Annex 16

Havering Cabinet Meeting on August 5 2020

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

Supplementary Retail Note for the Havering Local Plan (December 2018)

August 2020

Examination into the Havering Local Plan 2016 - 2031

Document for Public Consultation alongside the Proposed Main Modifications

Supplementary Retail Note for the Havering Local Plan (December 2018)

August 2020

now part of

Havering Local Plan (2016-2031)

Supplementary Retail Note December 2018

On behalf of **London Borough of Havering**

Project Ref: 30904 I Rev: A I Date: December 2018

Registered Office: Buckingham Court Kingsmead Business Park, London Road, High Wycombe, Buckinghamshire, HP11 1JU
Office Address: 33 Bowling Green Lane, London, EC1R 0BJ
T: +44 (0)203 824 6600   E: london@peterbrett.com

Document Control Sheet

Project Name: **Havering Local Plan (2016-2031)**

Project Ref: **30904**

Report Title: **Retail Briefing Note December 2018**

Doc Ref: **V2**

Date: **05/12/2018**

	Name	Position	Signature	Date
Prepared by:	Conor Lennon	Graduate Planner	CL	05/12/2018
Reviewed by:	Francesca Rowson	Senior Planner	FR	05/12/2018
Approved by:	Cathy Hall	Senior Associate	CH	05/12/2018
For and on behalf of Peter Brett Associates LLP				

Revision	Date	Description	Prepared	Reviewed	Approved
V1	03/12/2018	Draft report	CL	FR	CH
V2	03/12/2018	Draft report	CL	FR	CH

Contents

Figures

Tables

Appendices

This page is intentionally blank

1 Introduction

1.1.1 The London Borough of Havering (LB Havering) commissioned PBA, now part of Stantec, (PBA) to prepare a report outlining the justification for draft Policy 13 of the emerging Havering Local Plan (2016-2031). PBA prepared the Havering Retail and Commercial Leisure Needs Assessment ('RLNA') (LBHLP.21) in 2015 and a Quantitative Update as an Addendum to the RLNA in March 2018.

1.1.2 Draft Policy 13 of the emerging Havering Local Plan (2016-2031) states:

'Applications for new main town centre uses will be subject to the sequential test as defined in the NPPF. An impact assessment will be required for retail, leisure and office developments over 200 square metres in edge or out of centre locations.'

1.1.3 Paragraph 8.2.4 of the supporting text to draft Policy 13 states that:

'With regards to the average size of retail premises in town centres district centres in Havering are made up mostly of small shops, with the average floor space being below 200 square metres. In Romford the average floor space is generally higher, although this varies between frontages. The threshold for impact assessments for edge and out of town centre development is therefore set at 200 square metres in the Local Plan.'

1.1.4 The primary purpose of this Report is to examine whether there is a sound basis for the LB Havering to set a local impact floorspace threshold for retail uses and whether the proposed 200 sqm threshold is justified[1].

1.1.5 The secondary purpose of this Report is to provide the Inspector with further information on how identified convenience needs within the borough may be accommodated across the period to 2026. In this regard, Table 3 of draft Policy 13 identifies a need for an additional 8,299 sqm net convenience (food) floorspace by 2026 and 10,851 sqm net by 2031.

1.2 Structure of this Report

1.2.1 Section 2 considers whether there is a sound basis for the LB Havering to set a local impact floorspace threshold and whether the 200 sqm local retail impact threshold is justified based on the available evidence. This section provides a review of other London borough's local impact thresholds and centre vacancy rates. Section 3 sets out a strategy to meet convenience retail development needs identified in the RLNA 2018 Update up to 2026.

1.2.2 This Report is supported by the following appendices:

- Appendix A – London borough's impact thresholds
- Appendix B – London borough's vacancy rates

[1] Note: LB Havering have agreed that the reference to leisure and office uses within this part of the policy will be removed through a modification. Therefore, the revised wording is as follows: '*Applications for new main town centre uses will be subject to the sequential test as defined in the NPPF. An impact assessment will be required for retail~~, leisure and office developments~~ over 200 square metres in edge or out of centre locations.*'

- Appendix C – LB Havering growth locations map

1.3 Planning policy context

1.3.1 LB Havering's plan was submitted for examination before the 24 January 2019 deadline set out in the revised National Planning Policy Framework (2018). It is therefore being examined against the requirements of the NPPF (2012). Paragraph 23 states that planning policies '*should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period'* and specifically requires planning policies to:

'allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites;

allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre;'

1.3.2 The NPPF requires that local plans should be drawn up over a 15-year time frame (paragraph 157) and should be informed by an evidence base which assess:

- the need for floorspace for economic development, including retail and leisure development, over the 15-year plan period; and
- the existing and future supply of land to meet identified needs (paragraph 161).

1.3.3 While the NPPF suggests that local plans should identify sites to meet retail and leisure needs over a 15-year period, the Planning Practice Guidance (PPG) advises that strategies sites in town centres should be allocated over a three to five-year period subject to regular review[2]. Considering how need may be accommodated over the first 10 years of the plan therefore reflects a robust approach and has regard to the revised NPPF (2018) which advises that planning policies should allocate a range of suitable sites to meet retail needs looking 10 years ahead (paragraph 85).

1.3.4 Section 3 of this Report responds to the above requirements setting out a strategy to meet convenience development needs over the plan period.

1.3.5 The NPPF (2012) paragraph 27 states that when assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold. If there is no locally set threshold, the default threshold is 2,500 sqm gross. The purpose of the test is to ensure that the impact of out-of-centre and edge of centre proposals on existing town centres is not significantly adverse.

1.3.6 The Planning Practice Guidance (PPG) provides guidance on setting a locally appropriate threshold for retail impact assessments. The section 'Ensuring the

[2] Paragraph: 003 Reference ID: 2b-003-20140306 Revision date: 06 03 2014

Viability of Town Centres' states in setting a locally appropriate threshold it will be important to consider the following[3]:

- the scale of proposals relative to town centres;
- the existing viability and vitality of town centres;
- cumulative effects of recent developments;
- whether local town centres are vulnerable;
- likely effects of development on any town centre strategy; and
- impact on any other planned investment.

1.3.7 Section 2 of this report assesses the local context in respect of the above criteria.

1.3.8 The London Plan (2016) sets the overall spatial development strategy for London and includes town centre policies which require applicants to undertake sequential and impact assessments. Policy 4.7 (Retail and Town Centre Development) outlines the Mayor's support for a strong, partnership approach to assessing need and bringing forward capacity for retail, commercial culture and leisure development for town centres. The policy states that development proposals for new or extensions to existing, edge or out-of-centre retail, leisure or office development will be subject to an assessment of impact. However, the London Plan does not set a threshold for the impact assessment. The policy also requires that in preparing their local plans boroughs should:

- identify future retail and commercial leisure floorspace needs;
- undertake regular town centre health checks;
- resist inappropriate out of centre development; and
- manage existing out of centre retail and leisure development in line with the sequential approach.

1.3.9 London Plan Policy 4.8 (Supporting a Successful and Diverse Retail Sector and Related Facilities and Services) Part A requires that boroughs support a competitive retail sector which promotes sustainable access to goods and services.

1.3.10 London Plan Policy 7.1 (Lifetime Neighbourhoods) Part B requires that development should be designed so that the mix of uses improve people's access to local shops.

1.3.11 The Mayor published the new Draft London Plan for consultation on 1 December 2017 and subsequently published the new Draft London Plan showing Minor Suggested Changes (Draft London Plan) on 13 August 2018 with adoption timetabled for late 2019.

1.3.12 Draft Policy SD8 (Town Centres: Development principles and Development Plan Documents) advocates a town-centre first approach in development plans and development proposals, advocates a sequential approach to accommodating town centre uses, seeks to firmly resisting out-of-centre development of town centre uses

[3] Paragraph: 016 Reference ID: 2b-016-20140306 Revision date: 06 03 2014

and requires an impact assessment for new, or extensions to existing, edge or out-of-centre development for town centre uses that are not in accordance with the Development Plan. The policy does not however set a threshold for the impact assessment.

1.3.13 The Town Centres Supplementary Planning Guidance (SPG) provides further guidance on the London Plan ‘town centre first approach’ and impact assessment. Paragraphs 6.3.3 and 6.3.4 state that:

‘In line with NPPF paragraph 26, London Plan policy 4.7Bc requires an impact assessment for applications for new, or extensions to existing, edge or out of centre development. This policy is applicable to retail, leisure and office development exceeding 2,500 sqm outside of town centres, which are not in accordance with an up-to-date local plan. An impact assessment may also be required for developments below this threshold, for example, where a borough has set a proportionate, local floorspace threshold as indicated in the NPPF.’

1.3.14 Section 2 of this Report sets out the evidence underpinning the proposed local retail impact threshold for LB Havering.

2 Retail impact threshold

2.1 Introduction

2.1.1 In this section, we examine whether there is a sound basis for the LB Havering to set a local impact floorspace threshold and whether the proposed 200 sqm local retail impact threshold is justified based on the available evidence. First, we present our review of London borough's local impact thresholds and centre vacancy rates in LB Havering and across London. This Section is supported by Appendix A which presents a comparison of London borough's impact thresholds, where they have been adopted, and Appendix B which provides centre vacancy rates for LB Havering and other London boroughs.

2.2 Local impact thresholds across London

2.2.1 PBA has undertaken a review of adopted London borough's local plans to identify trends in the adoption of local impact thresholds. Appendix A presents the results of this assessment. The headline findings are set out below:

- 14 out of the 25 London boroughs have adopted a local impact threshold (56%);
- Adopted local impact thresholds range from 80 sqm up to 1,000 sqm;
- The most common local impact threshold across London is 200 sqm; five out of 14 boroughs have adopted this threshold; and
- Each London borough applies a 'blanket' approach whereby the threshold applies to all centres within the borough.

2.2.2 Based on these findings, a retail impact threshold of 200 sqm is not out of step with other London boroughs.

2.3 Town centre vacancy rates

2.3.1 Appendix B contains three tables which present vacancy rates for centres in LB Havering and comparable centres (by classification) across London:

- Table 5 - London metropolitan centre vacancy rates
- Table 6 - LB Havering district centre vacancy rates
- Table 7 - Average London district centre retail vacancy rates by borough

2.3.2 The vacancy data in Tables 4-7 is taken from the GLA London Town Centre Health Check report (2016) for retail units only. The GLA data has been used as it provides a consistent dataset for the comparison of London boroughs.

2.3.3 Romford is the only metropolitan centre in LB Havering. Table 5 shows that the vacancy rate in metropolitan centres ranges from 2% to 15% across London with Wood Green in LB Haringey having the lowest vacancy rate and Sutton in LB Sutton having the highest. Romford sits in the middle of this range with a retail vacancy rate of 7%.

2.3.4 Table 6 presents the retail vacancy rates for district centres in LB Havering and Table 5 shows, for each London borough, the average district centre vacancy rate. Table 6 shows that the vacancy rate in LB Havering's district centres ranges from 0% up to 11%. Table 7 shows that LB Havering has the second-lowest average district centre vacancy rate across London at 5%. Only LB Barking & Dagenham has a lower vacancy rate at 4% and it is worth noting that the unusual configuration of Rainham district centre which has a zero-vacancy rate skews the borough average for Havering.

2.3.5 Tables 6 and 7 show that there is significant capacity to meet future retail needs within existing centres; as of 2016 there was a total of 14,771 sqm gross vacant floorspace across LB Havering's centres.

2.4 LB Havering impact threshold

2.4.1 This Section presents the evidence to justify the proposed local impact threshold (200 sqm) against the PPG criteria (see Section 1) which require LPAs to consider the existing viability and vitality of town centres, the scale of proposals relative to town centres and the likely effects of development on town centres.

Health check summary

2.4.2 Section 3 and Appendix A of the Havering RLNA contain the most up-to-date comprehensive health check assessments of centres in LB Havering. The key findings on role and function of each centre are summarised below:

- Romford: is the principal shopping destination for residents within the borough and attracts visitors from further afield. The centre has a strong comparison and convenience offer anchored by three main shopping centres (The Liberty, the Mercury and the Brewery) alongside a wide range of commercial leisure uses;
- Collier Row: the centre predominantly caters for the day to day needs of residents, with representation geared towards convenience goods, hot food takeaways and some services. The offering in the town centre is generally towards the lower end of the market;
- Elm Park: the centre is anchored by three national multiple convenience retailers and predominantly caters for the day to day needs of residents with a good range of convenience stores and an extensive range of local services. However, the centre has a very limited evening leisure offer;
- Harold Hill: the centre is also anchored by three national multiple convenience retailers and the focus of the retail offer is convenience goods with some retail services, such as banking and hairdressing;
- Hornchurch: the retail offer contains a good diversity of comparison, convenience and service retail uses as well as an impressive commercial leisure offer which makes the centre a borough-wide leisure destination for eating and drinking and lends it a stronger 'evening economy' than might typically be expected for a district centre;
- Rainham: the centre is anchored by a large Tesco Extra supermarket which offers many of the services which would usually be found in a 'typical' district centre. Elsewhere in the centre, the offer includes a limited range of convenience

stores, comparison stores and takeaway restaurants with most units operated by independent operators. There are a number of gaps in the retail and services offer; and

- Upminster: the retail offer is geared towards meeting day-to-day needs with a good mix of commercial, civic and residential uses which contribute to the centre's vitality. The retail offer is anchored by four national multiple convenience retailers. There is some scope for improvement in the quality of the retail offer.

2.4.3 This review demonstrates that the offer in most of the district centres is focused on convenience goods catering to the day-to-day needs of residents. Most of the district centres are anchored by a few national multiple convenience retailers trading 'local' store formats complemented by a range of local retail services.

LB Havering floorspace analysis

2.4.4 PBA has undertaken an assessment of the average size of units in the LB Havering's centres. The data used for our analysis, presented in Table 1, is taken from the GLA London Town Centre Health Check report (2017). The data includes retail units and non-retail units within centres.

2.4.5 Table 1 shows that the average unit size in all centres except for Rainham is significantly below the NPPF threshold of 2,500 sqm. Only two centres, Romford and Rainham, have an average unit size greater than the proposed local impact threshold (200 sqm).

Table 1 – LB Havering average retail and non-retail unit floorspace (sqm)

Centre	Classification (London Plan)	Average unit size (Retail & non retail)
Romford	Metropolitan	399
Collier Row	District	162
Elm Park	District	40
Harold Hill	District	148
Hornchurch	District	178
Rainham	District	2,523
Upminster	District	187
Borough average	-	520

2.4.6 As Romford is the only metropolitan centre and the primary shopping destination in LB Havering it is to be expected that it would have a greater average unit size than other centres. In this respect Rainham presents an anomaly in the data.

2.4.7 The average unit size of Rainham is far higher than all other centres in the borough due to the presence of a large Tesco Extra store (5,224 sqm net) within the centre. The health check for Rainham prepared as part of the Havering RLNA in 2015 identifies that aside from the Tesco Extra the majority of retail units in Rainham are small independent stores.

Potential effects of development

2.4.8 Considering the evidence presented in the previous sections, it is likely that most centres in LB Havering would be vulnerable to adverse impacts arising from out of centre development proposals (retail, leisure or office) of between 200 sqm and 2,500 sqm.

2.4.9 Our analysis shows that the average unit size in all LB Havering centres except for Rainham is significantly below the NPPF threshold of 2,500 sqm. The average unit size data for Rainham is somewhat misleading since aside from Tesco Extra most units are small independent stores. In addition, only two centres, Romford and Rainham, have an average unit size greater than the proposed impact threshold (200 sqm).

2.4.10 The centre health checks presented in the RLNA (Section 3 and Appendix A) demonstrate that the offer in most of LB Havering's district centres is focused convenience goods. These centres are typically anchored by a few national multiple convenience retailers trading 'local' store formats. Given that these centres predominantly cater for day-to-day shopping needs, it likely that proposals for even small out-of-centre convenience food stores would compete directly with the district centres for turnover. The health checks also identify that the leisure offer (food and drink) in these centres is generally weak and could be improved. To ensure that the impact on designed centres is not significantly adverse applicants proposing edge or out-of-centre proposals (retail, leisure or office) over 200 sqm should be required to assess the potential impacts on designated centres.

2.4.11 While it is acknowledged that Romford would be less vulnerable to the impacts from small proposals it is not considered practical to apply a higher threshold for Romford and a lower threshold for the district centres. Due to the nature of overlapping catchment areas it is highly unlikely that a proposal would divert trade from a single centre only. Therefore, even if a higher threshold was adopted for Romford, in most cases the lower threshold would be tested in any case. The proposed 'blanket' threshold represents best practice and is consistent with the approach taken by all other London boroughs which have an adopted local impact threshold.

2.4.12 To protect the vitality and viability of all centres in the retail hierarchy we recommend that the proposed 'blanket' 200 sqm threshold for LB Havering should be adopted.

Committed retail development

2.4.13 This Section presents our review of retail applications approved by LB Havering between 2012 and 2018 located outside of designated centres. This analysis indicates the pressure that existing centres face from out-of-centre development, and will help to inform an appropriate local threshold for assessing retail impact.

2.4.14 The data used for our analysis, presented in Table 8 at Appendix C is taken from the London Development Database (sourced on 05/12/2018). This database includes all retail schemes over 1,000 sqm as well as schemes under the 1,000sqm submitted on a voluntary basis.

2.4.15 Table 8 shows that since 2012 planning permission has been approved for nine retail schemes located outside of LB Havering's designated centres, equivalent to 25,781 sqm gross floorspace. We have undertaken analysis of this data to identify the proportion of schemes which meet the NPPF impact threshold for testing retail impact:

- Proportion of approved retail schemes over 2,500 sqm - 33%
- Proportion of approved retail schemes 200 - 2,500 sqm - 56%
- Proportion of approved retail schemes less than 200 sqm - 11%

2.4.16 Our analysis shows that Our analysis demonstrates that 67% of retail schemes approved between 2012 and 2018 located outside of LB Havering centres fall below the NPPF impact threshold for testing retail impact. However, had the 200 sqm local impact threshold been adopted since 2012 then 89% of retail schemes would have been required to assess impact. In the absence of a locally set threshold, a significant amount of floorspace could be delivered in edge and out of centre locations in the future without any assessment of the potential impacts on designated centres.

2.4.17 This analysis demonstrates the importance of identifying an appropriate lower local threshold to ensure that future retail proposals are supported by appropriate evidence on their likely impact individually and cumulatively.

2.5 Conclusion

2.5.1 This Section demonstrates that there is clear justification for adopting a local impact threshold in LB Havering. It is highly likely that all centres in LB Havering would be vulnerable to adverse impacts arising from edge or out of centre retail proposals of between 200 sqm and 2,500 sqm. To ensure that the impact on designed centres is not significantly adverse applicants proposing edge or out-of-centre proposals (retail, leisure or office) over 200 sqm should be required to assess the potential impacts on designated centres.

2.5.2 To protect the vitality and viability of all centres in the retail hierarchy we recommend that the proposed 'blanket' 200 sqm threshold for LB Havering should be adopted.

3 Meeting convenience needs

3.1.1 In this section, we set out a strategy to meet convenience retail development needs as identified in the RLNA 2018 Update up to 2026. This Section is supported by the map at Appendix D which identifies the key housing growth locations.

3.2 RLNA 2018 Update

3.2.1 Draft Policy 13 identifies a need for 8,299 sqm net additional convenience floorspace within the first 10 years of the plan period (i.e. up to 2026). Table 3.3 of the RLNA 2018 Update summarises the convenience capacity forecasts with the figures presented on a cumulative basis, the figures are re-provided in Table 2 below.

Table 2 LB Havering quantitative convenience floorspace needs

	2017	2021	2026	2029	2031
Net sqm	8,235	5,822	8,299	9,829	10,851
Gross sqm	12,669	8,957	12,767	15,121	16,694

3.2.2 Section 2 of the RLNA 2018 Update identifies that per capita convenience retail spending growth is static over the plan period which means that the forecast convenience needs are purely a product of population growth. Key housing growth locations, outside of Rainham and Beam Park, comprise 12 Council-owned estates shown on the map at Appendix D.

3.3 Meeting convenience needs

3.3.1 This Section sets out LB Havering's strategy for meeting convenience floorspace needs over the first 10 years of the plan period. Although convenience floorspace needs have been assessed up until the end of the plan period the LB Havering has not identified sites to accommodate the full scale of floorspace needs up to 2031 since they have committed to review the plan 18 months after adoption. Further, the revised NPPF only requires planning policies to allocate retail sites looking ten years ahead.

3.3.2 In the medium term, convenience needs will be met through the delivery of new and enhanced floorspace as part of the planned redevelopment of Rainham and Beam Park Strategic Development Area and other key housing growth locations.

3.3.3 Planning permission has recently been granted for Beam park including up to 1,011 sqm net convenience floorspace. This leaves the remaining 7,288 sqm net convenience floorspace to be distributed between the 12 key housing growth locations. This equates to just 607 sqm net floorspace for each estate although in practice the locations with the highest level of housing growth will need to deliver greater floorspace.

3.3.4 Table 3 identifies the number of net additional dwellings expected to be delivered in each strategic housing growth location across the borough by 2031. Key housing growth locations are expected to deliver 2,116 additional dwellings by 2031 in total.

Table 3 Key housing growth locations and net additional dwellings up to 2031

Housing Estate	Net additional dwellings
Waterloo (and Queen Street)	1,165
Napier and New Plymouth	96
Solar – Arena - Sunrise	135
Maygreen	89
Old Church	214
Royal Jubilee Court	71
Delta	253
Dell Court	11
Delderfield	16
Farnham Hilldene	63
Brunswick	3
Total	2,116

3.3.5 The 2031 figures have been presented here because although the delivery of dwellings is not expected to complete until 2031 on some sites it is likely that the delivery of retail floorspace would come forward as part of a phased approach ahead of the completion date.

3.3.6 This strategy of co-locating the delivery of new homes and convenience floorspace is an appropriate strategy in the medium term since forecast convenience needs are a product of population growth. As well as meeting the quantitative convenience needs of new residents, retail uses will also play an important role in achieving to place-making objectives within new developments.

3.3.7 This strategy also accords with the strategic aims of the London Plan (Policies 4.8 and 7.1) which requires that new development promotes sustainable access to goods and services and improves people's access to local shops by incorporating a mix of uses.

4 Summary and conclusions

4.1.1 The LB Havering commissioned PBA to prepare a report outlining the justification for draft Policy 13 of the emerging Havering Local Plan (2016-2031).

4.1.2 Section 2 of this Report has examined whether there is a sound basis for the LB Havering to set a local impact threshold, rather than the NPPF default 2,500 sqm threshold and whether the proposed 200 sqm threshold proposed in draft Policy 13 is justified. The headline findings of Section 2 are as follows:

- Across London 14 London boroughs have adopted local impact thresholds ranging from 80 sqm up to 1,000 sqm and the most common adopted local impact threshold is 200 sqm. Each London borough applies a 'blanket' approach whereby the threshold applies to all centres within the borough;
- There is significant capacity to meet future retail needs within existing centres; the tables at Appendix B show that as of 2016 there was a total of 14,771 sqm gross vacant floorspace across LB Havering's centres. In accordance with the NPPF town centre first approach, available units in existing centres are the priority location for new retail development and other main town centre uses;
- The town centre offer in most of the district centres is focused on convenience goods and many are anchored by just a few national multiple convenience retailers trading 'local' store formats complemented by local retail services. The leisure offer (food and drink) in these centres is generally weak and could be improved;
- Although most of the district centres are currently functioning well they are vulnerable to the impact of out-of-centre convenience proposals because their turnover is heavily reliant on a small number of convenience stores. As such it is likely that proposals for even small out of centre convenience food stores by national multiple retailers would have an impact on the vitality and viability of these centres;
- The average unit size in all LB Havering centres except for Rainham is significantly below the NPPF threshold of 2,500 sqm. In addition, only two centres, Romford and Rainham, have an average unit size greater than the proposed impact threshold (200 sqm); and
- In the absence of a lower local threshold, a significant amount of floorspace could be delivered in edge and out of centre locations in the future without any assessment of the potential impacts on designated centres. Our analysis demonstrates that 67% of retail schemes approved between 2012 and 2018 located outside of LB Havering centres fall below the NPPF impact threshold for testing retail impact. This is a concern considering that most of LB Havering's centres are likely to be vulnerable to the impacts of retail proposals well below the NPPF impact threshold.

4.1.3 This evidence demonstrates that there is clear justification for adopting a local impact threshold in LB Havering and based on the above findings we recommend that the proposed 'blanket' 200 sqm gross threshold should be adopted.

4.1.4 Section 3 of this Report sets out a strategy to meet convenience retail development needs as identified in the RLNA 2018 Update within LB Havering up to 2026.

4.1.5 In the medium-term, convenience needs will be met through the delivery of new and enhanced retail floorspace in Rainham and Beam Park Strategic Development Area and key housing growth locations which together will accommodate the majority of new homes across the Borough to 2031.

4.1.6 This strategy of co-locating the delivery of new homes and convenience floorspace is appropriate in the medium term since forecast convenience needs are a product of population growth as explained in the RLNA 2018 Update. This strategy accords with the strategic aims of the London Plan (Policies 4.8 and 7.1) which seeks to promote sustainable access to goods and services and improves people's access to local shops within new developments. Finally, as well as meeting the quantitative convenience needs of new residents, retail uses will also play an important role in achieving to place-making objectives within new developments.

Appendix A London borough's impact thresholds

Table 4 Summary of London borough's impact thresholds

Local Authority	Policy document name and adoption date	Retail impact threshold	Relates to	Stage	Evidence base
Bexley	Bexley Core Strategy 2012 - Policy	500sqm	Convenience stores, Comparison	Adopted	Retail Capacity Study Update 2013
Brent	Brent Core Strategy 2010 - Policy DMP2	500sqm	Retail	Adopted	Retail Impact Assessment Threshold 2014
Tower Hamlets	New Local Plan 2018	200sqm	Retail	Submitted to SoS	Retail Impact Threshold Study 2018
Hackney	Draft Local Plan 2018 (same threshold in adopted plan July 2015) - Policy 28	200sqm	Retail	Public Consultation (Reg18)	Town Centre and Retail Study 2017
Islington	Development Management Policies 2013	80sqm	Retail	Adopted	Retail & Leisure Study 2017
Kensington & Chelsea	Consolidated Local Plan 2015 - Policy CF1	400sqm	Retail	Adopted, Local Plan review 2018 no bearing on this policy	Retail and Leisure Needs Study 2008
Lewisham	Development Management Local Plan	1,000sqm	Retail	Adopted	Lewisham Retail Capacity Study 2009
Merton	New Local Plan 2020 Sites & Policies Plan & Policies 2014 - Policy DM R2	n/a 180sqm	n/a Convenience retail	Stage 2 Consultation Adopted	n/a Retail and Town Centre Capacity Study 2011
Wandsworth	Development Management Policies 2016 - Policy DMTS 2	200sqm	Retail & Leisure but excluding convenience	Adopted	Retail Needs and Town Centre Assessment 2012
Waltham Forest	Development Management Policies 2013 - DM26	200sqm	Retail	Adopted	Town Centres and Retailing Study 2016
Hillingdon	Local Plan Part 2 Development Management Policies 2018 - Policy DMTC1	200-1000sqm	200sqm for Retail and 1000sqm for Main Town Centre Uses	Submitted to SoS May 2018	Retail Study Update 2012
Hounslow	Hounslow Local Plan 2015 - Policy TC3	500-2,500sqm	500sqm for Retail and 2,500 for other Main Town Centre Uses	Adopted	Retail Needs Study Update (2013)
Barnet	Development Management DPD 2012	500sqm	Retail	Adopted	Town Centre Floorspace Needs Assessment 2017
Harrow	Harrow Local Plan 2013	1,000sqm	Retail	Proposed	Economic Development Needs Assessment 2017

Appendix B London borough's vacancy rates

Table 5 London metropolitan centre vacancy rates

Centre	Borough	Vacant retail floorspace (%)	Vacant retail floorspace (sqm)
Bromley	Bromley	5%	5,950
Croydon	Croydon	10%	20,150
Ealing	Ealing	4%	3,750
Shepherds Bush	Hammersmith and Fulham	4%	5,660
Wood Green	Haringey	2%	1,890
Harrow	Harrow	7%	5,860
Romford	Havering	7%	11,381
Uxbridge	Hillingdon	7%	6,060
Hounslow	Hounslow	9%	6,910
Kingston	Kingston upon Thames	3%	4,420
Stratford	Newham	7%	11,380
Ilford	Redbridge	14%	13,780
Sutton	Sutton	15%	17,280

Source: Table 1, Appendix 4 - Technical Appendix, London Plan Town Centre Health Check 2017

Table 6 LB Havering district centre vacancy rates

Centre	Classification	Vacant retail floorspace (%)	Vacant retail floorspace sqm)
Collier Row	District	11%	830
Elm Park	District	0%	0
Harold Hill	District	8%	530
Hornchurch	District	6%	1,120
Rainham	District	0%	0
Upminster	District	4%	910
Average	**-**	**5%**	**-**
Total	**-**	**-**	**3,390**

Source: Table 1, Appendix 4 - Technical Appendix, London Plan Town Centre Health Check 2017

Table 7 Average London district centre vacancy rates by borough

Borough	District centre average vacant retail floorspace (%)
Barking & Dagenham	4%
Enfield	5%
Greenwich	5%
Havering	5%
Harrow	6%
Hackney	6%
Harrow	6%
Hillingdon	6%
Kensington & Chelsea	6%
Wandsworth	6%
Brent	7%
Lewisham	7%
Merton	7%
Richmond	7%
Waltham Forest	7%
Bromley	8%
Camden	8%
Sutton	8%
Westminster	8%
Redbridge	8%
Barnet	9%
Harringey	9%
Kingston	9%
Southwark	9%
Tower Hamlets	9%
Croydon	10%
Newham	10%

Borough	District centre average vacant retail floorspace (%)
Ealing	12%
Hounslow	13%
Lambeth	14%
Islington	15%

Source: Table 1, Appendix 4 - Technical Appendix, London Plan Town Centre Health Check 2017

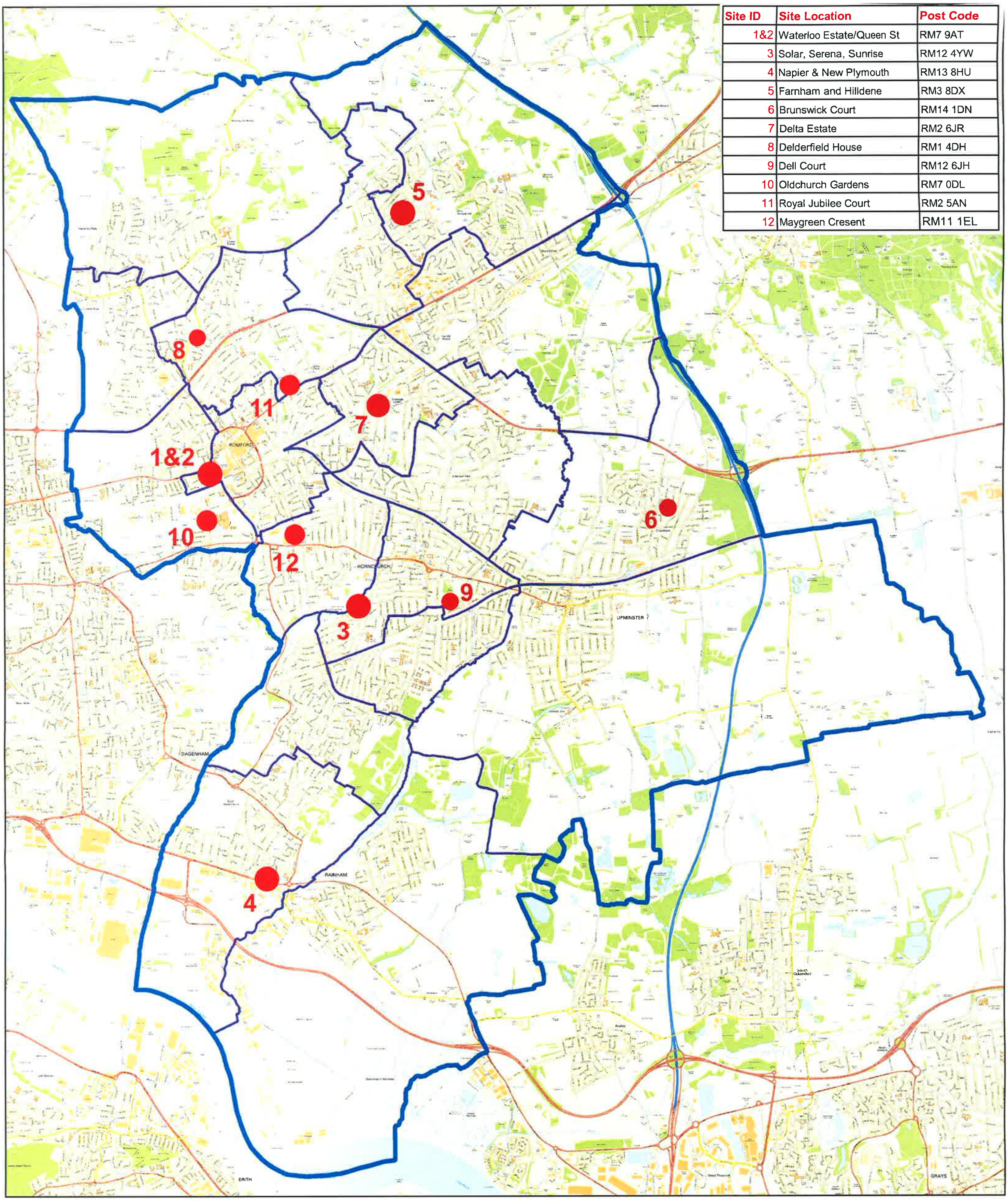
Appendix C LB Havering retail commitments 2012-2018

Table 8 LB Havering retail developments approved between 2012 and 2018

Site address	Location	Proposed A1 floorspace sqm
Site at Romford Ice Rink, Rom Valley Way, RM17 0AE	Out of centre	9,825
93-97, Collier Row Road, RM5 2AU	Edge of centre	6,000
93-97, Collier Row Road, RM5 3NX	Edge of centre	6,000
131-133, Gooshays Drive, RM3 8AE	Out of centre	1,661
Unit 6a Gallows Corner Retail Park, Colchester Road, RM3 0AD	Out of Centre	1,060
Former Petrol Station Adj 2a, Suttons Lane, RM12 6RJ	Edge of centre	418
78-80, Straight Road, RM3 8AA	Edge of centre	412
270, Hornchurch Road, RM11 1PZ	Out of centre	275
Essex House, 1, Harold Court Road, RM3 0YU	Out of Centre	130

Source: London Development Database (05/12/2018)

Appendix D LB Havering growth locations



Site ID	Site Location	Post Code
1&2	Waterloo Estate/Queen St	RM7 9AT
3	Solar, Serena, Sunrise	RM12 4YW
4	Napier & New Plymouth	RM13 8HU
5	Farnham and Hilldene	RM3 8DX
6	Brunswick Court	RM14 1DN
7	Delta Estate	RM2 6JR
8	Delderfield House	RM1 4DH
9	Dell Court	RM12 6JH
10	Oldchurch Gardens	RM7 0DL
11	Royal Jubilee Court	RM2 5AN
12	Maygreen Cresent	RM11 1EL

Site Locations for The 12 Estates Within London Borough of Havering
Drawn by C.O

N

Scale: 1:50000
Date: 10 October 2018

0 1000 2000 3000 metres

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