to pollutants and improving air quality (refer to Policies 33 and 34); and</li> <li>ix. Avoiding contributing to factors that affect climate change, and contribute to prevention</li> </ul>					

Ref	Page	Policy/ Paragraph	Main Modification												
			<p>measures that militate against the effects of climate change (refer to Policies 32 and 36).</p> <p>Amend the final paragraph of the policy as follows:</p> <p>Developers <u>of major development proposals are required</u> 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>												
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 <del>49,500</del><u>20,720</u> square metres, for convenience goods of up to <del>13,200</del><u>10,851</u> square metres and for commercial leisure floorspace (A3, A4 and A5 uses) of up to <del>21,000</del><u>10,620</u> 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><u>Table 8</u></p> <p><u>Floor space Needs (Gross) from 2017 -2031 (Comparison, Convenience and Commercial Leisure)</u></p> <table><tr><th><u>Year</u></th><th><u>2017</u></th><th><u>2021</u></th><th><u>2026</u></th><th><u>2029</u></th><th><u>2031</u></th></tr><tr><td><u>Comparison</u></td><td><u>-3,724</u></td><td><u>-3,345</u></td><td><u>8,179</u></td><td><u>15,303</u></td><td><u>20,720</u></td></tr></table>	<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>20,720</u>
<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>20,720</u>										



Ref	Page	Policy/ Paragraph	Main Modification						
			<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>	
			<u>Source: Havering Retail and Commercial Leisure Needs Assessment (2018) Quantitative Update Addendum (Peter Brett Associates)</u>						
MM15	46	Policy 15	<p>Section 8 : Thriving communities : 8.4 Culture and creativity</p> <p>Delete criteria iv. and vi. from the policy and renumber the remaining criteria as follows:</p> <p>The Council is committed to sustaining and enhancing Havering's cultural offer and creating inclusive and diverse communities by:</p> <p>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;</p> <p>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;</p> <p>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;</p> <p><del>iv. Requiring provision of arts and cultural facilities in major mixed use developments;</del></p> <p><del>v.</del> <u>iv</u> Encouraging a diverse range of evening and night time activities including expanding opening hours of</p>						

Ref	Page	Policy/ Paragraph	Main Modification
			<p>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;</p> <p><del>vi. Seeking contributions from developments that result in additional need for cultural and leisure facilities to enhance existing facilities or provide new facilities;</del></p> <p><del>vii.</del> <u>v</u> Ensuring that development proposals are designed to be inclusive;</p> <p><del>viii.</del> <u>vi</u> Working proactively with operators, landowners, stakeholders to maximise the positive impacts and mitigate the negative impacts of art, cultural and leisure activities; and</p> <p>x. <u>vii</u> 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> <ul style="list-style-type: none"> <li>v. They meet the floorspace requirements as set out in the statutory framework for the early years foundation stage;</li> <li>vi. Drop offs and pickups can be catered for safely <del>on-site</del>; and</li> <li>vii. There is no significant adverse impact on the amenity of existing residents.</li> </ul> <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. <del>on-site.</del></p>

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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> <ul style="list-style-type: none"> <li>i. Protecting designated Strategic Industrial Locations for industrial uses as set out in the London Plan;</li> <li>ii. Protecting designated Locally Significant Industrial Sites for B1 (b) (c), B2 and B8 uses;</li> <li>iii. Directing office development to Romford Metropolitan Centre and the borough's district centres as part of mixed-use developments;</li> <li>iv. Requiring large scale residential proposals within Romford Town Centre to incorporate high quality flexible business space, subject to viability, <u>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.</u></li> <li>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);</li> <li>vi. Supporting development proposals that improve the physical appearance, attractiveness and competitiveness of employment areas;</li> <li>vii. Supporting the sustainable growth and expansion of business and enterprise in rural areas;</li> <li>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; <del>and</del></li> <li>ix. Supporting the London Riverside and the emerging Romford Town Centre Business Improvement Districts;</li> </ul>

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			<p>Additional criteria x. and xi. be added to the policy:</p> <ul style="list-style-type: none"> <li>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></li> <li>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></li> </ul> <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</p>

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			<p>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 <del>19.5</del> <u>24ha</u> of <u>employment land can be released over the Plan period.</u> <del>Industrial land previously designated for its local significance can be released from industrial employment uses.</del> The <u>previously designated</u> 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> <p><del>Loss of industrial land</del> <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>

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			<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"> <li>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;</li> <li>ii. <del>The existing employment land use causes unacceptable detrimental effects, that cannot be mitigated, on the amenity of nearby residential areas; and</del></li> <li>iii. There is no market interest in the site following one year of continuous active marketing.</li> </ul> <p>Add new third and fourth paragraphs to the policy as follows:</p> <p><u>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.</u></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>

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			<p>Delete paragraph 9.2.2 of the explanatory text as follows:</p> <p><del>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.</del></p> <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 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>

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			<p>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 <u>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</u> <del>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.</del> 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.</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>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.</p> <p>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</p>



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			<p>alternative layouts and business uses, including smaller premises with short term flexible leases appropriate for SMEs.</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 <del>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</del> 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</u></p>

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			<p><u>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 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. <del>and the amount must be to the satisfaction of the Council.</del></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>

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			<p>Delete the final paragraph of the policy as follows:</p> <p><del>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.</del></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><u>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.</u></p> <p>Add a new second paragraph 9.3.2 in the explanatory text as follows:</p> <p><u>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:</u></p> <ul style="list-style-type: none"> <li><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></li> <li><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></li> <li><u>at rates which mean that occupation is feasible to a large number of small/ start-up businesses in the relevant sector(s)</u></li> </ul>

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			<p>Add new text to the end of paragraph 9.3.3 of the explanatory text:</p> <p>9.3.1.3 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. <u>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><del>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.</del></p> <p>Delete paragraph 9.3.3 of the explanatory text as follows:</p> <p><del>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</del></p>

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			<p><del>to pay higher rents. This will also enable a seamless transition to market level rent at the end of the period.</del></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><del>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.</del></p> <p>Insert new text in the explanatory text as paragraph 9.3.5 of as follows:</p> <p><u>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</u></p>

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			<p><u>businesses as part of its commitment to growing the Havering economy.</u></p> <p>Add new text as paragraph 9.3.6 in the explanatory text as follows:</p> <p><u>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.</u></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 In this context, 'affordable' would be defined as rent and service charges (excluding business support services) that are either:</u></p> <ul style="list-style-type: none"> <li><u>• less than 80% than comparable local market rates for a period of 5-years per occupant; or</u></li> <li><u>• a sliding scale of 60% of local market rates from years 1 to 2; and 80% from years 3 to 5.</u></li> </ul> <p><u>The Council will also consider alternative suggestions made by developers.</u></p> <p><u>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.</u></p> <p><u>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:</u></p> <ul style="list-style-type: none"> <li><u>• Use Class comparison</u></li> <li><u>• Havering borough comparison or (if sufficient comparator premises do not exist in the borough) across the Thames Gateway corridor</u></li> </ul> <p><u>Size</u></p>

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			<p><u>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.</u></p> <p><u>Type</u></p> <p><u>9.3.11 Local market analysis has identified key growth sectors<sup>2</sup> which the Council seek to strengthen. These include:</u></p> <ul style="list-style-type: none"> <li>• <u>Construction</u></li> <li>• <u>Creative &amp; Digital</u></li> <li>• <u>Logistics</u></li> <li>• <u>Manufacturing, Engineering &amp; Technology</u></li> <li>• <u>Medical science &amp; Health/Social Care</u></li> </ul> <p><u>9.3.12 These priority sectors will change over time to reflect the needs of the local economy.</u></p> <p><u>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:</u></p> <ul style="list-style-type: none"> <li>a) <u>determine the size of the affordable element of the workspace;</u></li> <li>b) <u>decide which industries are suitable to market the workspace too; and</u></li> <li>c) <u>help partner the applicant with the most appropriate Workspace Provider – to facilitate the design and planned management of the space.</u></li> </ul> <p><u>Off-Site Provision</u></p>

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

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			<p><u>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.</u></p> <p><u>9.3.15 Off-site provision will be achieved by the Council through:</u></p> <ul style="list-style-type: none"> <li>• <u>bringing redundant properties into use;</u></li> <li>• <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></li> </ul> <p><u>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.</u></p> <p><u>Workspace Provider</u></p> <p><del>9.3.5</del> <u>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.</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><del>9.3.6</del> <u>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</u></p>



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			<p><del>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.</del></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"> <li><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></li> <li><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></li> </ul> <p>A consequential modification is required to Table 10 of the Glossary as follows:</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>

Ref	Page	Policy/ Paragraph	Main Modification
			<ul style="list-style-type: none"> <li>• <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></li> <li>• <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></li> <li>• <u>at rates which mean that occupation is feasible to a large number of small/start-up businesses in the relevant sector(s).</u></li> </ul> <p><u>For the purpose of Policy 21, Flexible Workspace means:</u></p> <p><u>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.</u></p> <p><del>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)</del></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>
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>

Ref	Page	Policy/ Paragraph	Main Modification						
			<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>						
FMM22	64	Policy 24	<p>Section 10 : Connections : 10.2 Parking provision and design</p> <p><del>The Council will require all development to provide sufficient parking provision in accordance with the maximum parking standards in the London Plan.</del></p> <p><del>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.</del></p> <p><del>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.</del></p> <p><u>London Plan maximums standards apply across the borough</u></p> <p><u>In areas of the borough that have low public transport access (PTAL 0-1) where no improvements are planned, the minimum residential parking standards set out in Table 10 (below) will also apply:</u></p> <p><b><u>Table 10</u></b> Minimum Parking – PTAL 0-1*Outside of the Opportunity Areas</p> <table><tr><td><u>1 Bedroom</u></td><td><u>2 bedrooms</u></td><td><u>3+ bedrooms</u></td></tr><tr><td><u>0.5 spaces per unit</u></td><td><u>1 space per unit</u></td><td><u>1.5 spaces per unit</u></td></tr></table> <p><u>In all areas, subject to the standards set out in Table 10 being met, the Council will support proposals that:</u></p> <ul style="list-style-type: none"><li>i. Consider the location and layout of parking provision at the earliest stage and as an integral part of the design process;</li><li>ii. Locate parking close to people’s homes and in areas with natural surveillance;</li><li>iii. Provide intensive and durable planting in regular intervals that visually screens the continuity of</li></ul>	<u>1 Bedroom</u>	<u>2 bedrooms</u>	<u>3+ bedrooms</u>	<u>0.5 spaces per unit</u>	<u>1 space per unit</u>	<u>1.5 spaces per unit</u>
<u>1 Bedroom</u>	<u>2 bedrooms</u>	<u>3+ bedrooms</u>							
<u>0.5 spaces per unit</u>	<u>1 space per unit</u>	<u>1.5 spaces per unit</u>							

Ref	Page	Policy/ Paragraph	Main Modification
			<p>car parking to the front of dwellings and provides a green street scene; and</p> <p>iv. Include car club membership <u>open to all</u> and provide <u>on-site</u> car club parking spaces.</p> <p>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.</p> <p>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.</p> <p>Parking provision in new shopping and leisure developments should serve the area or centre as a whole. <u>It 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 <u>to</u> of 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>

Ref	Page	Policy/ Paragraph	Main Modification									
			<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>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. <u>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.</u></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><del>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).</del></p> <table><tr><th colspan="3">Minimum Parking Standards PTAL 0-2</th></tr><tr><td>1 bedroom</td><td>2 bedrooms</td><td>3 bedrooms+</td></tr><tr><td>1 parking space per unit</td><td>1.5 parking spaces per unit</td><td>2 parking spa per unit</td></tr></table>	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 spa per unit
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 spa per unit										

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>10.2.5 Table 10 sets out minimum parking standards for PTAL's 0-1. Applying minimum standards to 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.</u></p> <p>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. <del>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.</del></p> <p><del>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.</del></p> <p>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.</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>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.</p> <p>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-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.</p> <p>10.2.1110 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>10.2.1211 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>10.2.1312 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>

Ref	Page	Policy/ Paragraph	Main Modification
			<ul style="list-style-type: none"> <li>i. <del>Proposals that seek to sustain or</del> <u>conserve and</u> enhance the significance of heritage assets at risk in the borough;</li> <li>ii. The maintenance of up to date Conservation Area Appraisals and Management Plans;</li> <li>iii. The identification, and maintenance, of a local list of non-designated heritage assets that meet agreed selection criteria;</li> <li>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;</li> <li>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;</li> <li>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</li> <li><del>vii. Proposals affecting the significance of a heritage asset with archaeological interest, including the contribution to significance made by its setting, where:</del> <ul style="list-style-type: none"> <li><del>a. The proposals are supported by an appropriate assessment of the asset's significance;</del></li> <li><del>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</del></li> </ul> </li> </ul>



Ref	Page	Policy/ Paragraph	Main Modification
			<p><del>c. The significance of any asset or part of an asset to be lost is recorded and made publicly</del>  <u>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;</u></p> <p>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><del>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.</del></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><del>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:</del></p> <p>Delete criteria i. – v. of the policy as follows:</p> <p><del>i. Protecting Sites of Specific Scientific Interest, Local Nature Reserves and Sites of Importance for</del>  <del>ii. Conserving and, where possible, extending wildlife corridors;</del>  <del>iii. Preserving 'veteran' trees and ancient woodland outside protected areas;</del>  <del>iv. Protecting recognised priority species and habitats;</del>  <del>and</del>  <del>v. Supporting development that provides appropriate new biodiversity features on site.</del></p> <p>Replace deleted criteria (above) with new criteria i. – vi. as follows:</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>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;</u></p> <p><u>ii. Not permitting development which would adversely affect the integrity of Sites of Special 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;</u></p> <p><u>iii. Supporting proposals where the primary objective is to conserve or enhance biodiversity;</u></p> <p><u>iv. Encouraging developments where there are opportunities to incorporate biodiversity in and around the development;</u></p> <p><u>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;</u></p> <p><u>vi. Working with partners and local conservation groups to improve conditions for biodiversity in the borough.</u></p>
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>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</p>

Ref	Page	Policy/ Paragraph	Main Modification
			opportunities to restore and enhance rivers and their corridors in line with the Thames River Basin Management Plan (RBMP).
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; <del>and</del></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>
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>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>The Council will seek to maintain <u>at least a seven year</u> aggregate land bank, as per the <u>Havering apportionment of at least 1.75 million tons apportionment</u> 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> <ul style="list-style-type: none"> <li>i..Public health and safety;</li> <li>ii. The amenity and quality of life of nearby communities;</li> <li>iii. The natural, built and historic environments;</li> <li>iv. The efficient and effective operation of the road network, including safety and capacity.</li> </ul> <p>Insert additional text at the start of the second paragraph of the policy as follows:</p> <p><u>When necessary, A-appropriate</u> mitigation measures, to ensure that criteria i.- iv <u>is complied with</u> will be secured as part of any proposed development by planning condition and/or legal agreement.</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 (<u>as appropriate</u>) 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><b>Delivering new homes and communities through Havering's Housing Zones</b></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 <del>5,300</del> <u>6,000</u> and 3,000 homes, respectively, over the Plan period.</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>Amend paragraphs 14.0.28 onwards of the explanatory text as follows:</p> <p><b>Monitoring the Local Plan</b></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. <u>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.</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 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.</u></p> <p>Insert two new paragraphs in the explanatory text as follows:</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<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>14.0.3132 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>
FMM29	107	A.8 Monitoring	Table 10 Local Plan monitoring framework in the Local Plan

Ref	Page	Policy/ Paragraph	Main Modification				
			<u>Policy</u>	<u>Strategic objective(s)</u>	<u>Indicators</u>	<u>Target</u>	<u>Data source</u>
			<u>Places to live</u>				
			<u>Housing (Policies 1,2 and 3)</u>	<u>SOi SOii SOiv SOxvi</u>	<u>Annual net additional dwellings completed</u>	<u>Delivering a minimum of:</u> <ul style="list-style-type: none"> <li><u>700 new dwellings per year during Phase 1 of the Plan Period (2016/2017-2020/2021)</u></li> <li><u>1,801 new dwellings per year during Phase 2 (2021/2022-2025/2016) of the Plan Period and 1641 (2025/2026)</u></li> <li><u>1170 new dwellings per year during Phase 4 of the Plan Period (2026/2027-2030/2031)</u></li> </ul> <u>in accordance with Policy 3</u>	<u>London Development Database</u>

Ref	Page	Policy/ Paragraph	Main Modification			
					<p><u>Net additional dwellings completed from the 2015 financial year onwards</u></p>	<p><u>Meeting the cumulative housing requirement target since (and including) the 2015 financial year</u></p>
					<p><u>Net additional dwellings in:</u></p> <p>i. <u>Romford Strategic Development Area</u></p> <p>ii. <u>Rainham Strategic Development Area</u></p> <p>iii. <u>Council housing estates outside the Strategic Development Areas</u></p> <p>iv. <u>Other major sites outside the Strategic Development Areas</u></p>	<p><u>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 :</u></p> <ul style="list-style-type: none"> <li>• <u>At least 5,000 new homes on Major sites in the Romford Strategic Development Area (including Twelve Estate Regeneration Programme sites)</u></li> <li>• <u>At least new 3,000 homes on Major sites in the Rainham and Beam Park Strategic Development Area (including Twelve Estate Regeneration</u></li> </ul>



Ref	Page	Policy/ Paragraph	Main Modification				
					<p>and Council housing estates</p> <p>v. Small sites and through vacant units returning to use</p>	<p>n Programme sites)</p> <ul style="list-style-type: none"> <li>At least new 300 homes through the Twelve Estates Programme (these sites are outside the Strategic Development Areas)</li> <li>At least 1,500 homes on other major sites outside the Strategic Development Areas and Twelve Estates Regeneration Programme sites</li> <li>At least 1,500 homes on small sites and vacant units returning to use</li> </ul>	
					Percentage of dwellings built on previously developed land	100%	London Development Database
					Number of dwellings lost to other uses (without re-provision)	Minimal loss of housing to other uses	London Development Database

Ref	Page	Policy/ Paragraph	Main Modification				
					<u>Projected net additional dwellings up to the end of the Local Plan period</u>	<u>18,930 net units provided over the Plan Period in accordance with Policy 3</u>	<u>London Development Database London Borough Havering</u>
			<u><b>Affordable housing (Policy 4)</b></u>	<u>SOi</u> <u>SOiii</u>	<u>Net affordable housing completions (number and as a percentage of net housing completions)</u>	<u>Delivering at least 35% or 50%* new affordable homes per year on threshold sites in accordance with Policy 4.</u>  <u>*on public land and industrial sites (see policy 4)</u>	<u>London Development Database</u>
					<u>Net affordable housing completions by tenure type (number and as a percentage of net affordable housing completions)</u>	<u>Delivering a tenure mix of 70% social / affordable rent and 30% intermediate provision on threshold sites in accordance with Policy 4</u>	
			<u><b>Housing mix (Policy 5)</b></u>	<u>SOi</u> <u>SOiii</u>	<u>Net completions by housing size and type</u>	<u>Delivering housing mix comprising :</u>  <ul style="list-style-type: none"><li><u>Market Housing : 5% (1 Bed), 15% (2 Bed), 64% (3 Bed) and 16% (4+ Bed)</u></li><li><u>Affordable Housing : 10% (1 Bed), 40% (2 Bed), 40% (3 Bed) and 10 (4+ Bed)</u></li></ul> <u>in accordance with Policy 5</u>	<u>London Development Database</u>

Ref	Page	Policy/ Paragraph	Main Modification				
			<u>Specialist housing (Policy 6)</u>	<u>SOi</u>	<u>Net additional specialist housing completions</u>	<u>Delivering 255 new homes per year in accordance with Policy 6 until updated by subsequent reviews of the Havering Specialist Older Persons Accommodation Report (2015)</u>	<u>London Development Database</u>
				<u>SOi</u>	<u>Number and proportion of housing completions that meet the National Space Standards</u>	<u>All new homes to meet National Standard.</u>	<u>London Development Database</u>
			<u>Houses in Multiple Occupancy (Policy 8)</u>	<u>SOi SOii</u>	<u>Net additional HMO completions</u>	<u>Proposals do not result in more than 10% of properties in one street becoming HMOs (including lawful HMOs) in accordance with Policy 8</u>	<u>London Development Database</u>
			<u>Conversions and Sub-divisions (Policy 9)</u>	<u>SOii SOiii</u>	<u>Net additional completions arising from:</u>  i. <u>Conversions of existing non-residential buildings</u>  ii. <u>Sub-division of residential</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>

Ref	Page	Policy/ Paragraph	Main Modification			
					<u>developments</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>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>
			<b><u>Thriving communities</u></b>			
			<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>Town Centre development</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</u>

Ref	Page	Policy/ Paragraph	Main Modification					
			<u>(Policy 13)</u>			<u>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"> <li><u>make provision for a minimum of 20,722 square metres of comparison floorspace in Havering by 2031</u></li> <li><u>make provision for a minimum of 10,881 square metres of convenience floorspace in Havering by 2031</u></li> <li><u>make provision for a minimum of 10,619 square metres of commercial leisure floorspace in Havering by 2031</u></li> <li></li> </ul>	<u>London Development Database</u>	
					<u>In Havering's primary and secondary frontages, the number and percentage of:</u>	<u>In accordance with Policy 13, ensure that :</u>	<u>London Borough Havering</u>	

Ref	Page	Policy/ Paragraph	Main Modification			
					<ul style="list-style-type: none"> <li>i. <u>Vacancies</u></li> <li>ii. <u>A1 and A2 units</u></li> <li>iii. <u>A5 units</u></li> <li>iv. <u>Betting shops</u></li> <li>v. <u>Payday loan shops</u></li> </ul>	<ul style="list-style-type: none"> <li>the <u>proportion of A1 and A2 uses is more than 60% in primary frontages</u></li> <li>the <u>proportion of A5 uses to be greater than 10% in primary frontages and to maintain a minimum of 3 units in alternative uses between A5 uses</u></li> <li>the <u>proportion of betting shops and pay day loan shops in primary and secondary frontages and local centres to comprise a maximum of 5% or 1 unit (whichever is the greater) and there to be a minimum of 3 units in alternative</u></li> </ul>

Ref	Page	Policy/ Paragraph	Main Modification				
						<u>use between these uses</u>	
			<u>Eating and drinking</u>  <u>(Policy 14)</u>	<u>SOvi</u>	<u>Net additional A3 and A4 units and floorspace in Havering's metropolitan and district centres</u>	<u>Enhancing the quality of Romford and Havering's district centres</u>	<u>London Borough Havering London Development Database</u>
			<u>Culture and creativity</u>  <u>(Policy 15)</u>	<u>SOvii</u>	<u>Net additional arts, cultural, leisure floorspace in town centres and out of town centres</u>	<u>Enhancing Havering's town centres and out of town locations</u>	<u>London Borough Havering London Development Database</u>
			<u>Social infrastructure</u>  <u>(Policy 16)</u>	<u>SOv</u> <u>SOviii</u>	<u>Net additional floorspace for social infrastructure facilities</u>	<u>Provision of new social and community infrastructure in a timely and efficient manner and in appropriate locations to support, population, housing, employment and economic growth in accordance with Policies 1,2 and 16 of the Local Plan and the Infrastructure Delivery Plan</u>	<u>London Development Database</u>
					<u>Average size of GP patients lists</u>	<u>Securing GP medical facilities to improve the ratio for the average number of patients per GP (currently 1:1,991)</u>	<u>London Borough Havering</u>
					<u>Net additional floorspace for educational purposes</u>	<u>Provision of education infrastructure in a timely and efficient manner and in appropriate locations</u>	<u>London Development Database</u>

Ref	Page	Policy/ Paragraph	Main Modification				
						to support, population and housing growth in accordance with the Policies 1, 2 and 17 of the Local Plan and the Infrastructure Delivery Plan	
			<u>Open space, leisure and recreation (Policy 18)</u>	<u>SOxv</u>	<u>Net loss/gain of public open space, playing fields and leisure floorspace</u>  <u>Number of open spaces with Green Flag Awards</u>	<u>No net loss of open space designated for protection in the Local Plan in accordance with Policy 18</u>  <u>To maintain and increase the number of open spaces that secure Green Flag status</u>	<u>London Development Database</u>  <u>London Borough Havering</u>
			<b><u>Opportunities to prosper</u></b>				
			<u>Business growth (Policy 19)</u>	<u>SOix</u> <u>SOx</u>	<u>Amount of designated and non-designated industrial floorspace lost to non-industrial uses</u>  <u>Net additional office floorspace</u>	<u>The amount of industrial land released to other uses will not exceed 24.5 hectares in Havering over the Plan Period in accordance with Policy 19</u>  <u>Delivery of additional 17,132 square metres of B1 floorspace in Havering over the Plan Period in accordance with Policy 19</u>	<u>London Development Database</u>
			<u>Loss of locally</u>	<u>SOix</u>	<u>Amount of employment land lost to residential</u>	<u>The amount of industrial land released to other uses in Havering will</u>	<u>London Development Database</u>



Ref	Page	Policy/ Paragraph	Main Modification			
			<u>significant industrial sites and non-designated land</u>  <u>(Policy 20)</u>		<u>and/or commercial developments</u>	<u>not exceed 24.5 hectares over the Plan Period in accordance with Policy 19</u>
			<u>Affordable workspace</u>  <u>(Policy 21)</u>	<u>SOix</u> <u>SOx</u>	<u>Number of affordable workspace units delivered</u>	<u>A net increase in the number of affordable workspaces over the Plan Period in accordance with Policy 21</u>
					<u>Net additional affordable workspace floorspace</u>	<u>Provision of a minimum of 10% of floorspace in major commercial and mixed use schemes over the Plan Period in accordance with Policy 21</u>
			<u>Skills and training</u>  <u>(Policy 22)</u>	<u>SOx</u>	<u>Percentage of local labour used in the construction of new developments and end user phase where applicable</u>	<u>In accordance with Policy 22:</u>  <ul style="list-style-type: none"> <li><u>A minimum local labour target of 20% during construction and end user phase for major commercial or mixed use developments including a proportion of</u></li> </ul>

Ref	Page	Policy/ Paragraph	Main Modification				
						<u>apprenticeships where the length of construction phase allows</u> <ul style="list-style-type: none"> <li>A minimum local labour target of 20% during construction for major residential developments</li> </ul>	
			<b>Connections</b>				
			<b>Transport connections</b>  <b>(Policy 23)</b>	SOxi SOxii	Proportion of journeys made by Havering school pupils to school by walking and cycling	Pupil hands up survey data collected via the TfL STARS accreditation scheme to demonstrate that car use is maintained annually at 21% and cycling at 5%.	London Borough Havering
					Number of jobs within a 45 minute public transport journey of each local centre and town centre (as measured in the AM peak)	Provide an annual increasing the number of jobs available within 45 minutes of each town centre and local centre	London Borough Havering
					Progress on the delivery of key transport infrastructure projects as set out in Policy 23 and others that arise over the Plan Period	Feasibility studies progressed in accordance with their respective programmes	London Borough Havering  Transport for London
					Car use and car ownership across the borough	Mode share for car use in Havering does	London Borough Havering

Ref	Page	Policy/ Paragraph	Main Modification				
						not increase above current level of 58%.	Transport for London
					Number of road accidents (collisions) by age and Ward	Reduce borough wide KSI's to no more than 19 per annum by 2030 on borough roads	London Borough Havering
			<b><u>Parking provision and design (Policy 24)</u></b>	SOxi	Percentage of completed development schemes meeting the required parking standards	All permissions granted for new development are in accordance with Policy 24	London Borough Havering
			<b><u>Digital connections (Policy 25)</u></b>	SOxi	Percentage of completed development schemes with access to high speed broadband	All permissions granted for new residential and non-residential properties allow for the provision of superfast broadband in order to allow connection to that network as and when it is made available in accordance with Policy 25	London Borough Havering
			<b><u>High Quality Places</u></b>				
			<b><u>Urban design (Policy 26)</u></b>	SOxiv	Number of schemes subject to the Quality Review Panel	Promoting good design in all new development schemes in accordance with Policy 26  Ensuring development makes a positive contribution to place making and local	London Borough Havering

Ref	Page	Policy/ Paragraph	Main Modification			
						<u>distinctiveness in accordance with Policy 26</u>
			<u>Landscaping (Policy 27)</u>	<u>SOxiii</u> <u>SOxiv</u>	<u>Number of major applications approved without a detailed landscape scheme</u>	<u>Ensuring that all major developments are supported by a high quality landscaping scheme to make a positive contribution place making and local distinctiveness in accordance with Policy 27</u>
			<u>Heritage assets (Policy 28)</u>	<u>SOxiv</u>	<u>Number of applications permitted affecting designated heritage assets</u>	<u>All permissions granted which affect a designated heritage asset are in accordance with Policy 28</u>
					<u>Number of heritage assets on the Heritage at Risk Register</u>	<u>Annual reduction in the number of assets on the heritage at risk register</u> <u>Heritage assets within Havering are conserved and enhanced in a manner appropriate to their special interest, character or appearance and significance in accordance with Policy 28</u>
					<u>Number of Conservation Areas with up-to date Appraisals and Management Plans</u>	<u>Appraisals and Management Plans for Conservation Areas in Havering are less than 5 years old</u>
			<u>Green Places</u>			

Ref	Page	Policy/ Paragraph	Main Modification				
			<u><b>Green infrastructure</b></u>  <u><b>(Policy 29)</b></u>	<u>SOxiv</u>	<u>Progress on the key green infrastructure projects as set out in Policy 29</u>	<u>The quality of the features set out in Policy 29 :</u> <ul style="list-style-type: none"><li>• <u>All London Green Grid</u></li><li>• <u>Thames Chase Community Forest</u></li><li>• <u>Rainham Wildspace</u></li><li>• <u>Land of the Fanns Landscape Partnership; and</u></li><li>• <u>Roding, Beam and Ingrebourne Catchment Partnership)</u></li></ul> <u>is maintained and expanded</u>	<u>London Borough Havering Natural England</u>
			<u><b>Nature conservation</b></u>  <u><b>(Policy 30)</b></u>	<u>SOXv</u>	<u>Changes in areas and populations of biodiversity importance, including :</u> <ul style="list-style-type: none"><li>i. <u>Changes in priority habitats and species (by type); and</u></li><li>ii. <u>Changes in areas designated for</u></li></ul>	<u>No net loss of designated biodiversity sites including :</u> <ul style="list-style-type: none"><li>• <u>Sites of Special Scientific Interest</u></li><li>• <u>Local Nature Reserves ; and</u></li><li>• <u>Sites of Importance for Nature Conservation )</u></li></ul> <u>in accordance with Policy 30</u>	

Ref	Page	Policy/ Paragraph	Main Modification				
					<u>their intrinsic environmental value including sites of international, national, regional and sub-regional or local significance</u>		
			<u><b>Rivers and river corridors</b></u>  <u><b>(Policy 31)</b></u>	<u>SOxiv</u> <u>SOxxi</u>	<u>Percentage of main rivers of good or fair chemical and biological quality</u>	<u>In accordance with targets established by Environment Agency</u>	<u>Environment Agency</u>
			<u><b>Flood management</b></u>  <u><b>(Policy 32)</b></u>	<u>SOxxi</u>	<u>Number of planning permissions granted contrary to the advice of the Environment Agency</u>	<u>All applications granted are in accordance with Policy 32</u>	<u>Environment Agency</u>
					<u>Number and proportion of developments which incorporate Sustainable Drainage Systems (SuDS)</u>	<u>All applications granted are in accordance with Policy 32</u>	<u>London Borough Havering</u>
			<u><b>Air quality</b></u>	<u>SOxviii</u>	<u>Improve air quality in Havering by reducing the level of NO2</u>	<u>To reduce levels of NO2 at identified ‘hot-spots’, in accordance with the</u>	<u>London Borough Havering</u>

Ref	Page	Policy/ Paragraph	Main Modification				
			<u>(Policy 33)</u>			implementation of the strategic Air Quality Action Plan for Havering (2018/23) (as approved by the Mayor of London).	
			<u>Managing pollution</u>  <u>(Policy 34)</u>	SOxviii SOxx	Percentage of main rivers of good or fair chemical and biological quality	All applications granted are in accordance with Policy 34  Net reduction in annual average, hourly peak and daily peak recordings of all monitored pollutants	Environment Agency
			<u>On-site waste management</u>  <u>(Policy 35)</u>	SOxvii	Percentage of household waste recycled/re-used/composted	All applications granted are in accordance with Policy 35	London Borough Havering
			<b><u>Minerals</u></b>				
			<u>Mineral reserves</u>  <u>(Policy 37)</u>	SOxxii	Loss of mineral safeguarded land to development	No loss of safeguarded land in accordance with Policy 37	London Borough Havering
			<u>Mineral extraction</u>  <u>(Policy 38)</u>	SOxxii	Production (tonnes) of primary land won aggregates	Production in line with approved schemes for mineral working	London Borough Havering

Ref	Page	Policy/ Paragraph	Main Modification				
			<b><u>Secondary aggregates (Policy 39)</u></b>	<u>SOxxii</u>	<u>Production (tonnes) of secondary/recycled aggregates</u>	<u>Production in line with approved schemes for mineral working</u>	<u>London Borough Havering</u>
					<u>Use of primary won materials</u>		
			<b><u>Monitoring and delivery</u></b>				
					<u>Amount of Planning Obligations/CIL funding secured and spent (including by type)</u>	<u>Developer contributions secured to be maximised and spending to be optimised in accordance with identified priorities</u>	<u>London Borough Havering</u>
					<u>Completion of Authority Monitoring Report (including review of LDS milestones)</u>	<u>Production of Authority Monitoring Report</u>	<u>London Borough Havering</u>



## 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
<b>1.Overview</b>		
PM1	Section 1.2 Commenting on the Local Plan	<p><del>How to make comments on the Local Plan</del></p> <p><del>The Local Plan, all supporting documents and details of how to submit comments can be at <a href="http://www.Havering.gov.uk">www.Havering.gov.uk</a></del></p> <p><del>Hard copies are also available for inspection at all public libraries in Havering.</del></p> <p><del>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:</del></p> <p><del>Is the Local Plan <b>positively prepared</b>? Is it based on a strategy to meet the borough’s housing employment and infrastructure requirements?</del></p> <p><del>If the Local Plan <b>justified</b>? Are the policies founded on a robust and credible evidence base? Do they represent the most appropriate strategy when considered</del></p>

		<p>against reasonable alternatives?</p> <p>Is the Local Plan <b>effective</b>? Are the proposed policies deliverable and flexible? Can the council demonstrate how they will be monitored? Is the Local Plan <b>consistent with national policy</b>?</p> <p><b>You can submit your comments:</b></p> <ul style="list-style-type: none"> <li>• online at <a href="http://havering-consult-objective.co.uk/portal/planning_policy/lp/lp">HTTP://havering-consult-objective.co.uk/portal/planning_policy/lp/lp</a></li> <li>• By email to: <a href="mailto:development_planning@havering.gov.uk">development_planning@havering.gov.uk</a></li> <li>• in writing to Development Planning, London Borough of Havering, Town Hall, Main Road, Romford RM1 3BD</li> </ul> <p><b>All comments should be submitted by 5 PM on Friday, 29 September 2017.</b></p> <p><b>Next steps</b> 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>
<b>2. Vision for Havering</b>		
PM2		<p><b>Vision for Havering</b> <b>2.1 Achieving Havering’s corporate Vision</b></p> <p>2.1.1 The Local Plan has an important role in contributing to the delivery of the</p>

		<p>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 <del>also</del> to the whole of London.</p> <p><del>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,</del> The new vision is focused around four cross-cutting priorities: <b>Communities, Places, Opportunities</b> and <b>Connections</b>:</p> <ul style="list-style-type: none"> <li>• <b>Communities</b> - 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.</li> <li>• <b>Places</b> - 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.</li> <li>• <b>Opportunities</b> - 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 sustainable economic growth that generates local wealth and opportunities, as well as securing investment in high-quality skills and careers.</li> </ul>
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		<ul style="list-style-type: none"> <li>• <b>Connections</b> - 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.</li> </ul>
PM3	Paragraph 2.2.1	<p><b>2.2Havering in 15 years from now</b></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 '<b>Havering: Making a Greater London</b>' and provides a snapshot of what Havering will aspire to be like in 15 years from now.</p>
PM4	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>
PM5	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 recreation and leisure opportunities and, by 2031, will be more attractive and usable, as well as more accessible to residents.</p>
PM6	Paragraph 2.2.19	<p>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</p>

		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>
<b>3. Strategic Objectives</b>		
PM7	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>
PM8	Objective xv	Increase the <u>quantity</u> , quality and accessibility of Havering's public open spaces and maintain and enhance biodiversity and geodiversity;
<b>5. Borough wide Strategy for growth</b>		
PM9	Paragraph 5.1.1	Paragraph 5.1.1 Havering's population is expected to grow to over 293,000 <b>(1)</b> 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 <del>preserving</del> <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.
PM10	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 <del>to translate the ambition of its overarching vision - 'Havering - Making a Greater London'</del> <u>to deliver into the places and communities that will endure well into the remainder of this century.</u> 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.
PM11	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.
PM12	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</u> <del>for</del> 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 <u>and its ecological assets.</u> The Thames Chase Community Forest will be enhanced in line with the Thames Chase Plan. <u>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	<b>Key features of the spatial strategy</b>  <b><i>Housing Growth</i></b>

		<ul style="list-style-type: none"> <li>• Delivery of at least 17,550 high quality homes over the 15 year Plan period;</li> <li>• Delivery of over <del>5,300</del> <u>6000</u> new homes in the Romford Strategic Development Area;</li> <li>• 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;</li> <li>• Residential intensification of the borough's district centres, with proposed development compatible with their character, function and scale;</li> <li>• 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.</li> </ul> <p><b><i>Economic Growth</i></b></p> <ul style="list-style-type: none"> <li>• Regeneration of Romford Town Centre, providing a more diverse and higher quality retail, leisure, cultural and employment offer;</li> <li>• 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.</li> <li>• 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;</li> <li>• 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;</li> </ul>
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		<ul style="list-style-type: none"> <li>• 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.</li> </ul> <p><b><i>Transport Infrastructure</i></b></p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• Remodelling of Gallows Corner roundabout to increase safety, improve air quality and smooth motor vehicle traffic flows;</li> <li>•</li> <li>• Improved north-south links within the borough, connecting Rainham and Beam Park, Romford and Harold Hill;</li> <li>• Remodelling of sections of the Romford Ring Road;</li> <li>• Increased capacity at Junction 28 of the M25;</li> <li>• Improvements to the A127 through the A127 Growth Corridor project;</li> <li>• Working with Highways England <u>and other partners</u> to minimise the adverse impact on <del>Haverling and its</del> <u>local residents and the environment</u> of the Government's preferred option for a Lower Thames Crossing.</li> </ul> <p><b><i>Social Infrastructure</i></b></p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• New early years and school provision in the growth areas of Romford and</li> </ul>
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		<p>Rainham and Beam Park;</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• 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.</li> </ul> <p><b><i>Haverling's most valued assets</i></b></p> <ul style="list-style-type: none"> <li>• Protecting and enhancing the Green Belt and Haverling's open spaces and <u>ecological assets</u>;</li> <li>• <del>Preserving</del><u>Conserving</u> and enhancing the Haverling's rich heritage and historic environments.</li> </ul>
<b>6.Strategic Development Areas</b>		
Romford PM13	Paragraph 6.1.3	The arrival of Crossrail in <del>2018/19</del> <u>2020/21</u> alongside the relative affordability of this area are key drivers of growth.
PM14	Paragraph 6.1.12	Market Place is one of Romford's greatest assets and has potential to provide a key <del>civic</del> <u>public</u> -space within the town centre.
PM15	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>
PM16	Paragraph 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 Local Plan period. In order to meet the need for primary school places in the Romford area <del>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.</del> <u>a 3 form of entry primary school (630 places) has</u>

		<p>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. 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). <del>The Council will seek to identify sites suitable for additional education provision through the Romford Masterplan and Site Specific Allocations Local Plan.</del></p>
PM17	Paragraph 6.1.24	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.
PM18	Paragraph 6.1.25	<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>
PM19	Insert a new paragraph between paragraphs 6.1.25 and 6.1.26	<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>
PM20	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 PM21	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>
PM22	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, <del>in the long term</del> 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.
PM23	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 &amp; St Giles and the grade II* listed Rainham Hall.</u>
PM24	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>
PM25	Figure 4 Rainham and Beam Park Strategic Development Area	Show River Beam on Figure 4
<b>7. Successful Places to Live</b>		
PM26	Table 2 Housing Mix	Table 3 Borough Wide Housing Mix
<b>8. Thriving Communities</b>		
PM27	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</u>

		the principles of active design.
PM28	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>
PM29	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. <del>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.</del></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> <del>within, on the edge or outside of town centres</del></p>
PM30	Paragraph 8.2.3	Although overall performing well, the other district and metropolitan centres <del>are subject to the over proliferation of non-retail uses and</del> 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.

PM31	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 <del>out of town centres</del> 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>
PM32	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 <del>would</del> include residential, office and leisure uses. <u>Subject to the Council being satisfied that an appropriate residential environment will be provided, r</u>Residential 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</u> <del>will not be supported</del>. In terms of shop front design, laminated glass and internal security grills are preferred above external shutters.</p>
PM33	Paragraph 8.2.6	<p>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</u> <del>borough's metropolitan and district centres are considered to be the borough's primary shopping areas</del> <u>within the borough's metropolitan and district centres.</u></p>

PM34	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 <del>and most dominant</del> 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
PM35	Paragraph 8.2.8	In secondary frontages and local centres, the Council will seek to maintain a <del>majority</del> <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).
PM36	Paragraph 8.2.9	The <del>over</del> concentration of particular uses can impact negatively on the amenity of adjacent uses and adversely affect the vitality and viability of the town centre.
PM37	Policy 15 Culture and Creativity Insert new paragraph between paragraphs 8.4.2 and 8.4.3.	<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>
PM38	Policy 16 – Social Infrastructure	c. <del>Make use of an innovative delivery of social infrastructure;</del>
PM39	Policy 16 – Social Infrastructure	f. Explore the possibility to co-locate, <u>in multi-use buildings</u> with complimentary services; and
PM40	Policy 16 – Social	g. Are provided <del>in multi-use</del> , flexible, adaptable and healthy buildings.

	Infrastructure	
PM41	Policy 16 – Social Infrastructure	<del>Stakeholders</del> <u>Applicants</u> will be encouraged to consider funding arrangements for <u>reasonable</u> on-going maintenance costs.
PM42	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>
PM43	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.
PM44	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> <del>re-provision</del> (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 areas of defined need may be acceptable. The Council will also give consideration to the viability of retaining existing social infrastructure provision.</u>
PM45	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 <del>2028</del> <u>2024</u> . The Council <u>will support burial provision when</u>

		the local need for such facilities can be demonstrated, based on up-to-date evidence. <del>only support applications for burial space which meet an unmet need.</del>
PM46	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>
PM47	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
PM48	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. <del>The refurbishment of Chafford Sports complex;</del> <u>Provision of a new leisure centre in the south of the borough;</u> <del>c. Expansion of Central Park Leisure Centre;</del> <del>e.</del> <u>d. Enhanced facilities and a wider range of uses of Bretons Outdoor Recreation Centre;</u> e. New provision within the Rainham and Beam Park Strategic Development Area; and f. The provision of new 3G Artificial Grass Pitches (AGPs) and improvements to existing ones within the borough.
PM49	Paragraph 8.7.2	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,</u>



		<u>consistent with the definition of open space in the NPPF. Leisure and sSports and recreation facilities encompass indoor sports halls, swimming pools, fitness centres, outdoor sports pitches, playing fields tennis courts and bowling greens.</u>
PM50	Paragraph 8.7.8	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> <del>be</del> 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.
<b>10. Connections</b>		
PM51	Policy 23 Transport Connections	i. Maximising the <u>development opportunities supported by Crossrail as well as the benefits from Crossrail</u> for local businesses and residents.
PM52	Table 3 Havering Transport Schemes A127 Corridor Aspirations	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. This work will inform the production of a promotional document that can be used to highlight the importance of the Corridor and to support bids for external funding. With the long term aim of producing a "lobbying" document for external funding</u>
PM53	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>

		Delivery Timescales : <u>5 – 10 years</u> Key Partners : <u>Highways England</u>
PM54	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>
<b>11. High Quality Places</b>		
PM55	Policy 26 Urban Design	i. Are informed by, respect and complement the distinctive qualities, identity, <del>and</del> <u>character and geographical features</u> of the site and local area;
PM56	Policy 26 Urban Design	<u>The Council will require development proposals of a strategic nature to will be subject to an Urban Design Review Panel.</u>
PM57	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>
PM58	Paragraph 11.1.16	<del>The Council supports the use of Urban Design Review Panels</del> <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 development proposal of a strategic nature are those that have potential to significantly impact or alter the character of an area 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>

PM59	Policy 27 Paragraph 11.2.7	Landscaping schemes should demonstrate a commitment to promoting biodiversity, <u>having regard to the Havering Nature Conservation and Biodiversity Strategy (2014).</u>
PM60	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><del>41.3.5</del> <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. <del>that responds to the important characteristics of the Conservation Area, and which will preserve, enhance or reveal its character and appearance, and significance.</del> 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</p>

		<p>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><del>11.3.6</del> <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>
PM61	Paragraph 11.3.7	<p><del>11.3.7</del> <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><del>11.3.8</del> <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 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><del>11.3.9</del> <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>
PM62	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>
<b>12. Green Places</b>		
PM63	Policy 29 Green Infrastructure Paragraph 12.1.1	<p><del>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.</del> <u>defined as a network of green spaces - and features such as street trees and green roofs - that is planned, 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>

PM64	Policy 30 Nature Conservation Paragraph 12.2.6	London Wildlife <u>Sites</u> Board ...
PM65	Map 2 Havering Wildlife Corridors	Include the Thames Corridor as a wildlife Corridor.
PM66	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>
PM67	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>
PM68	Paragraph 12.3.2	All the Rivers in Havering (Beam, Ravensbourne, Rom, <u>Mardyke, Ingrebourne...</u>  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>
PM69	Paragraph 12.3.3	The Thames River Basin Management Plan <u>2015-2021 (*)...</u> Footnote: * <a href="https://www.gov.uk/government/collections/river-basin-management-plans-2015">https://www.gov.uk/government/collections/river-basin-management-plans-2015</a>
PM70	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> (1) <a href="https://www.gov.uk/topic/environmental-management/environmental-permits">https://www.gov.uk/topic/environmental-management/environmental-permits</a>
PM71	Insert new paragraph after paragraph 12.4.8	<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</u>

	<u>9</u>	<u>network in line with Policy 29.</u>
PM72	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>
PM73	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: <a href="http://www.bats.org.uk/pages/bats_and_lighting.html">www.bats.org.uk/pages/bats_and_lighting.html</a>)</u>
PM74	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: <a href="https://www.gov.uk/government/collections/groundwater-protection">https://www.gov.uk/government/collections/groundwater-protection</a>)</u>. Regard should be given to the Source Protection Zone along the border with Barking &amp; Dagenham, which needs to be protected during development around discharges or pathways to groundwater. The Council's leaflet ...</u>
PM75	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 &amp; Recycling Board (1). (footnote:<a href="http://www.lwarb.gov.uk/what-we-do/resource-london/successes-to-date/efficiencies-programme-outputs/">http://www.lwarb.gov.uk/what-we-do/resource-london/successes-to-date/efficiencies-programme-outputs/</a>) The Council will bring forward further detailed guidance in due course.</u>
PM76	Policy 36-Low carbon design, decentralised energy, and renewable energy. Paragraph 12.8.1	<u>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.</u>
<b>14. Delivery and</b>		

Implementation		
PM77	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 <del>and</del> , an ambitious estates regeneration programme <u>and has entered into three joint venture partnerships.</u> <del>and</del> The council is also 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		
PM78	Paragraph A.3.32	Havering has a diverse range of important heritage <u>assets, sites and areas.</u> There are currently 6 Grade I <del>and</del> , 15 Grade II* <u>and over 100 Grade II</u> listed buildings <del>located within Havering, as well as</del> 11 designated conservation areas <del>at including;</del> 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>





## **LOCAL DEVELOPMENT SCHEME (LDS)**

**2022-2024**

## 1. Introduction

### *What is the Local Development Scheme?*

- 1.1 Local planning authorities are required to prepare and maintain a Local Development Scheme (LDS) under Section 15 of the Planning and Compulsory Purchase Act 2004, as amended by the Localism Act 2011 and the Housing and Planning Act 2016. A Local Development Scheme sets out all the planning policy documents to be produced by the authority over a 3 year period.
- 1.2 This LDS sets out:
  - The planning policy documents that Havering have already prepared;
  - The planning policy documents that Havering intend to produce;
  - The subject matter and geographical area of each of the proposed documents;
  - The timetable for the preparation of the documents over the next three years; and
  - The opportunities for the local community and stakeholders to be involved in preparing planning policies by setting out an indicative timetable for the preparation of each document.
- 1.3 Progress on the implementation of the LDS will be reported annually in the Authorities Monitoring Report.

## 2. Planning Policy Context

### *National Planning Policy*

- 2.1 National Planning Policy Framework (NPPF) sets the national policy context for preparation of local plans. Local plans must be consistent with national policy and should enable the delivery of sustainable development in accordance with the policies in the framework. This is established in the 'tests of soundness' against which local plans are examined.
- 2.2 National Planning Policy for Waste was published in October 2014 and National Planning Policy for Traveller Sites was published in August 2015.

### *Regional Planning Policy*

- 2.3 The Greater London Authority Act 1999 requires the Mayor of London to produce a spatial development strategy – which has become known as 'the London Plan' - and keep it under review. London borough Local Development Documents (such as local plans) must be 'in general conformity' with the London Plan. A new London Plan was published in 2021 and this forms part of Havering's Development Plan, against which planning applications must be determined.

- 2.4 The Mayor of London has also published Supplementary Planning Guidance on a range of topics. These documents provide additional guidance on the implementation of London Plan policies.

### **3. *Havering's adopted Planning Policy Documents***

#### *Havering Local Plan 2016-2031 and Policies Map*

- 3.1 The Havering Local Plan 2016-2031 was adopted in November 2021. The Local Plan sets the vision and objectives for the spatial development of the borough.
- 3.2 The Local Plan replaced the Core Strategy and Development Management Policies Development Plan Document (DPD) and the policies within the Romford Area Action Plan.

#### *Site Specific Allocations*

- 3.3 The Local Plan 2016-2031 does not include Site Specific Allocations and for this reason the Site Specific Allocations DPD 2008 and site allocations in the Romford Area Action Plan (2008) have been retained until they are replaced.

#### *Joint East London Waste Plan*

- 3.4 The Joint East London Waste Plan was adopted by the four East London Waste Authorities, Havering Newham, Barking and Dagenham and Redbridge. The Waste Plan sets out a planning strategy for sustainable waste management enabling the adequate provision of waste management facilities) in appropriate locations for municipal wastes, and commercial and industrial waste, construction, excavation and demolition, and hazardous wastes.

#### *Supplementary Planning Documents*

- 3.5 Supplementary Planning Documents provide additional guidance on the implementation of policies in the Development Plan.
- 3.6 The Council previously adopted a number of SPDs to support the policies in the Core Strategy and Development Control Policies DPD. On adoption of the Local Plan 2016-2031 in November 2021, a number of SPDs were revoked and some were retained to support the new Local Plan, with the intention of being reviewed (refer to table 1 for further detail).

The following SPDs remain in place:

- Residential Extensions and Alterations SPD 2011
- Hall Lane Policy Area SPD 2009
- Emerson Park Policy Area SPD 2009

- Heritage SPD 2011 (including the Local List of Heritage Assets)

#### *Other Planning Documents*

3.7 There are a number of other planning documents that the Council prepares:

- *Statement of Community Involvement 2021* The purpose of SCI is to set out the preferred options and legal requirements for involving the community and other stakeholders in the preparation of planning policies and the determination of planning applications.
- *Authority Monitoring Report* The Localism Act 2011 requires local authorities to prepare and publish an Authority Monitoring Report containing information on the implementation of the Local Development Scheme and the extent to which the policies set out in the Local Plan are being achieved. The AMR is published annually.

#### **4. *Future Commitments***

- 4.1 The Inspector for the Local Plan examination found the Plan sound subject to an immediate update. In addition to the update of the Local Plan there are a number of other priority policy documents that will be taken forward over the next three years.
- 4.2 The Council's commitments are set out in Tables 1 and 2 below. Table 1 sets out the existing documents and any plans for them to be reviewed and updated. Table 2 sets out the new documents that the Council intends to produce.

**Table 1 – Existing planning policy documents and programme for their review**

<b>Existing document and date of adoption</b>	<b>Description</b>	<b>Geographical Coverage</b>	<b>Timescale for review</b>
Local Plan 2016-2031 Adopted 2021 and Policies Map 2021	Sets out the Council's vision, objectives and spatial strategy for the future development of the Borough and will contain strategic policies, detailed policies and site allocations.  The Policies Map provide a spatial representation of the policies in the Local Plan	Borough wide	<ul style="list-style-type: none"> <li>• Preparation of evidence base – throughout 2021 and 2022</li> <li>• Regulation 18 consultation – summer 2022</li> <li>• Regulation 19 consultation – spring 2023</li> <li>• Submission to the Secretary of State - late summer 2023</li> </ul> <p>The adoption of the Local Plan will be dependent on the Examination Process and is outside the control of the Council.</p>
Site Specific Allocations Development Plan Document 2008	Sets out the specific allocations for individual sites across the borough except for site in Romford Town Centre which are set out in the Romford Area Action Plan and site for Waste management which are identified in the Joint Waste Development Plan Document	Borough wide	To be revoked on adoption of the Local Plan update
Site Allocations in the Romford Area Action Plan 2008	Sets out the specific allocations for individual sites within Romford	Romford	To be revoked on adoption of the Local Plan update
Joint East London Waste Plan	Sets out a planning strategy for sustainable waste management enabling the adequate provision of	Havering, Barking and Dagenham,	Completion of joint evidence base 2021 Progression of Joint Waste Plan 2022 onwards subject to agreement with the other boroughs.

	waste management facilities in appropriate locations.	Redbridge and Newham Local Authority Areas	
Heritage SPD 2011 including Local List of Heritage Assets	Planning Document Seeks to ensure appropriate identification, protection, enhancement and management of Havering's heritage assets by providing additional guidance on the implementation of policies relating to heritage	Borough wide	Consultation on updated Heritage SPD – Summer 2022 Adoption of updated by SPD – by end of 2022  Local List of Heritage Assets to be reviewed separately throughout 2022.
Residential extensions and alterations SPD 2011	Provides design guidance to ensure householder development is sympathetic to the existing property and the street scene and does not detrimentally affect the living conditions of neighbouring properties	Borough wide	Consultation on updated Residential Extensions and Alterations SPD 2021 – Summer 2022 Adoption of updated SPD by end of 2022
Hall Lane Policy Area 2009	Provides guidance on maintaining and enhancing the special character of the Hall Lane Policy Area	Hall Lane Policy Area	Consultation on updated Hall Lane Policy Area SPD – Summer 2022 Adoption of updated SPD – by end of 2022
Emerson Park Policy Area 2009	Provides guidance on maintaining and enhancing the special character of the Emerson Park Policy Area.	Emerson Park Policy Area	Consultation on updated Emerson Park Policy Area SPD - Summer 2022 Adoption updated SPD – by end of 2022
Statement of Community Involvement 2021	Sets out how the community and other stakeholders will be involved in the preparation of future planning policy documents and in decisions regarding planning applications	Borough-wide	The SCI is up to date and no review is currently planned
Conservation Area Appraisals and	These documents identify the special interest of each conservation area and	Individual Conservation	A review of all Conservation Area Appraisals and Management Plans will take place by the

Management Plans for each of the designated conservation areas	provide a clear basis for assessing how far planning proposals preserve or enhance their character or appearance.	Areas across the borough	end of 2022. The review will identify any necessary updates. Consultation will take place on any updates to Conservation Area Appraisals in late 2022 and 2023.
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Table 2 – Programme for the preparation of new planning policy documents

Policy Document	Description	Geographical coverage	Key Milestones
Planning obligations Supplementary Planning Document	This SPD will set out the council's approach to funding and delivering the infrastructure needed to support sustainable development and good growth across the borough through the use of planning obligations (S106). The document will explain the Council's approach to the Community Infrastructure Levy (CIL) and the interaction between CIL and S106. It will also detail the council's approach to securing non-financial obligations such as affordable housing or other restrictions over the use of the land. In addition, it will include the process and fees for monitoring S106 clauses.	Borough Wide	Public consultation – Summer 2022 Adoption – Summer 2023
Design guide	The NPPF 2021 states that all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences. Design guides and codes provide a local framework for creating beautiful and distinctive places with a consistent and high quality standard of design. They should be produced as part of a Plan or as SPD	The NPPF states that guides and codes can be prepared at an area-wide, neighbourhood or site specific scale.	The Council is currently considering the best way of implementing the new requirement for design guidance and is following the pilot schemes currently underway elsewhere in the Country.  As part of the evidence base for this work and for the Local Plan in general, there will be a need to undertake a characterisation study, this work will progress during 2022.



Area based Supplementary Planning Documents	Guidance for specific areas of the borough	Area specific	The approach to area based Supplementary Planning Documents is under consideration. Further detail will be set out in future updates to this Local Development Scheme
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# **STATEMENT OF COMMUNITY INVOLVEMENT**

**November 2021**

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## 1. INTRODUCTION

### 1.1 What is the Statement of Community Involvement?

- 1.1.1 Planning policies help shape the places 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. Planning affects everyone in the community and Havering is committed to involving a wide range of people, communities, organisations and businesses in the planning process, including those who are traditionally under represented.
- 1.1.2 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 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.
- 1.1.3 The National Planning Policy Framework (NPPF) 2021 stresses the importance of early and meaningful engagement and collaboration with neighbourhoods, as many benefits can be obtained from it; greater focus on priorities identified by the community, making use of local knowledge, increasing community cohesion, efficiency, effectiveness and support for the planning service.

### 1.2 Why do we need a new Statement of Community Involvement?

- 1.2.1 The Council has adopted the Havering Local Plan (2016-2031) and will now be undertaking an immediate update of the Local Plan. 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.
- 1.2.2 A new SCI is needed so that it can take into account new legislation, and updated methods of communication with stakeholders. Since the covid-19 pandemic started, the Council and its residents have had to adapt to new ways of working and communicating online. This has accelerated people's familiarity with online engagement tools and allowed a wider variety of people to easily access and keep up to date with decisions. This update to Havering's SCI embraces the opportunity this has presented for online consultation, while also keeping traditional consultation methods for those who need it.

## 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. Havering wants to encourage everyone in the borough to get involved in planning the future of the borough.
- 2.1.2 Havering's community profile is ever-changing. The way we communicate should reflect this changing population and any challenges for engagement that come with it. There are groups in the community that frequently do not get involved in consultations and planning. These are mainly young people, ethnic minorities, disabled persons, Gypsy's and Traveller's and LGBTQ+. These groups make up an increasing and important part of Havering's community. Community groups representing these parts of Havering's community will be reached out to and encouraged by the council to take part as set out in section 3.6.2.

### 2.2 Consultees

- 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 full list of specific consultation bodies who are required to be consulted are set out in Appendix A.
- 2.2.3 The general consultation bodies (optional consultees) are also set out in Appendix A.

### 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 or may wish to produce. The different types of documents are set out below. Figure 1 shows the hierarchy of these documents within the national scale.

##### 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. Decisions on planning applications are taken in accordance with the policies set out in Local Plans, the London Plan (produced by the Mayor of London) and the NPPF (produced by the National Government).
- 3.1.3 The Local Plan has to be consistent with national planning policy (the NPPF) and in general conformity with the London Plan. Havering has recently adopted its Local Plan (2016-2031) but has agreed to an immediate update as per the request of the Planning Inspectorate. Until an updated Local Plan is adopted, development in Havering will continue to follow the policies in the current Local Plan, the London Plan (2021) and the National Planning Policy Framework (2021).
- 3.1.4 Local Plans are required to be supported by a robust evidence base. This includes a range of topics such as housing, waste, retail, growth, etc. Evidence base documents are usually published and consulted on alongside submission of the Local Plan.
- 3.1.5 For details on the process of preparing a Local Plan refer to section 3.2.2.

##### Neighbourhood Plans

- 3.1.6 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. There are currently no Neighbourhood Forums or Neighbourhood Plans in Havering.

##### Supplementary Planning Documents

- 3.1.7 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.
- 3.1.8 SPDs are subject to public consultation prior to being adopted. For further details on the process of preparing an SPD refer to section 3.4.

### Local Development Scheme

- 3.1.9 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. The Local Development Scheme is not subject to public consultation.

### Authority Monitoring Report

- 3.1.10 The Localism Act 2011 requires local authorities to prepare and publish an Authority Monitoring Report (AMR) containing information on the implementation of the Local Plan. The Authority Monitoring Report is not subject to public consultation but provides useful information which may be of interest to residents and other stakeholders.

### Community Infrastructure Levy

- 3.1.11 The Community Infrastructure Levy (CIL) is a levy that local authorities can choose to charge on new developments in their area that goes towards the cost of infrastructure (e.g., schools, community spaces).
- 3.1.12 The charging authority (The Council) sets out its levy rates in a charging schedule. The Charging Schedule is subject to 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 section 3.5.
- 3.1.13 The London Borough of Havering adopted its Community Infrastructure Levy (CIL) in July 2019. The levy applies to CIL liable developments granted planning permission on or after 1 September 2019.
- 3.1.14 The Mayoral CIL (MCIL) is also applicable in Havering, which is a levy set by the mayor to help fund Crossrail. MCIL applies to most new developments in London, with exemptions for some types of development such as affordable housing, self-build, educational facilities, etc. MCIL 1 charging rates are for planning permission granted between 1<sup>st</sup> April 2012 and 31<sup>st</sup> March 2019. The most recent charging rates (MCIL 2) apply to planning permissions granted from 1<sup>st</sup> April 2019 onward. MCIL charging rates are subject to consultation and

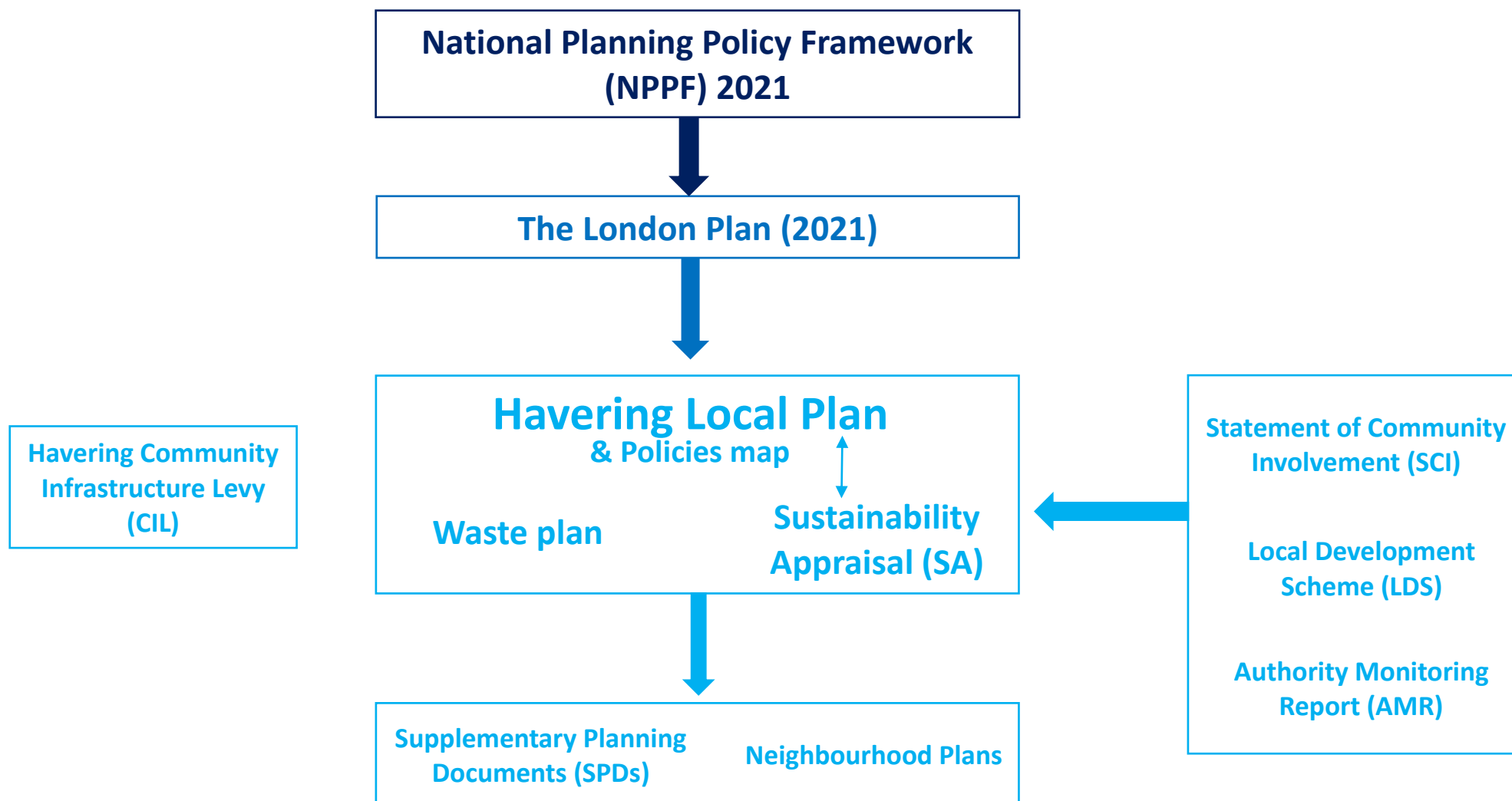


examination in public. Consultation on MCIL draft charging schedule is held by the Greater London Authority.

- 3.1.15 Further information, including the CIL charging schedule, is available on the Council's website. Any changes to the Havering CIL would be subject to public consultation and examination in public.

### *Sustainability Appraisal*

- 3.1.16 A Sustainability Appraisal (SA) is a statutory requirement, the purpose of which is to ensure that the principles of sustainable development are integrated into the plan making process. Local Plans must be accompanied by a Sustainability Appraisal, which is prepared in parallel to the Local Plan Process. It is a key tool used to appraise the environmental, economic and social effects of plans, strategies and policies.
- 3.1.17 The specific consultation bodies for SAs are set out in the Environmental Assessment of Plans and Programmes Regulations 2004. These are; Historic England, Natural England and the Environment Agency.
- 3.1.18 For further details on the process of preparing a Sustainability Appraisal for the Local Plan, refer to section 3.3.



**Figure 1:** Hierarchy of planning documents

## 3.2 Community Involvement in the Local Plan

**Table 1: Actions (What we will do)**

a.	Consult for a minimum of 6 weeks (possibility of a longer consultation period if the consultation falls at certain times such as Christmas or Easter)
b.	Publicise and make documents and relevant information available on the Council's website
c.	Notify specific consultation bodies by email
d.	Publicise via Council's Social media platforms (Twitter, Facebook, Instagram, and/or YouTube channel)
e.	Notify registered contacts (refer to section 3.6) by email
f.	Issue a statutory public notice in the Romford Recorder
g.	Make documents available for inspection in council offices*
h.	Make documents available in alternative formats on request (refer to section 3.7)
i.	Publicise in the Council's email newsletter 'Living in Havering'

\*exceptional circumstances, such as health pandemics, could result in documents not being able to be viewed in person. The Council will always follow the most up to date government guidance on these circumstances and will ensure consultation during these times are carried out in the safest and most constructive way for residents.

### **Stage 1: Preparation and initial consultation** (regulation 18)

- At this stage an initial consultation document will be prepared and it will be subject to public consultation. All actions in table 1 will be taken.

### **Stage 2: Publication** (regulation 19)

- At this stage the Local Plan is published in what is considered its finalised form. All actions in table 1 will be taken.
- The purpose of consultation at this stage is to comment on the soundness of the Plan (as set out in the NPPF) and it's conformity with legal and procedural requirements.

### **Stage 3: Submission to Secretary of State** (regulation 22)

- 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.
- A programme officer is appointed who is responsible for organising and running the Examination on behalf of the Inspector.
- There is no consultation at this time.

### **Stage 4: Public Examination** (regulation 24)

- 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. Details of the examination process will be available on the Council’s website.

**Stage 5: *Further Consultation*** (regulation 25)

- The Inspector may suggest changes to the Local Plan and further consultation may be required at this stage. 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.

**Stage 6: *Adoption*** (regulation 26)

- At this stage the Council adopts the final version of the Local Plan. The finalised documents will be made available and an adoption statement will be sent to the SoS and those on Havering’s consultation database. There is no public consultation at this time.

### 3.3 Community Involvement in Supplementary Planning Documents

**Stage 1: *Preparation***

- At this stage a draft version of the SPD is prepared
- There is no specific requirements for this stage. Informal engagement with relevant stakeholders to identify key issues may be held.

**Stage 2: *Public Consultation*** (regulation 12 and 13)

- At this stage the draft SPD is published for consultation. Following public consultation, the representations received will be considered and amendments will be made to the Supplementary Planning Document. All actions from Table 1 will be taken. Please note the statutory consultation period is 4 weeks for SPDs.

**Stage 3: *Adoption*** (regulation 14)

- At this stage, the Council adopts the final version of the SPD. The finalised documents will be made available and an adoption statement will be sent to those on Havering’s consultation database. There is no public consultation at this time.

### 3.4 Community Involvement in setting a Community Infrastructure Levy charging schedule

**Stage 1: *Preliminary draft charging schedule*** (regulation 15 of the CIL regulations 2010)

- A preliminary draft charging schedule is consulted on. All actions from table 1 will be taken. Please note the statutory consultation period is 4 weeks for CIL preliminary draft charging schedules.

**Stage 2: *Draft Charging Schedule Publication*** (regulation 16)

- At this stage the Draft Changing Schedule is published for consultation, after taking into consideration comments from stage 1, in what is considered to be

its final form. All actions from Table 1 will be taken. Please note the statutory consultation period is 4 weeks for CIL draft charging schedules.

**Stage 3: *Independent examination* (regulation 19 and 20)**

- At this stage, the Charging Schedule, Statement of consultation and any supporting documents are submitted to the Secretary of State for examination.
- There is no public consultation at this time.

**Stage 4: *Examiner's report and publication* (regulation 23 and 25)**

- Examiner's report is published, setting out recommendations. If approved, the Council adopts the final version of the CIL Charging Schedule.

### 3.5 Community Involvement in Sustainability Appraisal

3.5.1 A Draft Scoping Report is prepared by the Council which sets the context, establishes a baseline and decides on the scope. This draft report is subject to public consultation and all actions from Table 1 will be taken (please note that the consultation length for the SA is 5 weeks instead of 6 weeks as set out in Table 1).

3.5.2 The report is then developed, refined and finalised, alongside preparing the submission version of the Local Plan. The SA report is then consulted on alongside consultation on the Submission version of the Local plan (all actions from table 1 will be taken). Lastly, the SA report is adopted and effects of implementing the Local Plan will be monitored.

### 3.6 Havering's Planning Consultation Database

3.6.1 The Council 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 sections 3.2-3.5.

3.6.2 Additionally, we may reach out to groups or people that we feel are quiet communities to ask them to be added to the consultation database (reference 2.1.2). This is to encourage different communities in Havering to have the option to become involved in planning.

3.6.3 If you would like to be added to this Consultation Database, please contact: [developmentplanning@havering.gov.uk](mailto:developmentplanning@havering.gov.uk).

3.6.4 All data is held in accordance with the Data Protection Act 2018.

### 3.7 Availability of Documents in Alternative Formats

- 3.7.1 The Council offers alternative formats (such as Large Print or Easy Read), translation and interpreting services for disabled service users and those who do not speak or read English. Please contact [developmentplanning@haverling.gov.uk](mailto:developmentplanning@haverling.gov.uk) for further information.

### 3.8 The Duty to Cooperate

- 3.8.1 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 Council appreciates the value and efficiency that can be achieved through joint working and sharing of information and best practices.
- 3.8.2 The way in which the Council meets its Duty to Cooperate will vary depending on the type and scope of the planning document involved and the strategic issues and cross boundary implications. The full list of our Duty to Cooperate partners are in Appendix A.

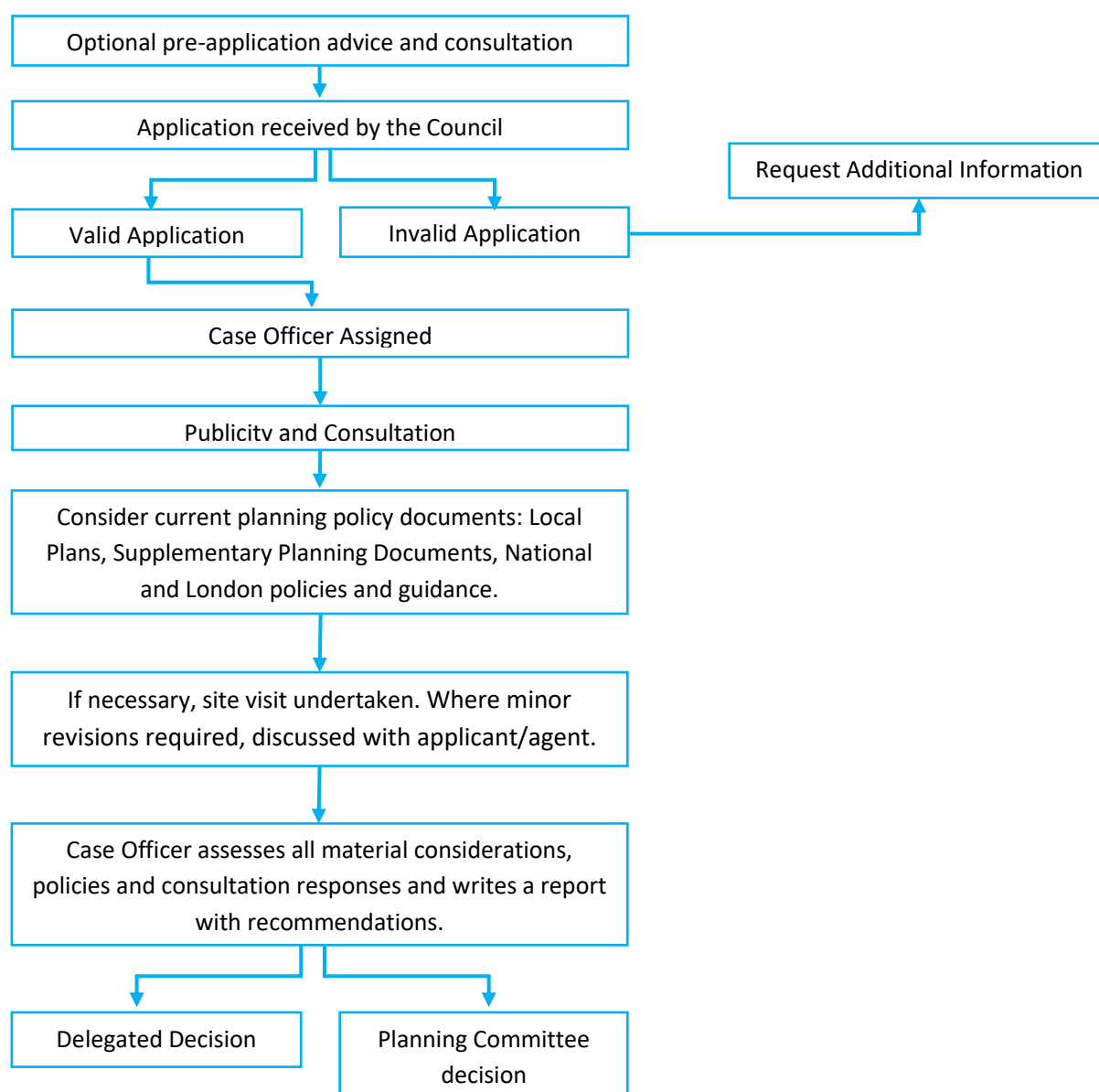
## 4. COMMUNITY INVOLVEMENT IN PLANNING DECISIONS

### 4.1 The Planning Application Process

- 4.1.1 The Council determines around 3000 planning applications each year, ranging from householder extensions to major new residential, retail or office developments. Planning legislation sets out 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.

**Figure 2: The Planning Application Process**



## 4.2 Community Involvement at the Pre-application Stage

- 4.2.1 In line with the NPPF 2021 and National Planning Practice Guidance, 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 strongly encourages developers to make use of meaningful pre-application consultation, as this is the stage where residents can have the greatest influence on proposals. 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. The Council expects engagement methods to take a variety of forms, to reach as many residents and local stakeholders as possible. For example:
- Public meetings, presentations and focus groups, which take place at a suitable location and time of day for the community
  - Creation of a dedicated website where proposals can be seen and comments can be made
  - Press releases
  - Local exhibitions
  - Notification letters
  - Leaflet drops and posters
- 4.2.5 Developers should have regard to comments gathered by the consultation undertaken when deciding whether to make any changes to their proposals before submitting their planning applications. It should also be noted that a statement of community involvement is a requirement in the council's validation list for all major developments. This should summarise the type of consultation carried out, the key issues raised and how the scheme has been amended to addresses these issues.



## 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, notification and consultation that is undertaken to ensure that stakeholders and the community have the opportunity to have their say on the development proposed. The extent of notification is set out in Table 2. Certain types of application are not subject to public notification. These are set out in Appendix B.

### Neighbour Notification and Site Notices

- 4.3.2 For most planning applications, the Council has a statutory duty to either notify any adjoining occupier or display a site notice close to the site. All letters are addressed to 'The Occupier' as we do not hold details of ownership.
- 4.3.3 The Council's current practice is to notify adjoining occupiers where there is a statutory duty unless it is not possible to identify all adjoining properties, in which case a site notice is displayed as close as possible to the proposed development site.
- 4.3.4 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.

### How can planning applications be viewed?

- 4.3.5 All received applications are made available on [Havering's website](#) and a list summarising all of applications received in the last 7 days is published weekly. To search for and view older planning applications, visit the [planning applications search](#) page on the Council's website.
- 4.3.6 In circumstances where use of electronic means to view applications is not possible, a request can be made for an appointment (during normal office hours) for viewing. This is for exceptional circumstances only.

### Consultation with Statutory Bodies

- 4.3.7 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. A list of consultees is at Appendix A.

4.3.8 The Mayor of London is consulted on all planning applications that are of potential strategic importance to London. These applications are called 'referred' applications. The Mayor may direct refusal, determine the application or allow the Local Planning Authority to determine the application itself. The Mayor of London Order (2008) sets out the criteria that determine if an application is referable. The criteria includes but is not limited to:

- development of over 150 residential units
- development over 30 metres in height (outside the City of London)
- major development on Green Belt or Metropolitan Open Land

4.3.9 Neighbouring Local Authorities will also be consulted on major or strategic applications that are adjacent to their area and / or may have a significant impact on them.

4.3.10 The Council will review 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 21 days on applications (or 18 days in the case of applications for public service infrastructure development) for any interested consultee to submit their comments.

#### Further Notification and Consultation

4.3.11 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

4.3.12 Anyone is entitled to submit comments on a current planning application regardless of whether or not they were personally notified. 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. Comments should be submitted online via the planning applications search or via a letter sent to the London Borough of Havering, Town Hall, Main Road, Romford, RM1 3BD

#### What comments on a planning application can be considered?

4.3.13 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 outlook, parking, highway safety, noise, government policy, layout and density of building, etc.

- 4.3.14 Issues such as loss of view, infringement of private property rights or covenants or negative effect on the value of properties are not material considerations.

#### *Speaking at committee*

- 4.3.15 The majority of planning applications are determined by officers under powers delegated through the Council's constitution. Where the decision is to be by Members of a committee, Planning Committee makes decision on smaller scale planning applications, while Strategic Planning Committee considers large scale applications that are significant for the borough. 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.
- 4.3.16 The only members of the public allowed to speak at the meeting are those who have objected to the application and have registered to speak with the Council beforehand.
- 4.3.17 All objectors to an application will receive notification 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 three minutes (Planning Committee) or five minutes (Strategic Planning Committee).
- 4.3.18 The applicant is given the opportunity to reply. Full details of the speaking arrangements can be found online in the [Planning Committee Procedure Rules](#).
- 4.3.19 Agenda and minutes from all Planning and Strategic Planning Committee meetings are available [online on the Havering Website](#). Agendas for future meetings are published at least five working days in advance and can be downloaded from the Council's website.

#### *Notification of a decision*

- 4.3.20 Once a decision is made on a planning application the decision notice is made available on the Council's website through the [planning search page](#). Provided those making a representation provide a valid email address, the Council will

send an email to those 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 minor 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, upward extensions of buildings 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, 42 days usually for larger residential extensions). Adjoining occupiers are notified of applications, and comments received, if relevant, are taken into account.
- 4.5.2 Applications will not be reported to the Planning or Strategic Planning Committee so there is no opportunity for objectors to be heard through speaking at committee.

#### 4.6 Additional Information for applicants

- 4.6.1 The Council offers a pre-application service for prospective applicants, further information including fees can be found [here](#).
- 4.6.2 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.
- 4.6.3 Further details on all aspects of the application process can be found [here](#).

## **5. MONITORING AND REVIEW**

- 5.1 Amendments to the Local Planning Regulations in 2017 mean that it is now required that local authorities review their SCI every 5 years. The next update for Havering's SCI should therefore be published in 2026.

**Table 2: Consultation procedures for Planning Applications**

Application Type	Consultation methods	Who will be contacted specifically	Period of Consultation	Period of determination	Decision Body
Householder Applications	Initially letters, followed by email if provided	Neighbours (common border, and opposite if development is at the front of the property);	21 days	8 weeks	Delegated Officer Decision or Committee, if Committee Consideration Criteria met
Applications for Prior Approval (where consultation is required)	Initially letters, followed by email if provided	Neighbours (adjoining occupier)	21 days	56 days	Delegated Officer Decision
Advertisement Applications	None required	None required	N/A	8 weeks	Delegated Officer Decision
Listed Building Consent or Works in Conservation Area	Site notice*, press notice	None additional required	21 days	8 weeks	Delegated Officer Decision or Committee, if Committee Consideration Criteria met
Minor Development	Initially letters, followed by email if provided	Neighbours (common border and opposite if development is at the front of the property )	21 days	8 weeks	Delegated Officer Decision or Committee, if Committee Consideration Criteria met
Major Applications	Initially letters, followed by email if provided , site notice*, press notice	Neighbours (common border and opposite); any Statutory Consultees affected	18 days (Public Service Development) or 21 days	10, 13 or 16 weeks	Delegated Officer Decision or Committee, if Committee Consideration Criteria met
Departure Applications or affected by Site Constraints	Initially letters, followed by email if provided , site notice*, press notice	Neighbours (common border and opposite); any Statutory Consultees affected	21 days	8 or 13 weeks	Delegated Officer Decision or Committee, if Committee Consideration Criteria met

\*exceptional circumstances, such as health pandemics, could result in site notices not being able to be put up. The Council will always follow the most up to date government guidance on these circumstances and will ensure consultation during these times are carried out in the safest and most constructive way for residents.

## 6. APPENDICIES

### Appendix A: Consultees

Specific consultation bodies;

- The Mayor of London
- Transport for London
- The Environment Agency
- Historic England
- The Marine Management Organisation
- Natural England
- The Highways Agency
- The Civil Aviation Authority
- Homes and Communities Agency
- Clinical Commissioning Groups
- NHS Commissioning Board
- Office of the Rail Regulator
- Integrated Transport Authorities
- Highway Authorities
- Network Rail Infrastructure Limited
- Metropolitan Police Service
- The Coal Authority
- Adjoining authorities that we share a boarder with
- Health & Safety Executive

General consultation bodies;

- Voluntary bodies some or all of whose activities benefit any part of the authority's area
- Bodies which represent the interests of different racial, ethnic or national groups in the authority's area
- Bodies which represent the interests of different religious groups in the authority's area
- Bodies which represent the interests of disabled persons in the authority's area,
- Bodies which represent the interests of persons carrying on business in the authority's area

## 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).
- Certain applications for Prior Approval (covered by the Town and Country Planning General Permitted Development (England) Order 2015 (as amended)), which do not require the Local Planning Authority to undertake publicity or notification, include:
  - o Agricultural and Forestry Development
  - o Toll Road Facilities
  - o Development Under Local or Private Acts or Orders
- 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 (although the public can comment if they wish)





## CABINET

<b>Subject Heading:</b>	Havering Climate Change Action Plan
<b>Cabinet Member:</b>	Councillor Damian White: Leader of the Council
<b>SLT Lead:</b>	Jane West: Chief Operating Officer Barry Francis: Director of Neighbourhoods
<b>Report Author and contact details:</b>	Nicholas Kingham: Corporate Projects Manager <a href="mailto:Nick.Kingham@havering.gov.uk">Nick.Kingham@havering.gov.uk</a> 01708 432896 Louise Warner: Business Intelligence Analyst <a href="mailto:Louise.Warner@havering.gov.uk">Louise.Warner@havering.gov.uk</a> 01708 432402
<b>Policy context:</b>	Tackling climate change affects all Council policies
<b>Financial summary:</b>	Each element of the plan will be costed prior to implementation. Recommendations include the establishment of two permanent posts.
<b>Is this a Key Decision?</b>	This is a key decision. Expenditure or saving (including anticipated income) of £500,000 or more Significant effect on two or more Wards
<b>When should this matter be reviewed?</b>	Every six months
<b>Reviewing OSC:</b>	Environment

## 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

Havering Council has resolved to review its policies to ensure that Havering leads the way on environmental protection and climate change.

Establishing the Havering Climate Change Action Plan signals a commitment by the Council to tackle climate change, influence decisions and bring together existing environmental policies. This plan will form part of the considerations when evaluating options for Council action and will establish the values of the Council and ensure that these values are considered when making policy decisions.

### Policy Statement

A policy statement provides a narrative on the importance of environmental considerations. It establishes the ambition of the Council to use its community influence in the field of tackling climate change and protecting the local environment for the benefit of all local residents. When coupled with a published Climate Change Action Plan it allows the Council to celebrate and record the investments made to protect the local environment and health priorities. Drawing upon previous Havering documents it is suggested that an overarching policy statement could read:

*The impacts and causes of climate change are recognised by the UK government and Havering Council has, over several years, developed strategies to identify and address these.*

*We believe we have a duty to act to reduce our carbon emissions in a way that has positive economic and welfare benefits for Havering residents, businesses and visitors and we are committed to continuing the initiatives we have already developed to protect Havering's green heritage and natural environment.*

*We are committed to the principles of sustainability and efficiency at the heart of our decision making and support residents and businesses across the borough to develop sustainable communities and services aligned to our Havering values.*

This statement could be considered and adjusted by Members with a wider policy consultation undertaken prior to its adoption. It would then replace previous statements.

### Values

The following values are suggested as a guide to the development of actions associated with the Havering Climate Change Action Plan:

- Taking pride in Havering
- Working with residents to make informed choices
- Being financially efficient and effective
- Building community wealth

## RECOMMENDATIONS

Cabinet is recommended to:-

1. Note the work already being undertaken to address Climate Change both within the Council and the local community
2. Approve the establishment of two permanent posts to support the ongoing work of the Climate Change Action Plan
3. Commit to Havering Council as an organisation becoming carbon neutral by 2040 or sooner
4. Agree that Cabinet receive a report every six months setting out the progress of the implementation and the impact of the Havering Climate Change Action Plan
5. Approve the themed action plans set out in Appendix A
6. Agree that officers publish emissions data for both the Council as an organisation and for the borough on an annual basis
7. Agree that officers design a carbon zero route map for the Council as an organisation
8. Agree that officers develop a branding for the Climate Change Action Plan and incorporate this in a Communications Plan for the wider community
9. Agree to adopt the principles of the Amazon Climate Pledge<sup>1</sup>. These are:
  - A. Regular reporting - Measure and report greenhouse gas emissions on a regular basis
  - B. Carbon elimination - Implement decarbonisation strategies in line with the Paris Agreement through real business changes and innovations, including efficiency improvements, renewable energy, materials reductions, and other carbon emission elimination strategies
  - C. Credible offsets - Neutralise any remaining emissions with additional, quantifiable, real, permanent, and socially-beneficial offsets to achieve net-zero annual carbon emissions by 2040
10. Recommend to Full Council that it endorses the content of the report and associated action plans

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<sup>1</sup> <https://sustainability.aboutamazon.com/about/the-climate-pledge#section-nav-id-1>

## **The National Picture**

- 1.1 The Climate Change Act 2008 set a mandatory greenhouse gas reduction target for the UK of 80% by 2050, amended in 2019 to 100%. It also established the statutory Committee on Climate Change (CCC)<sup>2</sup> to monitor and advise on the UK's progress, measured against legally binding five-year 'carbon budgets', a maximum amount of emissions the UK should emit during these periods on its way to net zero<sup>3</sup>.
- 1.2 In December 2020 the National Audit Office (NAO) highlighted that local authorities will have a critical part to play in the Government's overall set-up for carbon net zero. Local authorities and combined authorities (as well as the Greater London Authority) provide a range of services to people which impact on net zero, such as transport, planning, social housing and recycling and waste services.
- 1.3 The NAO Report July 2021 found that the Government has not yet set out to local authorities how it will work with them to clarify responsibilities for net zero. Decisions about local authorities' role in delivering the national net zero target are incorporated in the government's overall strategy for net zero and the underpinning sector decarbonisation strategies.
- 1.4 The Government plans to publish a number of strategies, including a statement on its overall net zero strategy and the respective responsibilities at national, regional and local level before the next United Nations Climate Conference, COP26, in November 2021.

## **The Regional Position: London Councils**

- 2.1 At a London level, in November 2019, the London Environmental Directors Network (LEDnet) and the Transport and Environment Committee (TEC) issued a joint statement agreeing to:

*“act ambitiously to meet the climate challenge that the science sets out, and find political and practical solutions to delivering carbon reductions that also secure the wellbeing of Londoners,”*

and set out agreed principles for climate governance, citizen engagement and resourcing. The statement also committed to:

*“prioritise and support” the delivery of the seven major programmes, by “pooling our experience, expertise and resources and working together collaboratively.”*

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<sup>2</sup> Reducing UK emissions: 2020 Progress Report to Parliament - Climate Change Committee (theccc.org.uk)

<sup>3</sup> <https://www.gov.uk/guidance/carbon-budgets>

- 2.2 The commitment statement and the seven major programmes being developed with Havering officers has been published by London Councils<sup>4</sup>.
- 2.3 The national and regional policies are interlinked within a number of disparate services, activities and existing plans which makes this a complex area to oversee. The Government Department for Business, Energy and Industrial Strategy (BEIS) has set up dedicated organisations to support local authorities on energy decarbonisation and the Department for Transport (DfT) is setting up a similar body on active travel. However, not having a single point of national contact on climate change impacts and actions means that these initiatives are managed locally through the respective service Directorates. In developing the Climate Change Action Plan the aim was to simplify the complexity and develop an organisational culture which ensures the day to day activities and strategic policy making of the Council and its partners includes consideration of the climate priorities of the Council. In this way even small decisions contribute to the overall goal of reducing carbon emissions.
- 2.4 Havering Council works closely with the Mayor of London and London Councils on a number of environmental initiatives. In meeting the challenges of improving air quality, protecting the environment and addressing the causes of climate change, Havering has a range of statutory plans and local actions. These include the Local Implementation Plan for Transportation (LIP3), the Air Quality Action Plan (AQAP), and aligning local planning responsibilities with the London Plan.

## **The Havering Picture**

- 3.1 Environmental and sustainability initiatives have always been part of the policy approach in Havering. These initiatives and actions not only support the custodianship of the environment but also directly contribute to tackling climate change and improving the well-being of Havering residents.
- 3.2 It is recognised that service actions have not previously been recorded in a single place and have been treated as one-off actions. Not all of the positive work has been captured in a single overarching, coherent strategy but that does not mean that actions are not progressing. It does mean that, as work is being completed in isolation, greater benefits from joining up work could be missed. With the evolving climate action expected of Councils it is more important to share these initiatives and involve others throughout the community so that they can take their own steps to address the causes of climate change.

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<sup>4</sup> <https://www.londoncouncils.gov.uk/node/36755>

## Methodology

- 4.1 In developing the revised Work Stream Action Plans (Appendix A) a series of themed workshops was held across all services. These enabled Directorates to identify and design service responses to tackle climate change. These actions and the overall approach have been further developed with the Cabinet and Directors to ensure that Council and community priorities are at the heart of the programme framework.
- 4.2 Service managers presented actions to Cabinet and Overview and Scrutiny which outlined what is planned or is currently being delivered to further the climate agenda. This collaborative approach allows all participants to develop their actions to compliment a corporate narrative and enable any gaps to be filled.
- 4.3 The Cabinet and Directors identified the need to have a programme branding. The rationale for the branding was threefold:
  1. To communicate the importance placed by the Council on tackling climate change.
  2. To allow the individual service actions taken over a number of years to be viewed as part of a strategic plan.
  3. To be transparent in the delivery and development of actions.
- 4.4 The Communications Service developed a Havering brand of the “Climate Challenge”. Having a clear corporate narrative is important in furthering the Council’s leadership role to enable residents and businesses to make informed, sustainable choices. This holistic approach will allow efficiencies to be realised and will give a clear focus for all Directorates to promote the continued protection of the environment and commitment to tackling climate change.

### What is climate change?

- 5.1 Evidence shows that our planet is getting hotter. The warmest 20 years on record have been in the last 22 years, with the warmest four between 2015 and 2018<sup>5</sup>. Global average temperatures are currently 1°C higher than in the pre-industrial era, with predictions of global temperatures increasing by as much as 3-5°C by 2100.
- 5.2 We are already feeling the effects of the erratic weather patterns associated with climate change, such as heatwaves, floods and severe storms, loss of polar ice and rising sea levels. These will only get worse as global warming intensifies.

### What is causing climate change?

- 6.1 It is widely recognised by scientists<sup>6</sup> and governments that climate change is triggered by increasing levels of “greenhouse gases” in the atmosphere. Greenhouse gases trap heat energy from the sun in order to regulate the Earth’s temperature. This is called the “greenhouse effect”. Without

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<sup>5</sup> World Meteorological Organisation

<sup>6</sup> AR5 Climate Change 2013: The Physical Science Basis — IPCC

greenhouse gases, the average temperature of the earth would be -18°C. However, as the concentration of greenhouse gases in the atmosphere increases, so too does the temperature.

- 6.2 Four of the most important greenhouse gases and a few of their main sources are shown in Table 1 below.

Greenhouse Gas	Source
Carbon Dioxide CO <sub>2</sub>	Combustion of fossil fuels in heating, electricity generation, transport etc
Methane CH <sub>4</sub>	Waste fermentation; oil and gas; agriculture
Nitrous Oxide N <sub>2</sub> O	Agricultural soil management (fertiliser); chemical production; biomass burning
Fluorinated gases “F gases”	Refrigeration; propellants (aerosols and foams)

*Table 1 Greenhouse gases and their origins*

- 6.3 Reducing the amount of greenhouse gases will help to tackle climate change. This can be done in two ways:

- lowering the emissions we are sending into the atmosphere, from activities such as domestic heating, power generation, transport and intensive agriculture
- removing greenhouse gas emissions from the atmosphere, for example by capturing carbon created during industrial processes before it is released or by planting more trees to offset emissions.

### **What does it mean to be net zero?**

- 7.1 Net zero means achieving a balance between the greenhouse gases emitted into the atmosphere and those taken out. When what we add is no more than what we take away we reach net zero. This state is also referred to as carbon neutral.
- 7.2 Net zero looks at emissions overall, allowing for the removal of any unavoidable emissions, such as those from aviation or manufacturing. Removing greenhouse gases could be via nature, as trees take carbon dioxide from the atmosphere, or through new technology or changing industrial processes.



## Scope 1, 2 and 3 emissions

- 8.1 Emissions are broken down into three categories, or “scopes”, in order to better understand where they are coming from.<sup>7</sup>

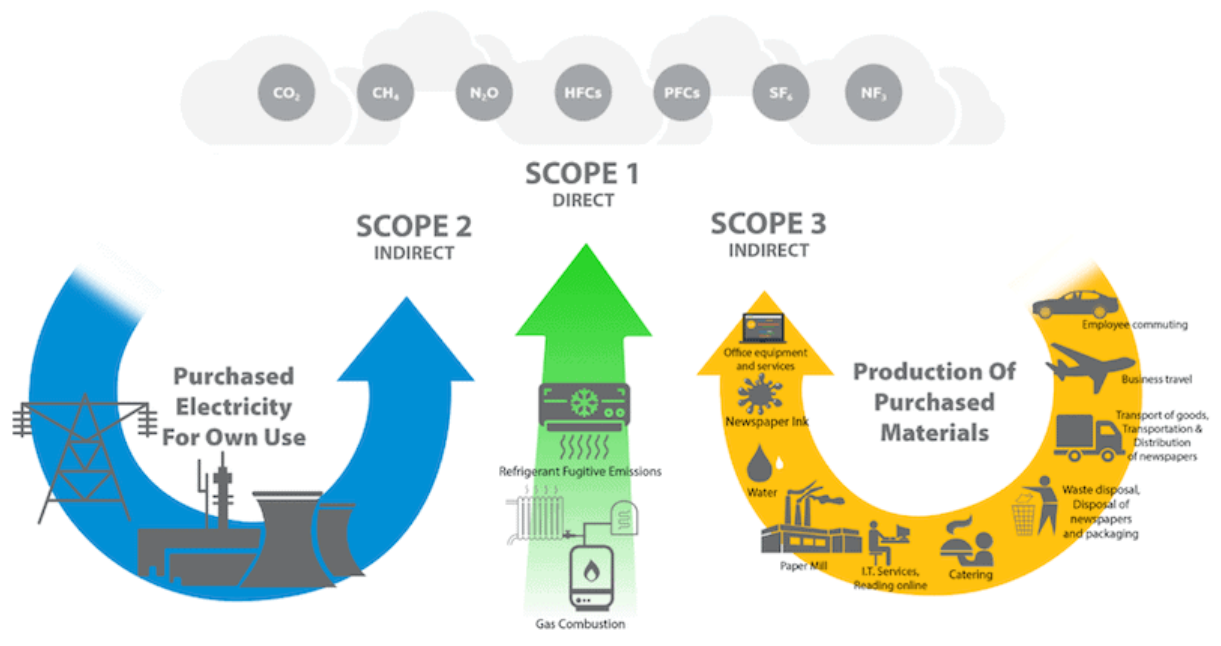


Figure 1 Greenhouse gas emissions by scope 1, 2 and 3

Scope 1 – All Direct Emissions from the activities of an organisation or under their control. This includes fuel combustion on site such as gas boilers, fleet vehicles and air-conditioning leaks.

Scope 2 – Indirect Emissions from electricity purchased and used by the organisation. Emissions are created during the production of the energy and eventually used by the organisation.

Scope 3 – All Other Indirect Emissions from activities of the organisation, occurring from sources that they do not own or control. These are usually the greatest share of the carbon footprint, covering emissions associated with business travel, procurement, waste and water.

## The Havering context - Local information sources

### ClimateView

- 9.1 ClimateView<sup>8</sup> is a climate-action technology company who use science, data and academic research to help cities and local authorities understand their local carbon emissions. By using ClimateView's interactive tool, officers have been familiarised with the sources of CO<sub>2</sub> emissions within the borough, and have gained a deeper understanding of the environmental impact of their actions and policy decisions. The ClimateView tool has supported officers in the development of their action plans and provides worked examples of areas where the Council can exert control over CO<sub>2</sub> emissions, and where the Council can influence behaviours to reduce CO<sub>2</sub> emissions. The tool is based on five socio-

<sup>7</sup> GHGprotocol.org

<sup>8</sup> ClimateView

economic sectors, which are Transport, Buildings, Industry, Energy and Waste.

## BEIS figures

10.1 The Department for Business, Energy and Industrial Strategy (BEIS) publishes carbon dioxide emissions for all UK local authorities and regions on an annual basis. The latest data available is from 2019.<sup>9</sup> These figures have been used to produce an interactive report which shows Havering's CO<sub>2</sub> emissions over the past 14 years in comparison to other London Boroughs. The report also analyses CO<sub>2</sub> emissions by sector (public sector, industry, commercial, domestic and transport) and shows how much each of these sectors contributes to the total annual emissions.

Emission Source by Year

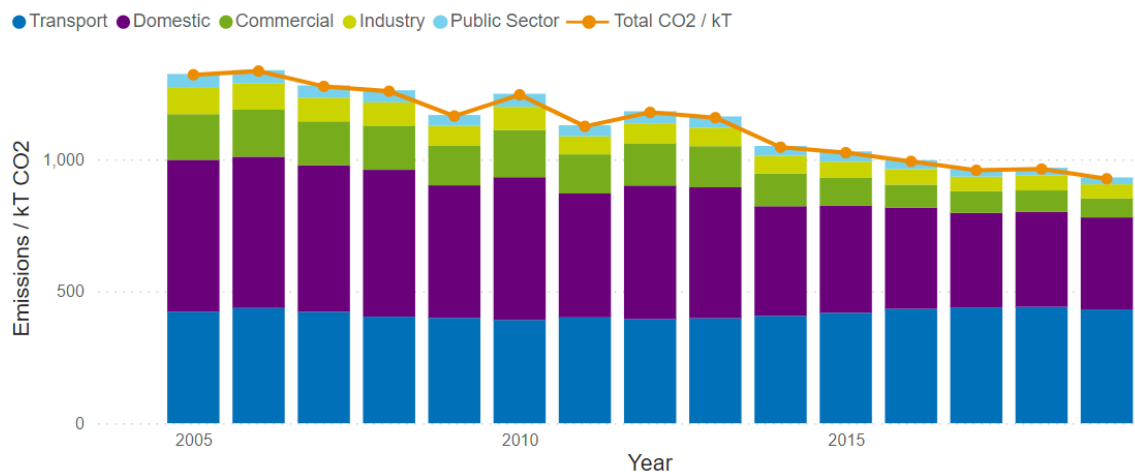


Chart 1 Havering's CO<sub>2</sub> emissions by sector 2005 - 2019

10.2 The largest contributors to CO<sub>2</sub> emissions in Havering are the Domestic Sector and the Transport Sector, which together were responsible for over 80% of total emissions in 2019.

10.3 Domestic CO<sub>2</sub> emissions in Havering have decreased since 2005, and the same is true for all local authorities. Emissions in this sector are largely attributable to gas and electricity consumption for use in our homes. The main factors which have a big effect on reducing domestic CO<sub>2</sub> emissions are using less coal for electricity generation and using less gas in our homes.

10.4 Transport is currently accountable for almost 50% of all CO<sub>2</sub> emissions in Havering. This includes freight and passenger transport, both for private and business purposes. Because the estimates are based on the distribution of traffic, the emissions figures include through traffic, and parts of trips into or out of the area, by residents and non-residents. The main factors which can have a big effect on reducing transport CO<sub>2</sub> emissions are making fewer road journeys and reducing petrol and diesel consumption, by using more fuel-efficient vehicles, and switching to hybrid or electric vehicles.

<sup>9</sup> UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2019 - GOV.UK

- 10.5 There has been a reduction in emissions from all other sectors in Havering since 2005, including the public sector which has seen a 50% decrease in emissions between 2005 and 2019.

### **London Energy and Greenhouse Gas Inventory (LEGGI)**

- 11.1 The London Energy and Greenhouse Gas Inventory (LEGGI)<sup>10</sup> is an emission inventory which quantifies pollution releases to the environment. It also quantifies the pollutants removed through land use, land change and Forestry sector activities. It is produced on an annual basis to measure progress against the Mayor's CO<sub>2</sub>e (CO<sub>2</sub> equivalent) reduction targets for London. Since 2020 it has also been used to meet the reporting requirements for the Global Covenant of Mayors for Climate and Energy (GCoM)<sup>11</sup>.

### **University of Leeds Consumption based emissions accounts**

- 12.1 The University of Leeds has recently been commissioned by London Councils to produce consumption-based emissions accounts for boroughs for the period 2001 – 2018 (the most recent year data is available for), which will be based on the GLA-commissioned pan-London consumption-based emissions accounts<sup>12</sup>.

### **Greenhouse Gas Accounting Tool**

- 13.1 The Local Government Association (LGA) has recently developed a free accounting tool for measuring emissions from council operations with Local Partnerships.<sup>13</sup> The tool measures heating, fugitive emissions (leaks and irregular releases), authority fleet, electricity, and electricity for electric cars and vans. It is straightforward to use and enables boroughs to align with a standardised methodology for local authorities in England and Wales to measure their emissions.

- 13.2 London Councils have recommended that:

- Boroughs should calculate their Scope 1, 2 and 3 council emissions using the Local Partnerships tool.
- Boroughs should use LEGGI for reporting Scope 1 and 2 borough-wide emissions. GLA and London Councils should collaborate in order to produce an annual report on the inventory.
- Boroughs should adopt the University of Leeds borough-level consumption-based emissions accounts for reporting on these emissions at the borough-wide level.
- London Councils, GLA and ReLondon should commit to commissioning an annual integrated report on pan-London and borough-level consumption emissions.

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<sup>10</sup> <https://data.london.gov.uk/dataset/leggi>

<sup>11</sup> London is taking action on climate change | Global Covenant of Mayors

<sup>12</sup> <http://www.emissions.leeds.ac.uk/>

<sup>13</sup> <https://localpartnerships.org.uk/greenhouse-gas-accounting-tool/>

- Boroughs should share their emissions reporting outputs with London Councils, to enable borough-wide comparison and learning, including through the seven climate change programmes.

## **Air Quality Action Plan**

- 14.1 Havering's Air Quality Action Plan (AQAP) 2018 – 2023<sup>14</sup> provides an overview of the air quality across the borough and outlines the actions required to improve it. It focuses on the levels of nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>x</sub>) in the air we breathe. The main sources of these harmful pollutants are road transport, heating systems and construction. Actions taken to reduce their levels should also have a positive impact on the emission of greenhouse gases, most notably CO<sub>2</sub>.

## **Corporate Estate**

- 15.1 The Council measures and reports the borough and organisation's carbon emissions on an annual basis, and we have reduced the carbon footprint of our Corporate Estate by 37% over the past 3 years. Improvements to street lighting (switching to LED bulbs) have reduced annual energy consumption by 69%, and CO<sub>2</sub> emissions by 120% over the past 8 years.

## **The Programme Approach**

- 16.1 As can be seen from the science, tackling climate change and protecting Havering's environment affects all areas of the Council and each Directorate has a specialist contribution to make. These contributions tackle either the direct emissions caused and controlled by the organisation or, by the Council acting in a leadership capacity, influence and raise awareness amongst partners and the wider community.
- 16.2 Managing such a wide ranging set of activities lends itself to a programmed approach. This approach requires service matter experts to integrate climate change impacts into the services they are accountable for in order to deliver the Council's Climate Change Policy. The approach not only gives a corporate grip on actions but also enables the flexibility to adjust tactics to the changing science, funding and technological advances. It also allows the wider community to track progress and understand their role in delivering a low carbon and "green" Havering.
- 16.3 The Council has a number of statutory and organisational plans which already contribute to the overall climate agenda. To avoid duplication and confusion, these plans, which have established governance and targets, will not be replicated in the Climate Actions but will be referenced. The Climate Actions will be aligned to support and strengthen delivery against the Council's existing plans and strategies. Each of these plans, through their review cycles, will set improvements for both health and climate actions. In doing so, the following themes, which are intrinsically linked to deliver good outcomes for Havering residents, should be considered:

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<sup>14</sup> Havering Air Quality website

- All actions should be taken in a Havering context
- There should be a focus on measurable actions
- Actions need to be designed in such a way as to communicate with and influence the wider community
- Plans should incorporate steps which will enhance environmental awareness, leading to a culture change within the organisation
- The environmental impacts of policy changes and decisions must be considered.

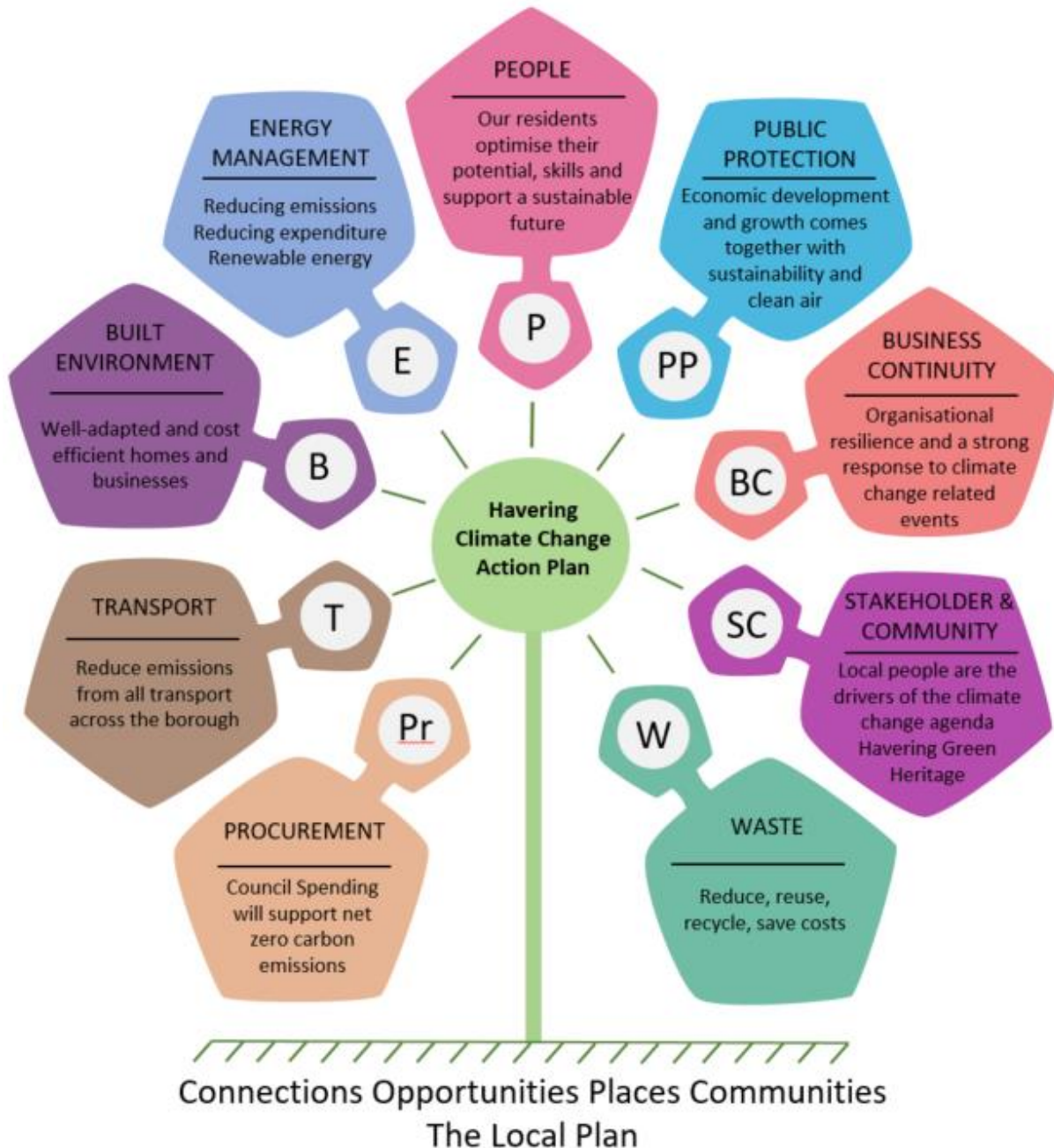


Figure 2 Climate Change Work Stream Diagram

## **Governance**

- 17.1 The proposed Climate Change Action Plan will remain a live document with annual updates to report on progress against actions, in order to allow for:
- Science and knowledge growing
  - Technological changes
  - Strategies developing
  - Feasibility to be considered and evaluated
  - Actions to be refreshed
- 17.2 The Action Plans set by respective Directorates are included as Appendix A. These plans will be reviewed annually and managed throughout the year at the Cleaner & Safer Steering Group, chaired by the Director of Neighbourhoods.
- 17.3 A key activity in continuing the Havering tradition to tackle carbon emissions is to consolidate an Action Plan which is focused on the actions the Council can take to move the borough towards net zero. A Carbon Management Plan will be developed internally for the Council to plan and monitor its route to net zero carbon across its own organisational assets and operations.
- 17.4 The Council now has direct control over less than a twentieth of the borough's emissions however changes in behaviour and investment are needed from all our residents, businesses and partners to meet the national net zero target by 2050. The Council will develop its work with local communities and partnerships to deliver net zero, and future updates to the strategy will reflect the actions and pledges taken by others. The delivery of this goal and the construction of further actions will be subject to an annual review of outputs to give political oversight and resident review. Performance will be reported to Cabinet twice yearly and the programme of projects will be internally measured monthly by the Cleaner and Safer Steering Group.

## **Consultation, Engagement and Communication**

- 18.1 Throughout the development of this plan Members have identified consultation and engagement, in the widest possible sense, as important to delivering improvement. As the Climate Change Action Plan is complex, cross cutting and interdependent, the type and nature of the engagement will vary depending on the audience. The most effective means of communication will be assessed for audiences such as businesses, schools, the voluntary sector, residents, tenants, suppliers, other public sector bodies and others. To ensure that this ambition has a focus, a specific work stream on stakeholder engagement has been established which will build upon the existing Community Compact Forum.
- 18.2 Each service will build tackling climate change into their operational and routine consultation. In addition the annual Corporate Communications Plan will ensure that all routes of communication will raise awareness of the climate challenge. This will identify how all stakeholders can “do their

bit” to ensure Havering is at the forefront of excellent environmental custodianship.

- 18.3 This wider conversation is ongoing and will develop as the Council listens and receives feedback from all partners, residents and interested stakeholders.

## **Conclusion**

- 19.1 The Council has a range of disparate mainstream policies and strategies, all of which contribute to environmental improvement and tackling climate change. These policies or strategies are at different stages of review and implementation. To ensure that there is no duplication or confusion of focus it is proposed to implement a flexible, programmed approach to taking action.
- 19.2 A successful approach will involve a culture change in decision making which empowers service experts to take account of climate change activities and to actively look for ways to contribute to the Council’s ambitions.
- 19.3 The Leader of the Council and Cabinet have made the need to act to tackle climate change a priority. To ensure that all partners and officers understand the importance of this priority there is a need to refresh and restate the overarching policy to reduce carbon emissions.

## **REASONS AND OPTIONS**

### **Reasons for the decision**

The Climate Change Act 2008<sup>15</sup> is the basis for the UK’s approach to tackling and responding to climate change. The Climate Change Act commits the UK government by law to reducing greenhouse gas emissions by at least 100% of 1990 levels (net zero) by 2050. The 100% target was based on advice from the Climate Change Commission’s 2019 report, ‘Net Zero – The UK’s contribution to stopping global warming’<sup>16</sup>.

Actions in this strategy bring with them a host of benefits fundamental to the well-being and prosperity of our communities. Many of these offer significant positive feedback loops. Reducing air pollution, for instance, can improve life expectancy, allow people to be more active, reduce days missed from school and work through sickness, and relieve pressure on the NHS, freeing up budgets to be refocused on other needs. Some of the organisational benefits identified during the review are set out in Figure 3.

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<sup>15</sup> Climate Change Act 2008 ([legislation.gov.uk](https://legislation.gov.uk))

<sup>16</sup> Net Zero - The UK's contribution to stopping global warming - Climate Change Committee ([theccc.org.uk](https://theccc.org.uk))





*Figure 3 Importance of Sustainability in Havering*

Action on the climate will also help the Council deliver on a number of other outcomes:

- Improving air quality, including through cycling, walking, electric vehicles, and removal of gas boilers
- Improving health and well-being, including through warm homes, cycling, access to green space, and sustainable diets
- Reducing poverty and inequality, through energy efficient, fuel poverty-proof homes, reskilling for green sectors, and access to clean air and green space
- Creating green growth, skills and employment opportunities for local people
- Enhancing biodiversity, by increasing and improving green space

### “Havering Acts”

The Council has always valued the green heritage of the Borough and, through numerous strategies and action plans, has acted to tackle climate change, introducing three targeted Action Plans to reduce carbon emissions. These focus on carbon emissions and the green heritage and have led to a number of notable achievements, as set out in Appendix B.

The Council now has the opportunity to double down on actions and develop a culture which will embed environmental consciousness in all decision making.

However, not all London Boroughs are spatially similar and it is important that the local context of regional and national policies is incorporated in the design of local actions. This will take account of local borough circumstances and local priorities such as:



- age profile
- geographical size
- transport connectivity
- geography of the Borough
- regeneration ambitions
- protected equality characteristics

Full Council agreed to review its policies and actions in relation to climate change and the environment.

#### **Other options considered:**

To maintain the current action plans within existing policies and strategies and not update them. This does not align with the decision of Full Council to lead on environmental policies, or the current government legislative ambition to be net carbon neutral by 2050.

## **IMPLICATIONS AND RISKS**

### **Financial implications and risks**

The net cost of decarbonising Havering is significant and, at this time, impossible to estimate. Currently there is a regional and national exercise to scope the cost of capital works which will inform the management of local finance and investment. As there is a statutory commitment to achieve net zero the government and businesses are allocating resources to meet the challenge. These are being released as discrete funding streams to Councils, businesses and residents. It is clear that innovative financing and purchasing models will be required to help deliver actions and drive down costs.

At a Directorate level, Havering is participating in a number of these opportunities and will need to continue to explore ways to supplement investments, including applying for grants from government and assisting partners and the voluntary sector to apply for funding from a range of sources.

In respect of local funding streams the range of additional funding across all work streams is difficult to estimate. Detailed costs for meeting the Council's climate ambitions will be produced at the project planning stage and presented to Members for decision. It is expected that many of these costs will be met from within existing capital and MTFS revenue budgets but this will need to be established when business cases are developed. Any additional funding and investment for 2022/23 will be considered and approved as part of the Council's annual budget setting process. The two new permanent posts identified in the recommendations will be funded from existing resources.

The Council is aware of the requirements of particular projects to decarbonise the Borough and these initiatives are being developed at a service level as part of our forward planning. As such, officers are able to incorporate many of the costs from existing budgets. Some initiatives however will require funding decisions and investment to succeed and the Council will need to recognise these costs in future budgets if it is to meet the targets set out in this report.

The Council will work closely with its partners and the Government to maximise external funding to support these initiatives.

There are however significant risks associated with the delivery of the targets in this report. These risks include:

- Additional demand for services – Population and demand increases may for example increase the number of vehicles the Council requires to deliver its services over the next few years. The Council will renew its fleet to use the most energy efficient vehicles we can afford but demand may require an increase in volume.
- Affordability – The Council has set an ambitious target of net zero carbon by 2040. Every effort will be made to achieve this target but the Council must always fulfil its statutory duties and finances may dictate that some initiatives have to be delayed or stopped if government or other external funding is not available.
- Impact – Extensive modelling has already been undertaken to establish the baseline carbon impact of Council operations. Further work will be required on a project by project basis.
- External Factors – Other external factors may impact on the Council's ability to deliver its targets. The COVID pandemic continues to have a significant impact on Council services and finances with large increases in the number and complexity of need of social care clients requiring support. This is restricting the ability of the Council to invest in other service areas. It is possible that other unforeseen events may happen which would place other unexpected pressures on the Council budget. The Council's Business Continuity Plan sets these possibilities out in more detail.

### **Legal implications and risks:**

There are no immediate legal implications of adopting the recommendations in this Report. However, given the commitments set out in the recommendations, a failure to achieve these targets may give rise to potential legal challenges. As and when more detailed plans are considered, legal advice on the implications will be provided.

### **Human Resources implications and risks:**

A number of the actions contained within the Action Plan at Appendix A have significant implications for the Council's workforce and on the HR&OD service that supports the Council. These implications range from additional training, learning and development to a designing a Council wide culture change programme which covers climate change issues. Wherever possible, delivery will be supported by redirecting or reprioritising existing HR resources.

### **Equalities implications and risks:**

The Council is required, when exercising its functions, to have due regard for, and take steps to, eliminate discrimination, advance equality of opportunity, and to foster good relations between people. This involves ensuring that decisions,

arising from the Council's ambition to tackle climate change, remove and minimise disadvantages of groups with protected characteristics. The protected characteristics are:

- Age
- Disability
- Gender Reassignment
- Pregnancy & Maternity
- Race & Religion
- Gender
- Sexual Orientation

Having an Energy Strategy to tackle carbon emissions assists households facing increasing energy prices who have limited scope to control the negative effects. Havering Council is already participating in initiatives for these households by:

- investing in the thermal efficiency of the Council owned housing stock,
- improving the energy performance of new builds through planning regulations,
- accessing Government grants and welfare support to improve the thermal efficiency of non-Council stock homes.

These actions will reduce harmful carbon emissions and improve the health of residents.

In terms of tackling carbon emissions in the Borough, evidence shows that the younger and older generations are more adversely impacted. Having a focus on reducing pollution and promoting more sustainable forms of travel through making clear the travel options allows residents to make an informed choice. It is recognised that the transition to cleaner methods of transportation might adversely affect protected groups, particularly the elderly and disabled, and service decisions will need to address these impacts.

The Environment Agency (July 2021) considered the need to address environmental inequalities as part of the "levelling up" agenda and highlighted how poorer communities have higher exposure to air pollution, flood risk and poor water quality in rivers. Therefore the efforts of the Council to respond to the externalities of climate change will contribute to the Government's levelling up agenda.

### **Health and Wellbeing implications and risks:**

Public and individual health is at the heart of everything the Council does. Tackling climate change and improving the environment is core to protecting and improving the health and well-being of all people who live, work, visit and play in the Borough. Each work stream will include representatives with public health expertise who will ensure that the health improvements of having a well-managed environment are identified and progressed.

According to the World Health Organization, climate change is the greatest threat to global health in the 21st century. Climate change impacts health directly through weather extremes (heatwaves and floods) and indirectly through disruption to natural systems, such as changing patterns of disease that impact

on both human and animal health, and social systems<sup>17</sup>. Equally, protecting and improving the biodiversity of the Borough plays an important role in improving the health and wellbeing of residents.

In the UK, extreme weather events already have a significant impact on public health, resulting in increased deaths and ill health<sup>18</sup>. Climate change is described as having the most impact on those who are socioeconomically disadvantaged<sup>19</sup> and is anticipated to widen health inequalities.<sup>20</sup>

Extreme high temperatures contribute to deaths from cardiovascular and respiratory disease, especially in older people. High temperatures affect air quality by raising the levels of ozone and other pollutants in the air that exacerbate cardiovascular and respiratory disease. Pollen and other aeroallergen levels are also higher in extreme heat, which can trigger asthma.

According to UK Health Security Agency, “20% of homes are currently overheating in today’s climate, and 90% of hospital wards are of a type prone to overheating”.<sup>21</sup> These influences on health have far-reaching impacts; from interrupting children’s education as a consequence of absences from school through sickness, through to greater demands on NHS and social care services, with the elderly, those with underlying conditions, and those living in accommodation not designed or adapted to deal with climate change being among those most affected. This is of particular concern to the Council as the population of Havering is relatively old in comparison with the rest of London, with the number of people aged 85 and above predicted to increase by 31% from 7,600 in 2018 to 9,900 in 2030.<sup>22</sup>

Heatwaves may lead to water shortages which can impact across all areas of society including agriculture, in turn leading to food shortages and unstable food prices. Climate change has been observed to influence the ecology, the impacts of which can affect human and animal health.

In 2013-14 the UK suffered the wettest winter for 250 years and 11,000 homes were flooded. There have been more recent episodes of flooding, including in 2021 when heavy rainfall led to flooding across the borough including Gidea Park and Rainham, affecting homes and businesses for many months.

Floods contaminate freshwater supplies, cause drownings and physical injuries, damage homes, overload sewerage systems, disrupt medical and health services, and interrupt critical supplies of utilities such as electricity. Experience of flooding can also have profound effects on people’s mental health and wellbeing that may continue over extended periods of time.<sup>23</sup>

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<sup>17</sup> <https://researchbriefings.files.parliament.uk/documents/POST-PN-0597/POST-PN-0597.pdf>

<sup>18</sup> <https://ukhsa.blog.gov.uk/2018/11/26/the-climate-change-act-10-years-on/>

<sup>19</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/371103/Health\\_Effects\\_of\\_Climate\\_Change\\_in\\_the\\_UK\\_2012\\_V13\\_with\\_cover\\_accessible.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/371103/Health_Effects_of_Climate_Change_in_the_UK_2012_V13_with_cover_accessible.pdf)

<sup>20</sup> <https://www.health.org.uk/news-and-comment/blogs/the-restructure-of-public-health-must-not-weaken-our-climate-change-response>

<sup>21</sup> <https://ukhsa.blog.gov.uk/2018/11/26/the-climate-change-act-10-years-on/>

<sup>22</sup> Havering JSNA

<sup>23</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/348903/Flooding\\_and\\_mental\\_health\\_essential\\_information\\_for\\_frontline\\_responders.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/348903/Flooding_and_mental_health_essential_information_for_frontline_responders.pdf)

## BACKGROUND PAPERS

None

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# BUILT ENVIRONMENT

LED BY *PAUL WALKER, AD DEVELOPMENT  
HOUSING SERVICES*

LEAD MEMBER *COUNCILLOR JOSHUA CHAPMAN*

ACCOUNTABLE TO *NEIL STUBBINGS, DIRECTOR OF REGENERATION PROGRAMME DELIVERY*

## INTRODUCTION

The UK residential sector accounts for 15% of net greenhouse gas emissions<sup>1</sup>, with the majority of these emissions being from gas used for heating and hot water. Poor insulation results in high gas demand and contributes to fuel poverty; cold homes cost the NHS around £1.4bn per year<sup>2</sup>. To eliminate carbon emissions our homes must be well-insulated, and heated by renewable sources.

The borough's non-domestic buildings include businesses, schools, main hospitals and a large variety of retail, leisure and entertainment venues.

Planning policy around carbon reduction currently focuses on operational carbon emitted during a building's use. However, around half of the carbon a building emits typically occurs before it is in use, in its materials and construction<sup>3</sup>. Construction contributes around 10% to UK annual emissions, with the production of concrete one of the world's major sources of greenhouse gases.

Havering currently uses energy from the national grid that is generated from a mix of renewables and fossil fuels. The borough generates a small amount of renewable electricity from solar installations, and there are further plans to deliver solar PV panels on council-owned properties.

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<sup>1</sup> Department for Business, Energy & Industrial Strategy, [2019 UK Greenhouse Gas Emissions, Final Figures](#)

<sup>2</sup> Ashden, *Climate action co-benefits: a toolkit for local authorities*, [CAC-Chapters-all\\_new-brand.pdf \(ashden.org\)](#)

<sup>3</sup> UK Green Building Council, [UK-GBC EC Developing Client Brief.pdf](#)

### What we need to do

With most of today's buildings expected to still be in place in 2050, retrofitting buildings to improve their existing energy performance will be a key challenge in the decarbonisation of Havering. Residents' wellbeing is paramount, so ensuring their homes can be warmed affordably is essential. A whole-home approach should be taken to ensure interventions are effective and compatible with further upgrades. Where appropriate, the Council is already actively looking at retrofitting its own buildings. In addition, providing the right information to the private sector, setting policy direction, facilitating access to grant support and developing opportunities to collaborate with residents and local organisations will be key as we go forward.

The Council will seek to optimise the energy efficiency of buildings and support low carbon and renewable energy developments including energy efficiency improvements to existing buildings, with embedded emissions from their materials and construction minimised. Existing and new buildings must also be made to withstand a changing climate, helping to manage higher heat, flood risk, and water scarcity. Planning policy will need to be updated at regular intervals to reflect latest best practice in achieving zero carbon development.

We need to reduce the energy we use by improving the efficiency of our buildings and appliances. The remaining energy we use must be supplied efficiently and from renewable sources. This can be achieved through efficient district heat networks, upscaling our local generation of renewable electricity, and buying our remaining energy from renewable sources.

### Opportunities and benefits

Ensuring that our current homes and new developments help Havering move towards net-zero carbon will not be easy and it will take time and resources to achieve. It will however offer many additional benefits, including:

- Reduced energy bills for residents.
- Higher quality of housing stock, making homes healthier and more comfortable to live in.
- Improved air quality through the reduction of emissions from gas boilers.
- Creating new skilled employment and commercial opportunities within the sustainable construction and green sectors.
- Increased greening of spaces and biodiversity provides physical, mental, social, environmental and economic benefits for city dwellers.



- Greening of spaces can also help urban areas cope with extreme episodic weather events, which result from anthropogenic climate change.

Key Challenges

Whilst there are many benefits moving towards net-zero we recognise that it also presents significant challenges. These challenges will need to be addressed, working alongside our partners to ensure that all stakeholders are part of the journey and make their contribution towards net zero. Challenges include:

- Changes to our local plan require a robust evidence base and sign off from a Planning Inspector. This will be time consuming.
- Ensuring projects remain viable.
- Poor incentives for landlords to upgrade their properties beyond the minimum requirements.
- A skills gap associated with low carbon retrofit and whole building solution design.
- National planning policy and incentives are not sufficiently favourable to zero carbon buildings or the repurposing of existing buildings.
- Housing target pressures.

Vision of the Built Environment Work Stream
<i>All residents in the borough live in comfortable, affordably heated, well-adapted and resilient homes that are cost efficient and have zero carbon impact. All business and organisational buildings are powered sustainably, cost efficient and have zero carbon impact. Heat and power are supplied from renewable energy and, where possible, by local sources that efficiently meet demand.</i>

**Scope of Theme**

- Planning
- Housing
- Regeneration
- Corporate Assets
- Infrastructure Planning

**Links to other work streams**

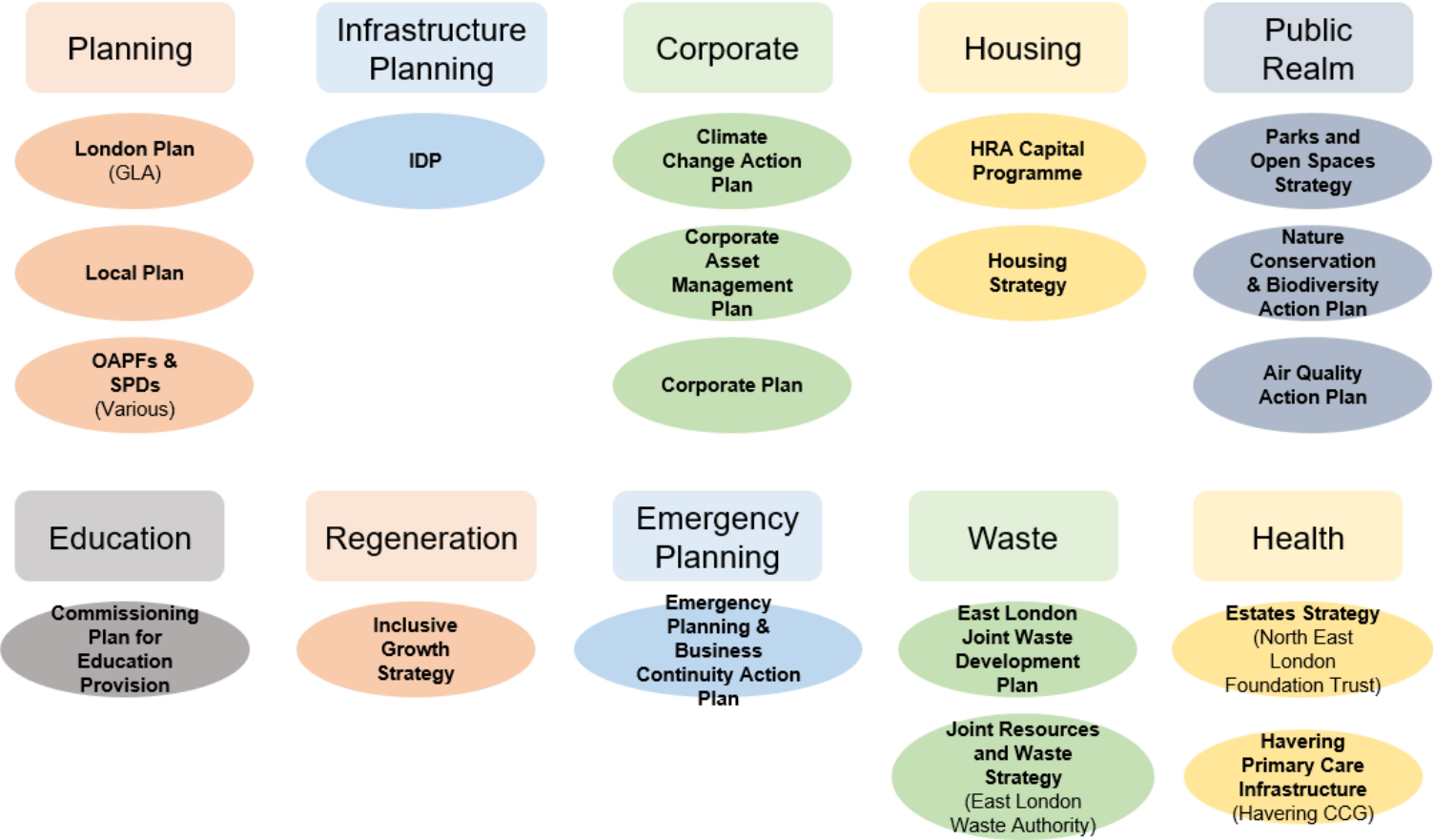
There are nine work streams in the Havering Climate Change Action Plan. These are:

- Built Environment
- Business Continuity
- Energy Management
- People
- Procurement
- Public Protection
- Stakeholder and Community
- Transport
- Waste Management

**Knowledge Links**

Department for Business, Energy & Industrial Strategy  
[2019 UK Greenhouse Gas Emissions, Final Figures](#)  
Ashden, *Climate action co-benefits: a toolkit for local authorities*  
[CAC-Chapters-all\\_new-brand.pdf \(ashden.org\)](#)  
UK Green Building Council  
[UK-GBC EC Developing Client Brief.pdf](#)

Key associated plans, policies and strategies



**Figure 1:** Existing plans and strategy documents relevant to management of the built environment in Havering. All documents and strategies produced by London Borough of Havering, unless otherwise stated.

<b>OWNER</b>	<b>KEY ASSOCIATED DOCUMENTS</b>	<b>REVIEW DATE OR TARGET</b>	<b>BY WHEN</b>
Greater London Authority (GLA)	London Plan	Adopted by GLA on 2 March 2021 Not yet due for review	-
Planning	Local Plan	Consultation on Proposed Further Main Modifications to the Havering Local Plan 2016 – 2031 closed 26 August 2021  Commitment to immediate review on Adoption	Q3 2021/22
Planning / GLA	Opportunity Area Planning Frameworks (OAPFs) / Supplementary Planning Documents (SPDs)	<ul style="list-style-type: none"> <li>London Riverside Opportunity Area Planning Framework, adopted 2015</li> <li>The Rainham and Beam Park Planning Framework (2016)</li> <li>Landscaping SPD (2011)</li> <li>Residential Design SPD (2010)</li> <li>Protecting and Enhancing the Borough's Biodiversity (2009)</li> <li>Protection of Trees During Development SPD (2009)</li> <li>Sustainable Design and Construction (2009)</li> </ul>	Remain adopted or to be reviewed following adoption of Local Plan
Infrastructure Planning	Infrastructure Delivery Plan	Currently being updated, updated draft due Autumn 2021	Q3 2021/22
Asset Management	Corporate Asset Management Plan	Current document from 2015 – 2019, currently under review	Q4 2021/22
Housing	Housing Revenue Account Capital Programme	Updated annually as part of Council's budget setting process	Annually

<b>OWNER</b>	<b>KEY ASSOCIATED DOCUMENTS</b>	<b>REVIEW DATE OR TARGET</b>	<b>BY WHEN</b>
Public Realm	Parks and Open Spaces Strategy 2021 - 2031	Currently in draft	Q3 2022/23
Public Realm	Nature Conservation and Biodiversity Action Plan	Draft dated 2014 – 2016	Q3 2022/23
Public Protection	Air Quality Action Plan (AQAP)	Actions are reviewed via the Annual Status Report (ASR) document which is submitted to the GLA in May; The Air Quality Action Plan will be reviewed in 2022 so that a new one can be issued in 2023.	Q3 2023/24
Education	Commissioning Plan for Education Provision	Existing plan dated 2019 – 2023	-
Regeneration	Inclusive Growth Strategy	Current document dated 2020 – 2045, associated Action Plan to be updated periodically	-
Emergency Planning & Business Continuity	Emergency Planning & Business Continuity Action Plan	Reviewed as part of the ongoing cyclical emergency planning process	Cyclical
ELWA & Waste Planning Authorities	Waste & External Contracts and Cabinet	To be published in February 2022, with member and public engagement in the meantime.	Q4 2021/22
Havering CCG	Havering CCG: Havering Primary Care Infrastructure	Current document dated 2016 - 2021	-

**How we can achieve our target**

The following table sets out a number of key actions which will support the Council in meeting its climate and sustainability ambitions. Where groups of actions exist in other plans and strategies, they are not replicated in the Havering Climate Change Action Plan but will be managed as part of the normal business management. These plans will be developed taking into account the Council's environmental commitments.

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
<b>Energy in council-owned assets and properties</b>					
B1	AD Property Services, Property & Land	Renewable energy in council assets	Identify and implement suitable renewable energy technologies for individual Council properties, hostels and sheltered accommodation.	<p>In council-owned homes we have undertaken a full energy assessment to understand the measures and cost to retrofit all our homes and are developing a detailed delivery plan to achieve zero carbon. Some monies have been included in the HRA business plan.</p> <p>We will be undertaking a scheme to install a number of air source heat pumps ahead of potentially procuring a larger programme and also looking at removing gas from our tower blocks, both to meet zero carbon objectives but also to help improve safety.</p>	Annual review

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
B2	Director of Regeneration Programme Delivery  AD Planning	Reducing energy consumption within new build schemes where the Council is the sole developer or partner	Investigate low-carbon and high energy efficiency standards in Council new build housing.  Ensure London Plan policy requirements are met and commit to exceeding these where possible.  Carbon-offset monies are secured via Section 106 obligations, where appropriate.		Ongoing as schemes arise
B3	AD Property Services, Property & Land	Reducing energy consumption in council-owned housing	Standardise low-energy specification in maintenance of housing-managed properties.	Surveys undertaken in 2011 with Climate Energy identified properties under Standard Assessment Procedure (SAP) rating 50.  Data procured from UNO Energy and used to identify properties in need of energy efficiency improvements. Average SAP now >60, with ongoing surveying work to establish what low-energy specification should be.	Annual review in conjunction with HRA Business Plan / Capital Programme

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
B4	AD Property Services, Property & Land	Reducing energy consumption	<p>Use condition survey data to identify and target worst performing properties.</p> <p>Use maintenance surveys to identify opportunities for energy efficiency improvements.</p> <p>Identify appropriate measures to improve energy efficiency of these properties.</p> <p>Assessment and phasing programme to be established.</p>	<p>In our council-owned homes we have continued to deliver a programme of replacing old inefficient boilers with newer efficient models which has helped reduce bills.</p> <p>We have also changed our lighting specifications to low cost LEDs</p>	Annual review in conjunction with HRA Business Plan / Capital Programme



REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
B5	Director of Asset Management  AD Customer and Communications	Renewable energy / reducing energy consumption in council-owned assets	Establish how proactive we are being as a commissioner of new facilities and achieving low carbon buildings, for example leisure centres.  Making existing assets as energy efficient as possible.	Rationalisation proposals are in progress to release 4 office buildings, which would reduce carbon footprint of the corporate estate. Councils' workstation 'estate' will reduce to one third of its current size due to continuation of remote working.  Energy management plan for corporate estate with explicit targets for energy reduction is currently in development.  Business cases have been developed for the retrofit of 10 further corporate sites and 30 schools.	Q4 2021 – 2022      Q3 2021 – 2022      Annually

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
B6	Director of Childrens' Services	Renewable energy / reducing energy consumption in other public sector owned assets	<p>Establish how best to influence Academy Trusts / Department for Education on promoting low carbon school buildings, improving existing buildings.</p> <p>New build schools and school expansions are built to high standard.</p>	Engaged with DfE on Bridge Close school re design principals.	Ongoing as opportunities arise

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
<b>Promoting low carbon development through the planning system</b>					
B7	AD Planning	Encouraging net zero development through planning	<p>Uphold current Havering standards and London Plan requirements for housing development.</p> <p>Create a Climate Change Checklist to discern the climate change credentials of each development.</p> <p>Work with housing developers to prepare for zero-carbon homes. Outline requirements in pre-application meetings for zero-carbon homes.</p> <p>Support and showcase low-carbon housing developments where beyond minimum requirements.</p> <p>Section 106 carbon offset fund obligations are monitored and funds made available for spend.</p> <p>Consider feasibility of including a Net Zero Carbon policy in the next Local Plan Review.</p>	<p>Local Plan in final stages of adoption, to be in conformity with London Plan adopted March 2021.</p> <p>At present, large applications are referred to GLA Energy unit for review.</p> <p>See Orchard Village by Circle &amp; Old Ford Housing for examples of Passivhaus in the borough Oldchurch development by Swan Housing achieving Code for Sustainable Homes Level 4.</p> <p>At present the council is looking at zero carbon options for new housing in Rainham - (c. 870 properties).</p>	<p>In line with adoption of Local Plan Climate Change Checklist to be produced in draft.</p> <p>Ongoing work with developers to deliver Zero Carbon homes.</p>

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
B8	AD Planning  Urban Design Officer, Planning	Resilience in development management	<p>Sustainable Urban Drainage (SUDs) / climate resilience strategies</p> <p>Incorporating guidance on SUDs / landscape into the planning / pre- application process</p> <p>Green development and landscaping, explore possibilities to employ 'sponge' principles – controlling run off, green rooves, underground water storage, use of landscaping and planting Promoting wildlife corridors as part of a wider landscape strategy</p> <p>Encourage the provision of appropriate species of broad-leaved trees on streets / in urban areas to provide shade and mitigate adverse temperatures.</p>	The Development Management Service deals with these issues when considering planning applications	<p>Work is ongoing through the operation of the Development Management service</p> <p>Study of optimum location for provision of broad-leaved trees to be undertaken, subject to resources by 2023 / 2024</p>

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
B9	AD Planning  Team Leader, Development Planning	Monitoring climate commitments from developers in development management	<p>Explore how to undertake ongoing monitoring to ensure the developers deliver what they commit to.</p> <p>Create a monitoring action plan in association with the GLA</p> <p>Aim to have this ready for Q3 2022/2023 with an accompanying business case which sets out the resources needed.</p> <p>Include additional monitoring indicators in the Annual Monitoring Review (AMR), after adoption of the Local Plan</p> <p>Scope use of Authority Monitoring Reports to monitor developer commitments, in line with the emerging Local Plan new monitoring indicators.</p>	Continued developer climate commitments scoping review which is already under early consideration.	<p>Scoping review to be completed Spring 2023</p> <p>AMR to be reviewed 2022 / 2023</p>

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
B10	AD Planning	Promoting urban greening through development management	<p>As part of the Development Management service, require major developments to demonstrate Urban Greening Factor measure (as per London Plan Policy G5 Urban Greening). Use measure to ensure urban greening is a fundamental element of site and building design.</p> <p>Where appropriate, explore option of setting a higher local Urban Greening Factor.</p> <p>Use council masterplans (such as forthcoming Romford masterplan) to increase parks and urban greening.</p>		Work is ongoing through the operation of the Development Management service

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
<b>Capital funding strategy</b>					
B11	Head of Finance for Business Partnering, Finance & Procurement	Securing external funding and grants	<p>Acquire external funding to deliver energy efficiency measures additional to or to support the capital programme (e.g., Energy Company Obligation [ECO] funding, government funding, etc).</p> <p>In particular, explore research grants available and acquire external funding within next 2 quarters / map of funding – including SALIX funding and identification of suitable properties required to secure funding.</p>	Council bidding for monies under the Social Housing Decarbonisation Fund (SHDF) which is now open. We will be looking to deliver full retrofit to around 50 of our worst performing homes.	Exploration of green energy efficiency grants and loans to be undertaken annually from Autumn 2021.
B12	Director of Asset Management	Capital funding budget allocation	Continue allocation of funding within capital budget specifically for energy efficiency measures.	Budget has been allocated, but not the full amount required to implement all improvements. Council Estate under efficiency review following Covid-19 pandemic; future investment will follow as appropriate	To be reviewed on annual basis

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
<b>Working with residents and RSLs</b>					
B13	AD Housing Demand, Housing Needs & Strategy Management	Residential energy savings	<p>Establish and deliver programme of engagement with Council tenants on energy saving.</p> <p>Share data with residents and landlords e.g. in tenancy handbook.</p> <p>Encourage Registered Social Landlords (RSL) to provide information to their tenants on energy saving.</p> <p>Share best practice on energy information for tenants amongst RSLs. This should be raised at least twice a year with RSLs via a best practice Forum with all the RSLs that have stock in Havering.</p>		Establishment of RSL Forum to be considered after adoption of the emerging Housing Strategy, by Winter 2022.



# BUSINESS CONTINUITY

LED BY *LILLY PANNIFER, CORPORATE AND COMMUNITY RESILIENCE MANAGER*  
LEAD MEMBER *COUNCILLOR VIDDY PERSAUD*  
ACCOUNTABLE TO *JANE WEST, CHIEF OPERATING OFFICER*

## INTRODUCTION

Insurers have categorised the response to climate change into two categories:

1. Adaptation to the physical and social consequences of climate change
2. Mitigation of greenhouse gas emissions.

This workstream focuses on identifying and managing the first of these categories. The purpose of the workstream is not confined to the immediate consequences for the operation of Council services but also encompasses the Civil Contingency risks, should any be identified.

The strategic approach is to identify business and strategic risks and develop a granular assessment of risks and/or opportunities.

The purpose of the workstream is also to develop an approach that benefits the residents of Havering. This will be achieved through improving the resilience of the local environment and anticipating any risks brought about because of:

- Changing climate events
- Biohazards and impacts on local flora and fauna, or local ecosystems which might occur over a period of time.

**Vision of the Business Continuity Work Stream**

*With severe weather becoming increasingly unpredictable and causing greater impacts to the wider organisation, the vision of this work stream is to develop the overall organisation resilience in response to changing risks surrounding climate change, whilst promoting ongoing improvements to support in the response to climate change related events.*

**Scope of Theme**

Key areas of activity are:

- Water management
- Severe weather management
- Insurance Risk

**Links to other workstreams**

There are nine work streams in the Havering Climate Change Action Plan. These are:

- Built Environment
- Business Continuity
- Energy Management
- People
- Procurement
- Public Protection
- Stakeholder and Community
- Transport
- Waste Management

**Knowledge Links**

Major emergency plan

[What we do in an emergency - Havering Major Emergency Plan | The London Borough Of Havering](#)

Multi-agency flood plan

[Multi-agency Flood Plan for Havering | The London Borough Of Havering](#)

Borough risk register

[Havering borough resilience forum - Borough risk register | The London Borough Of Havering](#)

Severe weather documented capabilities

[Winter service | The London Borough Of Havering](#)  
[Severe flooding advice - What to do in a major flood | Hazards, pollution and flooding | The London Borough Of Havering](#)  
[Heatwave: how to cope in hot weather | Havering Directory](#)

## Key associated plans, policies and strategies

OWNER	KEY ASSOCIATED DOCUMENTS	REVIEW DATE OR TARGET	BY WHEN
Assistant Director, Public Realm	Local Implementation Plan (LIP)	Continue to seek funding to deliver improvements and promotion of cycle paths and footpaths (greenways).	Q2 2022/23
Assistant Director, Public Realm	Local Flood Risk Management Strategy (2017)	Provides guidance and information for residents, businesses and developers to help understand and better manage flood risk within the borough. The strategy sets out Havering's nine overarching objectives to effectively manage flood risk.	Q4 2021/22
Assistant Director, Public Realm	Preliminary Flood Risk Assessment (PFRA)	As required by the Flood Risk Regulations 2009	Q3 2022/23
Assistant Director, Public Realm	Surface Water Management Plan (SWMP)	As required by the Flood and Water Management Act 2010	Q2 2022/23

**How we can achieve our target**

The following table sets out a number of key actions which will support the Council in meeting its climate and sustainability ambitions. Where groups of actions exist in other plans and strategies, they are not replicated in the Havering Climate Change Action Plan but will be managed as part of the normal business management. These plans will be developed taking into account the Council's environmental commitments.

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
BC 1	Corporate and Community Resilience Manager	Community	Promote the Havering Community Flood Warden Scheme to allow the Council to address any flood risks in Havering. The Flood Wardens duties include monitoring local areas that are at risk of flooding and reporting this to the Council. Flood Wardens are also encouraged to check the flood storage and critical drainage areas in their local community and share any information by taking photos of what they think might be a risk.	To link to community hubs / hold workshops / link to cohesion work	Q4 2022/23
BC 2	Corporate and Community Resilience Manager	Planning	Give advice on the implementation of proposals such as streetscape improvements, including the installation of greening measures.	To give advice on draining and greening measures	Ongoing

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
BC 3	Corporate and Community Resilience Manager	Extreme weather	Factor extreme climatic conditions and the effects of climate change into health and safety / risk assessments and risk registers for relevant Services. Includes borough specific circumstances that increase the likelihood or impact to Havering. Continue to review Borough risk register to ensure climate change related incidences are noted in the register.	Re-publication of a borough facing risk register, public facing version for London is already available via the GLA	Q3 2022/23
BC 4	Corporate and Community Resilience Manager	Community	Increase community engagement with the voluntary sector and community members to input into risk registers and identify resilience issues. Review Community resilience of warning and informing hard to reach sections of the community.		Ongoing
BC 5	Corporate and Community Resilience Manager	Emergency Planning	Continue to ensure that the Major Emergency Plan (MEP) for the whole of the Borough takes into consideration climate change scenarios and flood risk.	MEP response monitored and reviewed annually to ensure lessons from incidents considered and response amended as required.	Q4 2021/22

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
BC 6	AD Environment	Extreme weather	<p>Engage with London-wide and regional efforts on adaptation to climate change impacts with relation to flooding and water management.</p> <p>Continue to monitor responsibilities of the Flood and Water Management Act into day-to-day planning. Identify and introduce better flood management processes balanced with developmental and regeneration needs.</p>	Havering represents North East London Councils on the London Risk Advisory Group and also attends the NE London Flood Partnership Group	Ongoing
BC 7	AD Environment	Extreme weather	<p>Continue monitoring of blocked culverts, recording flooding incidences and allocating funding for maintaining cleared culverts.</p> <p>Monitor the flooding issues and rise of safety requirements across the borough.</p>	Regularly reviewed as part of Lead Local Flood Authority (LLFA) agenda	Ongoing
BC 8	AD Environment	Flood management	Implement actions in Surface Water Management Plan (SWMP).		Ongoing
BC 9	AD Environment	Flood management	Establish Sustainable Urban Drainage Systems (SUDS) approval body and carry out responsibilities.		Ongoing

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
BC 10	Corporate and Community Resilience Manager and Director ASC and Director PH	Emergency Planning	Deliver Severe Weather Plans, particularly to help vulnerable residents deal with hot and cold weather. Review and introduce new procedures.		Ongoing
BC 11	Corporate and Community Resilience Manager and Communications	Warning Informing	Provide additional guidance to the community during severe weather periods.		As required
BC 12	Director PH	Horizon scanning	Ensure plans are in place to consider and address the added impact of climate change on issues of disease, food safety, waste and climate-enhanced pandemics.	Reviewed regularly at the Health Protection Board.	Ongoing
BC 13	Head of Assurance	Insurance	Evaluate and address the financial and insurance risk relating to climate change.		Ongoing

# ENERGY MANAGEMENT

LED BY	<i>MARK BUTLER, DIRECTOR OF ASSET MANAGEMENT</i>
LEAD MEMBER	<i>COUNCILLOR ROGER RAMSEY</i>
TRANSFORMATIONAL BUSINESS ANALYST	<i>TOM BARA</i>
ASSISTANT DIRECTOR OF PROPERTY SERVICES	<i>GARRY KNIGHTS</i>
SENIOR ENERGY ADVISOR	<i>WASEEM ISHAQ</i>
STREETLIGHTING AND SIGNS SNR ENGINEER	<i>DAVID PARISH</i>
COMMUNICATIONS REPRESENTATIVE	<i>DARREN BINDLOSS</i>
ACCOUNTABLE TO	<i>SIMON POLLOCK, EXECUTIVE DIRECTOR ONESOURCE</i>

## INTRODUCTION

The Council's activities directly and indirectly cause emissions of various greenhouse gases, particularly carbon dioxide (CO<sub>2</sub>). The majority of carbon emissions are from road transport and from heating and powering our homes and other buildings. These are estimated for local authority areas annually by the Department for Business, Energy & Industrial Strategy (BIES)<sup>4</sup> BIES is the primary source for measuring the borough's progress to net zero carbon emissions.

In 2018, Havering emissions were estimated at 935 kilo tonnes of CO<sub>2</sub>, of which:

- 38% was from domestic electricity, gas and "other" fuels
- 17% was from industry and commerce
- 45% was from road transport.

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<sup>4</sup> [BEIS UK local authority and regional carbon dioxide emissions national statistics: 2005-2018](#)



These emissions have been decreasing and Havering has seen a reduction of 29% in total since 2005. The Council will continue to measure and report the borough and organisation's carbon footprints annually. The below mentioned carbon emissions are for the corporate estate excluding Highways and Community Housing.

**Electricity Consumption and Carbon Emissions (Scope 2):**

Year	Total Consumption kWh)	Carbon factors	Carbon emissions (tonnes of CO <sub>2</sub> )
2017-18	3,820,911	0.38140	1,457
2018-19	4,037,684	0.30480	1,231
2019-20	3,939,721	0.25560	1,007
2020-21	3,081,173	0.23314	718

**Gas Consumption and Carbon Emissions (Scope 1):**

Year	Total Consumption (kWh)	Carbon factors	Carbon emissions (tonnes of CO <sub>2</sub> )
2017-18	7,544,228	0.18380	1,387
2018-19	7,940,985	0.18362	1,458
2019-20	7,671,586	0.18380	1,410
2020-21	6,238,874	0.18387	1,147

Havering has made key progress in its responsibility to act as a leader in managing the energy agenda, and will develop actions and strategies which will be measured and reported to the local community. Our aim is to ensure that we are aware of and apply best practice to our plans, and to ensure that businesses and the community are made aware of their responsibilities and of opportunities to reduce carbon emissions in the Borough.

Our significant achievements include:

- We have reduced the carbon footprint of our Corporate Estate by 37% over the past 3 years.
- Improvements to our street lighting have reduced annual energy consumption by 69% and CO<sub>2</sub> emissions by 120% over the past 8 years.
- The flagship Elm Park Library, which features a green roof and solar panels, was one of the first low-carbon emission public buildings in London.
- Construction of Central Depot, BREEAM<sup>5</sup> Excellent, with ground source heat pumps.
- Retrofitting PV arrays to the roofs of a variety of corporate buildings.
- Replacing conventional lighting within buildings with LED units using Salix funding.
- Installation of building management systems (BMS) within larger corporate buildings and libraries.
- Rolled out smart meters.

## Vision of the Energy Management Work Stream

*All businesses and Council buildings are powered sustainably, are cost efficient and have zero carbon impact. Heat and power are supplied from renewable energy and, where possible, by local sources that efficiently meet demand. Decisions will be made with the aim of reducing the use of energy, leading to reduced carbon emissions and budget savings. Our progress and ambitions will be shared with local businesses and developers, in order to share best practice, acquire funding, and improve and design out energy wastage.*

<sup>5</sup> <https://www.breeam.com/>

### Scope of Theme

Key areas of activity are:

- Energy management for all LBH office buildings and operational assets to include, leisure centres, schools and community assets e.g. libraries and community centres
- Regeneration. To give advice and guidance to developers.  
(It is recommended and common practice in other authorities to secure a “Green Energy Plan” as part of Section 106 / Community Infrastructure Levy<sup>6</sup> (CIL) for new developments, which includes 3 years of monitoring – however we need an in-house energy expert for them to defer to – potential to share the service with other boroughs / oneSource
- Promote good practice amongst local businesses

### Links to other work streams

There are nine work streams in the Havering Climate Change Action Plan.

These are:

- Built Environment
- Business Continuity
- Energy Management
- People
- Procurement
- Public Protection
- Stakeholder and Community
- Transport
- Waste Management

### Knowledge Links

Defra Industry Guide to ICT sustainability

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/902944/defra-industry-guide-ict-sustainability.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/902944/defra-industry-guide-ict-sustainability.pdf)

Electronic waste and the circular economy report

<https://committees.parliament.uk/publications/3675/documents/35777/default/>

BEIS emissions data

<https://www.gov.uk/government/collections/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics>

<sup>6</sup> <https://www.gov.uk/guidance/community-infrastructure-levy>

## Key associated plans, policies and strategies

OWNER	KEY ASSOCIATED DOCUMENTS	REVIEW DATE OR TARGET	BY WHEN
Head of Finance for Business Partnering, Finance & Procurement	Capital Strategy	Review Capital Strategy in February 2022	Q4 2021/22
Housing	Housing Revenue Account Capital Programme	Updated annually as part of Council's budget setting process	Annually
Director of Asset Management	Energy Plan 2006 (Corporate Estate)	The in-house Council Energy Plan is currently under review	Q2 2021/22
Director of Asset Management	Corporate Asset Management Plan	Current document from 2015 – 2019, currently under review	Q4 2021/22

## How we can achieve our target

The following table sets out a number of key actions which will support the Council in meeting its climate and sustainability ambitions. Where groups of actions exist in other plans and strategies, they are not replicated in the Havering Climate Change Action Plan but will be managed as part of the normal business management. These plans will be developed taking into account the Council's environmental commitments.

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
E1	Director of Asset Management	Energy supply	Officers to model and develop options to increasingly purchase energy from renewable sources, by moving to a green energy supplier.	All electricity used within the corporate estate is conventional electricity, including schools, highways and corporate buildings. New supply contract was signed with LASER (Kent County Council) in 2020 giving option for the 'green basket' Renewable Energy Guarantees of Origin <sup>7</sup> (REGO) based electricity.	Q3 2021/22
E2	Head of Technical Services	Rationalisation of Corporate Estate and maintained schools	Rationalise corporate estate to reduce both accommodation and carbon footprints.  Review plan for corporate estate and identify which activities will have biggest impact / most achievable tangible impact on carbon reductions e.g. replacement of gas boiler in Town Hall.	Rationalisation proposals already in progress to release four office buildings.  Council's workstation 'estate' will reduce to one third of its current size due to continuation of remote working.	Q4 2021/22

<sup>7</sup> <https://www.ofgem.gov.uk/environmental-and-social-schemes/renewable-energy-guarantees-origin-rego>

# APPENDIX A HAVERING CLIMATE CHANGE ACTION PLAN

## ENERGY

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
E3	Director of Asset Management Head of Policy	Havering Energy Plan	Develop an Energy Management Plan for the corporate estate with explicit targets for energy reduction, and consider scope to extend plan to the Built Environment / Public Realm.	Currently in development	Q3 2021/22
E4	Business Analyst - Transformation	Renewable Energy	Development of retrofit solutions for retained corporate estate. Explore external funding opportunities.	Business cases developed for 10 further sites. Funding options include:  S106 Carbon Offset Fund – up to £350k available – application submitted  Power Purchase Agreement with 3 <sup>rd</sup> party supplier  Salix Decarbonisation Grant	Q3 2021/22
E5	Director of Asset Management	Carbon footprint	Continue to measure and report annual carbon emissions for the borough. Continue to manage and report the carbon emissions from the Council estate.	Reporting is based on the national carbon footprints published by BEIS. BEIS have recently published data for 2019.	ANNUALLY
E6	Director of Asset Management	Carbon footprint	Continue to measure and report annual carbon emissions for the organisation.	Currently achieving greater than 5% annual reduction in CO <sub>2</sub> emissions due to improvement in less carbon-intensive fuel sources in the National Grid.	ANNUALLY
E7	Director of Asset Management	Energy efficiency	The Council has a statutory responsibility to provide Display Energy Certificates (DECs) in all public buildings with a floor area greater than 250m <sup>2</sup> .	DEC certificates are renewed annually as a statutory requirement.	Up to date

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
E8	Director of ICT	Energy efficiency	Reduction of energy use by ICT (via moving to a Cloud-based system). ICT service to analyse the impact of ICT procurement and energy use.		Q4 2021/22
E9	Senior Energy Adviser	Smart meters	Install smart meters in the facilities managed by Corporate Estates and Community Housing.	Project underway with NPower to replace smart meters. This will include housing and non-housing properties. Working towards 100% in housing and corporate estate  Ofgem are monitoring the programme with the requirement for all suppliers to roll out smart meters by 2022 (currently 80% of the Council's portfolio has them).	Q1 2022/23
E10	Senior Energy Adviser	Water savings	Undertake a water meter audit and consolidate water bills in corporate estates.	Work underway with Anglian Business Water to achieve this.	Q2 2022/23
E11	Head of Technical Services	Sustainable Construction Strategy	Prepare/refresh criteria for construction standards applicable for Council projects, (ideally applicable to both new buildings and refurbishment, corporate estate and schools), that aim to increase environmental standards beyond those required by Building Regulations.	Measures can be categorised into those that demonstrate a return on investment, if Whole-Life costing is applied, and others that reduce carbon footprint but with a much lower financial return.	Requires policy and corporate funding decisions
E12	Senior Energy Adviser	Energy monitoring and targeting (M&T) data	Systems Link energy management software provides up to date M&T figures for use as benchmark data for all programmes.	Monitoring and targeting already in place	Updated quarterly

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
E13	Senior Energy Adviser	Wider access to M&T data	A web portal to SystemsLink (energy management software) M&T data will be provided to all campus managers, including schools, to access their own building's energy data.	SystemsLink currently working on client server and transition to our own server under review.	Q2 2022/23
E14	Head of Technical Services / Assistant Director Education	Schools Newsletter	Schools newsletter is used to inform schools of SALIX funding. Items in future to promote energy efficiency and to receive ideas on how to tackle climate change by reducing energy use.		Q4 2021/22
E15	Romford Campus Manager	Energy efficiency	All services should be included in internal communications such as newsletters that raise awareness about individual energy use at home and at work.		Q4 2021/22
E16	Senior Engineer Highways	Energy efficiency	Provide updates to street lighting LED replacement programme.	Programme already underway and significant reductions achieved. Update to be provided.	Q2 2022/23
E17	Assistant Director of Planning	Energy efficiency	Produce a plan to ensure all new developments conform with sustainable building practices and establish method of ongoing compliance.	Green Energy Plan can be secured as part of S106 for new developments, which includes 3 years' of monitoring.	Q1 2022/23



# PEOPLE

LED BY	<i>HOWARD SWIFT, HEAD OF INCLUSIVE GROWTH</i>
LEAD MEMBER	<i>COUNCILLOR DAMIAN WHITE</i>
EMPLOYMENT AND SKILLS	<i>AMANDA MONTAGUE</i>
HOUSING STRATEGY	<i>GILL BUTLER</i>
HUMAN RESOURCES	<i>BEN PLANT</i>
ACCOUNTABLE TO	<i>JANE WEST, CHIEF OPERATING OFFICER</i>

## INTRODUCTION

To achieve sustained and transformative change in Havering requires a collective understanding of the green economy. Delivering green skills and training to residents and ensuring that they are equipped to make informed choices and can benefit from the significant investments being made in the green economy are key considerations for the People work stream. A sustained and focussed effort to deliver low carbon training and information through school to adult education is necessary. This training will lead to improved employment prospects for residents and will ensure that businesses have the skills to reach net zero.

Havering has a thriving business sector which will need to demonstrate its environmental credentials in order to compete. It is recognised that not all businesses will have the resources to make the necessary changes but the Council will make every effort to ensure that local businesses are given the support and guidance to benefit from available grants and best practice. Ensuring residents and businesses have the enthusiasm and skills to lead this challenging agenda will require careful consideration and joint planning. The Council, businesses and other partners must support each other on this journey by sharing knowledge and highlighting best practice. The Council can use its convening power to achieve this collaboration.

**Vision of the People Work Stream**

*To support the delivery of our Climate Change mission with appropriate skills and resources at the right time and to ensure that our residents are able to take full advantage of the opportunities presented.*

**Scope of Theme**

- Optimising green employment
- Supporting businesses to transition to sustainable modes of operation
- Enabling residents to access and support a sustainable future
- Engaging stakeholders to broaden our reach
- Developing an LBH corporate culture that supports the delivery of sustainability
- Promoting positive health outcomes

**Links to other work streams**

There are nine work streams in the Havering Climate Change Action Plan. These are:

- Built Environment
- Business Continuity
- Energy Management
- People
- Procurement
- Public Protection
- Stakeholder and Community
- Transport
- Waste Management

**Knowledge Links**

Health in all Policies

[Health in all policies: a manual for local government | Local Government Association](#)

## Key associated plans, policies and strategies

OWNER	KEY ASSOCIATED DOCUMENTS	REVIEW DATE OR TARGET	BY WHEN
Public Health	Joint Strategic Needs Assessment (JSNA)	BHR JSNA 2020 is available on the Havering Data Intelligence Hub ( <a href="https://haveringdata.net">Havering – JSNA (haveringdata.net)</a> ) and is currently being reviewed	Q4 2021/22
Public Health	Health and Wellbeing Board Strategy	The reviewed JSNA will feed into the next iteration of the Joint Health and Wellbeing Strategy.	-
Inclusive Growth	Inclusive Growth Strategy	Current Strategy was signed off in 2020 and is due to be reviewed in 2022.	Q3 2022/23
Inclusive Growth	Social Investment Strategy	Currently being drafted and will be available in 2022	Q4 2021/22

**How we can achieve our target**

The following table sets out a number of key actions which will support the Council in meeting its climate and sustainability ambitions. Where groups of actions exist in other plans and strategies, they are not replicated in the Havering Climate Change Action Plan but will be managed as part of the normal business management. These plans will be developed taking into account the Council's environmental commitments.

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
P1	Head of Inclusive Growth	Business Links	Hold a conference with national and local businesses to raise awareness and jointly develop measurable outcomes for tackling climate change.		Q4 2021/22
P2	Head of Inclusive Growth	Business Links	Start horizon scanning for business grants to support in tackling or mitigating the impacts of climate change.	Commenced as part of the work of the Special Projects Officer within Inclusive Growth	Q3 2021/22
P3	Head of Inclusive Growth	Business Links	Identify what local businesses want to do in relation to climate change, air quality and health. Help businesses to access grants and government funds.	Survey of local businesses in preparation	Q1 2022/23

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
P4	Head of Inclusive Growth	Business Links	Create a 'Business' page on the website – a "Trusted site"	In progress – expected to complete during November 2021	Q3 2021/22
P5	Head of Inclusive Growth	Business Links	Begin promoting opportunities to forge business links and influence businesses and tackle climate change.		Q3 2021/22
P6	Employment & Skills Lead	Apprenticeships	Develop in consultation with Stakeholders a Green Apprenticeship Scheme Business case		Q1 2022/23
P7	Employment & Skills Lead	Apprenticeships	Prepare a paper to consider apprenticeships in relation to the environment. This should include the skills to meet the emerging requirements of changing technology driven by climate change initiatives e.g. EV charging points, air source heat pumps.	LBH is able to provide local apprenticeships	Q1 2022/23
P8	AD Housing Property Services	Skills Growth	Explore the feasibility of setting up a Local Housing skills centre to deliver practical green actions within the borough.		Q1 2022/23

# APPENDIX A HAVERING CLIMATE CHANGE ACTION PLAN

## PEOPLE

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
P9	Assistant Director for Education	Liaison with local colleges	Liaise with local colleges to identify emerging issues and set priorities.		Q3 2021/22
P10	Chief Executive	Council Green recovery	Ensure the Council Leadership recovery plan identifies future Council green skills requirements.		Q4 2021/22
P11	Employment & Skills Manager	Skills Growth	Undertake research to identify skills gaps of local residents. Identify opportunities to redress skills gap.		Q2 2022/23
P12	Head of Inclusive Growth	Business growth	Identify high-tech environmental companies who might wish to establish a presence within Havering.		Q4 2021/22
P13	Head of Inclusive Growth	Climate Change R&D	Joint Ventures with the Local colleges on research and development of green strategies.		Q4 2021/22
P14	oneSource Director HR	HR	Design and develop a culture change programme for climate issues for officers. This will ensure that officers understand and act to protect Havering's green heritage when making service decisions.		Q3 2021/22
P15	oneSource Director HR	HR	Review and evaluate the HR policies to ensure all are aligned with the Council's commitment to tackle climate change.	Policy reviews planned and will incorporate climate change considerations	Q3 2022/23

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
P16	oneSource Director HR	HR	Promote green staff benefits such as bicycle purchase scheme and Havering rewards.		Q2 2022/23
P17	oneSource Director HR	HR	Engage with Unions on working jointly to develop actions and behaviours to promote environmental and health actions. Discuss these with Lead Members.	Discussions commenced and wider consultation scheduled for November 2021	Q4 2021/22
P18	AD Policy, Performance and Community	Workforce engagement	Establish a staff forum on climate change.	Scheduled for November 2021	Q3 2021/22
P19	Cabinet, Leader and Member Support Team Leader	Member Engagement	Establish a programme of Member briefings on environmental and climate issues.	Initial discussions underway and presentation on climate science delivered	Q3 2021/22

# PROCUREMENT WORKSTREAM

LED BY	<i>ROSE YOUNGER, HEAD OF PROCUREMENT</i>
LEAD MEMBER	<i>COUNCILLOR ROGER RAMSEY</i>
ICT REPRESENTATIVE	<i>PATRICK MONTGOMERY</i>
FINANCE REPRESENTATIVE	<i>MARK WHITE</i>
PENSIONS REPRESENTATIVE	<i>STEVEN WILD</i>
JOINT COMMISSIONING UNIT	<i>JOHN GREEN</i>
ECONOMIC DEVELOPMENT MANAGER	<i>HOWARD SWIFT</i>
ACCOUNTABLE TO	<i>JANE WEST, CHIEF OPERATING OFFICER</i>

## INTRODUCTION

The Council exerts significant influence through its spending, investments and frameworks for decision making. The Government's Sustainable Procurement Taskforce (SPTF) identified the top priority spend categories as Construction (building and refit, highways and local roads, operations and maintenance) followed by Health and Social Work (operating costs of hospitals, care homes, social care provision).

In addition, the Council through oneSource maintains a significant ICT estate which not only uses energy but also creates electronic waste. ICT is not only a key enabler of reducing carbon emissions, but also has a responsibility to manage the resources it delivers in a sustainable fashion.

Havering's capital programme is one of the most significant levers at the disposal of the Council. Individual sponsoring Directorates have the responsibility to deliver capital investments, ensuring that Havering investments and budgets are used to maximise the



promotion of health, well-being and environmental benefits. The financial governance has a co-responsibility to ensure that capital investments deliver the wider Council priorities.

Vision of the Procurement Work Stream
<i>Council spending will support net zero carbon emissions as well as other climate change and social value priorities. Innovative financing and transparent environmental decision making will encourage public and private investment in helping achieve the UK climate change and environmental commitments.</i>

**Scope of Theme**

The Procurement Team is responsible for all aspects of the purchase of goods and services by the Council.

As one of the largest purchasers of goods and services in Havering, the Council is in a unique position to support Members' ambition to deliver net zero carbon emissions, as we have a strong convening power and local influence.

The Joint Commissioning Unit is responsible for securing key services to support households and residents.

**Links to other work streams**

There are nine work streams in the Havering Climate Change Action Plan. These are:

- Built Environment
- Business Continuity
- Energy Management
- People
- Procurement
- Public Protection
- Stakeholder and Community
- Transport
- Waste Management

**Knowledge Links**

Helping businesses create a greener, more sustainable future through ICT  
[Sustainability in information and communication technology \(ICT\): a Defra guide \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/guidance/sustainability-in-information-and-communication-technology-ict-a-defra-guide)

Electronic waste and the Circular Economy – House of Commons Environmental Audit Committee  
[Electronic Waste and the Circular Economy \(parliament.uk\)](https://www.parliament.uk/publications/2020/11/electronic-waste-and-the-circular-economy)

Circular Economy Package policy statement  
[Circular Economy Package policy statement - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/circular-economy-package-policy-statement)

**Key associated plans, policies and strategies**

OWNER	KEY ASSOCIATED DOCUMENTS	REVIEW DATE OR TARGET	BY WHEN
Head of Finance for Business Partnering, Finance & Procurement	Capital Strategy	Review Capital Strategy in February 2022	Q4 2021/22
Head of Pensions & Treasury	Pensions Strategy	Review progress on meeting the Pension Committee's aims and beliefs	Q4 2021/22
Director of Procurement	Sustainable Procurement Strategy / Social Value Strategy	Incorporated in procurement review.	Q4 2021/22
Head of Joint Commissioning Unit	Joint Commissioning Strategy	Review underway	Q4 2021/22

**How we can achieve our target**

The following table sets out a number of key actions which will support the Council in meeting its climate and sustainability ambitions. Where groups of actions exist in other plans and strategies, they are not replicated in the Havering Climate Change Action Plan but will be managed as part of the normal business management. These plans will be developed taking into account the Council's environmental commitments.

# APPENDIX A HAVERING CLIMATE CHANGE ACTION PLAN

## PROCUREMENT

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
Pr1	Democratic Service and Head of PMO	Framework for environmental implications for key decisions including capital programme	Ensure that projects and reports address key environmental considerations.	To be incorporated into project management software reporting	Q3 2021/22
Pr2	Director of Procurement	Vision statement / target	Agree a vision statement for sustainable procurement that aligns with national and Havering targets.	Staff, members, residents and businesses are clear on the council's ambition to reduce carbon emissions. Drafting, set up Social Value board. Needs to go through Governance process.	Q4 2021/22
Pr3	Director of Procurement	Procurement	Establish a framework to identify current spending against associated carbon emissions and agree a target for reduction. Investigate opportunities for divesting from fossil fuel.	Development of a low carbon procurement framework	Q2 2022/23
Pr4	Director of Procurement	Contract standing orders	Include sections in revised contract standing orders to ensure sustainability issues are incorporated into the procurement of goods, services and works	Environmental considerations are proportionately weighted in future tender processes. Process started, may need to revise following associated changes.	Q1 2022/23
Pr5	Director of Procurement	Staff awareness	Deliver staff training on sustainable procurement to ensure that Havering has a low carbon procurement framework, so that staff can advise and support companies with whom they do business. Contract managers are trained to evaluate and act on the environmental provisions made as part of the contract process.	All procurement staff receive training on sustainability and sustainable procurement.	Q1 2022/23

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
Pr6	Director of Procurement / Economic Development Manager	Local supply chains	Identify and prioritise local supply chains and work with them to ensure they understand, disclose and cut carbon emissions.		Q1 2022/23
Pr7	Head of Pensions and Treasury	Pensions	Aim to reduce Pension investment in environmentally unsustainable companies. Should the Pension Committee agree all the proposals being laid before it, then the Fund should have c.40% of its assets invested in environmentally sustainable companies by end of Q4 2021/22.	<p>Pensions Committee 16/3/21 agreed to switch the £191m LCIV Global Alpha Growth Fund (Active Equities) into a PARIS aligned version of the same fund.</p> <p>Pensions Committee 16/3/21 approved a commitment of £25m to the new LCIV Renewable Energy Fund.</p> <p>Pension Committee 20/7/21 has agreed to replace the £66m LGIM Fundamental Equities (Passive equities index) to the LGIM Future World index that is partly Paris aligned and significantly lower exposure to Fossil Fuel companies.</p> <p>The Pensions Committee 14/9/21 agreed an initial target allocation of 5% of Fund assets (c. £46m) to the LCIV Passive Equity Progressive Paris Aligned (PEPPA) Fund (new name for LCIV low carbon fund) funded from its LGIM Global market passive equity index fund.</p> <p>The MHCLG is set to issue guidance on LGPS implementation of the Task Force for Climate Change on Financial Disclosure (TCFD) recommendations during 2021 with likely implementation in 2022/23.</p>	Q4 2021/22

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
Pr8	Head of Finance for Business Partnering, Finance and Procurement	Finance	Evaluate funding strategy for tackling climate change, including green bonds and grant availability, and an evaluation of the UK Cities Climate Investment Commission.		Q1 2022/23
Pr9	Director of ICT	ICT representation	Develop a bespoke framework for ICT to evaluate the impact of ICT developments and purchases on the environment.	Decisions take account of the environmental consequences.	Q4 2021/22
Pr10	Director of ICT	ICT representation	Ensure that ICT purchases and disposals are sustainable by having clear evaluations on the use and disposal of electronic waste.	Reuse electronic equipment and reduction of unnecessary purchases.	Q1 2022/23
Pr11	Director of ICT	ICT representation	Establish a mechanism for measuring and monitoring the energy usage of ICT equipment and storage through working to industry standards.  This allows the Council to be clear about data storage and to reduce running costs of the Corporate estate.		Q1 2022/23
Pr12	Director of ICT	ICT representation	Communicate best practice with local businesses and other public sector organisations.	Lessons learnt are promoted locally to allow best practice to be shared and the reputation of the Council to be enhanced.	Q3 2022/23
Pr13	Head of Joint Commissioning	Commissioning	Develop an action plan to embed the need to tackle climate change amongst providers and partners.		Q4 2021/22

# PUBLIC PROTECTION

LED BY	<i>LOUISE WATKINSON, HEAD OF PUBLIC PROTECTION</i>
LEAD MEMBER	<i>COUNCILLOR VIDDY PERSAUD</i>
HOUSING STRATEGY MANAGER	<i>GILL BUTLER</i>
PUBLIC HEALTH CONSULTANT	<i>ELAINE GREENWAY</i>
ACCOUNTABLE TO	<i>JULIE CHANDLER, ASSISTANT DIRECTOR OF CIVIL PROTECTION</i>

## INTRODUCTION

Public Protection is a regulatory service for private sector housing, environmental health, trading standards, business licensing and environmental protection. The Public Protection Climate Action Plan (PPCAP) summarises the current activities that will contribute to the Council's strategy in response to sustainability and climate change. These activities will be regularly reviewed to ensure adequate prioritisation, resourcing and focus to meet the variable demands of climate change.

A key role for Public Protection is that it is the lead service for local air quality monitoring and modelling to ensure the Borough meets the statutory targets nationally for local air pollution levels. The scope of this programme and air pollution levels are reported in the [Council's Annual Status Report \(ASR\)](#). The Council's strategy to reduce local air pollution is within the Borough's [Air Quality Action Plan 2018-2023](#) (AQAP). The whole borough was declared an Air Quality Management Area on 11<sup>th</sup> September 2006 enabling the production and implementation of the AQAP. Public Protection's current role for sustainability and climate change is to continue to coordinate the implementation of the AQAP with other services and partners, ensure that local air pollution levels are demonstrated as accurately as possible and identify other key priorities and ways to support this agenda, some of which are stated below.

Public Protection is committed to implementing strategies to provide Havering residents with cleaner air, safe drinking water and adequate circumstances to live in. In the spirit of that, we are working on the following projects:

- Monitoring and modelling air quality throughout the Borough; raising awareness about air pollution (e.g. anti-idling webinars).
- Engaging with transport services on improving the infrastructure for sustainable mobility (e.g. electric vehicle charging points; schools streets; anti-idling events; promoting walking and cycling; infrastructure building).
- Engaging with the built environment services to reach air quality neutrality for new developments (along with green infrastructure and energy efficiency).
- Enforcing smoke control in the Borough to reduce the amount of unlicensed burning.
- Providing efficient and smart driving training to the drivers of the Council's fleets.
- Planting greenery in town centres and other pollution hotspots.
- Cooperating with Essex & Suffolk Water to ensure that residents have access to safe and clean potable water.
- Assisting the improvement of the Private Housing Stock of the borough via advising landlords on energy grants.

### Vision of the Public Protection Work Stream

*Havering Council is striving for a future where economic development and growth comes together with clean air and sustainability. In the future that we envision, all pollution hotspots are adequately targeted and mitigated.*

*It is vital for us to make sure that everyone in Havering has abundant and clean potable water and that all residents in Havering live in comfortable, affordably heated and well-adapted homes that are cost efficient with low or zero greenhouse gas emissions.*



Scope of Theme	Links to other work streams	Knowledge Links
<ul style="list-style-type: none"> <li>• Monitoring and modelling local air quality within the Borough to meet statutory requirements</li> <li>• Coordinate implementation of the AQAP</li> <li>• Built environment (constructions, planning, housing, regeneration) to ensure the adequate level of sustainability</li> <li>• Water Management (regulation of and cooperation with water companies and authorities)</li> <li>• Private Sector Housing (ensuring adequate living circumstances for residents)</li> </ul>	<p>There are nine work streams in the Havering Climate Change Action Plan. These are:</p> <ul style="list-style-type: none"> <li>• Built Environment</li> <li>• Business Continuity</li> <li>• Energy Management</li> <li>• People</li> <li>• Procurement</li> <li>• Public Protection</li> <li>• Stakeholder and Community</li> <li>• Transport</li> <li>• Waste Management</li> </ul>	<p>Havering Air Quality Action Plan (2013-2023)  <a href="#">Havering Air Quality Action Plan 2018 with cover.pdf</a></p> <p>Havering Air Quality Annual Status reports  <a href="#">Air Quality Annual Status Report   The London Borough Of Havering</a></p> <p>Havering Local Plan  <a href="#">Havering Local Plan   The London Borough Of Havering</a></p> <p>Havering Local Implementation Plan  <a href="#">Havering Local Implementation Plan: Transport strategy   The London Borough Of Havering</a></p> <p>London Environment Strategy  <a href="#">London Environment Strategy   London City Hall</a></p> <p>London Plan  <a href="#">The London Plan   London City Hall</a></p> <p>London Transport Strategy  <a href="#">Mayor's Transport Strategy 2018   London City Hall</a></p>

## Key associated plans, policies and strategies

OWNER	KEY ASSOCIATED DOCUMENTS	REVIEW DATE OR TARGET	BY WHEN
Head of Public Protection	Air Quality Action Plan (AQAP)	Actions are reviewed via the Annual Status Report (ASR) document which is submitted to the GLA in May; The Air Quality Action Plan will be reviewed in 2022 so that an updated version can be issued in 2023.	Q3 2023/24

## How we can achieve our target

The following table sets out a number of key actions which will support the Council in meeting its climate and sustainability ambitions. Where groups of actions exist in other plans and strategies, they are not replicated in the Havering Climate Change Action Plan but will be managed as part of the normal business management. These plans will be developed taking into account the Council's environmental commitments.

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
PP1	Senior Public Protection Officer (PSH)	Private Sector Housing	Develop a plan to reduce the emissions of the private sector housing stock, (including applying for decarbonisation related energy grants).		Q3 2022/23
PP2	Senior Public Protection Officer (PSH)	Private Sector Housing	Investigate the possibility of setting higher energy standards for licenced privately rented homes.		Q4 2021/22
PP3	Public Protection Manager (EH)	Air Quality Action Plan	Coordinate implementation of the agreed <a href="#">Air Quality Action Plan</a> .	Overall implementation is March 2023 see Plan and <a href="#">ASR Reports</a> for specific progress and action deadlines.	Q4 2022/23

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
PP4	Senior Public Protection Officer (AQ)	Air Quality Action Plan – Review	<a href="#">Review the Air Quality Action Plan 2018-2023</a>	To begin in April 2022	Q4 2022/23
PP5	Senior Public Protection Officer (PSH)	Private Sector Housing	Private Sector Housing – promoting energy efficiency schemes to landlords; reaching out to vulnerable tenants.	January 2022	Q4 2021/22
PP6	Public Protection Manager (EH)	Pollution inspection	Enforce smoke controls regarding unlicensed burning; investigate chimney smoke complaints; visit food premises to inspect their ovens.	Ongoing reactive action when officer observes or residents report nuisance/pollution smoke.	Ongoing
PP7	Senior Public Protection Officer (AQ)	Air Pollution	Identify new premises for Pollution Prevention and Control	April 2022 – Annual Review	Q1 2022/23
PP8	Public Protection Manager (EH)	Water quality	Liaise with water authorities and water companies to ensure that people in Havering have access to safe and clean drinking water.	Reactive when reports arrive from DEFRA, water companies, residents and other partners.	Ongoing
PP9	Senior Public Protection Officer (TS)	Trading Standards	Implement projects to support and protect vulnerable consumers		Q4 2021/22
PP10	Head of Housing Strategy and Service Development	Private Sector Housing	Harness value in working with RSLs to tackle climate change and promote partnerships.		Q3 2022/23

# STAKEHOLDER & COMMUNITY

LED BY *JERRY HALEY, HEAD OF COMMUNITIES*  
*JAMES ROSE, PARKS DEVELOPMENT MANAGER*  
*JESS FINNIN, COHESION MANAGER*

LEAD MEMBER *COUNCILLOR VIDDY PERSAUD*

ACCOUNTABLE TO *JANE WEST, CHIEF OPERATING OFFICER*

## INTRODUCTION

To effect change and give residents the choice to improve the Havering environment it is crucial to engage with the wider community on their role in assisting the Council to deliver local solutions which contribute to national commitments. The Council has a crucial leadership role to raise awareness of the ways in which local communities can help and participate in building local actions. Havering has a wealth of local voluntary and third sector partners who will have an increasingly important role in securing funds to deliver the Council ambitions and to improve the local biodiversity.

To deliver demonstrable improvements it is crucial that everyone who lives, works, studies or plays in Havering is equipped with the knowledge, tools and support required to make their contribution to it. This will require a programme of actions which are planned and measured, building on the green heritage of the Borough.

Vision of the Stakeholder and Community Work Stream		
<p><i>That local people are the drivers of the climate change agenda in Havering and support this through their actions and behaviours (Including businesses, students, visitors, partners etc.)</i></p>		
<p><b>Scope of Theme</b></p> <ul style="list-style-type: none"> <li>• Engage with schools &amp; Education Settings</li> <li>• Housing - RSL, Private, Housing Associations</li> <li>• Biodiversity &amp; green spaces; Friends of Parks</li> <li>• Consultation</li> <li>• Community Groups incl. faith groups &amp; diversity groups.</li> <li>• Local Employers (incl. major employers)</li> <li>• Communications</li> <li>• External funding applications</li> <li>• Support community groups with applying for grants associated with climate change</li> <li>• Consultation / engagement plan for sustainability and efficiency (e.g. focus groups, Q&amp;A sessions)</li> <li>• Advice and guidance – case studies that will inform others regarding this agenda</li> </ul>	<p><b>Links to other workstreams</b></p> <p>There are nine work streams in the Havering Climate Change Action Plan. These are:</p> <ul style="list-style-type: none"> <li>• Built Environment</li> <li>• Business Continuity</li> <li>• Energy Management</li> <li>• People</li> <li>• Procurement</li> <li>• Public Protection</li> <li>• Stakeholder and Community</li> <li>• Transport</li> <li>• Waste Management</li> </ul>	<p><b>Knowledge Links</b></p> <p>Forests, health and climate change  <a href="#">Forests, health and climate change — European Environment Agency (europa.eu)</a></p>

## Key associated plans, policies and strategies

OWNER	KEY ASSOCIATED DOCUMENTS	REVIEW DATE OR TARGET	BY WHEN
AD Policy, Performance & Community	Council 2040 Vision	Climate Change to be included in this strategy	Q1 2023/24
Public Realm	Parks and Open Spaces Strategy 2021-2031	Currently in draft	Q3 2022/23
AD Policy, Performance & Community	Community Cohesion Strategy	Review date 2022	Q3 2022/23
AD Policy, Performance & Community	Voluntary Sector Strategy	Review date 2022	Q3 2022/23
AD Policy, Performance & Community	Together with Communities Strategy	Currently in draft form. Is emergent with Hubs programme	Q1 2022/23
AD Customer, Communication & Culture	Sport and Physical Activity Strategy	Currently in draft, update pending	Q2 2022/23
AD Customer, Communication & Culture	Arts strategy	Currently in draft, update pending	Q2 2022/23
AD Public Realm, Environment	Tree Strategy	Currently in draft, update pending	Q3 2022/23

**How we can achieve our target**

The following table sets out a number of key actions which will support the Council in meeting its climate and sustainability ambitions. Where groups of actions exist in other plans and strategies, they are not replicated in the Havering Climate Change Action Plan but will be managed as part of the normal business management. These plans will be developed taking into account the Council's environmental commitments.

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
SC1	Head of Communities / Cohesion Manager	Information	Work in partnership with community and voluntary groups and COMPACT forum partners to raise awareness of climate change and energy issues.	A first session has taken place with the Compact Forum (see above). LAD2 information has been distributed to voluntary and community sector as an avenue to increase buy in from the public for this scheme.	Q4 2022/23
SC2	Head of Communities / Cohesion Manager	Involvement	Support funding applications by voluntary and community sector partners with regard to the climate change agenda.	Tapestry submitted a partnership application to the Big Lottery Climate Change Fund. External funding options regarding climate change are researched on a weekly basis.	Q4 2022/23
SC3	Cohesion Manager / Community Development and Resilience Officer	Involvement	Work with Havering Volunteer Centre and the Volunteering Hub to recruit volunteers for green initiatives across the Borough.	Havering Volunteer Centre has undertaken an anti- idling survey on behalf of the Council. A volunteer force to help clean up initiatives such as litter picks is currently being evaluated. This will require external funding.	Q4 2021/22

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
SC4	Head of Communities / Cohesion Manager	Integration	Explore what co-production with the community looks like, potentially a green forum.	This will be explored with the current Community Cohesion and Engagement Forum in September to activate interest	Q3 2021/22
SC5	Parks Development Manager	Involvement	Encourage community involvement within parks and support Friends of Parks groups.	Officers support all groups and encourage partnership working	Ongoing
SC6	Housing Engagement Officers	Involvement	Engage RSLs, care providers and private landlords around the green agenda, explore what is currently being done, best practice and future plans.		Q4 2021/22
SC7	Head of Communications	Involvement	Develop a web presence as a knowledge hub for green issues and climate change. Need to be transactional, signposting and not repetitive.		Ongoing
SC8	Parks Development Manager	Parks Strategy	Parks strategy to be published.	The 10 year Parks Strategy was in draft form but it is now going to be rewritten following a public consultation, including key stakeholders, e.g. friends groups, sports clubs. This is being worked on with the Communications team	Q4 2021/22



REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
SC9	Assistant Director of Education	Involvement	Continue Healthy Schools programme as a mode of engaging with schools and Education Settings.		Ongoing
SC10	Head of Communities	Funding	Explore funding initiatives such as crowdfunding to enhance community action regarding the green agenda.		Q3 2021/22
SC11	Head of Communications	Involvement	Ensure the annual Communications Plan aligns to the Council aspirations to publish best practice, promotes informed choices, encourages community action with behaviour change and supports becoming carbon net neutral.	Communications Calendar continually updated	Q4 2021/22
SC12	Head of Public Realm	Nature Conservation and Biodiversity	Produce an updated Havering Nature Conservation and Biodiversity Plan		Q3 2022/23
SC13	Head of Public Realm	Operations	Evaluate and report to Cabinet on the impact of herbicides and associated products on the natural environment.		Q3 2022/23

# TRANSPORT

LED BY	<i>NICOLINA COOPER, AD PUBLIC REALM</i>
LEAD MEMBER	<i>COUNCILLOR OSMAN DERVISH</i>
INFRASTRUCTURE	<i>BEN DIXON / CHLOE RUTLAND</i>
FLEET TRANSPORT	<i>SIMON BLAKE</i>
ACCOUNTABLE TO	<i>BARRY FRANCIS, DIRECTOR OF NEIGHBOURHOODS</i>

## INTRODUCTION

Road transport is responsible for 45% of the Borough's emissions<sup>8</sup>. Freight accounts for 46% of fuel use, with the remaining 54% from personal travel, predominantly made up of car usage<sup>9</sup>. As well as greenhouse gas emissions, transport creates air and noise pollution (combustion emissions and brake dust emissions), which have significant implications for health and biodiversity.

Havering Council has delivered a range of policies and schemes to encourage active travel, reduce traffic and promote clear vehicle usage. Transformation of the impact of transport on the environment will be achieved through a combination of supporting behaviour change, investing in more effective infrastructure and improving the public realm.

The Havering Transportation Strategy is aligned to

- The Third Local Implementation Plan (LIP3). Published in March 2019, LIP3 sets out how Havering will implement the London Mayor's Transport Strategy (MTS) at a local level. It identifies Havering's long-term goals and transport objectives for the next 20 years. It additionally reflects the transport needs and aspirations of the people of Havering.

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<sup>8</sup> [BEIS UK local authority and regional carbon dioxide emissions national statistics: 2005-2018](#)

<sup>9</sup> [BEIS Sub-national road transport fuel consumption 2005 - 2018](#)

- A ‘Strategic Environmental Assessment’ (SEA) of the LIP3 has been published, to determine the likely significant environmental effects of the proposed objectives and initiatives set out therein and to demonstrate how environmental considerations have been integrated into the Local Implementation Plan proposed programmes.
- The Local Plan

Vision of the Transport Work Stream	
<p><i>To reduce emissions from all transport across the borough and support the target of net zero carbon emissions by 2040.</i></p> <p><i>Carbon emissions from transport locally and nationally represent an area where improvements can be made. Taking actions to reduce carbon emissions from transport has added public benefits to improve public health, reduce congestion, stimulate low carbon sectors of the local economy and improve the quality and longevity of life for Havering residents. Promoting sustainable travel choices for local residents and making fewer polluting journeys overall can improve well-being.</i></p> <p><i>Havering has signed up to London Council’s programme to halve road journeys made by petrol and diesel vehicles by 2030 through a combination of measures that can restrict polluting journeys and incentivise sustainable and active travel options.</i></p>	

**Scope of Theme**

- Local Implementation Plan (LIP)
- Consider future investments in the transport infrastructure
- Encourage staff to travel to and from work via sustainable travel modes
- Ensure all residents have access to public transport
- Participate in opportunity funding to achieve more efficient and sustainable travel
- Ensure footpaths are maintained and easy to navigate by all users
- Create conditions to improve health and reduce health inequalities
- Give advice and guidance to businesses and residents on transportation

**Links to other work streams**

There are nine work streams in the Havering Climate Change Action Plan. These are:

- Built Environment
- Business Continuity
- Energy Management
- People
- Procurement
- Public Protection
- Stakeholder and Community
- Transport
- Waste Management

**Knowledge Links**

BEIS transport fuel consumption data

<https://www.gov.uk/government/collections/road-transport-consumption-at-regional-and-local-level#local-authority-data>

UK Transport Decarbonisation Plan

[Transport decarbonisation plan - GOV.UK \(www.gov.uk\)](https://www.gov.uk/transport-decarbonisation-plan)

Havering Local Implementation Plan (LIP3) Transport Strategy

[Havering Local Implementation Plan: Transport strategy | The London Borough Of Havering](#)

## Key associated plans, policies and strategies

OWNER	KEY ASSOCIATED DOCUMENTS	REVIEW DATE OR TARGET	BY WHEN
Transport Strategy	Local Implementation Plan (LIP)	Continue to seek funding to deliver improvements and promotion of cycle paths and footpaths.	Q2 2022/23
Planning	Romford Master Plan	Review parking and climate change agenda	Q2 2022/23
SLT	Corporate Plan	Review parking and climate change agenda	Q2 2022/23

## How we can achieve our target

The following table sets out a number of key actions which will support the Council in meeting its climate and sustainability ambitions. Where groups of actions exist in other plans and strategies, they are not replicated in the Havering Climate Change Action Plan but will be managed as part of the normal business management. These plans will be developed taking into account the Council's environmental commitments.

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
T1	Team Leader, Transport Planning	LIP Annual Status Review	Produce and publish the Annual Status Review		Q2 2021/22

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
T2	Head of Transport	Council Fleet upgrades	Council Fleet upgrades will include: Euro 6 conversion of remainder of PTS fleet Conversion of walk-along mowers to fully electric Fleet now contains no diesel vehicles Replacement of pool cars with electric vehicles and associated infrastructure	Complete the items in the Capital Programme	Q3 2021/22
T3	Head of Transport	Mayoral Vehicle upgrade	Replacement of Mayor's vehicle with fully electric vehicle	Action complete	Q2 2021/22
T4	Head of Transport	Transys pilot	Transys fleet management software is currently being trialed. Pilot to be reviewed at end of calendar year 2021.  Examine the feasibility of rolling software out for the rest of the Council's fleet.	Improved efficiency of Havering transport service	Q1 2022/23
T5	Head of Transport	Driver training	Driver Certificate of Professional Competence continues to be delivered through CPD for drivers in PTS, GM, Highways.	Improved and more fuel-efficient driving, increased awareness of environmental issues (e.g. idling)	CPD ongoing
T6	Team Leader, Transport Planning	Travel planning	Working with schools in the borough to set travel plans which deliver modal shift away from single occupancy car use	Already engaged with approximately two-thirds of Havering schools.	Annual rolling programme

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
T7	Head of Transport	Council fleet review	To review the Council fleet; to determine essential and necessary vehicles and consider opportunities to rationalise fleet.	Services to review their fleet	Q1 2022/23
T8	Director of Asset Management oneSource Director HR	Staff travel review	Look at pool cars and the possibility of creating car-pooling schemes.  Consider how to promote more fuel efficient vehicles when allocating car allowances.  Promote sustainable travel to our staff and contractors.	HR to be involved with permits, allowances etc.	Q1 2022/23
T9	Team Leader, Transport Planning, oneSource Director HR	Staff Travel review (ii)	Provision of parking spaces and cycle parking linked to action T8.		Q3 2022/23
T10	Team Leader, Transport Planning	Cycling and Walking Strategy	Cycling and walking strategy to be developed for residents, businesses, and the community.  To promote sustainable transport  To include / recommend / adopt measures to reduce congestion.  To include review on large-scale regeneration project design and strategic planning of town centres.  Review and advise members on a 6-monthly basis in relation to sustainable transport (to include e-scooters and other new technology)	Preparing the Council's Walking and Cycling strategy via the help of a consultancy – and implementing it.	Q1 2022/23

# APPENDIX A HAVERING CLIMATE CHANGE ACTION PLAN

## TRANSPORT

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
T11	Team Leader, Transport Planning	School Travel Plans	Get quarterly update reports on STARS Sustainable Travel Active, Responsible and Safe.	Information being evaluated.	Quarterly ongoing
T12	Project Manager, Environment	School Streets	Review current School Street pilots. Survey to be carried out with 3 schools (hylands, Squirrels Health and Branfil). Consultation to expand School Street programme.		Q4 2021/22
T13	Team Leader, Transport Planning	EV Charging Strategy	EV charging strategy for Council and the public – policy agreement and implementation this financial year to ensure funding secured.	Strategy being considered by SLT.	Q2 2022/23
T14	Schemes Manager	Last Mile Delivery	Produce a feasibility assessment and produce a paper to Cabinet		Q4 2022/23
T15	Head of Transport	Urban greening	Programme being developed to plant at least 250 trees per year on Havering land and highways		Annual programme



# WASTE MANAGEMENT

LED BY

*NICOLINA COOPER, AD PUBLIC REALM**PAUL ELLIS, HEAD OF ENVIRONMENT**JACKI AGER, WASTE AND EXTERNAL CONTRACTS MANAGER*

LEAD MEMBER

*COUNCILLOR OSMAN DERVISH*

CAMPUS MANAGER

*NIKKI RICHARDSON*

SENIOR ENERGY ADVISOR

*WASEEM ISHAQ*

DIRECTOR OF TECHNOLOGY AND INNOVATION

*PATRICK MONTGOMERY*

ACCOUNTABLE TO

*BARRY FRANCIS, DIRECTOR OF NEIGHBOURHOODS*

## INTRODUCTION

Havering, as a waste collection authority, arranges for the collection of domestic waste and recycling from over 108,000 properties each week. Since 2002 Havering's long-term priority has been to reduce the overall amount of waste presented by residents in the Borough. At the time the East London Waste Authority's contract with Shanks commenced, the Landfill Tax escalator was in operation and the national priority was to reduce waste going to landfill. Since then, recycling targets have come into effect, and whilst recycling continues to play a large role in waste management, waste minimisation remains both the key driver, and at the top of the waste hierarchy.

Havering regularly monitors and reports its waste flows through the national WasteDataFlow system, which then calculates the amount of waste produced per head of population, as well as Havering's household recycling rate. This includes collected household waste, waste from the reuse and recycling centre and municipal waste from Highways and Parks management activities. As a waste collection authority, Havering is not responsible for the treatment and reprocessing of that waste; that is the responsibility of the East London Waste Authority (ELWA) and its contractor, Renewi.

Havering continues to run various waste prevention campaigns including home composting, Reuse Shop, One Less Bottle, and Love Food Hate Waste. Funding from the LGA has supported work on behavioural change for household waste minimisation which has received national and international recognition.

Havering is reviewing its operations in Highways and Grounds Maintenance to reduce waste and, with ELWA, continues to review policies to prevent commercial waste entering the domestic waste stream at the household reuse and recycling centre.

In 2019 Central Government released its Resources and Waste Strategy, and in 2021 released two consultations (with a third to follow) that will shape future waste policy. This will likely include a mandated consistent set of materials for recycling for all Councils (also included in the Mayor's London Environment Strategy). Havering will be working to understand the service impacts and resourcing requirements in order to shape its future service provision.

#### **Vision of the Waste Work Stream**

*To reduce the overall amount of domestic waste produced in the Borough, and reuse and recycle as much of the remaining waste as possible.*

*To reduce the overall amount of waste produced by Council buildings and operations in the Borough, and reuse and recycle as much of the remaining waste as possible.*

*To measure and reduce carbon emissions associated with contracted activities and fleet operations in the Borough.*

*To comply with local and national legislation around waste and emissions, including the London Environment Strategy and national Resources and Waste Strategy.*

**Scope of Theme**

- Collect household waste generated in Havering and deliver to Renewi for recycling / processing under the ELWA waste disposal contract.
- To oversee the management of clinical waste arising in the borough.
- To manage business waste in the Borough, where requested.
- To manage waste generated by the Council's operations where requested.
- To manage illegally tipped waste in the Borough, and street cleansing waste.
- To refer customers to the correct outlets for hazardous waste disposal.

**Links to other work streams**

There are nine work streams in the Havering Climate Change Action Plan. These are:

- Built Environment
- Business Continuity
- Energy Management
- People
- Procurement
- Public Protection
- Stakeholder and Community
- Transport
- Waste Management

**Knowledge Links****GLA -**

<https://data.london.gov.uk/dataset/waste-plans> To benchmark / compare against other Boroughs

[www.wastedataflow.org](http://www.wastedataflow.org) - National wasteflow database to compare waste and recycling performance against other Boroughs

## Key associated plans, policies and strategies

OWNER	KEY ASSOCIATED DOCUMENTS	REVIEW DATE OR TARGET	BY WHEN
Waste & External Contracts Manager and Cabinet	East London Joint Waste and Resources Strategy	To be published in February 2022, with member and public engagement in the meantime.	Q4 2021/22
Waste & External Contracts Manager	Reduction and Recycling Plan (GLA)	Review in July 2021 (last review December 2020)	Q4 2021/22
Waste & External Contracts Manager	National resources and waste strategy consultation – borough response	Will feed into upcoming Environment Bill	Completed June 2021

## How we can achieve our target

The following table sets out a number of key actions which will support the Council in meeting its climate and sustainability ambitions. Where groups of actions exist in other plans and strategies, they are not replicated in the Havering Climate Change Action Plan but will be managed as part of the normal business management. These plans will be developed taking into account the Council's environmental commitments.

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
W1	Waste and External Contracts Manager	Various tasks and targets within published Reduction and Recycling Plan	Undertake twice yearly review to ensure delivery.	<a href="#">This is in the process of being updated</a>	2023

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
W2	Campus Manager(s)	Internal disposal / recycling of stationery, furniture etc.	<p>Identify departments which have significant contributions to Council waste production (through paper, catering, grounds maintenance, etc.), and develop and implement ways to reduce waste.</p> <p>Investigate impact of changes to cleaning regime on waste &amp; recycling in Council facilities.</p>	Corporate building recycling rolled out. Presentations given on waste prevention and recycling.	Q4 2021/22
W3	Campus Manager(s) / Director of Technology and Innovation	Internal disposal / recycling of ICT, mobile working equipment.	Develop and implement ways to reduce e-waste. Ensure responsible disposal of e-waste using the waste hierarchy to ensure as much is reused or recycled as possible, in a secure way.	Contract already in place for IT equipment recycling. However, information will need to be shared on the amount of IT waste recycled.	Q4 2021/22
W4	Campus Manager(s)	Mercury House / corporate building decommissioning	Set standards for the current and future decommissioning of corporate buildings.		Q4 2021/22
W5	Campus Manager(s)	Office waste recycling	Design an improved system for recycling of dry recyclate and potentially food waste, in line with upcoming government legislation.	Environment Bill will introduce this in coming months. Waste Team to provide advice.	Q3 2022/23

REF	ACCOUNTABLE COUNCIL OFFICER	SUBJECT	TASK	PROGRESS	BY WHEN
W6	Service-specific, supported by Campus Managers and Waste Team	Effectively manage and reduce non-office waste.	<p>Develop and communicate waste plans for Council operated buildings and share as good practice.</p> <p>Investigate opportunities for the Council to find more cost-effective ways to manage and reduce non-office waste. Investigate recycling facilities for non-corporate council buildings e.g. libraries, childrens' centres etc.</p> <p>Investigate opportunities for Parks, Cemeteries and Highways to find more cost-effective ways to manage and reduce waste.</p>	Cemeteries waste has been reviewed. Green waste is already composted via Gerpins Lane, and any change to that arrangement such as delivering in-house would result in higher emissions due to the transport distance. However, parks waste is also being reviewed to ascertain whether a second composting facility would be beneficial. Currently most waste is sent for recycling / reuse from cemeteries, with a very small amount of unrecyclable waste produced. This portion of the waste is under scrutiny to see if outlets can be identified.	Q1 2022/23
W7	Head of Facilities Management Head of Transport Services	Ensure a process of monitoring of fuel consumed, and estimate of CO <sub>2</sub> emissions of contractors and Council fleet.	Contractors to report annually on CO <sub>2</sub> emissions from vehicle-based waste collection operations, and maintain or reduce litres of fuel used in delivery of the service year on year.	Will be collecting an increased range of recycling from 2023 onwards which may require additional or different fleet, the resulting impact on fuel consumption will be monitored.	Q2 2022/23
W8	Business Development Executive	Minimise the Council's plastic consumption	Develop and design a project with milestones to reduce the use of plastic across all Council activities.	Design and engagement underway	Q3 2021/22

- The carbon footprint of Havering's Corporate Estate has been reduced by 37% over the past 3 years. Real time monitoring of carbon emissions is displayed in the refurbished Town Hall foyer.
  - Improvements to street lighting have reduced annual energy consumption by 69% and CO<sub>2</sub> emissions by 120% over the past eight years. 99% of the council's street lights have been switched to LED, and the majority of all corporate buildings have either LED lighting or energy efficient fluorescent lighting technology.
  - £770,000 government funding has been secured for the installation of energy saving improvements to homes in Havering. Supplying one property with 10 panels will save 1tonne of CO<sub>2</sub> emissions per year, the equivalent of planting 46 trees.
  - Elm Park library was one of the first low-carbon emission buildings in London, with a green living roof and solar panels. Solar panels have also been installed on Hornchurch library.
  - ICT have commenced moving the corporate Data Centre to the Microsoft Azure Cloud. Microsoft run their data centres as net carbon neutral with the aim to be carbon negative by 2030.
- 

- Cabinet members have led six climate change workshops and members of the Youth Parliament have taken part in environmental awareness campaigns, such as a litter pick alongside Councillor Ciaran White.
  - Staff discussion has been initiated to ensure there is an organisation-wide ethos to taking action in the services delivered by the Council.
  - The Voluntary sector has been engaged in Havering's climate change agenda, and have delivered two anti-idling training sessions to local businesses. Havering Volunteer Centre was supported to undertake a survey of businesses and schools about their involvement in tackling climate change. Climate change facts have been presented and discussed with various groups including the Community Cohesion Forum.
- 

- 16 Havering parks have been awarded the prestigious Green Flag status in recognition of their excellence and the essential involvement of our community with the Friends of Parks groups.
  - Havering currently has 16 park management plans, all of which include a section on environmental sustainability. A Parks Strategy is currently being consulted upon which will set out the objectives and plans for park management over the next 10 years.
  - 10% of the borough's highway verges have been designated as urban meadows.
  - 7,000 of the 25,000 gullies in Havering have been cleared of debris, to mitigate the risk of flash flooding. The remainder are scheduled to be cleaned by the end of 2021.
  - An environmental clean-up of Rainham Creek has been undertaken, with annual maintenance to take place in the future.
  - 1000 trees to commemorate the impact of Covid-19 on the local community will be planted from November 2021.
- 

- The Mayoral Car has been replaced with a Battery Electric Vehicle (BEV). Havering's Electric Vehicle (EV) Strategy has been drafted, setting out ambitious plans for delivery.

- All major development applications must be accompanied by a travel plan, in line with TfL guidance, which will include measures to travel sustainably to and from work.
  - Five electric commercial mowers have replaced the current noisy polluting petrol units with the end result of zero emissions and less noise generated in residential areas.
  - Agricultural and horticultural fleets will be switching to gas to liquid fuel (GTL) in 2021.
  - Driver Certificate of Professional Competence accreditation continues to be delivered to Council vocational and fleet drivers, which is linked to ECO Driving and anti-idling.
  - The Bikeability scheme offers free cycle training to Havering residents.
  - In 2020, 47 schools out of 88 were recognised with the TfL STARS accreditation scheme - 41 gold and 6 bronze. The TfL STARS (Sustainable Travel: Active, responsible, safe) accredited travel planning programme supports schools to reduce car use on school run.
  - 3 school streets schemes have been introduced in September 2020 to improve air quality and reduce carbon emissions. Further school-street schemes to be implemented, funding permitting.
  - Miles the Mole regularly visits schools as part of the Air Quality Campaign and Havering continues to promote AirTEXT through the Council's social media platform.
- 
- Havering has the highest recycling rates within the East London Waste Authority area (ELWA) at 37.4% (LBN 17.8%, LBBD 24.7% and LBR 25.3%). Havering is working with ELWA and the partner boroughs to produce a long term waste disposal strategy, which will cover waste reduction, reuse, recycling and waste treatment.
  - The Two Bag Challenge enhanced waste reduction scheme has become a national and international exemplar of best practice.
  - The Love Food Hate Waste campaign offers residents free training sessions and resources to reduce food waste at home.





## CABINET

### Subject Heading:

Introduction of All day visitors' permit

### Cabinet Member:

Councillor Osman Dervish

### SLT Lead:

Barry Francis, Director of Neighbourhoods

### Report Author and contact details:

Jo Green

Parking Manager

[jo.green@havering.gov.uk](mailto:jo.green@havering.gov.uk)

01708 432913

### Policy context:

Parking Strategy and Parking Operational Plan

### Financial summary:

New all-day visitor permit at a cost of £39 for 10 visits.

Estimated cost of £1,000 for purchase of permit stationary which will be paid from revenue account: A24670 641360 -0000-000000-000000

### Is this a Key Decision?

Yes

Significant effect on two or more Wards

### When should this matter be reviewed?

Annually

### Reviewing OSC:

Environment

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

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

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☐  
☐  
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## **SUMMARY**

The Council want to implement an all-day visitor permit in resident parking zones where applicable. This will enable and assist those who have longer term visits and should reduce the use of the shorter-term visitor permits which is currently the only option available to them.

## **RECOMMENDATIONS**

1. That having considered the information and recommendations contained in this report the Cabinet agrees to the introduction of a new all-day visitor permit, at the cost of £39 for 10 visits, for use in controlled parking zone ROST which covers the following roads in Romford Town Ward:

Cotleigh Road	
Honiton Road	
Stockland Road	
St Andrews Road	– Upon completion of redevelopment
Queens Street	- Upon completion of redevelopment
Waterloo Gardens	- Upon completion of redevelopment
Albion Close	- Upon completion of redevelopment

## **REPORT DETAIL**

### **1. BACKGROUND**

- 1.1 Following concerns raised by ward members and residents of visitor permits primarily in controlled parking zone ROST (locations noted above) which is currently Havering's only controlled parking zone operational 24 hours per day 7 days per week, officers have reviewed the visitor's permit policy with a view to introducing a zone-specific visitors' permit.
- 1.2 The Council currently operates several CPZ's with differing periods of operation of between 1 hour and 24 hours. The Council also issues different visitor parking permits (linked to the operational hours of the CPZ) for periods of 4, 6, or 8 hours. The result is that some visiting vehicles, parked within a CPZ for a full day, may be required to display multiple visitor parking permits/purchase multiple parking sessions using the virtual permit system (MiPermit) to cover the duration of their stay. This is particularly relevant for CPZ ROST.
- 1.3 Visitors and residents of CPZ ROST find the current permit arrangement confusing which has resulted in the issue of penalty charge notices where permits have been incorrectly displayed. The introduction of the new all-day permit is aimed at removing confusion.
- 1.4 The permit will enable a visitor to CPZ ROST to park for 24 hours from the time they arrive. Currently, a permit is activated by scratching out the relevant date and time that the vehicle is parked. Once this has been completed and displayed on the vehicle, a visitor would be permitted to park for a maximum period of 24 hours (with the new all-day permit) from the time of activation.

- 1.5 For example, if a permit was activated at 21:15 on 1<sup>st</sup> September the vehicle would be covered until 21:14 on the 2<sup>nd</sup> of September. Should a visitor be staying for the weekend, multiple permits can be used to cover the whole duration of stay.
- 1.6 Where short term visits are made, the 8-hour permits can continue to be used.
- 1.7 There is no expiry date for these permits therefore the purchase of 10 permits can be used over a longer period should 24-hour visits not be regular.
- 1.8 Visitors are required to display a valid visitor permit or have made the required payment using MiPermit, on their vehicle always during the prescribed hours of the CPZ, in accordance with the Visitor Permit Terms and Conditions, to avoid being issued with a Penalty Charge Notice.
- 1.9 It is proposed that the new all-day visitor parking permits will be available for purchase online. This is the same permit application process that is now in place for all other categories of visitor parking permits. There will also be provision for paper permits to be issued for the first 12 months to assist those unable to use MiPermit.
- 1.10 10 visitors' permit sessions is currently £13. This is regardless of whether the parking session is for 4, 6 or 8 hours.
- 1.11 It is proposed to offer the 24-hour permit at the same cost as three 8 hour permits - £3.90.

## **REASONS AND OPTIONS**

2. The Council currently operates several CPZ's with differing periods of operation of between 1 hour and 24 hours. The Council also issues different visitor parking permits (linked to the operational hours of the CPZ) for periods of 4, 6, or 8 hours. The result is that some visiting vehicles, parked within a CPZ for a full day, may be required to display multiple visitor parking permits to cover the duration of their stay. This is particularly relevant for CPZ ROST.
- 2.1 Visitors and residents of CPZ ROST find the current permit arrangement confusing which has resulted in the issue of penalty charge notices where permits have been incorrectly displayed. The introduction of the new all-day permit is aimed at removing confusion.

### **3 Reasons for the decision:**

- 3.1 The new permit for CPZ ROST will enable visiting vehicles to park for 24 hours from the time they arrive. The visitor will need to activate the permit using MiPermit or validate the paper permit by scratching off the arrival date and time. Once this has been completed the visitor can stay for a maximum of 24 hours from the time and date they have arrived.

## **IMPLICATIONS AND RISKS**

**4 Financial implications and risks:**

- 4.1 It is anticipated that there will be no additional income from the sale of the all-day visitor parking permits as they are likely to be purchased by those residents who would normally display multiple permits to cover an all-day period.
- 4.2 The cost to purchase the initial stock of all-day permits will be £1,000 but may be less only occurring with the introduction of e-permits.
- 4.3 Should the purchase of permit stock be required this will be funded through the existing revenue code A24670-641360-0000-000000-00000

**5 Legal implications and risks:**

- 5.1 Here officers are seeking authority to introduce a new 24-hour parking permit for use within CPZ ROST. Under section 45 of the Road Traffic Regulation Act 1984 ("RTRA 1984") a local authority has the power to designate parking places on the highway, to charge for use of them, and to issue parking permits for a charge.
- 5.2 Section 55 of the RTRA 1984 makes provision for the monies raised under section 45 of the RTRA 1984, in that it provides for the creation of a ring-fenced account into which monies raised through the operation of parking places must be placed, and for the application of any surplus funds.
- 5.3 Section 122 of the RTRA 1984 imposes a general duty on local authorities when exercising functions under the RTRA. It provides, insofar as is material, as follows:
  - (1) It shall be the duty of every local authority upon whom functions are conferred by or under this Act, so to exercise the functions conferred on them by this Act as (so far as practicable having regard to the matters specified in subsection (2) below) to secure the expeditious, convenient, and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway
  - (2) The matters referred to in subsection (1) above as being specified in this subsection are—
    - (a) the desirability of securing and maintaining reasonable access to premises.
    - (b) the effect on the amenities of any locality affected and (without prejudice to the generality of this paragraph) the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run.
    - (bb) the strategy prepared under section 80 of the Environment Act 1995 (national air quality strategy).
    - (c) the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles; and
    - (d) any other matters appearing to the local authority to be relevant."
- 5.4 Before making a Traffic Order the Council should ensure that the statutory procedures regarding consultation and publication set out in the Local Authorities Traffic Orders (Procedure)(England & Wales) Regulations 1996 (SI 1996/2489) are complied with. The Traffic Signs Regulations & General Directions 2016 govern road traffic signs and road markings.

**6 Human Resources implications and risks:**

- 6.1 The proposal can be delivered within the standard resourcing within the existing teams and has no specific impact on staffing/HR issues.

## **7 Equalities implications and risks:**

- 7.1 The proposals will allow residents to have all day visitors easily and with less inconvenience.
- 7.2 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.

- 7.3 The Council is committed to all 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 socioeconomics and health determinants.
- 7.4 This will affect all members of the public including those with disabilities or those with additional needs, but assurance is given that Disabled persons will not be disadvantaged. It is not intended that the introduction of the all-day permit will have an adverse effect on any of the protected characteristic groups, but this will be monitored and if so reviewed where necessary

## **8 Health and Wellbeing implications and Risks**

- 8.1 Traffic and parking management is a key element particularly in response to Covid-19, ensuring key workers have access to parking helps assist residents and businesses. Furthermore, traffic and parking management is critical to keeping vehicle movement thus allowing emergency services space to travel. The council has a statutory duty to keep traffic moving and this must be adhered to.
- 8.2 Current national guidance around transport during the COVID-19 pandemic is to walk and cycle to help support road networks and public transport. However, for some residents this will prove more challenging therefore providing discounted parking facilities provides people the opportunity to move around the borough safely. With the continued easing of lockdown and the encouragement of returning to school and workplace, we need to ensure that businesses can operate and residents are able to park.
- 8.3 The introduction of an additional permit type for the residents who reside in this specific parking zone will provide an alternative choice when purchasing their visitor permits. It will enable the resident to have all day visitors without negatively impacting upon them both financially and which may also enhance their social and personal needs.

- 8.4 There are no schools, nurseries, or care homes in this parking area so these do not need to be considered as implications or risks.
- 8.5 We believe this parking permit may provide increased social benefits for the residents in this parking area as it will allow residents to have visitors without the added concern for a Penalty Charge Notice being issued, therefore potentially reducing social isolation and enhancing well-being.
- 8.6 We do not believe this permit will promote car dependency or reduce people's physical activity in this area as all day parking is already offered and this permit merely simplifies the current arrangements of visitor parking.

<b>BACKGROUND PAPERS</b>
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None



## CABINET

10 November 2021

### Subject Heading:

Local Government Association (LGA),  
Independent Race, Equality, Accessibility,  
Diversity and Inclusion, (READI),  
Commissioned Review May 2021:  
Approval of Action Plan.

### Cabinet Member:

The Leader, Councillor Damian White

### SLT Lead:

Jane West

### Report Author and contact details:

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### Policy context:

This is the Council's high level action plan to implement the improvements requested and identified through the Independent LGA READI review priority recommendations. These improvements will help achieve the Council's promise of zero tolerance of racism and discrimination of any kind, helping the delivery of the Council's programme to be an employer of choice and achieve the Excellence Standard against the LGA's Excellence Framework for Local Government exacting criteria.

### Financial summary:

A one-off investment of £250k has already been agreed for the additional programme resources to accelerate the pace of delivery. This will need to be reviewed as part of the implementation and preparation for phase two: The Borough –wide READI review.

### Is this a Key Decision?

This report is a key decision as the improvements will have significant beneficial effects on two or more wards.

**When should this matter be reviewed?**

Given the strategic nature of the action plan, and the role of Overview and Scrutiny Board, this decision is one for consideration for scrutiny review by the Board through the progress of delivery against the action plan reviewed on at least a six monthly basis.

**Reviewing OSC:**

Overview and Scrutiny Board.

**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]

<b>SUMMARY</b>
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In June 2021 the Leader of the Council committed to commissioning a proactive improvement independent review of race relations initially within the Council. Whilst this retained a significant focus on Race, it was broadened out to ensure other protected groups were included, in recognition that Havering as a place is dynamic and its demographics are changing fast.

Some external press articles have said this was an Investigation, it was not, nor was the review requested by any other organisations This independent review was part of the Council's decision to hold a "mirror up", and get an honest snap-shot of the Council's internal policies and procedures, to safe-guard against complacency in its public sector equalities duties (PSED). This review was bravely undertaken during a global pandemic, and heightened awareness and sensitives raised by the heinous murder of George Floyd, which directly influenced the commitment to this review. Few other councils would have chosen to do this at such a period in our history. Havering is determined that these factors are exactly why we should tackle this now.

This report focuses on the Council's action plan, developed in response to the Council commissioning the Local Government Association (LGA) to undertake the Independent Race, Equality, Accessibility, Diversity and Inclusion (READI) Review and addresses the LGA's fifteen priority improvement recommendations.



The Council had a ten point plan to ensure it maximised the “warts and all” candour afforded through a “tell-us how it really is for you, and what do we need to change” ethos. A 400 page internal self-assessment was prepared for use by the LGA, to support its focus and enable robust exploration in confidential sessions with staff, Members and the public and key partners through the Community Cohesion and Engagement Forum.

It is proposed that the action plan in Appendix B is approved by the Cabinet and monitored on a six monthly basis to ensure the recommended improvements are implemented and any appropriate action taken to keep this on track, together with other information that can help show the impact on the ground.

Given the importance of this review and why it was undertaken, Cabinet have reiterated the Council’s stance and promise to be resolute in its zero tolerance of racism and discrimination of any kind. Given some of the misrepresentation in the press, it is an important cornerstone to reiterate and strengthen building trust and the dialogue that must be in place if things are to change. Without this we can’t grow the culture where people feel able to report, receive support, deal with and discuss the issues, however uncomfortable going forward.

As the improvements are strategic and cross-cutting in nature, and underpin the Council’s ambition to be an Inclusive employer of choice and achieve the ‘Excellence’ standard in the Equality Framework for Local Government (EFLG), a role for Overview and Scrutiny is proposed, this is in accordance with the statutory role of the Overview and Scrutiny function as set out in the Council’s Constitution. This request is one for consideration by the Overview and Scrutiny Board, who select their own areas for scrutiny.

## **RECOMMENDATIONS**

The action plan sets out a high level “what needs to be done”, and the timescales to achieve this. It is recommended that the Cabinet:

- Agrees the high level action plan in Appendix B
- Agrees the LGA’s READI report is published in its entirety
- Reviews progress against the action plan on a six monthly basis
- Agrees this report goes to Full Council for their endorsement
- Urges all Members to support the READI Programme
- Asks Overview and Scrutiny Board to consider progress against the action plan on a six month basis in line with the Scrutiny function
- Agrees this review and subsequent programme, informs the borough-  
“Phase two”, Borough wide READI review planning.

## **REPORT DETAIL**

## **1. Background**

1.1. The Council's Equality and Diversity arrangements were last reviewed in 2010 when the new Equalities Act came into being. In 2019 the Council committed itself to voluntarily electing to work towards the Excellent Framework for Local Government ("EFLG") Standard and in 2020 to becoming an employer of choice. In June 2020, in direct response to the murder of George Floyd, the Leader of the Council asked for an independent review at the AGM, to safeguard against complacency and ensure we had the right policies and procedures in place. Initially this was going to focus on race relations, but in light of the PSED requirements, this was broadened to include other protected characteristics, whilst having a significant focus on race.

1.2. The LGA was commissioned to undertake the independent review. The LGA set the exacting EFLG standards and offered a bespoke team of Members and officers who specialise in this area. The review team, comprising a senior member and officers from other local authorities spent three days working with Havering, between 18<sup>th</sup>- 26<sup>th</sup> May 2021. The Review team considered the five EFLG standard themes:

- **Understanding of the local place and priority setting:** Does the council understand its local context and place and use that to inform a clear vision and set of priorities?
- **Leadership of Place:** Does the council provide effective leadership of place through its elected members, officers and constructive relationships and partnerships with external stakeholders?
- **Organisational leadership and governance:** Is there effective political and managerial leadership supported by good governance and decision-making arrangements that respond to key challenges and enable change and transformation to be implemented?
- **Financial planning and viability:** Does the council have a financial plan in place to ensure long term viability and is there evidence that it is being implemented successfully?
- **Capacity to deliver:** Is organisational capacity aligned with priorities and does the council influence, enable and leverage external capacity to focus on agreed outcomes?
- In addition, given the review's significant focus on race, a bespoke sixth theme for race equality was developed.

## **2. The Independent review process**

- 2.1. The review was at the direct bequest of the Leader and not an investigation, it was not judged or marked and was entirely at the request and invitation of the Council. The Council engaged an independent expert review client/consultant and developed a 10 point plan to ensure the LGA were provided with a “bottom-up” all service in depth internal self-assessment, which was used by the peer team initially to prepare for the review. This was significantly more substantial than normal, due to the 27 service areas feeding into the amalgamated assessment. The plan saw actions ahead of the LGA report and recommendations. The review team used their experience and specialist knowledge to reflect on the information presented to them, and with people they met, things they saw and material that they independently read and researched.
- 2.2. The review was born out of recognition that the lived, day-to-day experience of some of our staff, the majority of whom live and work in the borough, was not as it could or should be. It was also informed by the ([www.haveringdata.net/population-demographics/](http://www.haveringdata.net/population-demographics/)) knowledge that the pace of demographic change in the borough is as fast if not faster than most places nationally (11<sup>th</sup> fastest changing borough in the UK according to 2018 Campaign Company analysis). Rather than shy away from what would be said, the Council commissioned this review as an opportunity to set the right foundations and encourage people to have their voices heard in a safe and supported environment-and fed-back through the report. This was in the knowledge it would make difficult reading. Below is the 10 point plan followed to support and ensure this was thorough;

**Step 1 - Nov – Dec 20** — Recruit the independent consultant, commission review and undertake this plan.

**Step 2 – Dec 2020** – Inclusion Diversity Equality and Access (IDEA) MS Networked Teams – including leadership collaboration spaces, Equality Diversity & Inclusion Committee (EDIC) spaces, and nominated leads spaces

**Step 3 – Jan - April 2021** – A detailed, independent internal self-assessment, with an additional race review strand, detailed data analysis and individual service self-assessments.

**Step 4 – Feb - April 2021** – A staff and community engagement programme.

**Step 5 - May 18,19,26 2021** - An independent LGA review – with an experienced panel, conducting 20 interviews and focus groups and in-depth analysis, including a dedicated race equality review.

**Step 6 – July 2021** – Mandatory online training for all managers

**Step 7 – July 2021-** draft READI strategy & how we deliver the change

**Step 8 – July-August 2021:** Series of lunch time sessions: Tackling racism in the workplace, reasonable adjustments, and cultural competence pilot.

**Step 9 – September 2021:** All Member equalities & PSED training

**Step 10 – September 2021:** Receive and circulate LGA report and responses to the 15 priority recommendations. To be taken to November Cabinet.

- 2.3. The review considered a range of documents and information in order to ensure they were familiar with the Council and the challenges it is facing. The team then spent 3 days virtually onsite at Havering, during which they:
- Spoke to more than 150 people including a range of Council staff together with Councillors and external partners and stakeholders.
  - Gathered information and views from more than 25 meetings, research and reading.
  - Collectively spent more than 250 hours to determine their findings – the equivalent of one person spending around seven weeks in LBH
- 2.4. The Review team undertook four feedback sessions at the request of the Council sharing their initial working slides. This included staff forum leads, service review leads, Trade Unions, the Cabinet and Group Leaders and others.

### **3 The LGA's Independent Report, Findings and Recommendations**

- 3.1. The LGA's full independent report is attached in Appendix A. The report makes for difficult and uncomfortable reading in some places and highlights examples of where staff have experienced things that have no place in an inclusive organisation and will not be tolerated.
- 3.2. The review recognised the commitment of leadership and identified positive steps for the future, including *"The borough is in a good position for change. The Leader, Chief Executive and senior officers are committed to changing the reputation of the Borough and working towards being an anti-racist Borough. Senior officers recognise that there is significant work to be done to achieve this aim as demonstrated in the Council's self-assessment. The LGA review team have been asked to give recommendations to help the organisation progress towards this goal. This is an important start, as it is vital that both managerial and political leaders model the behaviours that are expected of themselves, other councillors and staff"*.
- 3.3. The review is a snapshot in time and acknowledges that some of the feedback may be about things the Council is already addressing and progressing.

### **4 The LGA Review Priority Fifteen Recommendations for Improvement**

- 4.1. The following are the Review Team's priority recommendations for the Council and are addressed in the Action Plan, and recommended for approval, Appendix B:

**4.2. The LGA's Fifteen Priority Actions**

1. Clarify and communicate the next stage in the Council's Equality, Diversity & Inclusion review work. We understand the internal READI review is to be followed up by an external review of race relations across the borough, but this is not clearly understood across the organisation
2. Ensure councillors understand the implications of the changing demographics of the borough, including member workshops or training sessions
3. Share lived experiences with the leadership (senior officers and councillors) ensuring that this is done in a safe and supportive environment. These experiences will need to be acted upon
4. Use the self-assessment exercise as the first step in developing accessible service plans
5. Seek understanding from the staff forums as to how they see their role in the organisation and determine what the organisation wants from the staff forums
6. Develop with the EDIC group a clear and immediate EDI action plan that is SMART with clear timelines (e.g., 12 months, 36 months, etc)
7. Establish a clear operational lead for EDI, with ownership and responsibility around delivery, ensuring that this appointment is well-known across the organisation. Ensure that the member lead is also known and visible on this agenda
8. Collect, analyse and publish workforce data on protected characteristics, including pay gap data
9. Work with the staff forums and communications teams to increase disclosure rates of personal race and disability data in particular as well as across all protected characteristics
10. Improve understanding across the board of the complexity of the issues – EDI is not binary
11. Run EDI training for staff and councillors, starting with Corporate Leadership Team and Commissioning and Procurement
12. Political and managerial leaders to ensure that they are meeting their responsibilities as set out in the Public Sector Equality Duty, for example to promote EDI through their actions, and role model appropriately
13. Behavioural expectations of staff, customers and councillors to be made explicit and reinforced with appropriate support and disciplinary mechanisms
14. Review the effectiveness of the personal development review (PDR) process across the organisation

15. Adopt a communications strategy emphasising a zero-tolerance policy for all forms of discrimination, covering behaviour of Members, officers and customers. Should this policy be breached, ensure that appropriate action is taken, including police involvement if necessary.

## **5 Next Steps**

- 5.1. The Council has developed its high level action plan for the fifteen priority recommendations and is seeking Cabinet approval through this report.
- 5.2. The new READI programme team will strengthen and take forward the detailed work plan to ensure the changes required are undertaken including working across the Council to ensure that each and every one undertakes their responsibility in making the promise of Havering being an inclusive council, with zero tolerance to racism and discrimination of any kind.
- 5.3. The Cabinet will monitor progress against the action plan on a regular basis.
- 5.4. Overview and Scrutiny Board will be asked to consider reviewing progress against the priority improvement actions.

## **6 The Phase Two Borough Wide READI review**

- 6.1. The Terms of Reference and approach will be informed by the LGA READI review and developed by the READI programme manager and taken to Cabinet for approval and funding in due course. As this will involve other borough partners and stakeholders, wider agreement and collaboration as to what, when, who and how will need careful consideration and funding agreement.

### **Appendix A: LGA Independent READI Report.**

### **Appendix B: The Council's draft action plan to implement the priority improvement recommendations**

<b>REASONS AND OPTIONS</b>
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#### **Reasons for the decision:**

The purpose of having the LGA READI review was to gain an external independent view of priority and practical recommendations to assist the Council's progress against its ambitions and achieving its promise of zero tolerance to racism and discrimination and avoiding complacency in undertaking its Public Sector Equalities Duty.

**Other options considered:**

This option was adopted given the LGA is the body responsible for the Excellence Framework for Local Government Standard and could provide suitably experienced review team.

<b>IMPLICATIONS AND RISKS</b>
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**Financial implications and risks:**

There are no direct financial implications arising from this report. The Council has earmarked £250k for the programme resources as part of its planning for the review.

It may be that the improvements themselves require additional funding. If so, any requirement for additional funding will be brought back for consideration and approval via the appropriate channels as and when they materialise.

**Legal implications and risks**

Implementation of the action plan will ensure so far as possible that the Council complies with its duties under the Equality Act 2010 including the public sector equality duty set out below.

The Scrutiny Board is responsible for its own agenda and therefore Cabinet can merely request that they consider reviewing the action plan on a six monthly basis, but they are free to decline or to review on a more frequent basis if they so decide.

**Human Resources implications and risks**

There are no HR implications or risks that impact directly on the Council's workforce as a result of the recommendations. Plans are in development as part of the People and Organisation Transformation Programmes to create a more strategic approach to the leadership and management of the Council's workforce, with equality, diversity and inclusion at the heart of this.

**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. There is no EQHIA for this stage, as all the actions are in direct support of having a positive impact on those staff with protected characteristics, and to foster better relations with those that don't-through direct action.

### **Health implications and risks**

The Council should consider the impacts of racism and discrimination in terms of health and well-being, including mental ill health, emotional well-being, lower self-esteem and higher anxiety, stress and depression associated with discrimination and racisms as well as other impacts all of which the action plan is attempting to tackle.

The Action Plan is a positive step and sets out strategic steps to tackle racism, and to help achieve the delivery of the Council's Programme to be an Employer of Choice and Achieve the Excellence Standard. The Action plan should evolve as the programme progresses making sure the impact on health and well-being – on the work force and wider population, is inclusive.

## **BACKGROUND PAPERS**

**EFLG Standard:** [Equality Framework for Local Government | Local Government Association](#)

**Race at work Charter:** [Race at Work Charter Signatories - Business in the Community \(bitc.org.uk\)](#)

**PSED:** [Public sector equality duty - GOV.UK \(www.gov.uk\)](#)

**Equalities Act 2010:** [Equality Act 2010: guidance - GOV.UK \(www.gov.uk\)](#)

**Havering self-assessment: for the LGA only**



# **Race Equality, Accessibility, Diversity, and Inclusion (READI) Review London Borough of Havering**

18<sup>th</sup>, 19<sup>th</sup> and 26<sup>th</sup> May

## **Feedback Report**

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# 1. Executive Summary

London Borough of Havering (LBH) invited the LGA to undertake the Race Equality, Accessibility, Diversity and Inclusion (READI) Review.

The borough is in a good position for change. The Leader, Chief Executive and senior officers are committed to changing the reputation of the Borough and working towards being an anti-racist Borough. Senior officers recognise that there is significant work to be done to achieve this aim as demonstrated in the Council's self-assessment. The LGA review team have been asked to give recommendations to help the organisation progress towards this goal. This is an important start, as it is vital that both managerial and political leaders model the behaviours that are expected of themselves, other councillors and staff.

Councillors are aware that they have community leadership roles, but it appears that few understand their legal responsibilities with respect to equality. Middle managers also appear to be unaware of their responsibilities, or how to address particular issues that come up in their teams. This has led to a situation where people are reluctant to report racist incidents whilst others are reported anecdotally, but not then being dealt with effectively.

There are pockets of good practice across the council: a skilled and capable Communications Team, considerable knowledge about equality, diversity and inclusion (EDI) in both Adult and Children's Social Care, and examples of the council supporting community events, such as Romford Pride, an LGBTQ+ youth group. The fact that the council has invited peers in to conduct this review is also a positive indication of a council that is keen to reflect, be challenged and improve. However, this is not consistent across the organisation, and there are few mechanisms to share internal learning.

60% of the workforce live in the borough, and 20% of residents in the Borough are disabled or have a long-term illness or impairment. It would be reasonable to assume that the workforce has a significant proportion of disabled people, although there is a low level of disability declaration amongst the council workforce. A recent wellbeing survey highlighted disability inequality being overlooked.

The review team heard the terms "casual racism" and "casual sexism" frequently during the focus groups and meetings. These terms belittle the seriousness of racism and sexism and implies that the behaviour has been somewhat normalised. Racism and sexism are not acceptable, and are damaging not only to the individuals concerned, but to the culture and reputation of the organisation.

There are wider issues which affect how staff and communities experience EDI issues. The review team suggests developing a culture of learning, with a service-based approach and council-wide strategic medium- and long-term planning. This work needs to be clearly communicated internally and externally, with clear lines of responsibility, timeframes and demonstrable actions and tangible outcomes

Poor communication was at the heart of many of the problems that the review team encountered. However, the Communications Team was one of the council's strongest

assets, having a clear strategic oversight of the borough, and the council's role in supporting its residents.

The Council has identified evidence of discrimination, poor behaviours, and structural barriers, as well as highlighting a gap in specific data. The review team is clear that the council should not wait for more detailed data to become available but acknowledge the examples of people's lived experience that have been shared and address the organisational culture as quickly as possible.

London Borough of Havering feels like an organisation in transition to reset its EDI work going forward. It could use the post-Covid recovery as a way of improving its approach to service planning and strategic oversight, building equality, diversity and inclusion issues into this work to ensure that there are clear, well-publicised mechanisms to support its staff experiencing discrimination in any work situation (including while out in the community). This change in culture may take time to embed, but there are demonstrable actions that can be taken immediately to begin to address the issues.

## **2. Recommendations**

The review team was asked to identify practical steps for the council to take to improve the current situation. The majority of the report is therefore about recommendations, grouped into Quick Wins, and Priority, Medium-term and Long-term actions. The 'priority' recommendations are set out below:

### **Priority actions**

1. Clarify and communicate the next stage in the Council's EDI review work. We understand the internal READI review is to be followed up by an external review of race relations across the borough, but this is not clearly understood across the organisation.
2. Ensure councillors understand the implications of the changing demographics of the Borough, including member workshops or training sessions.
3. Share lived experiences with the leadership (senior officers and councillors) ensuring that this is done in a safe and supportive environment. These experiences will need to be acted upon
4. Use the self-assessment exercise as the first step in developing accessible service plans
5. Seek understanding from the staff forums as to how they see their role in the organisation and determine what the organisation wants from the staff forums.
6. Develop with the EDIC group a clear and immediate EDI action plan that is SMART with clear timelines (e.g., 12 months, 36 months, etc)
7. Establish a clear operational lead for EDI, with ownership and responsibility around delivery, ensuring that this appointment is well-known across the organisation. Ensure that the Member lead is also known and visible on this agenda.
8. Collect, analyse and publish workforce data on protected characteristics, including pay gap data

9. Work with the staff forums and communications teams to increase disclosure rates of race and disability in particular as well as across all protected characteristics
10. Improve understanding across the board of the complexity of the issues – EDI is not binary.
11. Run EDI training for staff and councillors, starting with Corporate Leadership Team and Commissioning and Procurement.
12. Political and managerial leaders to ensure that they are meeting their responsibilities as set out in the Public Sector Equality Duty, for example to promote EDI through their actions, and role model appropriately
13. Behavioural expectations of staff, customers and councillors to be made explicit and reinforced with appropriate support and disciplinary mechanisms.
14. Review the effectiveness of the Personal Development Review (PDR) process across the organisation
15. Adopt a communications strategy emphasising a zero-tolerance policy for all forms of discrimination, covering behaviour of Members, officers and customers. Should this policy be breached, ensure that appropriate action is taken, including police involvement if necessary.

It is important to recognise that this report is not the end of the process. The LGA is keen to support LBH to develop its work in this area, and the reviewers are keen to stay in contact. However, the review team particularly recommend getting involved more in regional networks, so that LBH can make as much progress as possible quickly.

### **3. Summary of the READI review approach**

#### **The review team**

The READI Review followed the LGA's Equality Peer Challenge approach. Reviewers (peers) were selected on the basis of their relevant experience and expertise and agreed with the council. The team who delivered the READI review at London Borough of Havering (LBH) were:

- Councillor Kam Kaur, Warwickshire County Council
- Sam Johnson, Policy and Performance Manager, BCP Council
- Yvonne Okiyo, Equalities Manager, London Borough of Croydon
- Serena Simon, Programme Director, London Borough of Westminster
- Angela Kawa, Programme Manager, LGA
- Becca Singh, Peer Challenge Manager, LGA

#### **Scope and focus**

The review team used the LGA's Equality Peer Challenge as its basic structure, which follows the themes of the Equality Framework for Local Government (EFLG). LBH

requested that Race Equality be an additional, specific focus. The themes for the READI Review were therefore:

1. Knowing and Understanding your Communities
2. Leadership and Organisational Commitment
3. Responsive Services and Customer Care
4. Diverse and Engaged Workforce
5. Race Equality

The READI review is not the mechanism to assess whether LBH is complying with its legal equality responsibilities. However, the team had serious concerns around how the council is interpreting the Public Sector Equality Duty, and how the council would be able to demonstrate that it is legally compliant if challenged.

### **The peer challenge and READI review process**

Peer challenges and LGA reviews are improvement focussed and tailored to meet individual councils' needs. They are designed to complement and add value to a council's own performance and improvement. The process is not designed to provide an in-depth or technical assessment of plans and proposals. The team used their experience and knowledge of local government to reflect on the information presented to them by people they met, things they heard and material they read.

Havering Council prepared for the READI review by conducting an in-depth self-assessment of its equality, diversity and inclusion challenges and needs. This involved 27 nominated leads, conducting 22 detailed service self-assessments, a detailed data analysis, including an in-depth EDI Staff Survey and a self-assessment report. This was modelled on the current LGA EFLG Assessment Framework, with an additional fifth strand on race equality and a series of Race Equality Workshops.

The review team prepared for the READI review by reviewing a range of documents and information in order to ensure they were familiar with the Council and the challenges it is facing. The team then spent three days virtually onsite at LBH, during which they:

- Spoke to more than 150 people including a range of council staff together with councillors and external partners and stakeholders.
- Gathered information and views from around 25 meetings, research and reading.
- Collectively spent more than 250 hours to determine their findings – the equivalent of one person spending around seven weeks in LBH.

This report provides a summary of the review team's findings. It builds on the feedback presentation provided by the team on 26<sup>th</sup> May 2021. In presenting feedback to the council, they have done so as fellow local government officers and members, not professional consultants or inspectors. By its nature, the review is a snapshot in time, and the review team appreciates that some of the feedback set out in this report may be about things the council have already identified through its self-assessment and are already addressing and progressing. The review team has heard how some of the recommendations were acted on immediately after the review took place.

## 4. Feedback

### Knowing and understanding communities

There is widespread understanding amongst officers about the changed and changing nature of LBH's demography, particularly across age, disability and race. The team heard repeated references to LBH as having one of the fastest changing demographics in the country. Although officers understand the changing demographics of the borough, they need to consider what action needs to be taken as a result. In particular, how to engage with younger people and disabled people.

When change happens, it is important for community leaders and politicians to demonstrate leadership on the inclusion of diverse communities. LBH is developing engagement options with the fire service. Partners are willing to work together – we spoke to Essex FRS, the Police, and NHS partners, as well as local voluntary and community sector organisations and London Fire Brigade.

LBH strengthened relations with the voluntary and community sector (VCS) during Covid, using the Hub strategy, local area co-ordinators and the involvement of communities. The review team encourage LBH to build on these positive relationships going forward.

The Community Cohesion and Engagement Forum appears to represent a diverse cross-section of communities and organisations, and those that the review team met spoke positively about engagement with LBH. The Forum focus group commented that the council is moving in the right direction to improve community cohesion. The group also requested regular cross-sector discussions, as this would likely improve community cohesion in the borough.

The Compact Forum and the Community Cohesion and Engagement Forum both welcomed more opportunities to engage with the council to help it improve. Improving the way LBH engages with the forums would help considerably: focussing on having more two-way conversations, rather than broadcasting information. For example, the review team heard that LBH does not always feedback the results and impact of consultations.

The Equality Impact Assessments (EIAs) format includes both a health impact assessment and modern slavery, which is good practice. However, they are not consistently done or managed, and do not always consider all communities and groups. The perception from officers and community representatives is that they are seen as a tick-box exercise, rather than an integral part of planning.

The borough has good examples of supporting events which are good for community cohesion, for example the Commonwealth Day event, and support for Romford Pride.

### Leadership and organisational commitment

LBH has an opportunity to lead the debate locally as a leader of place, perhaps through roadshows and cultural events in the communities. This has already started with the promotion of events such as 'Havering Changing'.

Senior officers at Senior Leadership Team (SLT) level have stated intentions on EDI, but the Corporate Leadership Team (CLT) need clearer direction on their roles and responsibilities. Different levels of management need to take responsibility across the board, including EDI responsibilities relating to managing their staff. CLT will need their own service-level responsibility and commitment to help them ensure that they are managing services and staff appropriately. The team heard several examples of how not all managers are delivering their responsibilities around their duty of care to all staff and colleagues. This includes little acknowledgement that racism has occurred. Staff reported a “culture of no consequences” and inconsistencies in the use of Personal Development Reviews (PDRs), which could be a tool to address discriminatory behaviour.

There is a system for reporting incidents (for example racism), but little knowledge of or confidence in this system. There does not appear to be any informal process for reporting and recording incidents. The team recommend that LBH learn from other councils how they record, report and deal with similar incidents, and change their processes to include informal arrangements (for example, staff equality champions) as well as formal procedures.

Councillors do not appear to understand their role in relation to EDI, particularly with respect to the Public Sector Equality Duty (PSED). Several times the team heard politicians say, “we aren’t employees, so it doesn’t apply to us”. This is not the case. The PSED applies to the council, not to individuals, and all those representing the council need to comply with it as part of their work, either as a councillor, officer, or third party. This includes those who deliver services on behalf of the council or from whom they procure services i.e., consultants. The review team therefore recommend mandatory councillor training as soon as possible to ensure no councillor is inadvertently causing the council to not comply with the PSED.

The council has demonstrated the importance it puts on the EDI agenda by having a strategic officer with responsibility for EDI (this is part of the remit of the Chief Operating Officer), and strategic member responsibility within the Leader’s portfolio. However, not all staff or external stakeholders were aware who the strategic officer and Member lead are. In order to be fully transparent, there needs to be clearer public ownership of this agenda by members and officers.

There appears to be little strategic planning corporately which has a knock-on effect on EDI work. The review team asked to see several strategic documents to see how EDI was embedded in them. The review team would expect EDI considerations to be woven through documents such as the Workforce Strategy (this was under development), the Community Engagement Strategy, the Communications Strategy, the Transformation Strategy, Theme Plans and recruitment policies. However, these did not all exist, or were not widely known about, and where they did exist, there were few references to EDI.

Senior officers acknowledge that this work is at an embryonic stage. LBH could make the most of this position by learning from others, for example from the peers on the review team, and through the LGA, and other council networks.



## **Responsive Services and Customer Care**

LBH has a clear commitment to deliver high quality services to residents. It can build on the relationships developed during the Covid-19 pandemic to achieve this, for example, the regeneration of leisure centres supporting people to be more active. Covid-19 response meetings were reported to be well-attended by partners including local voluntary and community sector organisations.

The council takes a Theme-based approach to strategic planning to encourage cross-department collaboration in service improvement. However, there are few written plans (none were available to the team), and limited strategic oversight or leadership of service planning across the council. Data on communities that does exist was not used to shape service delivery. There was little evidence that equality analysis, such as Equality Impact Assessments (EIAs) were undertaken systematically, and even where there are good examples, such as the regeneration of the leisure centres, it is unclear how changes to provision were designed.

The PSED cannot be delegated, so it is important for LBH to be sure that any work that is commissioned or procured by a third party is compliant with its legal duties. The team heard that social value and EDI were not included in commissioning or procurement contracts. This lays LBH open to potential legal challenges about its legal obligations.

All councils are concerned with rebuilding their local economy post-Covid-19. LBH needs to be clear how its many diverse small businesses are being supported during the potentially challenging months ahead as the economy recovers from the multitude of lockdown measures.

## **Diverse and engaged workforce**

There is an acknowledgement by senior officers and the Leader that there are issues to address internally, and a commitment to address them. These include potentially racist, sexist and homophobic incidents that have been discussed anecdotally, and lack of clarity on policies and processes. Appointing a consultant to start the process and advise on the next steps, commissioning the Wellbeing and Inclusion survey (which had a response rate of 38% and holding this READI review are all examples of delivering on that commitment.

Staff networks were established in early 2020, but it would be helpful to have more clarity around their purpose, identity and role. The Staff Networks would benefit from clear and bespoke Terms of Reference as their structures are opaque, although they do not all need to be run in the same way. The review team recommend providing clarity around how they fit into the governance and advisory processes. This would help to ensure their concerns are taken on board or addressed. The council needs to consider the value of the networks, and how they can be a positive force to assist the organisation to improve. It would also be useful to clarify the roles of the EDIC group and the Community Cohesion and Engagement Forum.

In focus groups for this review, the review team heard widespread negative views of LBH as an employer for equality. There are few support mechanisms for sharing lived experiences, and a lack of support for staff experiencing racist, sexist and homophobic

abuse from other staff or from customers. Examples were shared with us where an assault or abuse had taken place, but the police were not called, and customers were not challenged appropriately. Partly because of this type of inaction, there are a lot of demoralised Black, Asian and Minority Ethnic staff at LBH.

Disclosure rates for disability are reported to be very low. As a result, there is a risk of not addressing inequality for disabled people or making reasonable adjustments. There is reported to be a general lack of understanding of LBH's responsibilities around reasonable adjustments, at both the recruitment stage and in terms of the long-term management of disabled staff. The review team heard anecdotes that individuals tend to leave if they develop long-term conditions.

There is a perception that there are barriers to progression for different groups of staff. Staff report that they don't get feedback when they apply for a promotion and aren't successful. However, there are gaps in data on progression and development, so it is not possible to know for sure whether there are barriers or not. Where issues have been identified, there was no evidence of positive action initiatives to address them. It also appears that there is no talent management, or leadership programmes at LBH. This could be an opportunity for positive action for all under-represented groups of people. There is an apprenticeship scheme, but the details of it need to more clearly communicated.

## **Race Equality**

Throughout the report, issues around race equality are addressed alongside other discrimination, but specific points are made below:

The review team heard from senior managers that there was a commitment to working towards being an anti-racist organisation. However, this was met with scepticism by some staff. If the organisation wants to work towards this, it needs to develop a clear plan on how it plans to achieve this, and visibly demonstrate actions to build on that commitment.

LBH is a signatory to the 'Race at Work' charter, but the team heard no-one talk about this. This could be made more prominent and linked up with the commitment to being an anti-racist organisation.

The much-repeated allegations of "casual racism" and "casual sexism" being widespread were disturbing, as were the examples of racism, sexism and discriminatory behaviour towards disabled people shared with the review team. There appears to be no consistent approach to dealing with this, and this matter should be addressed urgently.

## **Quick wins**

The review team heard a lot of views that much work needed to be done to collect and analyse data. Whilst the review team agreed with this, they are of the view that there is a considerable amount that could be done in the meantime alongside working on improving data. These we have collated as a list of quick wins:

1. Councillors signing up to the Values and Behaviours of the borough, perhaps as part of the Code of Conduct
2. Establish a clear structure for the governance of EDI and communicate this widely
3. Set clear corporate Equality Objectives
4. Develop clear service specific equality objectives and embed these through the PDR process
5. Build on success of the council and the community working together during the Covid-19 response by learning from this and replicate the success factors
6. Ensure that Communications professionals and the staff forums are involved in shaping and driving the EDI agenda
7. Ensure the people strategy is developed in collaboration with staff forums and the wider workforce, with EDI embedded throughout as a 'golden thread'
8. Establish standardised EDI questions for recruitment
9. Ensure that all interview panels are as representative as possible (gender, ethnicity and disability etc)
10. More events to bring existing and new communities together, working with staff, forums and community organisations to create more effective cohesion
11. Ensure that Staff forums have support to be inclusive and well-run – in particular- time and resource to deliver corporate objectives
12. Work with the staff forum to establish effective informal and formal processes to report discriminatory practices (e.g., confidential hotline, safe spaces)
13. Review and refresh procurement pages
14. Encourage involvement with the regional EDI fora where good practice and ideas are shared
15. Provide corporate EDI training to all staff and councillors

### **Medium Term actions**

1. Ensure EDI work includes looking at accessibility and discrimination in the round, e.g., socio-economic impact, neurodiversity
2. Develop the EIA process and train managers in its use and importance
3. Incorporate equality objectives within the PDR process
4. Utilise the LGA's NGDP graduate scheme which has a big drive on diversity – councils can specify some requirements
5. Ensure alignment between the People strategy and the Havering Way
6. Establish a clear staff development programme
7. Develop leadership and secondments opportunities internally and externally to address the lack of senior representation from staff with protected characteristics
8. Organisational values and behaviours need to be demonstrated, linked and monitored through the PDRs.

9. Capture all exit interview information and monitor protected characteristics of applicants to the council at all stages through to job offer and acceptance
10. Link in external expertise to work with councillors to better understand and engage with up-and-coming new communities
11. Establish a Member development programme
12. Set up a Social Value Framework for commissioning and procurement
13. Engage with partners, such as Havering Changing, voluntary groups and local communities to create personal stories as part of personal, organisational and community development
14. Consider how you can give residents more opportunities to give feedback, for example meetings/ events/ virtual opportunities
15. Learn from other organisations in this field – e.g., Croydon & Hackney, the London Leadership Programme, the LGA

### **Long Term actions**

1. Ensure positive working relationships with all staff forums, and that they have equal and realistic operating procedures. Consider how they contribute to a positive culture at LBH and are helping the council to improve.
2. Explore how to unlock latent and overlooked talent in the organisation through positive action e.g.: talent management programme
3. Recognise that some of the outcomes are long-term and will take time. For example, changing the culture first so that people feel safe to share their experiences
4. Develop a culture of trust, responsibility, openness and understanding
5. Work with schools to explore and learn more about diversity e.g.: Black History Month work

## **5. Next steps**

### **Immediate next steps**

We appreciate the senior managerial and political leadership of the council, will want to reflect on these findings and suggestions, formulating an action plan in response to this report.

As part of the review process, there is an offer of further activity to support this. The LGA is well placed to provide additional support, advice and guidance on a number of the areas for development and improvement and we would be happy to discuss this. Kate Herbert, Principal Adviser for London, is the main contact between your authority and the Local Government Association (LGA). Her contact details are: [Kate.Herbert@local.gov.uk](mailto:Kate.Herbert@local.gov.uk)

In the meantime, we are keen to continue the relationship we have formed with the council throughout the review. We will endeavour to provide signposting to examples of practice and further information and guidance about the issues we have raised in this report.

## The Council's Summary Draft Action Plan to Implement the Improvement Recommendations

This action plan sets out the LGA READI review 15 priority recommendations and the Council's high level response. The READI Programme will take forward a detailed work plan that will support these and other improvements.

Date of LGA READI Review 18 <sup>th</sup> / 19 <sup>th</sup> and 26 <sup>th</sup> May				
No.	Race Equality, Accessibility, Diversity, and Inclusion (READI) Recommendation	Comment/Key Action	Timescale	Lead SLT Officer / Comments
1	Clarify and communicate the next stage in the Council's EDI review work. We understand the internal READI review is to be followed up by an external review of race relations across the borough, but this is not clearly understood across the organisation.	<ul style="list-style-type: none"> <li>• Leader and Chief Executive communication underway</li> <li>• All staff briefing held and LGA report circulated – 23<sup>rd</sup> September 2021 and 8<sup>th</sup> September</li> <li>• READI programme team established</li> <li>• Publish LGA report in public domain</li> <li>• Work with partners including local public sector organisations, local businesses and the voluntary and community sector to plan for the external review of race relations</li> </ul>	<p>Ongoing</p> <p>Completed</p> <p>End October 2021</p> <p>Cabinet October 2021</p> <p>Review approach to be agreed and in place by spring 2022</p>	Chief Operating Officer (COO) and READI Programme Manager

2	Ensure councillors understand the implications of the changing demographics of the Borough, including member workshops or training sessions.	<ul style="list-style-type: none"> <li>• Devise a rolling training and development programme that ensures all political leaders have the skills, knowledge, experience and behaviours to constructively engage and scrutinise and challenge potentially discriminatory decisions</li> <li>• All Member training on their role required by the Public Sector Equality Duty (PSED).</li> <li>• Group Leaders support for all Members to complete five mandatory training modules</li> </ul>	<p>Rolling training programme to be signed off by Governance Committee by the end of 2021</p> <p>Completed 7<sup>th</sup> September</p> <p>Launched 7<sup>th</sup> September</p>	COO and READI Programme Manager
3	Share lived experiences with the leadership (senior officers and councillors) ensuring that this is done in a safe and supportive environment. These experiences will need to be acted upon	<ul style="list-style-type: none"> <li>• Programme of shared lived experience sessions</li> <li>• Lunch time listening sessions</li> <li>• Supportive training programme</li> <li>• Active promotion of and participation in the extensive range of events being held as part of October 2021 Black History Month arranged by the BAME Staff Forum, the Library service and partners across the borough.</li> <li>• Consideration by the trade union joint consultative committee.</li> </ul>	<p>Ongoing</p> <p>October 2021</p>	<p>COO and READI Programme Manager</p> <p>All Members and staff</p> <p>TUJCC</p>
4	Use the self-assessment exercise as the first step in developing accessible service plans	<ul style="list-style-type: none"> <li>• Develop a READI strategy and programme of work that addresses the self-assessment and all LGA priority recommendations and others</li> </ul>	First Draft is complete. Share plan with EDIC group	READI Programme Manager

		<ul style="list-style-type: none"> <li>Ensure every service develops a plan to address the improvements needed which are reviewed quarterly and updated annually</li> </ul>	31 March 2022 and ongoing	Senior Leadership Team
5	Seek understanding from the staff forums as to how they see their role in the organisation and determine what the organisation wants from the staff forums.	<ul style="list-style-type: none"> <li>Work with staff forums to establish the future role of the forums</li> <li>Review resources allocated in support of this</li> </ul>	End December 2021	READI Workforce Programme Adviser
6	Develop with the EDIC group a clear and immediate EDI action plan that is SMART with clear timelines (e.g., 12 months, 36 months, etc)	<ul style="list-style-type: none"> <li>Review the officer Equality, Diversity, Inclusion and Cohesion (EDIC) Group Terms of Reference and READI Programme work plan</li> <li>Review by the TUJCC</li> </ul>	End December 2021	READI Programme Manager  TUJCC
7	Establish a clear operational lead for EDI, with ownership and responsibility around delivery, ensuring that this appointment is well-known across the organisation. Ensure that the Member lead is also known and visible on this agenda.	<ul style="list-style-type: none"> <li>Strategic Lead is Jane West, COO supported by Sandy Hamberger, the Assistant Director of Policy, Performance and Communities</li> <li>Councillor Misir is Member Champion</li> <li>Operational Lead will be the READI Programme Manager</li> </ul>	Completed	
8	Collect, analyse and publish workforce data on protected characteristics, including pay gap data	<ul style="list-style-type: none"> <li>First draft of available data analysed and reported to EDIC Group. This included an Ethnicity Pay Gap report. However, the absence of staff self-declaration on protected characteristics limits the value of all reporting currently.</li> </ul>	29 <sup>th</sup> September 2021  Ongoing	Assistant Director of HR

		<ul style="list-style-type: none"> <li>• Encourage take up of staff to complete their data on the Fusion HR system and improve data quality</li> <li>• Data to be analysed quarterly and reported to the EDIC Group</li> </ul>		
9	Work with the staff forums and communications teams to increase disclosure rates of race and disability in particular as well as across all protected characteristics	<ul style="list-style-type: none"> <li>• Discussions already held at EDIC and staff forums</li> <li>• SLT and CLT to encourage completion by staff and explain usage</li> <li>• Choose Havering Roadshows to provide paper completion by staff unable to do this online</li> <li>• Consideration by JTUCC</li> </ul>	Already underway and ongoing	EDIC and staff forum leads SLT and CLT  Choose Havering Campaign  JTUCC
10	Improve understanding across the board of the complexity of the issues – EDI is not binary.	<ul style="list-style-type: none"> <li>• Training programme for staff</li> <li>• Training programme for Members</li> <li>• Shared lives listening sessions</li> <li>• Conscious inclusion training</li> <li>• Cultural awareness training</li> </ul>	Already underway and ongoing	READI Workforce Advisor and SLT, EDIC Sub-Group on Training and Development, Staff Forum Leads and HR
11	Run EDI training for staff and councillors, starting with Corporate Leadership Team and Commissioning and Procurement.	<ul style="list-style-type: none"> <li>• Mandatory online training for managers</li> <li>• Generic training for all members</li> <li>• Develop training programmes (see No. 10)</li> </ul>	Completed – 15 <sup>th</sup> July  Completed – 7 <sup>th</sup> September	READI Workforce Advisor (to advance)
12	Political and managerial leaders to ensure that they are meeting their responsibilities as set out in the Public Sector Equality Duty, for example to promote EDI through their actions, and role model appropriately	<ul style="list-style-type: none"> <li>• Political and managerial leaders to ensure that they are meeting their responsibilities as set out in the Public Sector Equality Duty, for example to</li> </ul>	Ongoing	READI Workforce Advisor (to advance)



		<p>promote EDI through their actions, and role model appropriately.</p> <ul style="list-style-type: none"> <li>• Councillors signing up to the Values and Behaviours of the borough, perhaps as part of the Code of Conduct.</li> <li>• Senior Leadership Team to act as Strategic Sponsors for Staff Engagement Forums.</li> </ul>	<p>Ongoing but particularly in May 2022</p> <p>Allocated and ongoing</p>	<p>All Members</p> <p>Senior Leadership Team</p>
13	Behavioural expectations of staff, customers and councillors to be made explicit and reinforced with appropriate support and disciplinary mechanisms.	<ul style="list-style-type: none"> <li>• Training programmes in place</li> <li>• Programme Governance and roles and responsibilities communicated</li> <li>• Ensure policies, strategies and procedures clarify the organisation's expectations</li> </ul>	<p>Ongoing</p> <p>End December 2021</p> <p>Ongoing</p>	<p>HR Advisor</p> <p>READI Program Manager</p> <p>READI Programme Team</p>
14	Review the effectiveness of the Personal Development Review (PDR) process across the organisation	<ul style="list-style-type: none"> <li>• Through effective PDRs, ensure all staff are set meaningful behavioural and value-based expectations and specific activities, from leadership to frontline staff.</li> </ul>	<p>End February 2022 (for 22/23 objective setting)</p>	<p>Assistant Director of HR / READI Workforce Advisor</p> <p>Senior Leadership Team and all managers</p>
15	Adopt a communications strategy emphasising a zero-tolerance policy for all forms of discrimination, covering behaviour of Members, officers and customers. Should this policy be breached, ensure that appropriate action is taken, including police involvement if necessary.	<ul style="list-style-type: none"> <li>• Immediate communications plan is underway</li> <li>• Develop communication strategy in support of this</li> <li>• Reporting routes to be regularly communicated and monitored</li> <li>• Monitor and report on breaches and outcome</li> </ul>	<p>Underway</p> <p>End of December 2021</p> <p>Ongoing</p> <p>Quarterly</p>	<p>AD Communications and READI Programme Manager / Workforce Advisor and Monitoring Officer</p>

